

Summary of Representations

Rep. no.	Name	Comment	Response	Recommended Change
1.1	Cllr D Hopkins	There has been much research on the importance of the natural world (i.e. flora and fauna) on well-being. In any development there should be within eyesight from the living area some type of green infrastructure, particularly for those properties without gardens.	Para 3.4.2 acknowledges that 'open space in all its forms has a major influence on the well being of the whole community'	No change.
1.2		Increasingly concerned about the reduction of flexible living space within new builds. Room sizes have reduced by about a third over the last fifty years. Cannot find anything in the Design Guide that emphasises the importance of internal design to meet residents changing needs.	Section 4.2 of the Design Guide covers the subject of 'flexible homes'. Section 4.3 covers the subject of 'residential space standards'.	No change.
1.3		There is no reference in the Design Guide to the importance of natural light in dwellings. There has been much research on the importance of natural light on well-being and health.	Accept.	Include section on 'residential amenity' after section 4.10 which brings together issues such as privacy, natural light, space standards. Include new para under heading 'natural light' to read: 'Developers should ensure that key rooms within new dwellings and outdoor spaces have sufficient daylight to allow their comfortable use. As well as providing for the

2.1	Cllr J Bint	<p>1. Culdesacs & Block Principles (section 3.7 and large parts of 3.6, eg 3.6.27 onwards)</p> <p>I continue to oppose the general support this document gives for block structures. Block structures did not get support from the Members workshop in July 2011 and is not our preferred layout for residential suburbs! Please revise the entirety of 3.6 and 3.7 to reflect a strong preference for residential suburbs to be based on one or more principal residential road - eg Colesbourne Drive, Aldrich Drive, Claridge Drive, Harrier Drive, Newport Road (Woughton on the Green), Studley Knapp, Paxton Crescent, and I'll happily supply another 20 examples if necessary - with extensive culdesacs (sometimes quite large and often branched)! Normally, 50-80% of dwellings should be on culdesacs. Most roads in most new neighbourhoods, including the principal residential road described above, should be interestingly curved.</p> <p>As examples of what members keep asking for,</p>	<p>Disagree.</p> <p>This was the only objection to this issue received during the formal consultation</p> <p>Perimeter block structures based around a connected movement network is well recognised as best practice and supported from a Crime Prevention, and emergency vehicle access point of view</p> <p>My memory is that blocks structures were only discussed in so far as 'blocked streets' to create cul-de-sacs is concerned and the Guide does permit this to happen and will be including the Upminster example and already shows 3 example layouts on pg 59.</p> <p>Block structures can take on</p>	<p>amenity of residents the provision of buildings and dwellings with good quality natural light allows opportunities for passive solar gain.'</p> <p>No change proposed on block principles.</p> <p>Regarding section on cul-de-sac, propose the following wording: 'Revised cul-de-sac text para 3.6.44 4th bullet 'As a general rule there should be no segregated footpaths emerging from culs-de-sac.....' 5th bullet: 'Where footpaths off cul-de-sacs are deemed acceptable, or where appropriate are to be encouraged, is when it creates a shorter route to a destination by foot/cycle than by car. In this event it is critical that the public space that the footpath passes through is designed into the overall layout of the development</p>
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2.2		<p>can I commend the figs on p38 and p41 of your document!</p>	<p>a variety of forms – with curved and straight streets and detached and terraced housing at low and high densities. The illustrations of blocks are purely conceptual and have only been done as ‘square’ blocks with straight streets because they are easier to prepare this way. The Guide should be encouraging both curved and straight streets. Too many excessively curved streets however increase walk distances The Guide does actively encourage street just like you have mentioned (except where excessively wide verges are included)– these would be the ‘primary’ or highest level streets through a development and would be equivalent to the Avenues and Boulevards proposed on pg49/50 in the Guide Accepted in part. Para 3.6.23 states that ‘greenery within</p>	<p>such that it feels safe and resembles an unambiguous public route that is short, straight/direct and overlooked by housing.’ Replace 6th bullet with: ‘Where the footpath link off the cul-de-sac provides access to a local centre, school or other community facility, the cul-de-sac should have a footway on at least one side of the street.’ Will include the Upminster Close and Greenway examples as examples of good practice.</p>
		<p>3.6.24 is unclear as to whether it is encouraging grass verges or not. 3.6.23 fails to put enough emphasis on our expectations for generally green</p>		<p>Will include photo of Downhead Park which shows a good green</p>

		<p>suburban streetscenes, with considerable amounts of grass, shrubs and/or trees available at all points on all residential streets.</p>	<p>streetscapes is considered one of the most important aspects contributing to the neighbourhoods that residents like to live in.'</p>	<p>streetscene. Amend para 3.6.24 to read: 'Grass verges are important on certain streets to help create a character for the street and emphasise the street hierarchy. Grass verges or low maintenance planting are expected in Avenue/Boulevard and some Residential Streets (covering street types 5,6,7,8,9). Level surface streets won't have grass verges but will still have street trees and/ or planters.'</p>
2.3		<p>3.6.28 is unclear in that I can't tell the difference between types 7, 8, 9, or between 10, 11, 12, and I can't tell if type 5 is meant to be a grid-road or a major estate road. I don't agree that verges over 2.5m should be avoided (p 48).</p>	<p>Design Table needs simplifying. It refers to turning head types which aren't specified in the Design Guide. Type 5 is equivalent to a spine road through an estate Verges over 2.5m in width are problematic because drivers getting out of cars on</p>	<p>Amend Design Table. Regarding verge widths, include new para to go in after para 3.6.24 : 'Where housing fronts onto verges and on street parking is included, in order to allow residents to access the footpath or redway via a hard surface, the verge must either be only 2.5m</p>

			<p>street will have to walk over wet/muddy grass to get to footpath and their home. At 2.5m they can step onto footpath.</p> <p>Experience shows that cars will park across the access to their private driveway, and overrun the footpath.</p> <p>Verges either need to be narrow (less than 3.5m) to discourage parking, or wide (greater than 5m) to allow it to occur without blocking the footpath.</p>	<p>wide or if it is wider than a section (the length of the on street parking spaces) of hardstanding should be incorporated between the edge of the parking spaces and the footway/redway.</p> <p>In all instances, where housing faces the verge, the verge should be narrower than 3m or wider than 5m. This is to avoid cars blocking the footway by parking indiscriminately across the 'link' between the driveway and street.'</p>
2.4		<p>3.6.36 - there needs to be more guidance on boulevards. In MK we would not normally expect to see boulevards in residential areas, even in the vicinity of shops and other amenities, because grid-roads will keep sufficient traffic out of the residential areas to make blvds unnecessary.</p>	<p>The key advantage of a boulevard is that it allows frontage access (i.e. where residents like to park) which otherwise wouldn't be permitted.</p> <p>These may be useful where frontage access can't be achieved yet the boulevard would allow parking on plot</p>	<p>Dimensions to be added to boulevard cross section.</p>

2.5			<p>accessed from the front or on street.</p> <p>A boulevard might have been a better solution for that part of Broughton Gate that fronts onto Newport Road – a parallel ‘service’ road would have allowed frontage access and on street parking.</p>	
		<p>3.6.41 (shared surface streets): it's hard to tell if this is creating a loophole which will let developers build these hated type of streets, or restricting the developers as much as possible. If the former, please can it be redrafted. And we need to be more explicit about what on-street parking means, in this context.</p>	<p>Developers will be challenged to design and build level surface streets that meet strict criteria.</p> <p>On street parking will be allowed but measures will have to be included to ensure that cars can't park in the pedestrian only area. On street parking will also be designed into the level surface street that will not restrict movement of service vehicles</p> <p>Minimum widths will also be included to ensure service vehicles can safely pass through.</p>	<p>Include new bullet point in green box on page 55 under 'parking' to read: 'On street parking (as in all cases) will be unallocated if placed within the adoptable highway.'</p>

2.6		<p>2. Parking (3.9.11 and associated maps & tables)</p> <p>I suspect it is an oversight that the WEA is shaded for zone 4, when logic suggests it should be zone 3.</p>	<p>It will be zone 3 when housing starts to be built (but is currently zone 3). It is proposed to include the adopted 2009 residential standards within the Design Guide. If the accessibility zones plans need amending this can be done as part of the review of the parking standards.</p>	No change.
2.7		<p>Parking (3.9.11 and associated maps & tables)</p> <p>I welcome the general approach, especially as shown in the shaded bullet points. However in respect of Zone 3, I note that the total provision for large houses (2.5 spaces for 4+ bedrooms) is only marginally more than small homes (2.25/2.33 spaces for 2 bed flat/houses). For the larger homes, I believe this is not compatible with the Core Strategy, which seeks to have enough intentional parking spaces for the projected levels of car ownership plus visitors, so any car can be happily left parked while its owner uses another mode of transport for their next journey. We need to anticipate growing levels of grown-up children living at home, growing levels of households taking in lodgers, and growing numbers of cars with electric or hybrid cars for local usage (as well as traditional cars for longer journeys). I therefore</p>	<p>Any changes to the adopted 2009 parking standards need to be based on robust evidence. A review of current parking standards is to be undertaken. The Design Guide should include the current adopted 2009 standards as an appendix.</p> <p>Standards for HiMOs are better included within the HiMO SPD.</p> <p>Tandem parking is an appropriate parking solution in certain circumstances.</p>	<p>Delete third bullet point in green box after para 3.9.11. Replace with: 'Detached homes with 5+ bedrooms will generally be expected to have at least 2 on-plot, independently accessible parking spaces.</p> <p>For smaller homes (i.e. 4 bedrooms or fewer), independently accessible on-plot parking spaces are preferred but tandem parking (including any similar layout where the spaces are not independently accessible) will be acceptable,</p>

		<p>recommend for homes of 4+ bedrooms, the standard should be a minimum of 3 spaces total, comprising at least 2 dedicated and at least 0.5 unallocated.</p>	<p>provided that: The unallocated (on-street) provision is visible from and in close proximity (within 15m from the front of the property) to those homes that have tandem parking (or any similar layout where the spaces are not accessed independently).</p> <p>The on-street provision does not encroach into the carriageways on bus routes and other primary residential streets (types 5-7) so as to allow for the movement of free flowing traffic, including service delivery vehicles.'</p> <p>Delete paras 3.9.1-3.9.10, tables 1 & 2 and parking standards zone maps. Include extract from Addendum to Parking Standards (adopted 2009) in appendix. Amend para 3.9.11 to read: 'The Council's</p>
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				<p>requirements for parking for residential development are provided by the Addendum to Parking Standards adopted in 2009. An extract from the Addendum is included at Appendix F. The parking standards for Houses in Multiple Occupation (HMO) are contained within the HiMO SPD. Please note the following points in addition to the information set out in Appendix F:</p>
2.8		<p>I am pleased to see a specification of minimum dimensions for parking spaces - 3.9.45 - well done!</p>	<p>Noted.</p>	<p>No change.</p>
2.9		<p>3.9.44 - I'm disappointed that we are still allowing rear parking courtyards. While recognising the merit of the contents of appendix D, please can we strengthen the fact that we really REALLY don't want to have any of these!!</p>	<p>Para 3.9.44 makes it clear that rear parking courts are not supported as a parking option in Milton Keynes.</p>	<p>No change.</p>
2.10		<p>3. Railings (4.7)</p> <p>We should say that we expect most new suburbs to have hedges in general: the urban (rather than suburban) appearance of railings is not generally appropriate. 4.6.2 gives an impression that doesn't correspond to future suburban development!</p>	<p>The Design Guide covers the whole of Milton Keynes Council's administrative area and not just suburban areas and therefore a variety of boundary treatments are needed including hedges. Para 4.7.4 does say this.</p>	<p>No change.</p>

2.11			<p>It must be remembered that verges/low ground cover planting and street trees in the public realm will also enhance the green nature of streets</p>	
		<p>4. Active frontages (4.9)</p> <p>The example in the picture is (I believe) a spot where the amenity of the occupants has been seriously impaired by the attractions within the public realm. Recent experience of ponds, skateboard parks and even big play areas attracting visitors from the entire urban area and beyond shows we need to give more thought to houses facing onto all kinds of visitor attractions! Please can we have some wording here, to that effect.</p>	<p>Accepted in part. The point is it shows an active frontage.</p> <p>There is wording in para 3.4.6 (final bullet) that indicates where play areas that attract a lot of users are to be located (i.e. further away from houses).</p>	<p>Will include a different photo showing active frontage.</p> <p>Include new para after 3.9.44 to read: 'Where no dedicated parking is provided for a leisure attractor (e.g. a skatepark) located in a linear park or other open space, it is suggested that the streets closest to the facility (normally those lining the linear park) include additional on-street parking to cater for those users arriving by car.'</p> <p>No change.</p>
2.12		<p>5. Detailed design appearance (4.12)</p> <p>I believe that the author has misinterpreted CS13 by taking a quote out of context. We want to keep doing what MK does best: offering a wide range of house styles, of which contemporary, innovative design is one choice for future residents. But the existing narrative gives the impression it's to be the</p>	<p>The Guide is clear in para 4.12.1 that it is not promoting a particular style of architecture. The emphasis is on how detailed design appearance can help create a character for a development – this could</p>	

		<p>dominant style - which it isn't!!</p> <p>And as a result, lots of the subsequent material puts too much emphasis on contemporary designs.</p> <p>I can't find anything about sizes of dwellings - please can this (minimum sizes, e.g. based on London or similar) be added?</p>	<p>happen with a variety of styles.</p> <p>Traditional materials can still be used to create a contemporary appearance.</p> <p>Contemporary architecture is stated in para 4.12.14 as being of particular relevance on key frontages which help portray the image of MK as a 21st century city. In quieter residential streets with very little through traffic more traditional designs are entirely acceptable.</p> <p>While a section on Internal Space Standards is included no minimum dimensions are stated. If required this will be subject to a separate SPD.</p>	
2.13		<p>7: Density & public open spaces</p> <p>Where higher density is considered desirable in support of public transport usage or local shops etc, it is of course the people density not the dwelling density (ie pph not dph) that should be higher around these locations. As requested by Cllr Ferrans and others, wherever possible the siting of public open space should be closest to those with</p>	<p>Agreed – people per hectare is what makes PT and other services viable – but can't control how many people live in a house.</p> <p>Agree – it is logical to put houses with small private</p>	<p>Include new text after para 4.14.3 to read: 'Consideration should be given to locating dwellings that have small or no private gardens close to public open spaces, in particular play areas.'</p>

2.14		<p>the least amount of private garden space - and obviously this open space needs to be included within the pph density calculations!</p> <p>Are we allowed to say that in general, we prefer dwellings to be built with gardens (rather than building dwellings without gardens and then creating public open space in lieu of gardens)?</p>	<p>gardens close to public open spaces. However developers often like to put larger houses overlooking public open space from a sales point of view. This can't therefore be a mandatory requirement</p>	
2.15		<p>8: Services</p> <p>We should state in the document that we would normally expect all new dwellings to have access to television, telephone and broadband services, with broadband in particular at or above the norm/expectation of the time for an urban or rural context.</p> <p>9: The building process (from first occupation until adoption)</p> <p>We should say, in this document, that we want building activities, including phasing, to show the highest possible consideration for residents, with the period from first occupation until full adoption (of roads and landscaping) as short as possible, and with pre-adoption care and maintenance (of highways and landscape) being as close to post-adoption levels as possible.</p> <p>What we want to avoid is residents living in mud-</p>	<p>Para 4.15.11 will state in final SPD that every dwelling should have ducting to allow for superfast broadband infrastructure connection. It is considered that developers would be unable to market properties that did not provide television and telephone services.</p> <p>Agreed.</p>	<p>Amend para 4.15.11 second bullet point to read: 'Ducting for fibre connectivity to each dwelling or, if appropriate in terms of flats and apartments, aggregated connectivity.'</p>
				<p>Include new para after 5.8.2 to read: 5.9 Building Process 'Building activities, including phasing, must show the highest possible consideration for residents, with the period from first occupation until full adoption (of roads and landscaping) as short as possible, and with pre-adoption care and maintenance (of highways</p>

2.16		<p>strewn, unlit, unsigned, un-surfaced streets for up to 3 years, with a running battle every single year to get the grass and the shrubs cut!!</p> <p>10: The "Reality check"</p> <p>I believe it is useful to mentally compare the document against a number of MK's existing estates, and ask ourselves if the document would mean that those existing estates, if they were being proposed now, would be considered "acceptable" or not.</p> <p>Using the current version of the document, I believe Shenley Lodge, Monkston, Middleton, Willen, Willen Park, Downhead Park, Giffard Park, Great Linford, Bolbeck Park, Neath Hill, Kents Hill, Walnut Tree, Two Mile Ash, Shenley Church End, Crown Hill - and I could go on - would all be discouraged because they have too many culdesacs and too many homes build from traditional materials with a traditional appearance. I think this proves that the document needs to be changed.</p> <p>Conversely, I suspect estates like Broughton, Oxley Park and Broughton Gate - where we are already struggling to cope with problems caused by the layout - would be permitted by the current draft. Again, I think this proves that the document needs to be changed.</p>	<p>Partly accept. The Design Guide does encourage spine roads like seen in many of the older estates. It also promotes more on street and on plot parking. It does also allow curved streets. It finally builds on and encourages green street scenes.</p> <p>While the Design Guide does allow cul-de-sacs, it is true to say that it doesn't actively encourage branched cul-de-sacs like seen in many estates. This is however not acceptable from a variety of points of view and would not stand up well at an appeal.</p> <p>Nationally there has been a relaxation of density targets so this might encourage lower densities although developers have to build at a certain density to make schemes viable</p>	<p>and landscape) being as close to post-adoption levels as possible.'</p> <p>No change.</p>
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2.17			<p>Traditional materials are very much encouraged (para 4.12.21) and they do not have to all be contemporary in appearance – the Guide is clear that it is not prescribing a certain style. What is important is not so much the style but whether the detailed design appearance adds to the character of the area – poor pastiches which MK has had built in the past don't and this is especially that which is not supported.</p> <p>Accepted – but can't put an exact housing number to it.</p>	
		<p>11. "Place" - and see section 2.6, for example</p> <p>I don't think you've addressed how big a "place" needs to be - and if you suggest a place needs to be "distinctive", you need to address this point! Is a "place" a single street, a single developer's "block" of land; is it an entire estate, is it a local government unit, like a ward, is it a school catchment area, or what?? Taking my own ward purely as an example, I think the broadly contemporary estates of Middleton and Monkston both benefit from the absence of any overt differentiation. I used to live in an area of Shenley that would have been completely "in keeping" with both Monkston & Middleton, and with Willen, or Giffard Park. So for the majority of future</p>		<p>Include following text in section 2.6: 'For a large development the 'unit' of character should be the street. So by definition the character of a street should be uniform in terms of visual distinctiveness. Other streets, and buildings that line them, within a large development or new neighbourhood can have varying features but there should be some common elements throughout the scheme</p>

		dwelling, please can we AVOID visual distinctiveness purely for its own sake?		(e.g. a landscaping feature, street structure or building material) so that the development or neighbourhood as a whole has a feeling of a common identity.'
2.18		Linked to this, I don't see why the Landmark building (in my ward, in Broughton) is considered "good", but the equally distinctive circular staircase section of the apartments on p94 (in my ward, in Monkston Park) is considered "bad".	The images on page 95 are to be removed from the Design Guide.	Remove images on page 95.
2.19		Still on this topic, you've picked one contemporary example of visual identity, on page 23. For the second example, please can you pick a traditional example - Paxton Crescent or Blanchland Circle or Malton Close or any one of hundreds of traditional brick-build, tiled-roof, front lawns and hedges kind of roads!!	Isn't that the point. All these could be anywhere with the result that there is no differentiation in character.	Include a picture that shows identity with a less contemporary picture where landscape is the more dominant issue. Will use Downhead Park as an example.
3.1	Cllr J Ferrans	I welcome the design guide and in general feel that it is a major step forward in ensuring quality and usability of our residential areas.	Noted.	No change.
3.2		The precedence or otherwise of the CMK Design Guide perhaps needs to be clarified more.	We feel this is sufficiently covered – some representations have been about the length of the Guide already!!	No change.
3.3		Section 1.2.5 Remove the bit about not including how to deal with the problems of grid roads on estates. Some of the points I've listed below relate to this.	Agreed – will modify.	Delete third bullet point in green box after para 1.2.5.

3.4		2.3 General issue that sharply curvilinear local streets are problematic- awkward plot shapes, reduced parking, bad access lines to driveways, poor visibility, etc.	Paragraph 3.6.17 states that layouts that use gratuitous curves for no contextual reason should be avoided.	No change.
3.5	2.3.20 Suggest: Planting along “main local routes” was a key aspect of developments as it not only provided a significant character element within the development, and differentiated main and minor local routes, but also helped to link open spaces together and provide wildlife corridors.	Agreed	Amend para 2.3.20 to read: ‘Planting along “main local routes” was a key aspect of developments as it not only provided a significant character element within the development, and differentiated main and minor local routes, but also helped to link open spaces together and provide wildlife corridors.’	
3.6	Insert at end of 2.4.1 In many areas, rural villages have been enclosed within urban estates as development progressed. In general, the village has opted to remain a slightly separate community, with main roads directed around the outside of the village, and separate access to new housing areas. An alternative would be to make the village the centre of the new community. (examples – the pre-MK extension of Woughton on the Green to the northern part, still focussed on the village, and the layout of Great Linford separated off from the village along the old High St. or	Should this not be dealt with on case by case basis? Are there any more cases where the opportunity arises to make the village the centre of the new community within the city of MK? Aren't all existing villages already surrounded by housing. There are no key sites in proximity to villages within the city of MK.	No change.	

3.7		<p>Broughton Gate separate from old Broughton Village on London Rd)</p> <p>New 2.5.4 Neighbourhood Plans and Neighbourhood Design Statements</p> <p>Neighbourhood Plans are the new mechanism for a local community to initiate local masterplanning of an area, while Design Statements are an informal mechanism for the neighbourhood to pick out aspects of design and character that are important to them. Neighbourhood Plans that have completed the legal process are binding on developers. Developers will be expected to be sympathetic to Neighbourhood Design Statements.</p>	<p>Reference to neighbourhood plans could usefully be included in the Design Guide.</p>	<p>Include new paragraph 'Neighbourhood Plans' after 1.3.4 to read: 'The Localism Act 2011 introduces a new right for communities to draw up a neighbourhood plan. Neighbourhood plans will, once adopted, form part of the Development Plan.'</p> <p>Include new para after para 2.2.4 to read: 'A neighbourhood or village design statement is an informal mechanism by which local communities can identify the distinctive character of their village or neighbourhood. Where these have been prepared, developers can utilise them as part of their contextual appraisal of the site.'</p>
3.8		<p>3.1 need a paragraph on enclosing villages. Where the development abuts or surrounds an existing rural village, consideration should be given, in discussion with the parish council, to</p>	<p>See comment in 3.6.</p> <p>I agree with the point made, but are there opportunities to still do either option – much</p>	<p>No change.</p>

3.9		<p>either making the old village the centre of the new community, or preserving it as a separate community. In the former, a viability assessment of increased traffic levels etc should be carried out. In the latter, care should be taken to provide adequate access to the village, but to direct main new routes around the village, and position housing in separate blocks, thus preserving the character of the village.</p>	<p>housing already exists around existing villages within the city of MK (so is there much relevance to the comment).</p> <p>If a rural village outside of the city of MK, the new housing will require the existing village amenities and hence the old village will be the centre.</p>	
		<p>3.1.3 Design principles green box – very confused. Suggestion:</p> <p>Existing positive site features (established as part of the site context appraisal) should be used to structure the entire development</p> <p>Different facilities have different sized catchment areas, creating a complex definition of the “neighbourhood” and a complex travel pattern.</p> <p>The location of key relevant facilities in surrounding areas, and the catchment of facilities to be located on site should be established at an early stage.</p> <p>Masterplan layouts should seek to create strong shared desire lines from relevant housing areas on or off site to key community facilities on and off</p>	<p>Agree with much of what is suggested but is believed the green box on pg 26 already says most of what you are saying. The aim is furthermore to keep these principles short and to the point (other representations have already made the point how long the document is). The suggested wording makes the principles quite lengthy.</p>	<p>Amend 11th bullet point Design Principles green box page 26 to read: ‘Clearly demarcate public and private space as well as required service access.’</p>

		<p>site, including shops, schools, health facilities, leisure facilities and major open space, employment and public transport. Priority for very local catchments should be given to pedestrians, with priority switching towards cyclists, public transport and cars as the catchment size of the facility increases.</p> <p>A permeable movement framework should be established, accommodating main pedestrian and vehicular desire lines and connected with adjacent street networks. Pedestrians should be considered first, followed by cyclists, public transport users, service delivery vehicles and finally cars.</p> <p>Schools, shops and other high footfall community uses should be co-located to, amongst other benefits, create a community focal point, ease travel planning and reduce the parking required. These sites will be key attractors generating strong desire lines and surrounding street networks should be masterplanned to minimise walking distances to these community facilities. Other lower footfall facilities may be deliberately distributed around the site, to provide very local access, to provide active frontages on other footpaths, and to encourage more pedestrian exploration of the local neighbourhood.</p>		
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3.10		<p>The movement network should be arranged so as to maximise passive solar gain capture</p> <p>A hierarchy of street types should be established with different characteristics based on their importance with regard to their role as a place and as part of the network</p> <p>A range of densities should be included that are contextually appropriate and take into account the street's size and its level of accessibility to public transport facilities shops employment schools open spaces and the rural edge. A range of densities will encourage a mixed community with a range of house types to suit all needs.</p> <p>Buildings in general are to be arranged in perimeter block format with private backs and public fronts</p> <p>Public and private space and service access should be clearly demarcated</p> <p>Wherever possible, layouts should allow for direct access to plots and as much parking on plot or on street as possible</p>	Accepted.	Amend first sentence of para 3.2.1 to read: 'If a development is of such
		3.2 Local centres per grid square were never expected to be viable. MKDC specified sites at the junction between two grid squares and to serve		

3.11		<p>both and this has an impact on master planning and so should be clearly understood. In 3.2.1 insert “alone, or together with neighbouring areas” after “development”</p> <p>Green box item 2 reword as “Local centres will be major local attractors over one or more neighbourhoods, so the movement network should provide the shortest possible pedestrian routes from housing.”</p>	Agreed.	<p>size and/ or is in a location that it requires a local centre,....’</p> <p>Amend para 3.2.1 second bullet point to read: ‘Local centres will be major local attractors over one or more neighbourhoods, so the movement network should provide the shortest possible pedestrian and cycle routes from housing.’</p>
3.12		<p>3.3.2 first six items are relevant not 5.</p>	<p>All the attributes are relevant to the strategic layout of the development apart from ‘physical protection’ and ‘management and maintenance’.</p> <p>The positioning of underpasses and how surrounding development relates to them is important – but the design guide is not focussing on the actual design of underpasses</p> <p>These are included in definition</p> <p>Disagree that shops can’t be located next to open space.</p>	<p>Amend ordering of principles.</p>
3.13		<p>3.4.1 is it worth adding bridges and underpasses into the first sentence to remind people that these should be well-designed as public spaces not just as traffic flows?</p>		<p>No change (will however provide guidance on the relationship between buildings and underpasses).</p>
3.14		<p>3.4.4 add leisure and health facilities but remove shops. Shops next to open spaces lead to litter and drunken ASB. Reasonable proximity is</p>		<p>No change.</p>

3.15		<p>inevitable, but don't actively encourage it!</p> <p>3.4.6 third bullet add "Small family housing generates the most demand for play areas, and so should be the preferred housing type to overlook the play area"</p>	<p>Is this the case?</p>	<p>Include new text after para 4.14.3 to read: 'Consideration should be given to locating dwellings that have small or no gardens close to public open spaces, in particular play areas.'</p>
3.16		<p>3.4.6 last bullet make it "Larger play areas for older children and related..."</p>	<p>Agree</p>	<p>Amend first sentence of last bullet point para 3.4.6 to read: 'Larger play areas for older children and related sports facilities (such as skate parks) that may generate greater levels of noise may be better located within larger open spaces, such as linear parks where overlooking development might be less of a contributing factor towards achieving safety.'</p>
3.17		<p>Add after 3.4.7: Where a development is broken into parcels, or infill development abuts other development, care should be taken along the boundaries to avoid inaccessible or awkward small patches of public or private open space, or left over space, and to ensure compatible uses across the</p>	<p>Already covered by 3.4.7 2nd sentence not relevant to 3.4.7</p>	<p>No change.</p>

3.18		<p>boundary. Agreement about boundary responsibility and access for maintenance should be reached at the outset and included in legal agreements.</p> <p>3.4.15 add water losses and damage to highways and pipes to the problems list</p>	Accepted.	<p>Amend para 3.4.15 second sentence to read: ‘Consideration should be given to the choice and location of species to ensure the trees are able to deliver the benefits without the problems of obstructing movement, light/solar gain losses, water loss and damage to pipes, highways, or buildings.’</p>
3.19		<p>3.4.19 add “More unusual designs should be selected with care, to ensure that replacement with other materials is possible when the particular products cease to be available”</p>	Accepted.	<p>Add new sentence to end of para 3.4.19 to read: ‘When choosing materials and street furniture consideration should be given to the availability of replacement products, particularly when more bespoke designs are used.’</p>
3.20		<p>3.5.7 1st bullet in green box – typo - insert “space” after “open”</p>	Accepted.	<p>Amend first bullet point para 3.5.7 to read: ‘Locating taller buildings to the north of the site or to</p>

3.21		3.5.8 add at end “thirdly to interrupt visibility splays”	Guidance in para 3.5.8 is considered to be too prescriptive and is to be deleted.	the south of the road intersections or open space such as car parking which need less or no sun’ Delete para 3.5.8-3.5.10.
3.22		3.6 Somewhere I’ve missed the bit about redway crossings. I don’t think it’s viable to have redways given priority – so unusual that it would lead to bad accidents. Need cycle barriers at ones where there’s a slope or heavy children’s traffic. Cross-city ones won’t cross roads often anyway if they’re by grid roads.	Not accepted.	No change.
3.23		<p>And there’s nothing about underpasses. Should cover things like:</p> <ul style="list-style-type: none"> a. Underpasses to take vehicle and pedestrian traffic (and bridleways if applicable) on non-shared surfaces b. Position on really major desire lines to ensure frequent use and surveillance c. Straight route as short as possible and dual carriageway ones to have daylight from central reservation area d. Good visual splays into the underpass from 	Accepted.	<p>Include new section after 3.6.16 on underpasses to read: ‘Underpasses will be required where pedestrian and cycle routes need to cross grid roads. They should be provided on important desire lines to ensure frequent use and natural surveillance. The design of underpasses should consider the</p>

		<p>surrounding pathways</p> <ul style="list-style-type: none"> e. High quality robust lighting f. Landscaping around approach to be low level well back from the paths to keep visibility splays clear on sloping paths g. Walls to be graffiti-proofed to high standard h. Consideration to be given to public art by first residents of new estate on underpass walls – but graffiti-proofing to be paramount 	<p>following:</p> <ul style="list-style-type: none"> Routes should be straight and as short as possible; There should be enough distance allowed for so that the entire underpass can remain as a straight/direct alignment Underpasses should be of sufficient width to allow good visibility into and from the underpass; Housing should be located facing the underpass to provide natural surveillance into the underpass; Where they cross dual carriageways, provision should be made to allow daylight from the central reservation area; High quality robust lighting should be
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				<p>provided;</p> <p>Landscaping around the approach to the underpass to be low level to ensure good visibility;</p> <p>The needs of people with mobility problems should be taken into account with regard to path gradients;</p> <p>Walls to be graffiti-proofed. Consideration to be given to public art on underpass walls.'</p>
3.24		<p>We do need a section about the stretch of entrance road coming from high-speed roads – including acceleration/deceleration lanes, very good visibility particularly for redway crossings, and severe speed calming measures such as wide roundabouts before the first houses. Land before that can be used for leisure purposes such as allotments etc accessed from within the grid square or service yards for facilities accessed from the first roundabout. (Just initiated even more pressure</p>	<p>Accepted. Suggestion of land before the roundabout being used for leisure uses such as allotments is a good one.</p>	<p>Add text and supporting photos and diagrams after para 3.6.28 to read:</p> <p>'In order to create a suitable and safe environment for all users in that part of a neighbourhood or new</p>

		<p>about Livesey Hill where this rule is broken and the grid road still has a crossing and residents are screaming about recent accidents).</p>	<p>development where the boulevard/avenue joins the grid road the following principles should be adhered to:</p> <p>There should be a minimum distance of 50m between the grid road and the first side access street. Furthermore no private driveways will be allowed access to the spine roads within this 50m distance ;</p> <p>A roundabout should be used to slow traffic down as it exits the grid road and enters the residential neighbourhood. The roundabout should be located at the end of the 50m 'zone' ;</p> <p>The sort of uses that would be encouraged within this</p>
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3.25		3.6.3 Insert "or rural main roads" after "network"		50m 'zone' would include allotments and local centres (or other uses) which don't require access onto the boulevard/avenue within this 50m zone. Amend para 3.6.3 first sentence to read: 'All developments within the city of Milton Keynes will be placed within and (depending on their size) have either direct or indirect access to the Milton Keynes grid road network.'
3.26		3.6.6 after "buses" or obstruct the view of passengers as they board or leave the bus"	This paragraph is concerned specifically with the grid road network within the city of Milton Keynes. Parking will not be allowed at bus stops, so no problems envisaged.	No change.
3.27		3.6.13 We have real problems with high hedges obstructing visibility splays. Suggest 90 cm not 120 cm in the last bullet point	Providing a 2m strip between the redway and the property boundary will ensure appropriate visibility. Permitted development rights allow a 1m front boundary fence.	Add sentence within fourth bullet point page 43 after third sentence to read: 'To ensure appropriate visibility there must be a 2m strip of adoptable highway between the redway and the property boundary.' Amend last sentence to read: 'Front boundary treatment in these cases should be no more than

3.28		<p>3.6.13 suggest additional bullet point here: "Short stretches of connecting footpaths between streets or, for example between streets and grid road bus stops, are permissible to improve the permeability of the pedestrian network, providing good visibility and light from the street is maintained"</p>	<p>Paragraph 3.6.13 is concerned with redways and consequently the suggested bullet point is not appropriate for inclusion.</p>	<p>1m in height.'</p> <p>No change, but will provide guidance on design for development/open space in proximity to bus stops on grid roads.</p> <p>New text to read: 'All houses within a new development should be located no more than 400m from a bus stop. Bus stops should be easily accessed on foot. Pedestrian routes to bus stops should be direct and well-surveilled.</p> <p>Where bus stops are located on grid roads, development should be designed to ensure that pedestrian routes and bus stops are well surveilled. Layouts should be designed with housing overlooking the pedestrian</p>
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3.29		3.6.14 insert "leisure uses and" before "properties".	Accept point that surveillance is provided from users of the linear park.	route and the bus stop, and grid road reserve planting reduced to maximise visibility.'
3.30		3.6.17 Insert ", make on-street parking difficult and reduce visibility" after "increase walking distances" in the final sentence	Accepted.	Amend para 3.6.14 point 3 to read: 'Redways through linear parks – they are afforded surveillance from users of the linear park and adjacent properties.'
3.31		3.6.17 insert "or strong curves" after "reason" in the last sentence	Believe 'gratuitous' covers this	Add following sentence to end of para 3.6.17: 'They also can make on street parking difficult and reduce visibility.'
3.32		3.6.26 Add to end of first sentence "without damaging the surrounding area unduly by excessive water take from gardens, damage to highways, foundations or pipes, or blockage of highways or visibility splays in the growing season"	Accepted in part.	Amend last sentence of para 3.6.25 to read: 'Consideration needs to be given to the use of root protection barriers, to avoid problems of damage to highways, buildings or pipes.' Amend para 3.6.26 to read: 'Selection of tree species should be based

3.33		3.6.26 maybe it should say tree and shrub species – last time I looked, most of those listed were bushes.	List of appropriate species is wrong.	upon trees being reliable, requiring minimum maintenance and being capable of withstanding the abuses of highway activity. While appropriate species will vary according to the type of street, proximity of buildings and soil conditions, a selection of species include:...
3.34		3.6.28 last point in green box - is just 1 level difference realistic? It looks as though two is quite common to me and 1 will really constrain the network designs.	On Highways advice will be deleting last sentence.	Delete last sentence of para 3.6.28.
3.35		3.6.33 I don't think it's realistic to have the highest densities along the main street unless it is a semi-commercial street with flats. The parking and access problem is just too great with narrow frontage houses. Traditional areas I know usually have high densities just behind the main street rather than directly on it unless it is at least 4 floors high. Maybe amend to "along or immediately adjacent to"	Disagree – schemes will only be permitted if parking and access can be adequately dealt with	No change.

3.36	3.6.41 Pedestrian Space green box bullet 1. Add to end “and extends round the corner into the next road on at least one side” – our biggest problem with tiny non-pavement roads locally is the problem of walking out of them safely as cars come round the corner.	Disagree because separate pedestrian refuges are a requirement.	No change.
3.37	3 rd bullet same box – my windows need 0.6m to open as do most. 0.3 is too small. And a 0.3 setback is a nuisance – not big enough to do anything attractive in. Make it 0.6 m minimum generally.	Accepted.	Amend para 3.6.41 Pedestrian Space and Defensible Space third bullet point to read: ‘Where terrace housing occurs and hence where there is no parking to the side, there should be at least 1.5m defensible space to the front of the property.’ Also amend para 4.6.3 to read: ‘A setback of 1 metre should be seen as a minimum to ensure that windows do not open up over adoptable highway.’
3.38	Width – 2 nd bullet point mistyped nonsense. Please correct.	Accepted.	Amend second bullet point in green box ‘width’ (p55) to read: ‘As a general minimum, all level surface streets should allow for 2 way traffic with a minimum carriageway of 4.8m.’
3.39	After 3.6.18 insert new bullet point after 5 th . “a	Higher level streets are there	No change.

		<p>solution to this problem can be to design two culs de sac as one higher level street, but split it into two, with landscaping etc. blocking vehicle access but not impeding pedestrian access or sightlines, combining many of the advantages of both culs de sac and busier streets. Creative layouts can leave space that can be used for additional parking or turning heads."</p>	<p>for a reason – they are not converted into cul-de-sacs</p> <p>Drawing at top of pg 59 illustrates a street broken into 2 culs-de-sac</p>	
3.40		<p>Next bullet point insert " except for the blocked street design" after "culs de sac"</p>	<p>'Blocked street design' does not make sense. Upminster Close example in Monkston Park is in effect what I think you mean by a 'blocked street design'.</p>	<p>No change although include the Upminster Close example in Monkston Park and Greenway in Broughton.</p>
3.41		<p>I need convincing that 3.7.5 will work. There should be clear guidance that this situation and approach should be discouraged in favour of central on-street shared parking courts with restricted access (e.g. constrained public squares) and parking streets.</p>	<p>Disagree – frontage access is not allowed.</p>	<p>No change.</p>
3.42		<p>3.8.3 One very successful narrow frontage option is to have a one-sided street with parking on the other side – e.g. facing open space or a public square. Probably not facing a play areas unless with a protecting hedge!</p>	<p>Agree – single sided street would accommodate parking on the other side. This is particularly useful where tandem parking is provided.</p>	<p>Include new para after para 3.9.36 to read: 'Streets with single-sided development, facing open space, provide opportunities to accommodate on-street</p>

3.43		Similarly add "or narrow-fronted houses" after flats in 3.9.3		parking. Spaces can be provided on the other side of the street, where there are no driveway crossovers. This is particularly useful where on-plot parking for housing is provided in the form of tandem parking.'
3.44		3.9.14 point 5 is repetitive and most important one has been missed. Replace with "Surveillance of the rear parking area blocked by garden fences"	Flats are the most likely housing typology to have shared parking areas. For other typologies, there appropriateness should be considered on the merits of the case. Agree.	No change.
3.45		3.9.15 add to point 5 "forcing pedestrians into the road"	This is implied by footpath parking. As tandem parking is to be accepted in certain circumstances, this paragraph is no longer relevant. Unnecessary.	Delete point 5 para 3.9.14 and replace with: 'Surveillance of the rear parking area blocked by garden fences.' Delete para 3.9.15.
3.46		3.9.17 expand point 2 "On street to the front of dwellings, directly in front or in shared parking		No change.

3.47		<p>areas at the front"</p> <p>3.9.22 I would only allow drive thrus with the sort of arrangement you'll find in 30-50 Lynmouth crescent in Furzton, where</p> <ul style="list-style-type: none"> a. The garden is enclosed from the rear parking area b. Good highway grade access is provided to all front doors c. a flat over the drive thru access provides surveillance to the rear d. the number of dwellings using the drive thru is no more than 4-5 	<p>The arrangement at Lynmouth Crescent is a rear parking court, which is not supported by the Design Guide. Drive throughs are to rear parking spaces within the curtilage of individual dwellings.</p> <p>This parking example does however raise the issue of how you protect/enclose the rear garden.</p>	<p>No change, but will amend drawing and text to allow tandem parking drive-throughs.</p>
3.48		<p>3.9.44 re-title this as Parking for Flats and reword to:</p> <p>Flats present a different problem with different solutions. Many of the problems normally associated with rear parking courts are not present, as surveillance of and access to rear areas is typically far better from flats. While front parking courts or shared parking areas are preferred, rear parking courts or parking courts accessed from drive thrus with flats above are permissible for flats providing direct access to the building, and good surveillance is provided. However, where the flats</p>	<p>Disagree on the need to retitle 3.9.44</p> <p>Agree that parking for flats should not be called a rear parking court</p>	<p>Amend wording in Appendix D, para D5 to read: 'Because of their higher density, apartments often need parking in the form of courts. These are not referred to as rear parking courts if front entrances and habitable rooms face the parking court. Care needs to be taken that entrances also face the street (ie dual frontages</p>

3.49		<p>are dual or triple aspect, care must be taken to ensure that the parking is easily accessible and well signed from all directions of approach, to discourage early parking in unsuitable spots.</p> <p>3.9.45 – when we did the parking working party a few years ago, officers came up with recommended minimum garage sizes. These should be included as the standard ones are too small and that adds to the parking problem.</p>		<p>are created). In these cases, these parking courts are acceptable.’</p> <p>Otherwise no change.</p>
3.50		<p>3.10.3 intro paragraph. Depending on their use and context, they may be designed as “stand-alone” buildings, or may need to relate to their context while also differentiating themselves to stand out. They may be intended primarily as pedestrian landmarks, or as driver landmarks. Note that drivers’ attention on busy local roads is focussed at ground level, so height is not an effective differentiator for them!</p>	<p>Accepted.</p> <p>Unnecessary detail.</p>	<p>Include following text in green box after para 3.9.11: ‘Garages are an important design feature of residential developments, which if well designed can provide useful additional space for dwellings. Garages with minimum internal dimensions of 3 x 7 metres are considered large enough for the average sized family car and cycles, as well as some storage space.’</p> <p>No change.</p>

3.51		3.10.3 green box add to last bullet “appropriate to their target audience”	Don't understand comment.	No change.
3.52		3.10.3 green box add bullet point: “Appropriate commonality with or differentiation from the design of surrounding buildings”	Unnecessary detail.	No change.
3.53		4.3.2 odd wording – do they have to produce standards or meet them? “Must be met” would be better wouldn't it?	Accepted.	Amend para 4.3.2 to read: ‘Developers need to be aware that they will be required to meet residential space standards in the following circumstances:’
3.54		4.5... I thought we had a policy that all roads within new grid squares are designed to 20 mph didn't we? We have been pressing for it, cross-party, for long enough! Thought HCA were designing to that now? If so, it's not clear from this.	Spine roads (avenues / boulevards) will be 30mph.	No change.
3.55		I am surprised that the technical detail in 4.5.14+ is in here and not in the highways manual. Can I request a technical discussion perhaps on site, with a highways officer about this, as we have had a LOT of problems with turning circles in recent developments and I don't understand this well enough, or know what the specs are of recent developments, to assess whether this will prevent	Section 4.5 to be redrafted to exclude technical detail that will be part of the Highway Design Guide.	Delete paras 4.5.4-4.5.18 and 4.5.25-4.5.38.

		them.			
3.56		Visual splays don't seem to allow for drivers to be able to see the resident waiting at the kerb to cross. Is the footway included in the definition of highway, or do we need to allow for it?		Technical guidance will go into highway design guide.	No change.
3.57		4.5.33 I don't understand why 2.0 x distance is considered adequate here. It seems to me that 2.4 would be more appropriate. 2.0 is too short for some cars.		Manual for Streets states that "A minimum figure of 2m may be considered in some very lightly-trafficked and slow-speed situations". For an access serving an individual house, it is considered that 2m is appropriate. This section is proposed to be moved to the Highway Design Guide.	Delete para 4.5.33.
3.58		4.5.34 Again, a little more than 2.4 seems needed to me here.		Manual for Streets states that "Using an X distance in excess of 2.4 m is not generally required in built-up areas." This section is proposed to go in the Highway Design Guide.	Delete para 4.5.34.
3.59		4.5.38 is another area we have a lot of problems with. It is not acceptable to say wait till the final document! Can I see the draft please? (and happy to offer an on-site walk-round to test it against		This technical highway guidance sits better within the Highway Design Guide.	Delete para 4.5.38.

3.60		several different cases!) 4.6.2 and 4.6.3 as above recommend minimum setback of 60 cm	Accepted.	Amend para 4.6.2 to read: 'Generally setbacks will be smaller (1-2 metres) where a more urban, higher density, pedestrian friendly character with lower traffic speeds is to be created, with larger setbacks (2-6 metres) where a more open, lower density character is to be created.' Amend para 4.6.3 to read: 'A setback of 1 metre should be seen as a minimum to ensure that windows do not open up over adoptable highway. Where there are no footpaths (i.e. level surface streets), setbacks should be a minimum of 1.5 metres.'
3.61		4.7.5 add "However, they must not be of a height close to junctions to obstruct the visibility splay"	Accepted.	Include sentence at end of para 4.7.3 to read: ' that boundary treatment should respect the required vehicle and pedestrian visibility splays.'
3.62		4.9.6 can you test this against 30-50 Lynmouth Crescent please? That works well and I think 25%	Other respondents have argued that this requirement	Delete last sentence of para 4.9.6.

3.63		<p>may be a little excessively tight.</p> <p>4.10.1 I absolutely agree, but this is in direct conflict with the advice given to DCC recently that the entrance should be on the minor road (leading to rear parking). We have several corner houses which have front doors on side roads and residents find it confusing, but it does mean parking is easier nearer the entrance. Please decide between you!</p>	<p>is too prescriptive.</p> <p>Noted.</p>	<p>Amend second sentence of para 4.10.4 to read: 'Parking should, wherever possible, be provided adjacent to the dwelling rather than to the rear of the garden, where it not only tends not to be used but also increases the length of inactive frontage.'</p>
3.64		<p>4.10.4 convex layout – I LOVE this. It works superbly well for visibility splays and road width at corners and roundabouts and my several neighbours have wanted small gardens. Don't see why the objection. Concave must have very low growing greenery so close to the corner and parking is difficult. More problematic.</p>	<p>Both diagrams have been criticised by other respondents.</p>	<p>Delete convex and concave diagrams on page 92.</p>
3.65		<p>4.11.1 Insert "minimum" before "objective" and "with privacy measures" after 13.7m. It's pretty tight.</p>	<p>Unnecessary</p>	<p>No change.</p>
3.66		<p>4.12.15 You can't come up with a more interesting good glazing bar example can you? The examples given are pretty boring!</p>	<p>Subjective view</p>	<p>No change.</p>
3.67		<p>4.12.18 Our tradition is the local stone and local brickworks! Reword as Although the traditional</p>	<p>Unnecessary.</p>	<p>No change.</p>

		building materials of North Bucks are yellow stone or red, yellow or mottled brick, Milton Keynes has consistently encouraged a varied range of building materials.			
3.67		4.12.31 Suggest you leave flat roofs out of it. After what it cost us to put Fishermead right...	Flat roofs can work	No change.	
3.68		4.12.34 could suggest roof spaces be fitted out as storage spaces – lack of storage space is a frequent complaint among new arrivals.	This can be done already	No change.	
3.69		4.12.39 Add "Shielding from the prevailing wind direction should be designed in." (It's a windy city!)	Agree - but as long as complements overall design.	Include new sentence after second sentence in para 4.12.39 to read: 'Notwithstanding other urban design considerations, the locations of balconies should take into account the prevailing wind direction.'	
3.70		4.12.41 Add a note that conventional TV aerials and dishes above xx diameter are not permitted.	Under the Town and Country Planning (General Permitted Development) Order 1995 (as amended), there is a general permission to install an antenna up to a specific size on a property. Accepted.	No change.	
3.71		Add after 4.14.11 "Where significant numbers of children are expected to use the on-site play		Add new para after 4.14.11 to read: 'Where significant	

		<p>facilities, careful consideration should be given to layout to dissipate noise, to avoid conflict with surrounding households.”</p>		<p>numbers of children are expected to use the on-site play facilities, careful consideration should be given to layout to dissipate noise, in order to avoid conflict with surrounding households.’</p>
3.72		<p>4.15.3 I have challenged elsewhere that 1.75 sq m of bin storage has to be occupier-number-related, surely? Not sufficient for 6 flats let alone more. I think the wording was mis-typed in the standards.</p>	<p>1.75 sq m refers to individual house</p>	<p>No change.</p>
3.73		<p>No mention of clothes drying space, which was a guarantee in the early days of MKDC and helps immensely to reduce damp problems in small flats and houses. Our standard says 15 sq m per block of flats and residents used to be guaranteed a small amount in individual flats. In practice, access to 8 sqm or so is needed.</p>	<p>Presumably this relates to flats only</p>	<p>Include new para after para 4.14.8 to read: ‘All apartments should provide space to dry clothes either within the apartment or within a communal facility.’</p>
3.74		<p>4.15.10 can we add “and telecoms junction boxes” and “Stations and junction boxes should be placed off the highway wherever possible.” (Our streets have recently had fibre-optic junction boxes dumped on the pavements)</p>	<p>Statutory Service providers have power to install equipment where they want to (unless dangerous etc.) and that they only have those powers (and so will always want to install their gear) in the highway.</p>	<p>Include new para after 4.15.10 to read: ‘Developers are advised to talk to statutory providers, like telecoms, early in the process to ensure that equipment is properly placed, or put underground where possible. Where this is not achievable,</p>

			<p>The council have no powers to insist on specific requirements</p>	<p>equipment should be designed sympathetically in order to minimise the negative impact on the public realm.'</p>
3.75		<p>Insert extra heading Play Areas or include this in 3.4.6 Add new bullet: the target age of the children should be taken into account, and care taken to design protection against abuse by significantly older children, or dangerous attraction for younger children. Where a play area covers a wide range of ages, some zoning of age groups should occur to create a more controlled environment for younger children.</p>	<p>This point is already sufficiently discussed.</p> <p>Accept point but how do you stop older children using it.</p> <p>Play strategy should address this.</p>	<p>No change.</p>
4.1	Cllr Edith Bald	<p>I like the Guide and the way it is written which makes it intelligible for ordinary people.</p>	<p>Noted.</p>	<p>No change.</p>
4.2		<p>I cannot tell what are new requirements in the guide which would have been useful to know. In our new estates such as Oxley Park and Kingsmead and Westcroft we have issues due to lack of parking spaces, narrow roads, winding roads which are difficult for buses, and vertical speed bumps. Have the standards for these things changed in the Design Guide? The Guide appears to say all the right things and the number of parking spaces specified per dwelling type appears to be adequate, as does the guidance on street widths etc. So am I to conclude correctly that these Design Standards have changed the requirements for parking, road widths etc.? If they haven't</p>	<p>Yes, the Design Guide does provide new guidance (or guidance that never previously existed) for many of the issues you refer too.</p> <p>Some standards for parking, road widths have changed.</p> <p>Some of the standards are mandatory and others are advisory and the letters implementation depends on a variety of circumstances.</p>	<p>No change.</p>

4.3		<p>changed how will the Design Guide prevent the same problems happening again? The standards should be mandatory. Are they?</p> <p>I would like to see level surface streets banned. I used to live in one and they are not good. I don't know of any resident who likes them. If they are unavoidable they should only be allowed in cul de sacs.</p>	<p>Disagree. The Guide is requiring developers to design and build level surface streets in a different way to what has been previously built.</p> <p>Other requirements are included to deal with many of the existing issues.</p> <p>In urban design terms, level surface streets are important to help create a street hierarchy and help create varying character across a development.</p> <p>Noted.</p>	No change.
4.4		<p>I am pleased to see that vertical speed bumps are not recommended. They should be used in very exceptional circumstances. On bus routes they should be a definite not allowed.</p>	<p>Noted.</p>	No change.
4.5		<p>Para 4.33 on page 80. I think it is essential to publish minimum space standards for housing. Modern houses have inadequate storage for a family. Would be best to have fewer bathrooms and more storage. Why does a 4 bed house need 3 bathrooms. Bathrooms are expensive so storage / larger rooms instead of bathrooms would be cheaper for builders.</p>	<p>Any space standards would be introduced through a separate SPD. Market forces determine the number of bathrooms provided within dwellings.</p>	No change.

4.6		<p>Para 4.12.22 Statement should be made about considering the maintenance costs of external cladding.</p> <p>Timber might look great initially but requires maintenance and looks awful after a few years if it doesn't get it. Coloured painted cladding is even worse. Design fads and fashions should not have precedence over maintenance costs. What looks good now could look awful in 10 years - and will for example Oxley woods development, and Vizion development with wood cladding. Monopitch photo page 103 is a disaster in my view.</p>	<p>Much of this is subjective views.</p> <p>Para 4.12.27 states that "Materials must be selected that wear well with age and last a long time."</p>	No change.
4.7		<p>Play areas appear to be adequately covered. However whereas it is easy to find play areas for children up to 8 on new estates, those for 8 plus are hard to find. Same question as I raised above - is this a new standard? Will it be enforced?</p>	<p>The standards for new play areas are established by Local Plan policy L3, rather than the design guide.</p>	No change.
5.1	Development Management (Highways)	<p>Page 26, Design principles, we wonder whether we need to include a parking hierarchy? This may not be the correct place in the guide for it to appear but there are a few bullet points that mention parking.</p>	<p>There is already a parking hierarchy at paras 3.9.17-3.9.19.</p>	No change.
5.2		<p>Page 26, Design principles The last bullet point, 'Layouts should be such to allow as much parking as possible on plot and on street'. By on-street, were you just giving credence to an amount of visitor parking as we have always had? We have decided that we wouldn't have dedicated parking on street but we wonder whether developers will see this point and think they can place dedicated parking on-street.</p>	<p>This principle is simply encouraging parking within the most appropriate locations, i.e. on street or on plot.</p>	<p>Amend last bullet point page 26 to read: 'Layouts should be such so as to allow as much parking as possible on plot and on street – so long as all other best practice urban design principles can be achieved.'</p>
5.3		<p>On page 73 you discuss on street parking but don't explain whether this is dedicated or unallocated. In</p>	<p>As rear court parking courts are not supported, the</p>	<p>Delete diagrams on page 73 and para 3.9.28.</p>

		<p>the lower of the two diagrams I am presuming that the central reservation parking is unallocated. Obviously we have unallocated (communal) parking in such areas as Fishermead that works well but is this something we would be prepared to see built today?</p> <p>Page 27, second bullet point - this bullet point needs to include cyclists (or a separate bullet point included).</p>	<p>rationale for this drawing and supporting text no longer exists.</p>	
5.4			<p>Accepted.</p>	<p>Amend para 3.2.1 second bullet point to read: 'Local centres will be major local attractors over one or more neighbourhoods, so the movement network should provide the shortest possible pedestrian and cycle routes from housing.'</p>
5.5		<p>Page 33 under 'Hard Landscaping' suggest a paragraph be inserted to say that '<i>a proliferation of signs/road markings should be avoided to prevent street clutter</i>' or some similar wording</p>	<p>Accepted.</p>	<p>Amend para 3.4.18 first sentence to read: 'Street furniture, road markings and signs should not over-dominate spaces or result in visual clutter and be integrated into the overall appearance of the street.'</p>
5.6		<p>The plan on page 39 shows elements of highway layout that would not be acceptable. Should this be of concern or can the plan be accepted in the context in which it is meant?</p>	<p>Accepted.</p>	<p>Delete plan on page 39.</p>
5.7		<p>Page 40 para 3.6.7, do you really mean to say 'or on-street' parking. In the context of rear courtyard parking as the alternative, we agree but just wondered whether this had been superseded by the tandem parking issue.</p>	<p>Accepted.</p>	<p>Amend para 3.6.7 first sentence to read: 'The street network must be designed so that, wherever possible, direct access</p>

5.8		<p>P41, is there a place for segregated redways? The example you have shown is an extreme and we agree, is not good, with no surveillance at all. Are we sure we want to get rid of segregated redways all together or just ensure they have better surveillance than the example you show? The loss of these will result in more redways to the front of properties which themselves bring problems of continual breaches for accesses and visibility issues and the potential for conflicts, something that is not desirable and contrary to the redway design manual.</p> <p>It is important that the location of redways is planned at an early stage to ensure the least number of crossings. Perhaps consideration should be given to allowing cyclists to use a wider estate road for cycling rather than a segregated redway? This initiative is mentioned in Manual for Streets (Section 6.4) and for this reason alone we feel a principle needs to be established as if a developer submitted a proposal in accordance with MfS we would need to make an assertive response in the case that we found such a design feature unacceptable.</p>	<p>The Design Guide is trying to ensure that when new developments are planned segregated redways with no natural surveillance are designed out. The design Guide does promote redways through linear parks and grid road corridors, which avoids the problem of continual breaches for accesses etc. Core Strategy specifically promotes the extension of the redway network into new major developments.</p> <p>Para 3.6.10 states that cycling/walking trips usually involve a mixture of residential streets and redways. There is no reason why cyclists can't use residential streets</p>	<p>onto plots and on-street parking is allowed.'</p> <p>No change.</p>
5.9		<p>P43, neither the photo nor the diagram show priority for cyclists as there is nothing to tell the driver to give-way.</p>	<p>Accepted. Will include plan from Local Transport Note on Cycle Infrastructure which shows priority for cyclists.</p>	<p>Delete photo on page 43. Include plan from Local Transport Note on Cycle Infrastructure.</p>
5.10		<p>P43, the bullet points in the green box don't give enough emphasis to uninterrupted cycling and we</p>	<p>First point is not accepted. If frontage access is to be</p>	<p>Add sentence within fourth bullet point page 43 after</p>

		<p>can't merely say 'it is permissible for driveways to cross the redway'. To avoid a proliferation of crossings we need to spell out on what basis these are permissible. The highway perspective is that these should be avoided.</p> <p>Can the principle be established that in instances where accesses cross redways that traffic approaching them first has to cross a landscape verge to enable sufficient visibility?</p>	<p>allowed, driveways will need to cross redways.</p> <p>It is accepted that redways should be offset from property boundaries to allow sufficient visibility.</p>	<p>third sentence to read: 'To ensure appropriate visibility there must be a 2m strip of adoptable highway between the redway and the property boundary.'</p>
5.11		<p>P44, the photo annotated '<i>Redway within linear park overlooked by adjacent development</i>', provides no close surveillance at all and isn't a good example.</p>	<p>Disagree. In the context of a linear park, the redway has a degree of surveillance from adjacent development.</p>	<p>No change.</p>
5.12		<p>P45, paragraph 3.6.17 – surely there is a design principle that building form should dictate the street layout, not the other way around. What is a gratuitous curve?</p>	<p>Accepted. It is a design principle that building form should dictate the street layout, not the other way around. A gratuitous curve is one that is included for no good contextual reason.</p>	<p>Add sentence to end of para 3.6.17 to read: 'Building form should dictate the street layout, not the other way around.'</p>
5.13		<p>Paragraph 3.6.21 needs further explanation. Do you mean that on-street parking should only be in 'designed-in' bays?</p>	<p>The need to design in parking is to ensure the free flow of traffic.</p>	<p>Amend para 3.6.21 second sentence to read: 'In these cases, on-street parking must be an integral part of the design of the street to ensure the free-flowing movement of traffic.'</p>
5.14		<p>P48, the table mentions 'shared streets'. There are</p>	<p>References should be to</p>	<p>Amend design table on</p>

5.15		<p>also other references to shared streets in the document. Am I right in thinking that all of these should be changed to level access streets?</p> <p>P49, para 3.6.30 doesn't make any mention of footways.</p>	<p>'level surface streets' to ensure consistency.</p> <p>Accepted.</p>	<p>page 48.</p>
5.16		<p>P50, para 3.6.34, can there be some mention of planting height restrictions to allow visibility?</p>	<p>Planting height restrictions are referred to in para 3.6.24.</p> <p>Accepted.</p>	<p>Amend para 3.6.30 second sentence to read: 'In addition to footways, they require a 2.5 metre (minimum) wide reservation on each side to accommodate a combination of a verge and on street parking (except where they pass through a local centre or other non-residential fronting developments where the requirements will be specific to the context).'</p> <p>No change.</p>
5.17		<p>P51, the diagram should show a 0.50m wide wobble strip between the redway and the parking spaces. The section should show a verge between the building line and the redway.</p>	<p>Accepted.</p>	<p>Amend diagram and section on page 51.</p>
5.18		<p>P52, para 3.6.36 – do we really want to encourage this type of layout as it results in the roads becoming one-way streets and they would need to be operated and signed as such. They are also poor for cross-street pedestrian movements. The layout results in approximately 33m between building faces.</p>	<p>The benefit of the boulevard street type is that it allows for frontage access to buildings.</p>	<p>No change.</p>

5.19		<p>P53, Residential Street (Street types 6,7,8 & 9). This conflicts with the table on P48 as street type 8 and 9 only have a footway on one side.</p>	<p>Accepted.</p>	<p>Amend paragraph 3.6.37 second sentence to read: 'It will be characterised by a carriageway and footways (on either side of the street for streets with homes on both sides).'</p>
5.20		<p>PARKING</p> <p>As a principle should separate consultation on changes to C3 parking standards have taken place? Potential consultees for parking standards may have missed this consultation and as a result there will be claims that inadequate consultation on changes to the parking standards has taken place. If the standards are to be kept then changes to the HiMO standards need to be made to improve the evidence base for Area B.</p> <p>Where is the evidence base for the changes to the C3 standards? It is inevitable that challenges will be made to the change for 2 bed flats at planning appeals and without a sound evidence base it is unlikely that a successful defence case can be made.</p>	<p>Any changes to the adopted 2009 parking standards need to be based on robust evidence. A review of current parking standards is to be undertaken. The Design Guide should include the current adopted 2009 standards as an appendix.</p> <p>Standards for HiMOs are better included within the HiMO SPD.</p>	<p>Delete paras 3.9.1-3.9.10, tables 1 & 2 and parking standards zone maps. Include extract from Addendum to Parking Standards (adopted 2009) in appendix. Amend para 3.9.11 to read: 'The Council's requirements for parking for residential development are provided by the Addendum to Parking Standards adopted in 2009. An extract from the Addendum is included at Appendix F. The parking standards for Houses in Multiple Occupation (HiMO) are contained within the HiMO SPD. Please note the following points in addition to the information set out in</p>

5.21		P69, para 3.9.17, surely option 2 in the green box is incorrect? What about parking in front courtyards as an option?	Accepted that parking in front courtyards is an acceptable option.	Appendix F: Amend para 3.9.17 green box to read: '1. On plot, located at the front or side of the dwelling' Delete para 3.9.18.
5.22		P69, para 3.9.18, shouldn't we be stipulating the plot width rather than the house type in terms of minimum widths?	In the light of workshop on Feb 28 th , tandem parking is accepted as an appropriate parking solution.	
5.23		P69, para 3.9.20, what is meant by chevron parking (last bullet point in green box)? We aren't sure that chevron parking (echelon?) parking is practical for dedicated, on-plot, parking.	Section 3.9.26 and associated drawings needs a rethink.	Amend para 3.9.20 third bullet point to read: 'to the front as right-angled or parallel parking.'
5.24		P69, 'Drive-Throughs' – these can still result in tandem parking where this has been catered for in the rear garden. If the occupier chooses to not use the rear garden parking how is the tandem parking rule going to be enforced. Even if something can be conditioned the 'relaxation' back to tandem parking might go unnoticed and therefore is not easily enforceable.	In the light of workshop on Feb 28 th , tandem parking is accepted as an appropriate parking solution.	Delete para 3.9.25, and amend drawing on page 71 to show with tandem parking.
5.25		P74, P 3.9.32, unallocated parking should not be allowed at right angles and should not be intermixed with dedicated parking. We are getting more and more applications showing this and a stop should be put to it. The middle photo on this page doesn't show a landscape build-out to identify the parking space when a car isn't parked in it (to maintain the traffic calming element). Does the bottom picture show dedicated or unallocated parking? It doesn't appear as dedicated parking from a highway perspective!	Accepted. Unallocated parking should not be mixed with dedicated parking. The middle photo doesn't include a landscape build-out as required in the supporting text. It is unclear whether the bottom photo shows on plot or on street parking.	Amend para 3.9.32 to read: 'On-street parking can be provided in two different configurations: echelon or parallel.' Delete middle and bottom photos on page 74 and para 3.9.35.

5.26		P75, the diagram at the bottom of the left hand column is wrong as it shows a discontinuous footway. The footway should 'run through'. On street parking should respect visibility splays at junctions and accesses.	Accepted.	Amend diagram at bottom of left hand column.
5.27		P76, the diagram under p3.9.43 is not the best as it shows end car parking spaces that can only reverse from the courtyard; unacceptable.	Accepted.	Amend diagram under para 3.9.43 to remove requirement for cars to reverse from the courtyard.
5.28		P77, where did the dimensions for the parking spaces come from; these are different to anything we have indicated previously? Can we request that the diagrams make use of the full page width? The diagrams are confusing as they don't show sufficient detail. As a minimum please show a further diagram of two 'side by side' on-plot spaces not just the single space scenario.	The dimensions for the parking spaces are the same as those that are to be included in the Highways Design Guide.	Amend drawings on page 77 to make them clearer. Also increase size of drawings.
5.29		4.5.4 states that humps "can assist with reducing speed" yet 4.5.5 states that they should not be used?	Section 4.5 is to be redrafted to remove technical highway guidance, which will be included in the Highway Design Guide.	Delete para 4.5.4.
5.30		4.5.5 when mentioning vertical features are you saying that raised tables should also not be used? I would disagree as this is a useful method of managing approach speeds at junctions.	Section 4.5 is to be redrafted to remove technical highway guidance, which will be included in the Highway Design Guide.	Delete para 4.5.5.
5.31		4.5.8 does not agree with the table on table 48. For example there is no "type 3".	Accepted.	Delete para 4.5.8.
5.32		4.5.14 – 4.5.18 – query the inclusion of this section which would better sit within the highway design guide.	Accepted.	Delete section 4.5.14-4.5.18.

5.33		4.5.25 – 4.5.38 – suggest this section is removed from the guide and put in the highway design guide and/or reference made to the other documents that this information can be found in.	Accepted.	Delete paras 4.5.25-4.5.38.
5.34		4.6.2 & 4.6.3 – ideally this should be 0.5m. 0.3m should be used as an absolute minimum.	Accepted.	Amend para 4.6.2 to read: 'Generally setbacks will be smaller (1-2 metres) where a more urban, higher density, pedestrian friendly character with lower traffic speeds is to be created, with larger setbacks (2-6 metres) where a more open, lower density character is to be created.' Amend para 4.6.3 to read: 'A setback of 1 metre should be seen as a minimum to ensure that windows do not open up over adoptable highway. Where there are no footpaths (i.e. level surface streets), setbacks should be a minimum of 1.5 metres.'
5.35		Section 4.7 – boundary treatment should ensure that it respects the required vehicle and pedestrian visibility splays.	Accepted.	Include sentence at end of para 4.7.3 to read: 'Boundary treatments should respect the required vehicle and pedestrian visibility splays.'

5.36		4.15.11 – my understanding for this is that the wiring is put in for EVCP with residents having the option to put in the full point when the dwelling is being built?	Accepted.	Amend para 4.15.11 heading to read: 'Electric Vehicle Charging Points' and first bullet point to read: 'Where practicable, dwellings should be designed to enable the installation of a domestic EVCP to approved industry standards at a later date' and second bullet point to read: 'Ducting for fibre connectivity to each dwelling or, if appropriate in terms of flats and apartments, aggregated connectivity.'
5.37		Page 109 – "Has the development provided all parking on plot and on street with all spaces being able to be accessed independently." – reference should be made that parking to be provided in accordance with the council's adopted parking standards.	Accepted.	Para 5.2 add bullet point in Building the Place green box to read: 'Has parking been provided in accordance with the Council's adopted parking standards?'
5.38		P137 – 138 – what were the criteria for including certain LP policies in this section. For example, T15 is an important parking policy but is not included. (There will no doubt be other important policies not included).	Accepted.	Include policy T15, together with other local plan policies, in appendix B.
5.39		D9 – this can be difficult to design when the back of the car port is someone else's garden.	Accepted. Car ports also cause surveillance problems.	Amend para D9 to read: 'Garages and car ports should be avoided within

5.40		<p>This leads me onto a general point about car ports. In recent years there have been many applications with car ports included. Some of these have been open two sides while others have been just been “garages without doors”. These last ones have resulted in subsequent enforcement action to get doors put on. Although we have successfully defended refusals of planning permission they are an indication that car ports are not what people want. Where car ports are open at the back (as they should be) onto the occupant’s own garden there is an immediate issue of security which the occupant’s will want to fill in. In conclusion on car ports the residential design guide should include some detailed advice on how car ports should be designed.</p>	Accepted.	<p>parking courts as they block surveillance of vehicles.’</p> <p>Include new para after 3.9.44 to read: ‘Unlike garages, carports can be counted as on-plot car parking because they are unlikely to be used for storage. However, there are concerns where they are accessed from the public realm as they provide gathering spaces for youths, and are often poorly surveilled. Car ports are required to be open on two faces and to have minimum internal dimensions of 3.0m x 5.0m per space. Where the car port is located to the side of the house, any fence or wall provided to secure the rear garden should be at least 1 metre from the end of the car port.’</p>
5.41		<p>Location of bus stops. I think it would be worth including a section on this with reference to LP policy T5.</p>	Accepted.	<p>Include section on bus stops to read: ‘All houses within a new development should be located no more than 400m from a bus</p>

				<p>stop. Bus stops should be easily accessed on foot. Pedestrian routes to bus stops should be direct and well-surveilled. Where bus stops are located on grid roads, development should be designed to ensure that pedestrian routes and bus stops are well surveilled. Layouts should be designed with housing overlooking the pedestrian route and the bus stop, and grid road reserve planting reduced to maximise visibility. ' Include diagram and photos showing development / open space in proximity to bus stops on grid roads.</p> <p>No change.</p>
5.42		Flat developments should include cycle storage.	Para 3.9.46 includes guidance on cycle parking. Accepted.	
6.1	Transport Policy & Programme Manager	3.5.3 Refers to aligning roads East-West to increase passive solar gain. This alignment can cause issues at sunrise / sunset with the sun being low in the sky either causing glare or directly affecting the driver's ability to view the road ahead. Roads aligned E-W are best avoided in highway terms, but where provided they need careful design		Include new sentence at end of para 3.5.3 to read: 'East-west streets can cause issues at sunrise/sunset with the sun being low in the sky causing glare or directly

6.2		<p>to ensure that these issues are addressed (by building locations, planting, avoiding longer straights...).</p> <p>3.6.10 Leisure routes should not be considered to form part of any essential route, they are (as the name suggests) routes which are used for leisure purposes and are extra to those required for accessing facilities, commuting etc. It may be that leisure routes are used as an alternative by choice, but they should never be essential.</p>	Accepted.	<p>affecting the driver's ability to view the road ahead. They need careful design to ensure that these issues are addressed.'</p> <p>Amend para 3.6.10 first sentence to read: 'In Milton Keynes cycling/walking trips usually involve a mixture of residential streets and redways.'</p>
6.3		<p>3.6.12/13 It isn't clear what the third type of redway is. Also, the cross-city and local redways have no meaning any longer. We have not built 5m wide cross-city redways for many years and redways on longer routes are designed to the same standards as 'local' ones. The only difference now is their location. This section needs re-writing to emphasise the characteristics of each location and not to imply that there are three types of redway.</p>	Accepted.	<p>Amend para 3.6.12 to read: 'The Council will be seeking a network of redways within new developments.'</p> <p>Amend first sentence of para 3.6.13 to read: 'There are three locations within which redways will be provided, all of which may be required depending on the size of the development.'</p> <p>Amend first sentence of para 3.6.14 to read: 'The second and third locations of redways to be included in new developments are for cyclists who want to travel greater distances at</p>

6.4		<p>3.6.13 The box refers to giving priority to pedestrians and cyclists over vehicle traffic. This is not legal and priority CANNOT be given to these users over vehicle traffic. Give ways can only apply when giving way to vehicular traffic. Without enforceable give-ways you are only able to give the indication of priority where none exists – in these circumstances you put the redway users at increased risk by giving them a false sense that they have priority when they do not. The second and third bullet points need revising to remove the word priority and the approach needs to be modified to achieve a satisfactory way of improving redway routes across roads.</p> <p>Also in this box the 4th bullet point makes redways sound second-rate compared to cycling on-street. This needs re-wording to emphasise the qualities of redways as the preferred alternative.</p> <p>The 5th bullet in this box should be re-worded to discourage driveways crossings redways. It should be clear that this is not desirable and should only occur where unavoidable. It should also make the point that where drives do cross redways they should be grouped together to minimise the number of crossings.</p>	<p>Local Transport Note on Cycle Infrastructure allows for crossing where cyclists have priority over traffic.</p>	<p>increased speeds with less interruptions from crossings streets (and no crossings by private driveways):...’</p> <p>Include diagram from Local Transport Note on Cycle Infrastructure (attached). Delete photo on page 43.</p> <p>Delete third bullet in green box on page 43.</p>
6.5		<p>3.6.18 Crossroads are not normally acceptable and the document should start by making that point. In</p>	<p>Accepted that the wording in the 4th bullet point downgrades the importance of redways.</p> <p>Final point is not accepted. If frontage access is to be allowed, driveways will need to cross redways.</p>	<p>Amend para 3.6.18 to read: ‘Staggered junctions</p>

		<p>low speed and low volume environments where cross-traffic is minimal crossroads can be considered where it is important to maintain the directness of a pedestrian route (that itself carries large numbers of pedestrians to a specific destination).</p>		<p>reduce vehicle conflict compared with crossroads, and therefore are generally preferred. However, in low speed and low volume environments where cross-traffic is minimal crossroads can be considered. In these circumstances, crossroads may be appropriate where it is important to maintain the directness of a pedestrian route.'</p>
6.6		<p>3.6.24 should refer to visibility splays, not visual splays.</p>	<p>Accepted.</p>	<p>Amend third sentence para 3.6.24 to read: 'Highway requirements for clear visibility splays normally restrict the height of this planting to 300-400mm.'</p>
6.8		<p>3.6.25 Trees are not traffic calming features. This is a recurring theme, the use of the term "traffic calming" and the features being discussed as traffic calming are not appropriate. Features such as street trees can assist with speed restraint as part of an overall package of elements that together affect driver behaviour.</p>	<p>Accepted.</p>	<p>Amend fourth sentence para 3.6.25: 'For streets at the bottom end of the hierarchy, such as level surface streets, trees can be located within the carriageway.'</p>
6.9		<p>Is the installation of street trees within a 2m footway really achievable? Are Mark Haynes and Stephen Gillions both happy with this? If so, the guidance should be clear that the trees must be positioned at the back of the footway, away from</p>	<p>Senior Landscape Architect (Development Management) advises that installation of street trees within a 2m footway is achievable. He</p>	<p>No change.</p>

6.10		<p>the carriageway.</p> <p>Also the word “pavement” should be replaced with “footway” (the carriageway is also a ‘pavement’).</p>	<p>does not agree that the tree should be positioned at the back of the footway.</p> <p>Accepted.</p>	
6.11		<p>3.6.32 The latter part of this paragraphs states that these roads “should” be narrowed down further. I think it ought to say they “can” be narrowed down further – it is not essential that they are narrowed.</p>	<p>Accepted.</p>	<p>Amend para 3.6.25 fifth sentence to read: ‘For streets with higher volumes of traffic, they can occur within a footway of 2m wide so long as there is close co-ordination between the design of utilities and landscaping proposals and in particular street trees.’</p> <p>Amend para 3.6.32 fourth sentence to read: ‘In specific points they can be narrowed down further to accommodate redway or other dedicated pedestrian crossing points.’</p>
6.12		<p>3.6.33 should say “especially” if it is a bus route. I think higher densities should still be on more major routes as they tend to have better ped / cycle access (e.g. redways).</p>	<p>Accepted.</p>	<p>Amend para 3.6.33 to read: ‘The highest densities of the development will tend to be along this street type, especially if it is a bus route and/or contains local facilities.’</p>
6.13		<p>3.6.40 3rd bullet in the box should say “serving” too many houses, not “served by” too many.</p>	<p>Accepted.</p>	<p>Amend para 3.6.40 3rd bullet point to read: ‘too much traffic because</p>

6.14				<p>inappropriate street selected as level surface street (too connected, too long and serving too many houses)'. Amend diagram on page 55 and include additional diagram showing scenario where parking occurs to the side of the property. Amend Pedestrian Space and Defensible Space green box to read: 'Defensible Space Where parking occurs to the side of the property, there should be a minimum private defensible space of 2m to the front of the property; Where terrace housing occurs and hence where there is no parking to the side, there should be at least 1.5m defensible space to the front of the property;</p>
		<p>3.6.41 This whole section needs reviewing and redrafting. The text is poorly phrased and often doesn't read properly at all. The descriptions of non-vehicular strips and defensible space are not at all clear and need supporting diagrams. This section also needs further discussion with DM Highways and ourselves.</p>	<p>Accepted in part. Non-vehicular strips are no longer to be included.</p>	

6.15		The table after 3.8.3 (which should be labelled!!!) isn't clear about what is being shown. Narrow frontage types say "no on-street parking" but it isn't explained that this is because of requirements for access to on-plot parking. The whole table could be better described and much clearer.	Accepted.	Anything located within the defensible space should be a maximum of 0.6m high to provide sufficient visibility for small children.'
6.16		3.9.5 refers to table 3 and table 2 for HiMOs – there is no table 3.	HiMO standards are to be included within the HiMO SPD.	Delete paras 3.9.5-3.9.6.
6.17		3.9.22 this is confusing – why are you giving dimensions for a drive through? If the dimensions are not for the drive through, what are they for? If any guidance is given on a drive through it should be about the minimum width that is acceptable.	It is accepted that this information is unclear.	Amend final sentence of para 3.9.22 to read: 'Minimum width should be 3.5m.'
6.18		3.9.27, 3.9.34, 3.9.35 another reference to traffic calming – should be revised as per my comment above.	Accepted.	Amend first bullet point para 3.9.27 to read: 'assisting with speed restraint as part of an overall package of elements that together affect driver behaviour.' Amend second sentence para 3.9.34 to read: 'When they are located within the carriageway, they can assist with speed restraint. Some form of planting is

				required at each end of the parking to ensure that the speed restraint effect remains when the car is absent.'
6.19		4.5.8 refers to road types 3 and 4 but these are not in the table and are industrial roads. Types 3 and 4 should be excluded.	Accepted. Section 4.5 is to be redrafted to exclude technical detail that will be part of the Highway Design Guide.	Delete para 4.5.8.
6.20		4.5.38 refers to the ped/cycle priority issue as mentioned above.	Section 4.5 is to be redrafted to exclude technical detail that will be part of the Highway Design Guide.	Delete para 4.5.38.
7.1	Development Management (MKP)	3.4.25 – Please remove reference to Milton Keynes Partnership	Accepted.	Amend para 3.4.25 to read 'Milton Keynes Council expects suitably qualified ecologists and landscape architects to be employed to advise on all biodiversity and landscape matters.'
7.2		Believe the document goes into a lot (possibly too much?) detail on highways/street design/parking etc.	Accepted. Section 4.5 is to be redrafted to exclude technical detail that will be part of the Highway Design Guide.	Delete paras 4.5.8-4.5.18 and paras 4.5.25-4.5.38.
7.3		Surprised that the document is proposing new parking standards to supersede the Addendum. This potentially has a big impact on our sites by increasing the 2-bed flat allocated spaces requirement to 2 spaces and the 2-bed house unallocated spaces requirement to 0.33. It should	Any changes to the adopted 2009 parking standards need to be based on robust evidence. A review of current parking standards is to be undertaken. The	Delete paras 3.9.1-3.9.10, tables 1 & 2 and parking standards zone maps. Include extract from Addendum to Parking Standards (adopted 2009)

		<p>not be the role of the Residential Design Guide to change Milton Keynes parking standards.</p>	<p>Design Guide should include the current adopted 2009 standards as an appendix.</p> <p>Standards for HiMOs are better included within the HiMO SPD.</p>	<p>in appendix. Amend para 3.9.11 to read: 'The Council's requirements for parking for residential development are provided by the Addendum to Parking Standards adopted in 2009. An extract from the Addendum is included at Appendix F. The parking standards for Houses in Multiple Occupation (HiMO) are contained within the HiMO SPD. Please note the following points in addition to the information set out in Appendix F:'</p>
7.4		<p>There is a note under Table 1 about rounding up – it gives examples for 0.75 and 0.5 but it should also make reference to 0.25 if the expectation is that this should be rounded up.</p>	<p>Standards in the draft Design Guide are to be removed. Current adopted standards are to be included in an appendix.</p>	<p>Delete table 1.</p>
7.5		<p>P69-71 From experience it is already difficult for developers to comply with current parking standards in designing layouts. Preventing tandem parking for all properties would make this even more difficult, if not impossible without resulting in car-dominated streets, as demonstrated by the example of on plot parking at the side and front of</p>	<p>Accepted.</p>	<p>Delete para 3.9.15 and include new bullet point in green box after para 3.9.11 to read: 'Detached homes with 5+ bedrooms will generally be expected to have at least 2</p>

		<p>dwelling. Drive throughs create unattractive gaps in the built form and parking in rear gardens will significantly reduce private amenity space.</p>		<p>on-plot, independently accessible parking spaces.</p> <p>For smaller homes (ie 4 bedrooms or fewer), independently accessible on-plot parking spaces are preferred but tandem parking (including any similar layout where the spaces are not independently accessible) will be acceptable, provided that:</p> <ul style="list-style-type: none">• The unallocated (on-street) provision is visible and in close proximity (within 15m from the front of the property) to those homes that have tandem parking (or any similar layout where the spaces are not accessed independently).• The on-street provision does not encroach into the carriageways on
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				bus routes and other primary residential streets (types 5-7) so as to allow for the movement of free flowing traffic, including service delivery vehicles.'
7.6		P74 Don't understand the difference between what is being said in para 3.9.34 and 3.9.35	Agree.	Delete para 3.9.35.
7.7		P78 para 3.10.3 Repetition in bullet points.	Accepted.	Delete repeated bullet point in green box para 3.10.3, page 78.
7.8		The photo of Lagan Homes corner building is not the greatest example. Is there a better example to use of a landmark building e.g. Brooklands flatiron.	Subjective view.	No change.
7.9		P91 4.9.6 'Car ports or garages generally not take up more than 25% of an elevation of a street.' It would be extremely difficult to measure whether this quantification is being conformed with. This sentence should be removed or revised to be less prescriptive.	Accepted.	Delete last sentence of para 4.9.6.
7.10		P91 4.9.7 – do you mean a room over the garage? This is a big issue to deal with for the City Street in the expansion areas. Further guidance on acceptable solutions would be helpful.	Accepted that this is unclear. This solution involves a garage accessed from the rear, with a room fronting the street.	Include example illustrating this solution.
7.11		P107 – EVCPs. Are developers likely to resist this on cost grounds? Where do they need to be located on the dwelling?	It is accepted that the requirement in the Design Guide is too onerous.	Amend para 4.15.11 heading to read: 'Electric Vehicle Charging Points' and first bullet point to

7.12		P108 – 5.1 should not refer to the SPD as having teeth. Change to make reference to material consideration or a similar planning term.	Accepted.	read: 'Where practicable, dwellings should be designed to enable the installation of a domestic EVCP to approved industry standards at a later date.'
7.13		Are appendices A and B necessary?	Appendix A provides case studies of successful neighbourhoods in Milton Keynes. Its inclusion is a result of addressing the responses from the previous consultation in 2010. The policy guidance in appendix B provides the development plan basis for the guidance in the Design Guide.	Amend para 5.1 to read: 'This Design Guide, by being adopted as a Supplementary Planning Document, will be a material consideration in assessing planning applications and therefore will help to raise design quality. However, developers need to be aware of other methods that the Council will employ in order to ensure design quality is achieved.'
				No change.

7.14		Appendix D – parking courts. Guidance on rear parking courts should be included in the main document. If it stays in the appendix it could potentially get overlooked by developers.	Not accepted. The inclusion of rear parking courts within the appendix emphasises that they are not supported.	No change.
8.1	Development Management (MKC)	Overall, this is considered to be a useful design guide which will help to guide developers to provide high quality built environment appropriate for its Milton Keynes location.	Noted.	No change.
8.2		There are concerns about the length of the document which may deter people from using it fully. And there are questions as to whether it is appropriate to have all the highway advice in it and not in a specific highway design guide.	While it is accepted that the document is long, everything in it is believed to be required and in part is a result of addressing the responses from the previous consultation in 2010. Notwithstanding the above, Section 4.5 will be drafted to remove the technical highway guidance. The highway advice will be included in the Highway Design Guide which is to be consulted on in April.	Delete paras 4.5.8-4.5.18 and paras 4.5.25-4.5.38.
8.3		Paragraph 3.9.11 discourages the use of tandem parking. Whilst it is accepted that the use tandem parking can add to parking problems in some areas, it can in some cases be a useful form of parking. The provision of independently accessible parking spaces in low density areas with detached houses can work well. However, in higher density areas	Accepted.	Delete para 3.9.15 and include new bullet point in green box after para 3.9.11 to read: 'Detached homes with 5+ bedrooms will generally be expected to have at least 2 on-plot, independently

	<p>with smaller terraced and semi-detached houses the provision of independently accessible spaces will have a significant impact on density and built form.</p> <p>Firstly with regard to density, schemes may have to include houses with a greater degree of separation ie. not semi-detached and terraced leading to a less dense form of development. This will potentially affect the viability and deliverability of some housing developments and developers may prefer to develop elsewhere. Whilst this is not directly a matter for Planning Officers, Milton Keynes Council needs to deliver housing growth and meet housing targets.</p> <p>Secondly, the form of development coming forward may change. There may be a reliance on more front parking courts and cars in front of dwellings leading to streetscenes dominated by cars. In addition, a less robust form of development not using perimeter block principles and not fully addressing the streetscene may have to be used. It is considered that tandem parking is useful as one of a number of approaches to parking and the draft design guide should be amended to allow it (perhaps with a caveat or on a limited basis).</p>		<p>accessible parking spaces.</p> <p>For smaller homes (ie 4 bedrooms or fewer), independently accessible on-plot parking spaces are preferred but tandem parking (including any similar layout where the spaces are not independently accessible) will be acceptable, provided that:</p> <p>The unallocated (on-street) provision is visible and in close proximity (within 15m from the front of the property) to those homes that have tandem parking (or any similar layout where the spaces are not accessed independently).</p> <p>The on-street provision does not encroach into the carriageways on bus routes and other primary residential streets (types 5-7) so as to allow for the movement of free flowing traffic, including service delivery vehicles.'</p>
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9.1	John Russell Housing Development Officer	P.11, Para 1.8.1 – are there any plans to include (MK CIL) on future design and planning consultations?	MK Centre for Integrated Living were included on the list of consultees for the Design Guide. They can be included in future design consultations where appropriate.	No change.
9.2		P.11, Para 1.8.2 – design principles do not include Inclusive Design/Inclusion by Design.	The design principles were established through the workshop in July 2011. It is accepted that the Design Guide should include reference to inclusive design.	Include new sections on the subject of inclusive design (see response to rep. no. 14.2).
9.3		P.21, Para 2.3.26 – ‘continues to provide exemplar housing “beyond the regs” by HCA.’ Will this include Sustainable Code Level 4 as a requirement?	The requirement for Sustainable Code Level 4 is established in the Core Strategy.	No change.
9.4		P.66, Para 3.9 - Parking – Lifetime Homes requires on-plot parking with the capability of enlargement to 3.3m. For communal parking areas, at least one 3.3m wide parking space per block with short and level access to front doors.	Do we want to refer to Lifetime Homes with regard to parking space sizes?	Include new sentence at end of para 3.9.45 to read: ‘Dwellings designed to meet Lifetime Homes standards will have to provide larger car parking spaces (see section 4.2 of the Design Guide). Details of the requirements can be found on the following website: www.lifetimehomes.org.uk
9.5		P.79, Para 4.2.1 – “....should be accessible to and inclusive for all potential users”	Accepted.	Amend para 4.2.1 third sentence to read:

9.6		<p>P.80, Para 4.3.2 – English Partnership’s Quality Standards 2007 embrace a large variety of quality standards including Building for Life Silver Standard, Lifetime Homes, Inclusive Design, Secured by Design, space standards etc. Suggest that MK Council adopts this as the basis for all new development.</p>	<p>The Government scrapped HCA’s design and sustainability standards in 2010, suggesting that housebuilders would develop a new framework for local building standards.</p>	<p>‘Developments should be accessible to and inclusive for all potential users.’ No change.</p>
10.1	<p>Countryside Officer (Ecology)</p>	<p>2.2 and Table C2: Context Appraisal These sections do not adequately reflect that much new development will occur on greenfield sites on the edge of existing settlements. Contextual appraisal must therefore address nearby landscape, wildlife, and economic (e.g. farmland, woodland) assets. Para. 2.2.2 should be re-drafted and Table C2 augmented to reflect this. Though addressed in 3.4.10, it needs a strong emphasis here.</p>	<p>It is accepted that the character of the surrounding area may be one of open countryside. Para 2.2.3 states that ‘the character of the new development should also be developed from an understanding of the context of the surrounding built and natural forms.’ It is therefore considered that nearby landscape, wildlife and economic assets are covered. Table C2 is intended to help developers develop local design cues for the layout and design of their development. It is not intended to cover all contextual issues.</p>	<p>No change.</p>
10.2		<p>Biodiversity requirements The key statement is the box on p31. This is</p>	<p>1. Not accepted. The Local Plan is part of the</p>	<p>Include new paras under heading ‘Biodiversity’ after</p>

		<p>largely OK, but:</p> <ol style="list-style-type: none"> 1. Text should emphasise that inclusion of biodiversity in developments is not just an MK "nice-to-have" but explicit in PPS9 and the Draft National Planning Policy Framework. 2. To future-proof the SPD you may want to omit the refs (3rd bullet) to MK Local Plan saved policies. 3. To the list of measures (5th bullet) add: "bat or bird boxes and crevices". 4. As green roofs is given a paragraph, add one on the habitat potential of SuDS. Though addressed in 3.4.29 it needs flagging here. 	<p>development plan and is more than an MK "nice-to have".</p> <ol style="list-style-type: none"> 2. The SPD supplements Local Plan policies and therefore it is appropriate to refer to them in the text. 3. Accepted. 4. New text on biodiversity to include reference to possible biodiversity features including SUDS. 	<p>para 3.4.12 to read: "The design and layout of new residential development should protect and enhance biodiversity on the site, and enhance connections between ecological features within and across the site. Existing areas and features of biodiversity value should be incorporated into the design and layout and wherever possible enhanced.</p> <p>Biodiversity features which might be incorporated in the design and layout of new developments could include:</p> <ol style="list-style-type: none"> (1) Sustainable Urban Drainage Systems (SUDS); (2) Green roofs and green walls; (3) new pond and other water features; (4) a varied structure of wildlife friendly trees, shrubs and flower rich
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10.3				<p>meadows; (5) bat or bird boxes and crevices.”</p> <p>A biodiversity report will be required for all applications to create 5 or more dwellings, or where there is evidence of a protected species or a strong likelihood of a protected species being present. The report should include: (1) a desk study of the site and surrounding area to identify designated wildlife sites, statutory or non-statutory (Local Plan policy NE1); (2) on-site surveys to record habitats and identify protected or priority species (Policy NE2); (3) impact assessment and mitigation (Policies NE1, NE2); (4) proposals for overall biodiversity enhancement (Policy NE3).’</p>
		<p>3.6.26 Tree species selection The examples in the box are all low shrubs. This section should cross-refer to the box on p32 which specifies "predominantly native and locally</p>	Accepted.	<p>Amend green box page 32 first bullet point to include sentence at the end to state: ‘Non-native species,</p>

		<p>sourced tree species". However as the range of native trees suitable for an urban environment is small, add: "Non-native species where used should be selected for known wildlife value".</p> <p>Minor points/tips</p> <p>The document bears evidence of different contributors and needs proof-reading e.g. the reprint of Local Plan Appendix L3.</p> <p>5.8.1: CABE is now defunct.</p>	<p>where used, should be selected for known wildlife value.'</p> <p>Amend para 5.8.1 to read: "Building For Life " is a partnership between several national agencies, including Design Council CABE, ...'</p>
10.4			<p>Document will be proof read before final publication.</p> <p>CABE is now part of the Design Council.</p>
11.1	<p>Landscape Adoptions Officer</p>	<p>Landscape Adoption Process/Requirements (p34)</p> <p>To para. 2 add: "...and in consultation with colleagues in landscape architecture, arboriculture, ecology, etc."</p> <p>Para 3.4.22 states that developers must produce a maintenance regime for all open spaces. This needs including in the landscape adoption process. For significant sites there should be a planning condition for a Landscape and Ecological Management Plan (or similar) but even for incidental landscaping it is desirable that the adopting party is informed of the design intentions.</p>	<p>Accepted.</p> <p>Amend para 2, page 34 to read: 'Open Space Adoptions Officer provides guidance on open space for the proposed development in accordance with Local Plan requirements and SPD, and in consultation with colleagues in landscape architecture, arboriculture, ecology, etc.'</p>
12.1	<p>Mark Haynes Senior Landscape Officer (Development Management)</p>	<p>Plant list on page 47 (para 3.6.26) lists low shrubs rather than street trees and should be amended.</p>	<p>Amend green box para 3.6.26 to read: Avenue/boulevard</p> <ul style="list-style-type: none"> • Acer platanoides 'Emerald Queen'. Norway Maple species.

			<ul style="list-style-type: none"> • Tilia cordata 'Green Spire'. Lime species. • Carpinus betulus 'Frans Fontaine'. Hornbeam species. • Pyrus calleryana 'Chanticleer'. Ornamental Pear species. <p>Residential Street</p> <ul style="list-style-type: none"> • Fraxinus angustifolia 'Raywood'. Claret Ash. • Tilia tomentosa 'Brabant'. Lime species. • Prunus avium 'Plena'. Cherry species. • Betula pendula. Silver Birch. <p>Lanes/Mews.</p> <ul style="list-style-type: none"> • Acer campestre 'Streetwise'.
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12.2				<p>Field Maple species.</p> <ul style="list-style-type: none"> • Prunus x schmittii. Cherry species. • Sorbus aucuparia 'Sheerwater Seedling'. Mountain Ash species • Crataegus x laveallei Hawthorn species. <p>Specimens/Special Places.</p> <ul style="list-style-type: none"> • Betula utalis 'Jacquemontii'. Himalayan Birch. • Liquidambar straciflua. Sweet Gum. <p>Add sentence to end of para 3.6.24 to read: 'Appropriate species include...' followed by existing list of species in green box after para 3.6.26.</p>
		The Design Guide should add further details under	Accepted.	Amend para 4.14.1 to

13.1		<p>section 4.14 ('Outdoor space') regarding retaining trees within gardens and the need to provide greater space. Garden lengths should allow space for existing mature trees.</p>		<p>include additional text stating: 'Where gardens include existing mature trees, gardens will need to be larger to provide space for trees.'</p>
13.2	<p>Louise Izod (Public Arts Projects Officer)</p>	<p>Disappointed that public art is mentioned only once in the hard landscaping section (3.4.17). Public art offers far more than just hard landscaping and can help address many of the other aspirations in the guide.</p> <p>3.4.2 <i>Good quality public realm which is attractive, inviting, safe and well maintained.</i> Public art can make these spaces unique and create identity adding to well being and the quality of the development. It can support the development of identity and sense of place.</p>	<p>Noted.</p>	<p>No change.</p>
13.3			<p>Accepted.</p>	<p>Include new para after 3.4.22 to read: 'Public Art can add to local identity and sense of place, and aid wayfinding. Opportunities for art to be incorporated into the streetscape through bespoke design of street furniture (such as seats, railings or other elements) should be taken. It should be specifically designed as part of the development. Developers should discuss their proposals with the Council's Public Arts Projects Officer at an early stage in the design process.'</p>
		<p>3.4.3 <i>Landscape quality and management of public</i></p>	<p>Developers should consider</p>	<p>See above.</p>

		spaces... <i>designed in at early master plan stage.</i> We would advocate that an artist be part of a design team and contribute to master planning and design codes to consider at the earliest stage the opportunities and impact public art can have on the development and for it to be integrated within the overall concept of the place.	public art at an early stage in the design process. The specific details should be addressed at this stage.	
13.4		3.4.5 <i>local ownership built into the delivery and management of open space.</i> Public art projects engage people in the process and this can assist in local ownership of both the artwork and space that it inhabits, thus supporting this ambition.	The value of public art is noted. It is accepted that additional text on the subject should be included in the design guide.	No change.
13.5		Page 31 – good landscape design can help create legibility create focal points and reference points. Public art can offer strong support to this with bespoke features that aid wayfinding and create landmarks.	Accepted that public art can help with wayfinding.	See above.
13.6		3.10 Landmarks, vistas and focal points – I would like to see reference to the role public art can have in creating focal points, highlighting vistas and providing landmarks and contributing to meeting this aspiration.	Accepted.	Include new sentence at start of para 3.10.1 to read: 'Key focal points and gateways can be marked by buildings, public art or distinctive landscaping.'
14.1	Jeremy Beake Corporate Equalities & Diversity Officer	I am concerned that upon reading the New Residential Development Design Guide: SPD that it seems to be weak on the need for accessibility for people with a disability and how we are using the Design by Inclusion principles. This is a fundamental piece that is missing from the SPD. Our legal duty under Section 149 of the Equality Act is to consider, amongst other things, how we are removing the barriers and advancing equality	Accepted.	Include new text (see below).

14.2		<p>of opportunity. I think this is a great opportunity to influence this</p> <p>Could I suggest that, like you have done for Community Safety, that you include a section on Accessibility in sections 3 and 4, I am willing to help you write these brief sections.</p>	Accepted.	<p>Include new text to read: '3.4 A Place that is Accessible for All</p> <p>3.4.1 The CAGE publication "The Principles of Inclusive Design" contains guidance that will make a place more accessible for all, and in particular, for the elderly, people with a disability and families with small children.</p> <p>3.4.2 The following principles, based on the CAGE guidance, represent good practice and will help in the development of an accessible neighbourhood:</p> <p>Involving people in design</p>
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				<p>of neighbourhoods - community organisations like the Centre for Integrated Living in Milton Keynes can help ensure the participation of people from the disability community and the older residents (contact details: www.mkweb.co.uk/mk_disability/).</p> <p>Places without barriers - making Milton Keynes barrier free for the elderly, people with a disability and families with small children reduces the barriers for everyone.</p> <p>Make reasonable adjustments - in particular considering the multi-users of environments; including motorised-wheelchair users, the needs of those with a sensory disability in</p>
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				<p>signage, the need for dropped kerbs and lighting.</p> <p>4.4 Creating designs that are Accessible for All</p> <p>4.4.1 Detailed designs should allow a place to be accessible for all: and in particular, for the elderly, people with a disability and families with small children.</p> <p>4.4.2 Developments should ensure a barrier-free path for the safety and independence of disabled people, especially the sightless. Avoid placing obstacles in designs, including:</p> <ul style="list-style-type: none">• Obstacles and protruding elements in the
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				<p>path of travel.</p> <ul style="list-style-type: none">• Low overhanging signs and foliage.• Lack of warning signs around obstructions <p>4.4.3 Accessible amenities should be designed that are convenient to all people, without obstructing the free passage of pedestrians along travel routes. Plans must consider including all reasonable adjustments that make it easier for people to use the environment and avoid practical problems due to:</p> <ul style="list-style-type: none">• Lack of or improper design of street furniture.• Obstructed pathways.• Inaccessible street facilities and signs
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				<p>4.4.4 Pathways and redways should be clear, obstruction-free, level and wide for the convenience of all users, especially the sightless and people with mobility problems. They should avoid:</p> <ul style="list-style-type: none">• Changes in level and uneven curbs with obstacles.• Inconvenient or dangerous interruptions in the path of travel.• Insufficient width for all users, considering the mixture of pedestrians, cycles, disability vehicles and wheel chairs. <p>4.4.5 Accessible parking facilities should be provided as close as possible to the point of</p>
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14.3		<p>Could I suggest that you look at the following issues and consider including them. These will strengthen the details we include in the guidance.</p> <p>1. OBSTRUCTIONS</p> <p>a. PROBLEM IDENTIFICATION</p> <ul style="list-style-type: none"> • Obstacles and protruding elements in the path of travel. • Low overhanging signs and foliage. • Lack of warning signs around obstructions. <p>b. PLANNING PRINCIPLE</p> <p>To design a barrier-free path for the safety and independence of disabled people, especially the sightless.</p> <p>2. STREET FURNITURE</p> <p>a. PROBLEM IDENTIFICATION</p>	Noted.	<p>destination. In particular they should consider the different users of environments, which include motorised wheel chairs, the needs of those with a sensory disability in signage, and the need for dropped kerbs and lighting.'</p> <p>New text included (see above).</p>
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		<ul style="list-style-type: none"> • Lack of or improper design of street furniture. • Obstructed pathways. • Inaccessible street facilities. <p>b. PLANNING PRINCIPLE To design accessible amenities convenient to all people, without obstructing the free passage of pedestrians along travel routes.</p> <p>3. PATHWAYS & REDWAYS</p> <p>a. PROBLEM IDENTIFICATION</p> <ul style="list-style-type: none"> • Uneven curbs with obstacles. • Inconvenient or dangerous interruptions in the path of travel. • Insufficient width for all users. • Changes in level. • The mixture of pedestrians, cycles and disability vehicles and wheel chairs on Redways <p>b. PLANNING PRINCIPLE To provide clear, obstruction-free, level and wide pathways for the convenience of all users, especially the sightless and people with mobility problems.</p> <p>4. PARKING</p> <p>a. PROBLEM IDENTIFICATION</p> <ul style="list-style-type: none"> • Poor parking facilities. 		
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15.1	Gill King Waste	<ul style="list-style-type: none"> • Insufficient width of the parking aisle. • No allocation of parking space for the disabled. <p>b. PLANNING PRINCIPLE To provide accessible parking facilities as close as possible to the point of destination.</p> <p>Three other areas that you could consider are Signage, Crossings and Curb Ramps. There are possibly more areas you could consider, however in my experience these are the most common urban design complaints from people with disabilities.</p>		
15.2		<p>Amend para 4.15.2 to read: The Council currently operates a system of black sacks for refuse, pink sacks for dry recyclables, a blue box for glass and a green wheeled bin for food and garden waste, together with a 5 litre caddy for use in the kitchen to collect food waste for the green wheeled bin, and a small clear plastic bag for battery recycling. All new developments should be designed to cater for this arrangement of waste containers. More information can be found at www.milton-keynes.gov.uk/recycling</p>	<p>Accepted on the whole. However, it is not considered necessary for the Design Guide to provide the level of detail suggested.</p>	<p>Amend para 4.15.2 to read: 'The Council currently operates a system of sacks for dry recyclables and refuse, a blue box for glass and a green wheeled bin for food and garden waste. All new developments should be designed to cater for this arrangement of waste containers. More information can be found at www.milton-keynes.gov.uk/recycling'</p> <p>Amend para 4.15.3 to read:</p>
		<p>Amend para 4.15.3 to read: Residents are required to bring their refuse and</p>	<p>Accepted.</p>	

15.3		<p>recycling containers to their front property boundary, and the design of houses should help to facilitate this. There should be adequate space to place the containers within the property's boundary - residents should not place their containers on the street. If containers are not stored at the front permanently, there should be secure independent access to the front of the property from the rear garden or other storage place. A minimum of 1.75 sq m external space is required to accommodate the variety of waste containers needed by each property.</p>		<p>'Residents are required to bring their refuse and recycling containers to their front property boundary, and the design of houses should help to facilitate this. There should be adequate space to place the containers within the property's boundary - residents should not place their containers on the street. If containers are not stored at the front permanently, there should be secure independent access to the front of the property from the rear garden or other storage place. A minimum of 1.75 sq m external space is required to accommodate the variety of waste containers needed by each property.'</p>
		<p>Amend para 4.15.4 to read: Flats, housing in multiple occupation and sheltered housing normally have some kind of communal refuse area. It is important that adequate refuse and recycling space is provided for the number of properties. The refuse area should be secure and unobtrusive to prevent vandalism and fire risks and</p>	<p>Accepted, in part. However, it is not considered necessary for the Design Guide to provide the level of detail suggested.</p>	<p>Amend para 4.15.4 to read: 'Flats, housing in multiple occupation and sheltered housing normally have some kind of communal refuse area. It is important</p>

		<p>be readily accessible from a road. Areas should be designed for the wheeled bins to be pushed or pulled easily to the edge of the public highway. Bin storage areas can form a significant fire risk and therefore fire resistant separation should be provided between any bin storage area, accommodation and doors to accommodation or dwellings. Ventilation in particular should be carefully considered in relation to bin storage so that it meets environmental and fire safety requirements without impacting upon the potential convenience of the facility.</p> <p>Guidelines on the storage space provision are:</p> <p>Storage space should be allowed for</p> <ul style="list-style-type: none"> 0.75 black sacks per bedroom 1 pink recycling sack per bedroom 1 blue recycling box per 3 bedrooms 1 x 140 litre green bin for food waste per 6 bedrooms. If there is a garden, garden waste can also be included in the green bin, and a 240 litre bin provided. <p>On occupation, the following must be obtained from the Council:</p> <ul style="list-style-type: none"> Enough black sacks to supply 0.75/week/bedroom Enough pink sacks to supply 1/week/bedroom 1 blue box per 3 bedrooms 1x140 litre green bin per 6 bedrooms or 1 x 240 litre green bin if garden waste is to be included 	<p>that adequate refuse and recycling space is provided for the number of properties. The refuse area should be secure and unobtrusive to prevent vandalism and fire risks and be readily accessible from a road. Areas should be designed for the wheeled bins to be pushed or pulled easily to the edge of the public highway. This allows entrances to these areas to be of narrower, less dominating width (rather than wider to allow bin lorries to enter parking courts).'</p>
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15.4		<p>1 food waste caddy should be supplied for each bedroom. 1 battery bag should be supplied per bedroom</p> <p>Wheeled bins can be supplied in larger developments; this should be discussed on an individual basis with the Council's Waste Manager. Landlords should place a poster in their premises about waste management and supply each new resident with an information pack containing the latest information about waste management on their premises. Both of these can be obtained from the waste service.</p>	Accepted.	
15.5		<p>Residents in (both houses and flats) are likely to use the Council's bulky collection service for the removal of bulky waste (e.g. sofas, beds etc) from their property. Consideration should be given as to where residents may place these items outside for up to 10 days for collection; collectors do not enter properties.</p>		<p>Insert new para after 4.15.5 to read: 'Residents may need to use the Council's bulky collection service. Consideration should be given to providing space for residents to leave bulky items for collection.'</p>
16.1	Peter Goff Neighbourhood Management	<p>Many studies and organisations that indicate that one of the main benefits of green space is physical and mental health. Whilst mention is made of biodiversity, health receives no recognition. Why not make development subject to Health Impact Assessment (HIA), supporting establishment of a place for green space in the Joint Strategic Needs Assessments (JSNA).</p>	Para 3.4.2 acknowledges that 'open space in all its forms has a major influence on the well being of the whole community'.	No change.
16.2		<p>Compared with the average sizes of homes in Europe the UK fares badly (76 sq m in England &</p>	The decision whether or not to prepare a SPD on	No change.

		Wales compared with 115 sq m in Netherlands). Set minimum standards for space as they are a prerequisite for an inclusive home.	residential space standards is a separate matter to be considered outside the Design Guide consultation process.	
17.1	Simpson and Ashland Parish Council	Welcomes MKC's Draft New Residential Design Guide and appreciates its breadth and depth.	Noted.	No change.
17.2		Concurs with the points covered in the discussion points captured at the presentation given to parish councillors by Neil Sainsbury (Head of UDLA) on 18 January 2012.	Noted.	No change.
17.3		The Design Guide should require that developers use qualified architects/landscape architects/urban designers.	It would not be possible to enforce a requirement for professionally (RIBA or equivalent) qualified architects to be employed on major developments.	No change.
17.4		Design quality assurance should be strengthened. A stronger pre-application procedure required which includes a local design review panel.	Discussions have taken place regarding the establishment of a local design review panel. However, it is not possible to give a commitment to the establishment of one within the Design Guide.	No change.
17.5		The Design Guide should cover the provision of allotments and community growing spaces in public spaces (e.g. planting spaces and the use of fruit trees instead of ornamental species).	Accepted.	Include additional bullet point on page 32 to read: 'Consideration should be given to incorporating community food growing

17.6		MKC should take account of parishes' comments on planning applications.	Any comments received from the Parish Council are considered and taken into account by planning officers in making a recommendation on a planning application.	opportunities as part of public open space, e.g. allotments, community gardens/orchards, planting fruit trees.'
17.7		The Residential Design Guide and the Highways Design Guide should be better co-ordinated.	The Design Guide has been prepared in consultation with the Highways Department. The Highway Design Guide will be consulted on in April.	No change.
17.8		The Design Guide should cover street furniture, TV aerials/satellite dishes etc and aim both to avoid and to reduce street clutter.	Para 3.4.18 states that street furniture should not result in street clutter. Whilst it is accepted that satellite dishes have an impact on the quality of the public realm, their provision is covered by permitted development rights. It is therefore not proposed to include guidance on this subject.	Amend para 3.4.18 first sentence to read: 'Street furniture, road markings and signs should not over-dominate spaces or result in visual clutter and be integrated into the overall appearance of the street.'
17.9		Guidelines are needed for house extensions and householder developments to ensure that original design concept is not lost although it is also noted that many changes to building are permitted	The Council has published separate guidance on house extensions. As noted many householder developments	No change.

		development.	and changes to buildings are permitted development.	
17.10		Developers should be required to discuss proposals with parishes/town councils. This includes small infill development. The speed with which planning application need to be processed means that such discussion should take place before planning permission is sought. That discussion has taken place, and outcomes, should be taken into account when a planning application is considered.	Para 5.3.1 of the Design Guide encourages developers to follow good practice and carry out pre-application consultations with the local community. However, the planning regulations do not allow the Council to require that this to be done.	No change.
17.11		The Design Guide needs to cover design considerations where existing villages are incorporated in new development areas.	There are no key sites in proximity to villages within the city of MK.	No change.
17.12		Provision of facilities in developments apparently too small to warrant them, e.g. Ashland, should be considered in residential design. In some situations a relatively small development may be left without facilities that need to be nearby, e.g. a meeting place, rather than in a neighbouring area or parish and across a grid road.	Standards for meeting places are set out in Local Plan policy C3 and the Council's SPG on Planning Obligations for Leisure, Recreation and Sport Facilities. It is not possible to require their provision in small developments.	No change.
18.1	Shenley Church End Parish Council	It is important for community space such as play areas to be provided. The provision of 106 agreements and guidelines for allotments, meeting places, play areas etc. do not ensure that at a detailed level these facilities are planned in and space is allocated. e.g. Oakhill. If there is no space allocated then provision cannot be made even if funding is available.	The requirement for open space is established through Local Plan policy L3 and the SPG on Planning Obligations for Leisure, Recreation and Sport Facilities.	No change.

18.2		<p>Smaller scale play provision should be mentioned. Especially in higher density locations with large amounts of on street parking there should be areas of open play space, if all play space is exclusively provided in large play areas or playing fields then large number of residents will be discouraged from using the facility. E.g. would you let your 10 year old child go to another grid square to kick a ball about?</p>	<p>The requirement for open space is established through Local Plan policy L3 and the SPG on Planning Obligations for Leisure, Recreation and Sport Facilities.</p>	No change.
18.3		<p>Agree with the consensus that rear parking bays should be avoided at all costs. Suggest more inventive parking solutions such as the provision of basements to give greater density and allowing more surface parking without increasing the overall height of the buildings.</p>	<p>Point regarding rear parking courts is noted. Basements are not generally considered to be a viable option.</p>	No change.
18.4		<p>Garages are listed as not being counted for parking purposes. Suggest that garages could be replaced with smaller outdoors storage space e.g. garden stores, more secure than a shed, capable of storing bikes and the usual garage contents but using less space. This addresses density, storage for recycling and bins as well as other usual uses for garages such as workshops etc. in a smaller footprint.</p>	<p>Noted. Whilst this may be a sensible idea, it is not something which the Design Guide needs to be prescriptive on.</p>	No change.
18.5		<p>Milton Keynes has a uniform feel due to its street furniture. The MK benches, street lights, street signs etc are all give a sense of place. To an outsider these may seem out of place in an old village location such as Shenley Church End, but they are part of what makes Milton Keynes distinctive. Milton Keynes should retain its trade mark street furniture in new estates and ensure</p>	<p>Noted. The selection of street furniture is not something which the Design Guide needs to be prescriptive on. Different solutions may be appropriate for different locations, particularly as the Design</p>	No change.

		that when they reach their end of life they are replaced with the same or similar designs.	Guide is applicable throughout the Council's administrative area.	
18.6		Sight lines are geometric placement of street furniture gives many part of MK an uncluttered feel. New estates should be design with the same care as the original estates to ensure sight lines of key building such as churches are preserved, and street furniture is laid out in a thoughtful way e.g. CMK street lighting layout.	Para 3.4.18 states that 'street furniture should not over-dominate spaces or result in visual clutter and be integrated into the overall appearance of the street.'	No change.
18.7		The residential design guide points to the mixing of commercial and residential. This might be appropriate depending on the details of each application but the commercial buildings should adhere to the guidelines and be in keeping with the nearby residential buildings. Commercial should not mean exempt.	Any new commercial buildings should respect the existing context.	No change.
18.8		Smaller community gardens could be built in to the design of new estates in addition to allotment provision.	Accepted.	Include additional bullet point on page 32 to read: 'Consideration should be given to incorporating community food growing opportunities as part of public open space, e.g. allotments, community gardens/orchards, planting fruit trees.'
18.9		A diagram of the local centre concept would be useful rather than purely a description as at present.	Accepted.	Include diagram illustrating design principles for local centres.
18.10		Echo the consensus that employing a professionally (RIBA or equivalent) qualified	It would not be possible to enforce a requirement for	No change.

		architect should be a requirement for any major development e.g. more than 10 houses.	professionally (RIBA or equivalent) qualified architects to be employed on major developments.	
18.11		The maintenance of the built environment should be explicitly mentioned. The section of maintainability is written from a public open space materials and planting perspective. We should include the maintainability of the buildings as well. Difficult to maintain features such as rooftop doves, clock towers with no maintenance access, wooden window frames that are not accessible should be prohibited.	Whilst it is accepted that buildings should be capable of maintaining, it is not a matter which the planning system can control.	No change.
18.12		Although out of scope, express general support for the concept of grid roads, and the focus on the design concepts that made MK a great place to live such as Redways, linear parks and a designed environment.	Noted.	No change.
18.13		Roof top aerials and satellite dishes should be minimised though the provision of a single dish/aerial in flats or cable where possible. This should be made explicit in the guidelines.	Whilst it is accepted that satellite dishes have an impact on the quality of the public realm, there provision is covered by permitted development rights. It is therefore not proposed to include guidance on this subject.	No change.
19.1	Campbell Park Parish Council	No comment.	Noted.	No change.
20.1	Bletchley & Fenny Stratford	Supports the Design Guide.	Noted.	No change.

21.1	Town Council Emberton Parish Council	Although there is a presumption that householders will not all afford to be a two car family for at least a few years, there should still be adequate parking provision for the future. There is a lack of parking facilities in towns and villages now and the same could happen in the future.	Any changes to the adopted 2009 parking standards need to be based on robust evidence. A review of current parking standards is to be undertaken. The Design Guide should include the current adopted 2009 standards as an appendix.	Delete paras 3.9.1-3.9.10, tables 1 & 2 and parking standards zone maps. Include extract from Addendum to Parking Standards (adopted 2009) in appendix. Amend para 3.9.11 to read: 'The Council's requirements for parking for residential development are provided by the Addendum to Parking Standards adopted in 2009. An extract from the Addendum is included at Appendix F. The parking standards for Houses in Multiple Occupation (HiMO) are contained within the HiMO SPD. Please note the following points in addition to the information set out in Appendix F.'
22.1	Wolverton and Greenleys Town Council	Where dwellings are along roads with heavy traffic they should be set back to reflect the need to reduce noise nuisance as well as other means being taken to mitigate noise such as triple glazing and landscaping.	Heavy traffic should only be found along the grid roads, where there will be a significant landscape buffer between housing and the	No change.

				road. Para 3.6.34 states that on avenues/boulevards – the primary residential street type – dwellings should be set back a minimum of 3 metres from the footpath.	
23.1	Stony Stratford Town Council		Congratulations on the guide and particularly the way that architecture is embraced in the guide.	Noted.	No change.
23.2			Need to emphasise that the street realm is easily maintainable. It is all well and good producing an attractive streetscape when development is completed. This attractiveness needs to be maintained through the life of a development and can only be achieved by an ease of maintenance.	Para 3.4.19 states that materials and street furniture should require only simple maintenance.	No change.
24.1	Kents Hill and Monkston Parish Council		No comments.	Noted.	No change.
25.1	Woburn Sands & District Society		We have considered the above document carefully and broadly support the contents, and the lessons learned from the poor development of the last 15 years.	Noted.	No change.
25.2			There has been much research on the importance of the natural world i.e. growing, living flora and fauna on wellbeing. We consider that in any development of whatever type there should be, within eyesight, from the living area, some type of green infrastructure, particularly for those properties without gardens. All residents should be able to see from the living area trees or green planting. Research has clearly shown the effect on mood and indeed health of dwellings where the only aspect is onto brick and concrete, with	Para 3.4.2 acknowledges that 'open space in all its forms has a major influence on the well being of the whole community'.	No change.

25.3		<p>resultant social problems. Therefore we of the view that this should be a minimum requirement in any development. There should be no dwelling in any new development, where the only aspect from the main living area is of brick and concrete.</p> <p>We are becoming increasingly concerned about the reduction of flexible living space within the new builds of the last 50 years. Room size, including door size, has reduced by about one third, over the last 50 years, as developers have increased room numbers, without increasing land footprint, in order to maximize profit. This has led to increased constraints of the ability of a dwelling to meet the evolving requirements of residents – having children, disabled living and aging, particularly as was found by the audit committee, that many homes do not comply with building code. We cannot find anything in the design guide that emphasizes the importance of internal design to meet residents changing needs over time. No doubt developers, in these days of built in obsolescence, expect residents' to move, however it is the function of the Design Guide to set out the minimum requirements of any development.</p>	<p>Section 4.2 of the Design Guide covers the subject of 'flexible homes'. Section 4.3 covers the subject of 'residential space standards'. The decision whether or not to prepare a SPD on residential space standards is a separate matter to be considered outside the Design Guide consultation process.</p>	<p>No change.</p>
25.4		<p>We cannot find in this design guide any reference to the importance of natural light in dwellings, and the importance that any new build should, as a minimum requirement, be designed to maximize the amount of natural light/sunlight available, particularly in the living area. No amount of magnolia painting and beige carpets will make a dark room light, just less dark. We have considered</p>	<p>Accept.</p>	<p>Include section on 'residential amenity' after section 4.10 which brings together issues such as privacy, natural light, space standards. Include new para under heading 'natural light' to read:</p>

26.1	HCA	<p>some of the new builds over the last 20 years, and many due to their cramped, and indeed high construction in some cases, severely restrict the amount of natural light inside the dwelling. Again there has been much research on the importance of natural light on wellbeing and health, and this, along with the two points previously mentioned should be made basic requirements of this design guide.</p>	<p>Accepted.</p>	<p>'Developers should ensure that key rooms within new dwellings and outdoor spaces have sufficient daylight to allow their comfortable use. As well as providing for the amenity of residents the provision of buildings and dwellings with good quality natural light allows opportunities for passive solar gain.'</p>
		<p>3.5 <u>Layout for Passive Solar Gain Capture</u></p> <p>This chapter currently recommends a number of things that are generally bad from an urban design perspective. This should be omitted to avoid negative effects on place-making.</p> <p>While solar gain could be increased by the position of the houses, it is more dependent on the design of the house, for instance on the size of the windows, rather than their orientation. While solar gain may be useful on sunny winter days, it can lead to overheating on warm summer days. Any houses on the northern side of an east-west street will have back gardens that will be in the shade for the majority of the time. Placing these houses further from the street to create large front</p>		<p>Delete paras 3.5.8-3.5.10, and illustration on page 39.</p>

		<p>gardens with sunshine is bad for the street. These gardens will either not be used due to lack of privacy, or if privacy is created this means that there is no connection between the houses and the streets, leading to an unattractive and potentially unsafe environment. Overly large front gardens are likely to be used for parking and reduce the enclosure of the street.</p> <p>On north-south streets all back gardens can receive sunshine most of the day.</p> <p>Most developments are relatively restricted in their layouts due to their context, neighbouring buildings, existing streets and needs for certain connections, etc. Legibility and street frontage is more important than any solar gain.</p> <p>Arranging homes along short cul-de-sacs rather than providing continuous building frontage along north-south routes will create poor places. It is unclear what "Placing larger detached houses one plot deep along the street" means, but this could provide similar problems.</p> <p>"Skewing the plots in relation to the street or skewing the houses within the plots" will lead to very unattractive streets with broken building lines and blank side gables being prominently exposed to the street.</p> <p>Using shadow as an argument as to where on a site certain building types and masses should be located is likely to result in a very poor environment. The streetscape, street hierarchy,</p>		
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26.2		<p>and existing context should determine massing.</p> <p>The layout shown on p.38 is of very poor urban design quality, not least because of the lack of permeability due to cul-de-sacs, but also with lack of supervision of pedestrian routes, poor left-over public space and staggered building lines. There is a high risk of this paragraph being used to defend poorly designed layouts. It detracts from and contradicts other good design principles promoted in the document.</p> <p>4.10 <u>Turning corners</u></p> <p>It is good to have this paragraph in order to minimise inactive frontage to the streets, however the text and images can be improved to make this clearer, and actually reach this goal.</p> <p>Paragraph 4.10.3 might simply state that gable ends and garden fences should be kept to a minimum and replaced by corner types that fully turn the corner, for instance the apartments or I-shaped buildings mentioned.</p> <p>The 'convex-shaped' buildings that seem to be discouraged on p.92 are actually ideal to turn the corners without any gables or garden fences to the street. This is in my view more important than the shape of the back garden, which actually become much larger and more usable if parking is provided next to the properties as is shown on the other</p>		
			<p>Not accepted. It is considered that the text within para 4.10.3 provides a specific solution to the problem of inactive frontages at corners.</p> <p>Accepted.</p>	<p>Delete illustrations of concave and convex corner buildings on page 92.</p> <p>Amend diagrams showing detached corner houses, to provide a smaller gap between dwellings in the bottom example.</p>

27.1	Parks Trust	<p>examples.</p> <p>In contrast, the ‘concave-shaped’ development promoted here actually makes the situation worse. It creates two sets of gables and back garden fences to the streets, rather than one. The public space in front of it may end up a bit of an unused space and management burden.</p> <p>The image of the detached corner houses actually shows a wider gap between the houses with the option that is promoted, than with the one that is discouraged. Other parking options such as on-street, in front of the house or in small rear courts should not be dismissed so easily, to accommodate sufficient parking for terraced housing or slightly higher densities.</p>	<p>It is accepted that the image of the detached corner houses shows a wider gap between the houses with the option that is promoted, than with the one that is discouraged. However, this can be addressed through amending the diagrams.</p>	
		<p>Paragraphs 3.4.10 and 3.4.11:</p> <p>These paragraphs cite the Milton Keynes Green Infrastructure Plan (Feb 2008) and the Open Space Strategy as relevant documents to draw upon in order to understand the Milton Keynes biodiversity context and landscape infrastructure. However there is a need for specific guidance to be drawn up to explain and advise on detailed landscaping principles and design used in Milton Keynes, to ensure that new residential, commercial and other areas seamlessly blend into the existing landscape context. This guidance is currently lacking but it would not be appropriate for</p>	<p>Noted. Whilst in principle it may be a good idea, a commitment cannot be given here to preparing a complementary SPD on Milton Keynes Landscape Design principles.</p>	No change.

27.2		<p>the New Residential Development Design SPD to contain this detail - instead a commitment should be given here to preparing a complementary SPD on Milton Keynes Landscape Design principles in liaison with the Parks Trust.</p> <p>Paragraph 3.4.26 and Appendix F (Design and Access Statement Guidance Note, "Pre-application Discussions and Negotiations):</p> <p>It would be helpful if this SPD could refer to the significant role that The Parks Trust plays in the management and maintenance of open space in the city, including the strategic open space network of the linear parks and landscaping along Transportation Corridors. This point is particularly relevant to those developing new residential areas adjacent to these existing areas, as they should be liaising with the Parks Trust to ensure that their proposals do not unacceptably impact on existing landscaped areas, by causing damage to the existing landscape or creating future maintenance difficulties for the Trust. As presently drafted, those reading the SPD could be unaware of the role the Trust plays and the need to liaise with it. This lack of awareness is a current and reoccurring problem for the Trust.</p>	Accepted.	
28.1	John Oldfield (Bedford Group of Drainage)	Pleased that the Design Guide mentions flood attenuation in the Exec Summary and gives some clear over-arching principles in section 3.4.27-	Noted.	<p>Include new para after para 3.4.12 to read: 'The Parks Trust plays an important role in the management and maintenance of open space in the city, including the strategic open space network of the linear parks and landscaping along Transportation Corridors. When developing adjacent to these existing areas, developers should liaise with the Parks Trust to ensure that their proposals do not unacceptably impact on existing landscaped areas, by causing damage to the existing landscape or creating future maintenance difficulties for the Trust.'</p> <p>No change.</p>

28.2	Boards)	3.4.32 about strategic integrated and maintainable SUDS. In November last year BS8533 the Code of Practice for Assessing Flood Risk in Development came out. This may replace PPS25, so it would be worth referring to both BS and PPS.	Accepted.	Amend para 3.4.32 first three bullet points to read:’ <ul style="list-style-type: none"> • Flood and Water Management Act 2010 • National Planning Policy Framework (2012) • Milton Keynes Drainage Strategy – development and Flood Risk SPG (2004)’ and insert new bullet point to read: BS8533: Code of Practice for Assessing Flood Risk in Development (2011)’
28.3		There is a typo in green box under 3.4.32, as we should be the “Bedford Group of IDBs”	Accepted.	Amend para 3.4.32 fourth bullet point to read: ‘Best practice examples from DEFRA, EA, CIRIA, Bedford Group of IDBs’.
29.1	Natural England	SPD is not detailed enough to give clear guidance to developers and planners on how biodiversity policies are to be adopted.	It is accepted that further guidance could be provided on the subject of biodiversity to provide greater emphasis of its importance.	Include new paras under heading ‘Biodiversity’ after para 3.4.12 to read: “The design and layout of new residential development should protect and enhance biodiversity on the site, and enhance connections between

				<p>ecological features within and across the site. Existing areas and features of biodiversity value should be incorporated into the design and layout and wherever possible enhanced.</p> <p>Biodiversity features which might be incorporated in the design and layout of new developments could include:</p> <ul style="list-style-type: none">(1) Sustainable Urban Drainage Systems (SUDS);(2) Green roofs and green walls;(3) new pond and other water features;(4) a varied structure of wildlife friendly trees, shrubs and flower rich meadows;(5) bat or bird boxes and crevices." <p>A biodiversity report will be required for all applications to create 5 or more</p>
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				<p>dwellings, or where there is evidence of a protected species or a strong likelihood of a protected species being present. The report should include:</p> <p>(1) a desk study of the site and surrounding area to identify designated wildlife sites, statutory or non-statutory (Local Plan policy NE1); (2) on-site surveys to record habitats and identify protected or priority species (Policy NE2); (3) impact assessment and mitigation (Policies NE1, NE2); (4) proposals for overall biodiversity enhancement (Policy NE3).'</p>
29.2		<p>Good example of Residential Design Guide is that of Exeter City, which provides an appropriate level of guidance in relation to biodiversity.</p>	<p>Noted.</p>	<p>See proposed change above.</p>
29.3		<p>Note there is scope to include reference to biodiversity (in particular tree planting) in the sections on highways (4.5) especially in the context of improving attractiveness and slowing traffic, and outside spaces (4.14). It may be appropriate to require a fruit tree to be planted in some or all gardens (potentially achieving a number of sustainability benefits).</p>	<p>It is considered that sufficient reference to tree planting within streets is provided within the document, e.g para 3.4.9 and 3.6.23-3.6.26.</p> <p>Accepted that tree planting, particularly fruit trees, within</p>	<p>Include new sentence at end of second bullet point on page 32 to read: 'Consideration should be given to including domestic fruit trees or other appropriately sized trees within rear gardens.'</p>

			rear gardens has biodiversity benefits.	
29.4		May wish to consider the principles outlined in Biodiversity by Design: A Guide for Sustainable Communities.	Noted. It is considered that sufficient guidance on biodiversity is provided in the SPD.	No change.
30.1	Alan Francis (Green Party)	The Design Guide should specify a more permeable layout for pedestrians and cyclists. This is stated as a Design principle in 3.1 but not reflected in the detailed specification such as in 3.6.11.	Para 3.6.11 promotes a perimeter block form which ensures that layouts are permeable.	No change.
30.2		The routes for pedestrians and cyclists from their homes to facilities such as shops, schools, surgeries, bus stops, etc should be as short as possible. The shorter the route the more likely that travel will be a sustainable mode of transport, walking and cycling in this context, rather than by car. This means that walking and cycling routes should be as direct as possible and pedestrians and cyclists should not be forced to make long detours.	Para 3.6.8 states that 'walk distances to schools, shops and open space should therefore be minimised, through these routes being as direct as possible, legible and matching desire lines.'	No change.
30.3		The Design Guide gives too much weight to overlooking by housing, 3.6.11. Overlooking sounds desirable in theory but is of little benefit in practice and may even be counterproductive. Pedestrians are likely to be most vulnerable to crime after dark. At those times there will be no overlooking because the curtains will be drawn on the windows of any nearby houses that overlook the footpaths/Redways, meaning that in practice there is no overlooking.	Disagree. Surveillance of the public realm is an important urban design and community safety principle. Rather than ignoring this principle, the Design Guide should encourage design solutions that promote pedestrian movement along well surveilled routes.	Revised cul-de-sac text para 3.6.44 4 th bullet: 'As a <u>general</u> rule there should be no segregated footpaths emerging from culs-de-sac.....' 5 th bullet: 'Where footpaths off cul-de-sacs are deemed acceptable, or where appropriate are to

		<p>So pedestrians get little benefit from the overlooking criterion. However they get a huge disbenefit because it prevents more direct and thus shorter paths being built. In fact it may actually increase the potential for harm because if pedestrians are forced to walk further their journey will take longer and they will be exposed to potential harm for longer.</p> <p>We would argue that the Design Guide should encourage footpath links from the ends of cul-de-sacs.</p>		<p>be encouraged, is when it creates a shorter route to a destination by foot/cycle than by car. In this event it is critical that the public space that the footpath passes through is designed into the overall layout of the development such that it feels safe and resembles an unambiguous public route that is short, straight/direct and overlooked by housing.'</p> <p>Replace 6th bullet with: 'Where the footpath link off the cul-de-sac provides access to a local centre, school or other community facility, the cul-de-sac should have a footway on at least one side of the street.'</p>
30.4		<p>Focussing now on walking to bus stops, MKC policy is that all houses must be no more than 400m from a bus stop. This is interpreted as the crow flies.</p> <p>However govt guidance (see below) says: In residential areas bus stops should be located</p>	Accepted.	<p>Include section on bus stops to read: 'All houses within a new development should be located no more than 400m from a bus stop. Bus stops should be easily accessed on foot.'</p>

	<p>ideally so that nobody in the neighbourhood is required to walk more than 400 metres from their home.</p> <p>Now walking distance and direct distance can be very different, with walking distance 2 or 3 times the direct distance. Take, for example, a street that is served by 300 bus service that I picked almost at random. The cul-de-sac at the northern end of Lindores Croft, Monkston. That is about 200m from the bus stop on V11 almost opposite Chippenham Drive. However to walk to it involves a journey of about 600m, via Lanercost Cres and the Redway that runs parallel to Lindisfarne Drive. So houses in that street comply with MK guidance, within 400m as crow flies, but do not comply with govt guidance, within 400m walking distance. Walking distance is 3 times direct distance.</p> <p>There is a Redway alongside V11 that could be used to access the bus stop but it is separated from the cul de sac by a fence, a strip of grass and a tree belt. A link path should have been built. There are dozens of streets all over the city with similar issues. This should not be replicated in Design Guide.</p> <p>Now obviously the closer someone is to the bus stop the more likely they are to be willing to walk to the bus stop and hence use public transport. I've been trying to find some data on the relationship between willingness to use the bus and distance from home to bus stop. If we assume that 100%</p>		<p>Pedestrian routes to bus stops should be direct and well-surveilled.</p> <p>Where bus stops are located on grid roads, development should be designed to ensure that pedestrian routes and bus stops are well surveilled. Layouts should be designed with housing overlooking the pedestrian route and the bus stop, and grid road reserve planting reduced to maximise visibility. ' Include diagram and photos showing development/open space in proximity to bus stops on grid roads.</p>
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		<p>would use bus if it stopped at their door, ie 0 metres to bus stop. I expect that % would be about 0 for a distance of 800m. But what does the curve look like inbetween? My guess would be that it was an S curve, pretty flat to about 300m and then dropping off quite steeply to about 600m and then flattening out at the bottom. This is supported by DfT guidance – below - which states that “general use of bus services decreases if the distance is more than 250 meters.” It is MKC policy to encourage more use of buses so it should also have a policy of making the walking distance to bus stops as short as possible.</p> <p>If MK is to comply with govt guidance the new estates have to become much more permeable to pedestrians.</p>		
30.5			<p>Noted. Second design principle on page 26 states that ‘Development should be based on a permeable movement framework, which accommodates pedestrian desire lines and is connected with adjacent street networks’.</p>	No change.
30.6		<p>Redways</p> <p>We support the principle that cyclists should have priority at road crossings. However we note that this policy has not been followed on existing residential areas. Indeed barriers have been erected, both literally and metaphorically to prevent this. On Bradwell Common where Common Lane redway intersects Booker Ave and Ibstock Ave barriers were erected about 5 years ago across the</p>	<p>This is a proposal within the draft Design Guide. It is not current Council policy, and therefore has not been applied in existing residential areas. The Design Guide states that appropriate visibility should be built into redway crossings to ensure that the need for barriers is</p>	No change.

31.1	Toby Maloy	<p>Redway on both sides of both roads. The Design Guide should discourage that kind of intervention.</p> <p>Page 7 - 1.4.1 Review of design guide after 5 years. Previous design guides were issued in August 2008, then 17 months later in January 2010, now the latest draft has been issued 23 months later.</p> <p>How many new issues have really arisen in Urban Design, Architecture and Landscape to warrant such quick turnarounds? Surely the best approach would be to fully appraise and review the January 2010 guide and hold a consultation on what principles were successful and what can be done to provide better guidance in other areas.</p>	<p>designed out.</p> <p>Previous drafts are versions of the same Design Guide, which have been revised to take account of representations received from consultees.</p>	No change.
31.2		<p>Page 9 -Diagram 1.6.1. The diagram does not clearly define that the Guide is not part of the local plan and is merely "guidance".</p>	<p>The Design Guide is a Supplementary Planning Document. Paras 1.2.2 and 1.3.1 explain the status of the Design Guide.</p>	No change.
31.3		<p>Page 11 - 1.8.1 We would expect that third party Urban Designers, Landscape Architects, Planners and other professionals not used in the consultation? We would also question how was the event advertised and the architects and developers selected? Has a broad range of views been sought from the micro developer (1-10 units) to the macro?</p> <p>We feel the workshops should've included Housing Associations and residents of Milton Keynes to get a fuller picture of the current situation and how to improve it.</p>	<p>The workshop was a focussed event bringing together representatives involved in housing development from the public and private sector.</p>	No change.
31.4		<p>Page 11 - 1.8.2 The table shown below only</p>	<p>As acknowledged, these are</p>	No change.

31.5		<p>contains very high level principles which are far less prescriptive than those shown in the Design Guide. For example did the conclusion stated: "Management of Parking Levels" really mean no tandem parking?</p>	<p>high level design principles. The detailed guidance within the document has been developed in the light of these principles. It is now proposed to allow tandem parking in certain circumstances.</p>	
		<p>Page 64 -Table is very prescriptive and would create a very car dominated street scene or very spread out houses. We are concerned that the Council is recommending "poor" Urban Design features, which is demonstrated in "narrow" and "wide" fronted properties (typically the most common type of houses) and the setback or continuity of frontage. Both sections state the non-tandem parking arrangement will cause poor urban design, "At least 5-6m if part of terrace, so fairly poor street enclosure" in setback or "Poor if parking only occurs to the side" in Continuity of frontage. This is contrary to PS3 Para 16. "Takes a design-led approach to the provision of car-parking space, that is well integrated with a high quality public realm and streets that are pedestrian, cycle and vehicle friendly" This approach is disappointing for a Council which is known for innovation in its Architecture and Urban Design. The width of the house types appears to be designed solely for the car and not the context of place. A narrow house type is certainly not 5.5m - 6.5m. A</p>	<p>The typologies were largely driven by the requirement to provide non-tandem parking solutions. The revised tandem parking text means that this is no longer the case.</p>	<p>Amend housing typologies table.</p>

31.6		<p>narrow house can be designed to work at 4.5m, but we feel the guide is prescribing larger unit to argue for cars to park 2 abreast at the front of their house. Such a strategy would only go to reducing housing densities, but create a car dominated streetscene.</p> <p>Page 65- Diagrams appear inconsistent and difficult to read due to poor resolution. All diagrams look heavily car dominated.</p>	<p>The typologies were largely driven by the requirement to provide non-tandem parking solutions. The revised tandem parking text means that this is no longer the case and therefore different parking arrangements can be illustrated.</p>	<p>Amend drawings to address issues of consistency. Amend narrow frontage and bungalow dwellings to show parking to the side.</p>
31.7		<p>Page 67 - 3.9.11 What evidence base is used to define that all parking must be "independently accessible (i.e. no tandem parking)"? This very prescriptive requirement and will change the urban form of all new developments significantly. The Council should be considering other forms of parking with careful implementation of on-street unallocated spaces.</p>	<p>It is accepted that tandem parking may be appropriate in certain circumstances.</p>	<p>Delete para 3.9.15 and include new bullet point in green box after para 3.9.11 to read: 'Detached homes with 5+ bedrooms will generally be expected to have at least 2 on-plot, independently accessible parking spaces. For smaller homes (ie 4 bedrooms or fewer), independently accessible on-plot parking spaces are preferred but tandem parking (including any similar layout where the</p>

31.8		<p>The parking standards have also been increased since the 2008 consultation paper; however, there has been no consultation of justification to the increase in minimum standards? We are particularly surprised by the Zone 3 2B flat requiring 2 allocated spaces, as the consultation carried out in December 2008 predicted that the 2026 requirement for 2B Flats is 1.1 cars. How has this suddenly doubled?</p>		<p>spaces are not independently accessible) will be acceptable, provided that: The unallocated (on-street) provision is visible and in close proximity (within 15m from the front of the property) to those homes that have tandem parking (or any similar layout where the spaces are not accessed independently). The on-street provision does not encroach into the carriageways on bus routes and other primary residential streets (types 5-7) so as to allow for the movement of free flowing traffic, including service delivery vehicles.'</p>
			<p>Any changes to the adopted 2009 parking standards need to be based on robust evidence. A review of current parking standards is to be undertaken. The Design Guide should include the current adopted 2009 standards as an appendix.</p>	<p>Delete paras 3.9.1-3.9.10, tables 1 & 2 and parking standards zone maps. Include extract from Addendum to Parking Standards (adopted 2009) in appendix. Amend para 3.9.11 to read:</p>

		<p>Shouldn't we be promoting more sustainable forms of transport and making our residential developments well connected and serviced?</p>		<p>'The Council's requirements for parking for residential development are provided by the Addendum to Parking Standards adopted in 2009. An extract from the Addendum is included at Appendix F. The parking standards for Houses in Multiple Occupation (HiMO) are contained within the HiMO SPD. Please note the following points in addition to the information set out in Appendix F.'</p>
31.9		<p>Page 68 - 3.9.13- The guide references PPS3, but it fails to reference this pertinent point "Promoting designs and layouts which make efficient and effective use of land, including encouraging innovative approaches to help deliver high quality outcomes." Subsequently we feel all these proposed parking restrictions are contrary to national policy and should be dismissed.</p>	<p>It is accepted that tandem parking may be appropriate in certain circumstances.</p>	<p>No change.</p>
31.10		<p>Page 69 - 3.9.15- This point needs evidence to demonstrate it is wrong. Tandem parking is not the issue, people parking on the road is. Regardless of parking standards, some people will naturally have more cars, particularly when they have children in their late teens. The issue lies with designing</p>	<p>It is accepted that tandem parking may be appropriate in certain circumstances.</p>	<p>Delete para 3.9.15 and include new bullet point in green box after para 3.9.11 to read: 'Detached homes with 5+ bedrooms will generally be</p>

		<p>appropriate capacity on street and integrating this requirement, rather than trying to squeeze it all on plot. Tandem parking is supported in the Urban Design Compendium and English Partnerships "Car Parking, What works where" study into parking. See page 15 of the guide "Plan for access to vehicles at the front of properties." Both of these documents appreciate that certain parking solutions work best in certain situations, where others are not appropriate. We feel this is an approach the Council should be adopting.</p> <p>What evidence is there to say tandem parking doesn't work with appropriately detailed roads and streets?</p> <p>Any application which was refused based on this reason would be likely to gain approval at appeal (unless other material considerations indicate otherwise) and the Council would then be liable to the costs associate with such appeals.</p>	<p>expected to have at least 2 on-plot, independently accessible parking spaces.</p> <p>For smaller homes (ie 4 bedrooms or fewer), independently accessible on-plot parking spaces are preferred but tandem parking (including any similar layout where the spaces are not independently accessible) will be acceptable, provided that:</p> <p>The unallocated (on-street) provision is visible and in close proximity (within 15m from the front of the property) to those homes that have tandem parking (or any similar layout where the spaces are not accessed independently).</p> <p>The on-street provision does not encroach into the carriageways on bus routes and other primary residential streets (types 5-7) so as to allow for the movement of free flowing</p>
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31.11		<p>Page 70 & 71 - 3.9.22 The diagram for drive through parking in the garden shows an awful design with little regard to the resident. If you have a design guide it needs to demonstrate best practices. Please imagine living in the house shown on the diagram, access to the garden is awful. The private amenity space is destroyed by the desire to remove cars from the streetscene. Your garden would be too detached from your house and you'd have to look over a car to see your garden. It's hardly an attractive solution. We'd like to see someone reverse that car out as shown in the diagram as it would surely require larger visibility splays to accommodate the reversing?</p> <p>The diagram also allows potential for tandem parking as the access is so poor. Then you haven't solved the problem. If you lived in that house, you'd park both your cars beside your house. You'll end up with Developers and Architects designing this solution to argue that tandem parking isn't occurring, when in practice that's all it will ever be.</p> <p>Also the Council needs to consider if this is efficient use of land, the land take would be approximately 55m² of hard standing ((2x 2.5m x 5m) + (10m x 3m)) for parking two cars and access. If the same house had tandem to the side it would be a minimum of 30m² (2 x 3m x 5m). Surely the proposal shown is an example of the inefficiencies</p>	<p>As drawn the diagram does show a poor relationship between the vehicle, the dwelling and its private amenity space. However, it is considered that in principle drive throughs are an acceptable option.</p> <p>This solution would work better with tandem parking, which is now an acceptable option in certain circumstances.</p>	<p>traffic, including service delivery vehicles.'</p> <p>Amend diagram on page 71 to show with tandem parking.</p>
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31.12		<p>caused by removing tandem parking and again reinforces how this guidance is contrary to PPS3 and design quality.</p> <p>Page 72 3.9.26The example photograph does not reflect actual parking levels. The houses are clearly at least four bedrooms, with one parking space and a garage. Currently policy requires two dedicated spaces for such a house. This picture subsequently doesn't accurately reflect what the diagrams would achieve it terms of the streetscene.</p>	<p>Not accepted. The photo illustrates on plot parking to the front.</p>	<p>No change.</p>
31.13		<p>Page 88 4.6.2 Set backs at 0.3 - 2m in urban areas. How is this shown in the parking guidance? This means all parking would need to be on-street, or to the side. If the parking was to the side, how would it achieve the density associated with an urban area? The continuity of frontage would also be ruined.</p>	<p>It is not impossible to create the more urban character indicated in para 4.6.2, particularly if tandem parking is an acceptable option. Continuity of frontage can be provided through the use of drive throughs. However, as para 4.8.5 acknowledges building frontages will generally have larger breaks because of the desire to have on-plot parking.</p>	<p>No change.</p>
31.14		<p>Page 92, The convex and concave diagrams contradict previous guidelines on parking. If the Convex units had on plot parking to the side, wouldn't their gardens be bigger and possibly appropriate? The convex scheme, the central unit, where do they park?</p> <p>Policy. No reference back to current national policy, only the Draft NPPF. Surely it should only reference current policy until new policies are</p>	<p>Accepted.</p>	<p>Delete convex and concave diagrams on page 92.</p>
31.14			<p>Accepted, in part. It is considered that the NPPF text in appendix B is</p>	<p>Amend para 1.3.2 to read: 'The guide accords with and reinforces government</p>

31.15	adopted?	unnecessary. This guidance can easily be accessed from the CLG's website. The NPPF has now been published, and therefore should be referenced.	<p>guidance, as well as Local Plan policy and the submission version of the Core Strategy. The key local policies which are relevant to the Design Guide are included at Appendix B.'</p> <p>Delete text on Draft National Planning Policy Framework in Appendix B. Amend para 1.3.3 first sentence to read:</p> <p>'The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England.' and 1.3.4 to read:</p> <p>'The NPPF states that: The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.'</p>
	Page 111, 5.7.1 Clarification needs to be sought	Whilst the Council considers	No change.

31.16	<p>on the Council's view on this. Whilst as Architects, we accept this is a positive step, we do not see how this could be enforced?</p>	<p>that it is essential that suitably qualified designers are employed, it does not have the power to enforce this.</p>	
	<p>Conclusion Overall the document has some serious contradictions with urban form and its relationship to parking. These need to be considered fully and ideas re-consulted with design professionals, at present, we feel the design guide would lead to an era of poor urban design and difficulty obtaining efficient land use and creating unattractive places people want to live. We feel the document goes too far in prescribing detail and when this is compared to current policy in PPS1, PPS3 and the proposed NPPF, it contradicts the need for design innovation. The prescriptions could lead to Committee members using the guidance and deeming it as policy and thus stifling the future of Milton Keynes. This would subsequently lead to numerous appeals which would be impossible for the Council to defend in regards to tandem parking. We feel the guide would really impinge upon brownfield site developers, primarily because these sites often have serious constraints in terms of existing urban form, size and access to the highway. We therefore feel if these plans are to adopted guidance, they need to explain that the Council will make exceptions in such circumstance</p>	<p>The acceptance that tandem parking is an acceptable solution, in certain circumstances, eliminates the contradictions with urban form. The Guide has been revisited to remove certain aspects considered too prescriptive and beyond the scope of a Design Guide. In some areas, greater detail has been requested by developers to provide greater certainty, e.g. with regard to design of redways. Design solutions are included to assist developers and not to restrict innovation. Additional text could be included to clarify that the guidance is not intended to be prescriptive. Developers should assess the context of sites, as</p>	<p>Insert new para after 1.2.4. to read; 'Investing in good urban design has been shown to add value to residential developments. However, design requirements should not be so onerous as to impact on the viability and/or deliverability of schemes. Often designers of housing schemes will have to balance a number of design requirements. It will not always be possible to satisfy every requirement. If developers feel they are unable to comply with any aspects of the Design Guide, they should raise it with the Council as part of pre-application discussions.'</p>

32.1	Andrew Wright (Kirkby & Diamond)	<p>on smaller to medium schemes <25 houses, where it can be demonstrated that the guidance does not provide the correct solution for its context. The guide is far easier to implement on larger "grid square" housing schemes where the designers have a blank canvas and very few constraints to work with.</p> <p>The document also requires a caveat that the solutions proposed may not be appropriate in historic or village contexts.</p> <p>Para 3.9.11 – Car parking. The requirement to make provision for 2 parking spaces for 2 bedroomed units in accessibility zones 3 and 4 is excessive and should be reduced.</p>	<p>indicated in section 2 of the Guide.</p>	
		<p>Any changes to the adopted 2009 parking standards need to be based on robust evidence. A review of current parking standards is to be undertaken. The Design Guide should include the current adopted 2009 standards as an appendix.</p>	<p>Delete paras 3.9.1-3.9.10, tables 1 & 2 and parking standards zone maps. Include extract from Addendum to Parking Standards (adopted 2009) in appendix. Amend para 3.9.11 to read: 'The Council's requirements for parking for residential development are provided by the Addendum to Parking Standards adopted in 2009. An extract from the Addendum is included at Appendix F. The parking standards for Houses in Multiple Occupation (HiMO) are contained within the HiMO SPD.'</p>	

33.1	Places for People	<p>1.5.2 In what way is it intended that "the Council will give due consideration" (in the final sentence of this paragraph)? Is it intended that the Council will "favour" such submissions? Clarity is required on this point or its deletion.</p>	<p>The implication is that the officers will not object and the council will not refuse any application on the basis of a variation from the pre-existing design codes if it supports the principles on the design guide</p>	<p>Please note the following points in addition to the information set out in Appendix F: Replace last sentence of 1.5.2 with: "Where the reserved matters application is supportive of the content of the SPD, the Council will not refuse the application solely on the basis that it varies from any of the pre existing approved design codes, especially when the application is seeking to incorporate the principles contained in this SPD."</p>
33.2		<p>Paragraph 1.5.3 over complicates the issue relating to the established decision-making framework for reserved applications beholden to pre-existing design codes and development briefs. Reserved matters applications for Brooklands are, first and foremost, required to be in accordance with permitted hybrid application, adopted Development Brief and Design Codes - meeting the Design Guide principles in some cases is encouraged but not required (para.1.5.2). However, the message put forward by paragraph 1.5.3 seeks a greater commitment where one is not required. Equally, the second sentence of this paragraph is</p>	<p>Accepted.</p>	<p>Delete para 1.5.3.</p>

33.3		<p>not expressed clearly. What "will allow development to proceed"? Must there be pre-application discussions on this particular matter in every case? Delete paragraph 1.5.3.</p> <p>2.2.3 What would be a "time-distinctive" design response? Again, an instance of unclear expression. Reword second sentence. " <i>A mix of high quality materials and a contemporary approach to architectural design and detailing which draws upon a history of innovation within Milton Keynes should be utilised</i> ".</p>	Accepted.	
33.4		<p>2.2.9 The treatment of densities does not distinguish between MK's very low gross densities and its rather more standard, PPS3-defined net densities.</p>	Accepted.	<p>Amend para 2.2.3 to read: 'The character of the new development should also be developed from an understanding of the context of the surrounding built and natural forms. A mix of high quality materials and a contemporary approach to architectural design and detailing which draws upon a history of innovation within Milton Keynes should be utilised. The positive features of the surrounding local area that help create an identity or character for the development should be used as design cues to be interpreted in the new development.'</p> <p>Amend paras 2.3.8-2.3.9 to read: '2.3.8 With the adoption of PPG3 (Housing) in the 1990s, net</p>

		<p>It is an over-simplification to state that "densities across Milton Keynes are however generally still low, largely because of all the open space". While this statement applies to gross densities, it does not apply to net densities (which take account of "all the open space"). MKC should reflect this point more distinctly.</p>		<p>densities of new development have increased, particularly around local centres and along public transport routes. 2.3.9 Gross densities across Milton Keynes are however generally still low, largely because of the extension of linear parks and other strategic open space incorporated as part of new developments across the city. This is however a defining feature of MK and what makes Milton Keynes so desirable for its residents.'</p>
33.5		<p>2.4.2 - 2.4.6 This guidance is too generic and insufficiently MK-specific. Unless it can be made more MK-specific, it should be deleted, as it tends to duplicate national planning policy. Delete.</p>	<p>Whilst it is accepted that this guidance is on the whole generic, it does serve to emphasise the fact that the Design Guide is applicable to the rural areas as well as the urban area of Milton Keynes, and that the borough contains a number of conservation areas and listed buildings.</p>	<p>No change.</p>
33.6		<p>3.2.1 4th bullet point Too prescriptive - hinders design aspirations for</p>	<p>Accepted in part.</p>	<p>Amend para 3.2.1 4th bullet point to read:</p>

33.7	<p>local centres to possess a more organic design composition. Reword. " <i>In this respect there should be a clear definition between users serving local centre uses and pedestrians accessing the local centre uses</i> . "</p>		<p>'In this respect there should be a clear distinction/ definition between that part of the local centre where users arrive (both by car and foot) and that part which requires servicing.'</p>
33.8	<p>3.3.1 Secured by Design - does "expected" mean it is mandatory? This point requires clarification.</p> <p>3.4 In terms of landscape attributes, it has been shown throughout Milton Keynes that the landscape, routes, streets and spaces are what set the backdrop for successful residential areas whatever their architectural character. This section should reinforce that it is a well understood principle that the glue that binds a place together, is a consistent, high quality, well designed public realm.</p>	<p>While it is expected, it can't be 100% mandatory because there might be a valid contextual reason why the layout for the site (1 of the 7 elements of SBD) can't achieve full secured by design accreditation</p> <p>It is considered that para 3.4.2 of the Design Guide adequately expresses the importance of good quality public realm. Para's 2.3.2, 2.3.18 – 2.3.21 and 3rd last bullet in section 2.6 deal with this issue in the MK context Section 3.4 also emphasises the importance of green space in the MK context</p>	<p>Amend third sentence para 3.3.1 to read: 'Developers should therefore discuss their proposals with the Crime Prevention Design Advisor at the earliest opportunity, as they will generally be expected to achieve the Secured by Design accreditation given by Thames Valley Police.'</p> <p>No change.</p>

33.9		<p>3.6 Section If there is to be an SPD on transport there is no need to include the transport section. Simplify this section to avoid duplication with the Council's Transport and Sustainable Transport SPD.</p>	<p>Not accepted. Section 3.6 deals with important urban design principles. This section is about more than just technical highway requirements.</p>	No change.
33.10		<p>3.6.18 It is not clear if the Council prefers crossroads or staggered junctions. Clarify this point in 3.6.18.</p>	Accepted.	<p>Amend para 3.6.18 to read: 'Staggered junctions reduce vehicle conflict compared with crossroads, and therefore are generally preferred. However, in low speed and low volume environments where cross-traffic is minimal crossroads can be considered. In these circumstances, crossroads may be appropriate where it is important to maintain the directness of a pedestrian route.'</p>
33.11		<p>3.6.26 To aid the appropriate selection of trees. Reword: " <i>A selection of trees species should be based upon being reliable, require minimum maintenance and can withstand the abuses of highway activity. A reason as to why certain trees are more appropriate than others should assist selection.</i> "</p>	Not convinced that the proposed wording adds anything to what the Guide already says.	No change.
33.12		<p>3.6.35's accompanying plan The plan needs to avoid car opening over roadway as per requirements for Brooklands.</p>	Accepted.	Amend plans on pages 51 and 52 to show dimensions including

33.13		<p>Add "wobble strip" to the plan.</p> <p>3.6.37 Should provide greater clarity for footway provision along new residential streets. Reword. " <i>A ?residential street' is designed to serve residential properties and is not intended to carry through traffic, including buses. It will be characterised by a carriageway and footways (on either side of the street for streets with homes on both sides).</i> "</p>	Accepted.	provision for 'wobble strip'. Amend paragraph 3.6.37, second sentence to read: 'It will be characterised by a carriageway and footways (on either side of the street for streets with homes on both sides).'
33.14		<p>3.6.41 2nd bullet point. To provide a more adaptable and responsive design approach. Replace " <i>must</i>" with " <i>should</i>"</p>	Not accepted. It is not considered appropriate for level surface streets to be accessed off primary streets.	No change.
33.15		<p>3.8.3's accompanying table How does this table respond to situations where there are different frontage types of house along a street or opposite each other? Please clarify these points.</p>	Comment partly accepted. Clearly there will be different house types along a street. This section is simply trying to illustrate how different house typologies impact on the elements identified in 3.8.2.	Delete last sentence of para 3.8.3.
33.16		<p>3.9.11 3rd bullet point and others in relation to tandem parking Object to the statement made by the Design Guide that states no tandem parking at all. This approach is too prescriptive and threatens the successful delivery of the approved Brooklands scheme by: Disrupting agreed residential densities for some areas of Brooklands - the requirement for</p>	Accepted.	Delete para 3.9.15 and include new bullet point in green box after para 3.9.11 to read: 'Detached homes with 5+ bedrooms will generally be expected to have at least 2 on-plot, independently accessible parking spaces.'

		<p>non-tandem parking can increase the land take of a house plot by up to 35% with side parking</p> <ul style="list-style-type: none"> - reducing density by one house in four; <p>Reduced density will impact upon roof tax receipts, New Homes Bonus, and viability of schemes due to significantly reduced land values;</p> <p>Adversely affecting the amenity of some areas in Brooklands by resulting in a more car dominated public realm - greater levels of on-street and on plot parking in front of properties;</p> <p>More numerous breaks in landscaping of residential streets caused by more independent access</p> <p>points to parking spaces;</p> <p>More numerous breaks in the street frontage, creating less opportunities for surveillance and enclosure of the street; and,</p> <p>Larger gaps between residential properties to accommodate extra parking that will provide a less satisfying urban composition and one that does not reflect careful urban design and planning.</p> <p>This policy also threatens the delivery of high quality developments throughout the Borough. The likely response by the development industry - seeking to minimise loss of land as a result of this initiative - will be to park cars at the front of properties and smaller types of properties. This will result in streets with frontages completely occupied by cars and as consequence continuous drop kerbs and no ability to introduce trees and verges. Surely, this is not what the Council is seeking to achieve?</p>		<p>For smaller homes (ie 4 bedrooms or fewer), independently accessible on-plot parking spaces are preferred but tandem parking (including any similar layout where the spaces are not independently accessible) will be acceptable, provided that:</p> <p>The unallocated (on-street) provision is visible and in close proximity (within 15m from the front of the property) to those homes that have tandem parking (or any similar layout where the spaces are not accessed independently).</p> <p>The on-street provision does not encroach into the carriageways on bus routes and other primary residential streets (types 5-7) so as to allow for the movement of free flowing traffic, including service delivery vehicles.'</p>
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33.17		<p>Reword. " Parking spaces should in most cases be independently accessible where implementation does not adversely affect residential density and amenity ."</p> <p>3.9.15 Parking on verges and pavements is illegal and as such should not be tolerated and rigorously enforced. Reword: " Tandem parking has not either proved practical or desirable in some cases, since the second car is often parked on verges, on footpaths or inappropriately on streets. Parking on verges and pavements is illegal and as such should not be tolerated and rigorously enforced."</p>	<p>Tandem parking can be an appropriate parking solution, particularly for smaller dwellings.</p>	
33.18	3.9.18		<p>Accepted.</p>	<p>Delete para 3.9.15.</p> <p>Include new text after para 3.9.16: 'Opportunities for inappropriate parking should be designed out of schemes, as far as possible. Providing sufficient designated on-street parking spaces in the right locations will assist in reducing the instances where residents feel the need to park on pavements or verges. However, inappropriate parking should also be prevented through the design of the street. A range of street elements, such as carriageway widths, street furniture and planting, (including trees and groundcover planting), can be manipulated to constrain or direct parking.'</p> <p>Delete para 3.9.18.</p>

33.19		<p>As above. Delete this paragraph.</p> <p>3.9.27 The diagram shows a lot of street parking. If it is assumed that on plot parking is at front of house then the impact of this on the streetscape is extremely poor - see comment 3.9.11 above. Please rectify this plan accordingly.</p>	<p>Accepted. The point of this drawing is to simply show that on street parking vs rear courts provide larger rear gardens while keeping densities the same. Not really needed now that there is a general acceptance from all parties that rear parking courts are not a preferred parking solution</p> <p>Accepted.</p>	<p>Delete drawing on page 73.</p>
33.20		<p>3.10.3 3rd bullet point Repetition of bullet point. Delete 3rd bullet point.</p>	<p>Accepted.</p>	<p>Amend green box 3.10.3 to delete second bullet point.</p>
33.21		<p>4.2.4 Is it really being suggested that people who are already struggling to afford the money to purchase a new home are going to want to pay the additional cost of foundations and lintels that they may never use to extend their home? Delete this paragraph.</p>	<p>Adaptability is a key urban design objective. Para 4.2.4. suggests ways in which adaptability can be built into new homes – it is not a requirement. It is accepted that the level of detail relating to buildings that could be extended is excessive and may appear to be prescriptive.</p>	<p>Amend first bullet point para 4.2.4 to read: 'buildings designed to provide additional future floor space through conversion or extension.'</p>
33.22		<p>4.12.39 Well designed external balcony frames can be attractive therefore should not be banned. Delete the following: "<i>(rather than be supported by an external frame).</i>"</p>	<p>The wording says 'should' not 'must' which suggests that recessed or cantilevered are preferred.</p>	<p>Add sentence after second sentence para 4.12.39: 'Where external frames are used care needs to be taken that they</p>

33.23		<p>4.13.4 Internal layout should not be prescribed. The layout of the house interior will be determined by what the market desires. It is not clear how the linking of a dining room to a living room provides a better thermal solution than to a kitchen. Delete this paragraph.</p>	<p>This was only guidance, however it is accepted that the level of detail included in this section is unnecessary.</p>	<p>complement the overall elevation design and are not seen as a 'bolt-on' that clutters the elevation.' Delete para 4.13.4.</p>
33.24		<p>4.15.9 Why is it necessary to be prescriptive on this point? Many designs of homes may well look better with letter boxes in alternative locations than the centre of the front door. Delete this paragraph</p>	<p>The point of this paragraph is not the visual appearance but the ease of use of the letterbox. Letterboxes at the bottom of the door are inconvenient for postmen. This could be made clearer in the text.</p>	<p>Amend para 4.15.9: 'For houses, letter boxes must be located at a convenient height for ease of use by postmen.'</p>
33.25		<p>4.15.11 1st and 2nd bullet points These bullet points appear to be mandatory. Until appropriate demand exists the provision of EVCP is an additional cost to the home that will add no value. Better to design in the ability to provide a point if it is required. What infrastructure is required to be delivered for homes? Interesting that no mention is made of satellite dishes as these do have a far greater impact on the quality of the public realm. Please clarify what is meant by Super Fast Broadband and how it is to be provided where the</p>	<p>The point about EVCPs is accepted. It is also accepted that the guidance regarding superfast broadband needs clarifying. Whilst it is accepted that satellite dishes have an impact on the quality of the public realm, there provision is covered by permitted development rights. It is therefore not proposed to</p>	<p>Amend para 4.15.11 heading to read: 'Electric Vehicle Charging Points' and first bullet point to read: 'Where practicable, dwellings should be designed to enable the installation of a domestic EVCP to approved industry standards at a later date' and second bullet point to read: 'Ducting for fibre connectivity to each</p>

		utility providers are not able to deliver it?	include guidance on this subject.	dwelling or, if appropriate in terms of flats and apartments, aggregated connectivity.’
34.1	Barratt Homes and David Wilson Homes	Support the intent of the Draft Design Guide, and the level of detail that the document discusses giving good practice examples of many aspects of residential development. There is a good deal to be applauded in the document.	Noted.	No change.
34.2		Length of the document is excessive. A great deal of column inches are spent describing the MK context – this could be condensed.	It is considered necessary to provide the MK context to ensure that the document is specific to Milton Keynes.	No change.
34.3		There is a great deal of detail on the design of highways and parking strategies. This could be incorporated in the Highway Design Guide.	Accepted in part. Section 4.5 is to be redrafted to remove technical highway guidance.	Delete paras 4.5.8-4.5.18 and paras 4.5.25-4.5.38.
34.4		Position of house on plot – para 3.5.8-3.5.10 this section of the SPD encourages south facing houses to be locate deep into the plot with north facing houses closer to the street. However, this would result in building setbacks being defined by solar orientation rather than urban design principles for successful streets. Setbacks from the street should be determined by the character of the street being created. It is more important to consider the potential to incorporate solar gain into the fabric of the building (larger openings facing south and narrower openings on the north side). On the whole an east-west orientation of roads with minimal length north-south roads will provide the optimum layout.	Accepted.	Delete paras 3.5.8-3.5.10 and illustration on page 39.

34.5	<p>Para 3.8.1 – a minimum width of 5.5m would exclude the majority of Barratt Homes/David Wilson Homes narrow frontage dwelling types. The ability to accommodate two independently accessible parking spaces to the front of the dwelling should not be the basis on which house type widths are defined.</p>	<p>Accepted, although the Design Guide is in no way intended to be prescriptive on plot width. Accept that the ability to accommodate two independently accessible parking spaces to the front of the dwelling should not be the basis on which house type widths are defined.</p>	<p>Amend para 3.8.1 and table on page 64 to remove reference to house widths.</p>
34.6	<p>Needs to be additional clarity on what is meant by 'dual aspect types.' The example given is of a property where both the front and back of the property provide street frontage. A more common dual aspect house type is where the property fronts a road and side road (turning the corner). This type should be acknowledged in the guidance</p>	<p>Accepted. The L-shaped unit would serve that function although it is not indicated in the housing typologies table or diagram.</p>	<p>Amend housing typologies diagrams and table to identify the potential of the L-shaped house type to have a double frontage.</p>
34.7	<p>Parking standards – para 3.9.11: Tandem parking does not cause off-plot parking problems in the majority of cases. It allows an efficient use of space which allows cars to be parked close to the entrance to properties. Where unacceptable on-street parking problems do occur, the Council have the ability to control this via Road traffic Orders.</p> <p>The exclusion of tandem parking will have a detrimental impact on the ability to create a street hierarchy. Hierarchy is key to legible navigation, way finding and a structured character in residential design. Restricting the options available</p>	<p>Accepted (except for first sentence of comment) - there are many instances with tandem parking where the 2nd car parks on street.</p>	<p>Delete para 3.9.15 and include new bullet point in green box after para 3.9.11 to read: 'Detached homes with 5+ bedrooms will generally be expected to have at least 2 on-plot, independently accessible parking spaces. For smaller homes (ie 4 bedrooms or fewer), independently accessible</p>

	<p>to designers will result in a dramatic reduction in the quality of public space.</p> <p>Parking solutions which do not include tandem parking will result in a dramatic reduction in achievable densities and hence impact on scheme viability.</p>		<p>on-plot parking spaces are preferred but tandem parking (including any similar layout where the spaces are not independently accessible) will be acceptable, provided that:</p> <p>The unallocated (on-street) provision is visible and in close proximity (within 15m from the front of the property) to those homes that have tandem parking (or any similar layout where the spaces are not accessed independently).</p> <p>The on-street provision does not encroach into the carriageways on bus routes and other primary residential streets (types 5-7) so as to allow for the movement of free flowing traffic, including service delivery vehicles.'</p>
34.8	Support the move to make parking courts a last resort.	Noted.	No change.
34.9	In order to achieve development of 2 spaces per unit, the document recognizes that this will require the almost exclusive use of wide-fronted units.	Comment accepted. The existing parking	No change.

		<p>Narrow fronted plots are key to the achievement of certain urban design objectives but to achieve the parking standards, the entire width of the frontage would be taken up by parking. To break this up with landscape, the rhythm of the buildings will need to be widened and wide front plots would be necessary. It will be extremely inefficient to place parking to the side of dwellings unless these are very large detached units.</p>	<p>standards require 2 spaces per dwelling. If tandem parking is allowed, there is a greater choice of parking options. However, it is accepted that parking options for narrow-fronted terraced dwellings are limited.</p> <p>Following change in tandem parking the SPD will not need to emphasise use of wide fronted units.</p>	
34.10		<p>On-plot parking – para 3.9.20: Drive-through parking solution. To make these independently accessible, the diagram shows parking across and down the side of rear gardens. This would be extremely unattractive to potential occupiers, particularly as it results in the loss of rear private amenity space and introduces cars and vehicle noise to the rear of properties. Manoeuvring is hindered and it encourages vehicles are reversing onto the highway. It will increase the amount of hardstanding, increasing surface water run-off.</p>	<p>Accepted. If tandem parking is to be an option, then the drive through is a more workable solution.</p>	<p>Amend drive-through options diagram. Delete para 3.9.25.</p>
35.1	Crest Nicholson	<p>Whilst we welcome the principle of a Residential Design Guide, the draft document is considered overly prescriptive, to the extent that it will have a seriously detrimental impact on housing delivery. In particular, the new parking standards are incredibly onerous, and will impact on the quality of the public realm, dwelling mix, landscaping, and density. The</p>	<p>Further data to be provided by Dave Lawson with regard to parking standards – with potential to reduce requirement for 2-bed flats (this will be based on census data)</p>	<p>Insert new para after 1.2.4. to read: 'Investing in good urban design has been shown to add value to residential developments. However, design requirements should not</p>

	<p>ability for developers to make adequate returns is questionable and if adopted in its current form will have far reaching implications for both the Council and Developers.</p> <p>The Guide is disjointed and difficult to follow in its current form. Whilst being Guidance, it refers to mandatory and non mandatory standards, which are not clear. Some key requirements that will have large implications on the quality of developments are not apparent. A more succinct document would prove a more useful tool for developers, architects and the Council's Development Management Officers.</p> <p>The document refers to a forthcoming 'Highways Design Guide', which will contain further technical details around Highway Design. These will have significant implications on the layout and design of residential developments, and the two are mutually compatible. The current draft contains a significant amount of detailed highways guidance, which we consider unnecessary in this document, but essential in a separate Highways Design Guide, which should be published for consultation at the same time as the Residential Design Guide. Not to do so leaves uncertainty over some aspects of this guidance.</p> <p>There is a reference to dwelling space standards being published separately. Again this has a significant impact on scheme design and we</p>	<p>While it is accepted that not everything in the Guide is a requirement (i.e.mandatory), there are some requirements for example adhering to parking standards, street/parking space widths, redway widths, fronting onto public realm, having a street hierarchy, creating places with character etc.</p> <p>Whilst it is accepted that the document should be succinct as possible, the contents of the document have been shaped by consultation with stakeholders. Further consideration will be given to how the guidance is phrased with regard to mandatory and non-mandatory requirements.</p> <p>Technical highway guidance will be removed and included in the Highways Design Guide.</p>	<p>be so onerous as to impact on the viability and/or deliverability of schemes.</p> <p>Often designers of housing schemes will have to balance a number of design requirements. It will not always be possible to satisfy every requirement. If developers feel they are unable to comply with any aspects of the Design Guide, they should raise it with the Council as part of pre-application discussions.'</p> <p>The Guide has been revisited in light of comments received to remove certain aspects considered too prescriptive and beyond the scope of a Design Guide.</p> <p>Other changes in relation to these comments are dealt with under individual representations below.</p>
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		<p>consider should form part of this Design Guide.</p> <p>We do not consider the extent of the consultation process sufficient for a document that will have significant implications on housing delivery over the next 5 years. The document refers to a workshop held in Summary 2011. Crest are developing circa 1,100 new homes in Oakgrove, but as far as we are aware, Crest were not invited to the workshop. Given the significant implications on future development that this document will have in its current form, and the extent of our comments, we consider a further workshop necessary. Crest would have a significant concern with the process should this be adopted in current form and those who have made representations not be given the opportunity to comment on a revised draft document.</p> <p>We do not consider a number of the 'parking solution diagrams' to be workable, which emphasises the need to hold a further workshop.</p> <p>Page 4 second para: The aim of the document is considered too narrow. It should be expanded to recognise that its aspirations must be considered in the round, so that viable schemes are delivered on the ground.</p>	<p>The decision whether or not to prepare a SPD on residential space standards is a separate matter to be considered outside the Design Guide consultation process.</p> <p>A meeting with developers, officers and relevant Cabinet members was held on 29th February 2012, to discuss some of the issues raised.</p> <p>Parking solutions in the Design Guide will be reviewed, and expanded to include options involving tandem parking</p>	
35.2			<p>Accepted. Will mention something about deliverability and the need to balance different requirements.</p>	<p>Insert new para after 1.2.4. to read: 'Investing in good urban design has been shown to add value to residential developments. However, design requirements should not be so onerous as to impact</p>

				<p>on the viability and/or deliverability of schemes.</p> <p>Often designers of housing schemes will have to balance a number of design requirements. It will not always be possible to satisfy every requirement. If developers feel they are unable to comply with any aspects of the Design Guide, they should raise it with the Council as part of pre-application discussions.'</p>
35.3		<p>Page 5 third para, 1.6.3, 3.4.16: The Highways Design Guide should also be published for consultation. Postpone adoption of the Residential Design Guide until the Highways Design Guide is published for consultation.</p>	<p>It is anticipated that the Highway Design Guide will be published for consultation in April.</p>	<p>No change.</p>
35.4		<p>Page 5 final para: This sets out that section 5 outlines a series of mandatory and non-mandatory tools, however this is not clearly set out in Section 5. In addition this is a Design Guide, and we consider the inclusion of mandatory items overly onerous.</p>	<p>Design & Access Statements, which are referred to in the Design Quality Assurance section, are mandatory. Paragraph can be reworded to remove reference to mandatory and non-mandatory items.</p>	<p>Amend final para page 5: 'Section 5 focuses on Design Quality Assurance and includes a Design Checklist, as well as other methods of ensuring high quality residential developments in Milton Keynes.'</p>
35.5		<p>Para 1.1.1, first bullet: It is considered too prescriptive to say that the SPD will be "used" by</p>	<p>This is semantics.</p>	<p>No change.</p>

35.6		<p>the Council. This is a Design Guide and should be a document to be <u>considered</u> in the determination of planning applications.</p> <p>Para 1.1.1, second bullet point: The terminology used is considered overly onerous. The provisions of the SPD should be seen as an aspiration of the Council, not a blanket expectation. This meets the aims of a guide.</p>	<p>This is semantics.</p>	<p>No change.</p>
35.7		<p>Para 1.1.2: The phrase “<i>seem popular with residents of Milton Keynes</i>” should be better explained and evidenced. It seems an intangible link to include elements in a document that have significant implications on the design of future development that only seems to be liked by residents. This should be precise statement and the link evidenced.</p>	<p>Accepted.</p>	<p>Amend para 1.1.2 first sentence to read: ‘The Design Guide promotes best practice in urban design while at the same time reflecting and building on those elements of a neighbourhood that have proved successful in Milton Keynes.’</p>
35.8		<p>Para 1.2.3: This sets out that the Design Guide provides ‘requirements’, which does not accord with the spirit of a guide. It should provide guidance and advice, but not hard and fast requirements.</p>	<p>While it is accepted that not everything in the Guide is a requirement, there are some requirements for example adhering to parking standards, fronting onto public realm, having a street hierarchy, creating places with character etc</p>	<p>See response to comment 35.1</p>
35.9		<p>Para 1.2.4: This paragraph does not help the reader. It should be expanded to list the other elements that it provides guidance to, rather than having an unspecific statement like that currently drafted.</p>	<p>Accepted.</p>	<p>Delete para 1.2.4.</p>

35.10	Para 1.2.5: We question whether this paragraph is necessary. It will be clear from the preceding paragraphs (if expanded as per our suggestion) what is covered in the Design Guide.	This paragraph was included to ensure that the scope of the document is clear.	No change.
35.11	1.3.1, last sentence: The last sentence requires qualification to provide a clear steer on how the document will be used by Development Control Managers.	Not accepted. The document will be a material consideration in the determination of planning applications.	No change.
35.12	Para 1.4.1: Whilst we welcome the commitment to review the Design Guide after a period of time, the commitment to it being after 5 years could result in difficulties, should further policy / best practice be published before this date that contradict the provisions of the guide. We therefore consider it necessary to introduce flexibility into the review process.	Accepted.	Amend para 1.4.1 to read: 'The performance of the Design Guide will be monitored to establish whether it needs to be reviewed. A full review of the document will take place within at least five years after its adoption. However, it may be reviewed earlier if there are changes to policy or best practice guidance, which have a significant impact on the contents of the Design Guide.'
35.13	1.5.4: An overly onerous expectation that other applications must be in accordance with the SPD – they should seek to accord with its provisions, but material considerations may result in some elements not being in full accordance. Amend to read as follows: “submitted after the adoption of this SPD will	Comment partly accepted.	Revise para 1.5.4 as follows: “and other forms of design guidance (e.g. design codes) submitted after the adoption of this SPD will need to have

		<p><i>be considered against the content of this SPD.”</i></p>		<p>been prepared wherever possible and / or appropriate in accordance with the content of this SPD. All planning applications and other forms of design guidance submitted after the adoption of this SPD will be considered against the content of this SPD.”</p>
35.14		<p>1.6.1: The last sentence includes an overly onerous requirement that best practice Design Guidance must be adhered to. However, some aspects of the Design Guide itself do not accord with best practice (such as parking solutions). It will therefore be difficult for developers to meet the aims of both best practice and the SPD.</p>	<p>Partly accepted – there might be contextual reasons why best practice urban design principles can't be achieved</p> <p>The Parking solutions shown don't in their own right not comply with best practice – it is rather the implications in terms of streetscape quality that may result that might not adhere to best practice</p>	<p>Amend para 1.6.1 last sentence to read: 'The best practice design guidance is not repeated in this Design Guide, but must, wherever possible, be taken into account by developers.'</p>
35.15		<p>There is no reference to the chart on page 9. This should be added.</p>	<p>Not accepted. Para 1.6.1 refers to the diagram.</p>	<p>No change.</p>
35.16		<p>Page 10 (green box) Section 4 – a Design Guide should not set requirements, but objectives.</p>	<p>Accepted in part (see earlier comments – there are some requirements)</p>	<p>Amend para 1.7 green box fourth para to read: 'Section 4 is entitled 'Detailing the Place' and provides practical advice, solutions and where</p>

35.17		Page 10 (green box) Section 5 – are these validation requirements? It is not clear.	Wording could be made clearer.	<p>applicable, requirements, on how to deliver high quality proposals for elements pertaining to the more local scale of the individual street and the environment around the home.'</p> <p>Amend green box page 10 to read: 'Section 5 focuses on Design Quality Assurance and includes a Design Checklist, as well as other methods of ensuring high quality residential developments in Milton Keynes.'</p>
35.18		1.8.1 Feedback from the workshop is lacking. We consider it important to provide details of attendees and their feedback as an appendix to the SPD.	Para 1.8.1 provides information on the range of people attending the workshop. It is not considered necessary or appropriate within a Design Guide to specify names.	No change.
35.19		2.2.3 Reference to design cues being interpreted in a contemporary manner is overly prescriptive and unnecessary. Design cues should be interpreted in an appropriate manner and each site will be have a different appropriate response. For example, in Milton Keynes village, it may not be appropriate for a contemporary design response, but a high quality interpretation of the local vernacular. In addition,	Accepted.	Amend para 2.2.3 to read: 'The character of the new development should also be developed from an understanding of the context of the surrounding built and natural forms. A mix of high quality

		<p>some of the example photographs in the document show good examples of more traditional building types, which we agree can be successful in certain situations.</p>		<p>materials and a contemporary approach to architectural design and detailing which draws upon a history of innovation within Milton Keynes should be utilised. The positive features of the surrounding local area that help create an identity or character for the development should be used as design cues to be interpreted in the new development.'</p>
35.20		<p>2.2.4: The appraisal template for the surrounding area is referred to, however it is not clear whether this is a requirement for pre-application discussions, or a validation requirement for full planning applications.</p>	<p>Accepted. The template would be especially useful to use if the council feels the development is not appreciative of the context (this could be discussed as part of pre-application).</p>	<p>Delete 3rd sentence of para 2.2.4 and replace with: 'The Council will encourage applicants to complete the appraisal tables to help establish a suitable character for the new development.'</p>
35.21		<p>2.3.9: The paragraph sets out that recent government guidance has abolished the requirement for any minimum density to be achieved for a development. We are not clear why this statement is in this section – what is it seeking to achieve? If it is leading onto guidance on appropriate density ranges then it would be better placed in section three, or in the planning policy context section.</p>	<p>Accepted.</p>	<p>Delete last sentence of para 2.3.9.</p>

35.22	<p>2.3.10: The point that the majority of buildings in Milton Keynes are three storeys or below, with taller buildings used to highlight gateways and key corners, is noted, however this point is not reiterated in the objectives section, and we consider it important to make reference to massing later in the document.</p>	Accepted.	<p>Add a bullet into Design Aspiration/Vision on pg24 to read: 'White Milton Keynes should continue to be characterised by low rise buildings of 3 storeys and lower, taller buildings should be used to highlight key gateways and corners and assist with wayfinding as well as vary character across a site.'</p> <p>Within the Design Principles on pg 26 add following wording: 'Where appropriate (e.g. to mark gateways and key corners, help with wayfinding, reinforce street hierarchy and vary character) taller buildings should be used.'</p>
35.23	<p>2.3.26: The last sentence states the following</p> <p><i>"It's essential that Milton Keynes maintains this momentum and continues to provide exemplar housing during the run-up to zero carbon homes nationally in 2016"</i></p> <p>Whilst we welcome this aspiration, it should be noted that it is an aspiration, and not an essential requirement. We consider it necessary to amend</p>	Accepted.	<p>Amend para 2.3.26 third sentence to read: 'It's important that Milton Keynes maintains this momentum and continues to provide exemplar housing during the run-up to zero carbon homes nationally in 2016.'</p>

35.24		<p>the text appropriately.</p> <p>Page 25, Table 2: We consider it necessary to add Street Lighting to the table, as this adds to the character of a streetscape.</p>	<p>Accepted.</p>	<p>Amend Table 2 Page 25 to include: 'Street furniture and lighting'.</p>
35.25	<p>2.6, 'Green Box' 4th bullet point: The first sentence states the following:</p> <p>“Across the city as a whole, a variety in terms of density, street layout, landscaping and design appearance is encouraged for specific sites”</p> <p>We appreciate what is sought here but question whether this could be more appropriately worded as it is currently rather ambiguous.</p>	<p>Accepted.</p>	<p>Amend fourth bullet point green box para 2.6: 'Across the city as a whole, a variety in terms of density, street layout, landscaping and design appearance is encouraged. The ability of a specific site to reinforce this variety will depend on the nature of the location and nature of the site and the surrounding context (for example a site adjacent to a grid road and its reserve could reflect for example a different character to the adjacent estate) as well as the size of the development.'</p>	
35.26	<p>3.3.3: The last sentence of this paragraph states:</p>	<p>The Council is currently</p>	<p>Delete para 3.3.3.</p>	

35.27		<p>“Secured By Design accreditation is to be achieved on all properties built on HCA Land”. We consider qualification of this necessary in section 3.3.</p> <p>Page 31, ‘Green Box’ third bullet point: The third bullet point states the following:</p> <p><i>“To optimise biodiversity attributes all development proposals, but especially larger ones, require an ecology strategy.....”</i></p> <p>This requires further qualification – do all development proposals, even ones for one or two dwellings require an ecology strategy? This would be an onerous requirement.</p>	<p>negotiating the transfer of HCA land. This paragraph is consequently considered unnecessary.</p> <p>Accepted.</p>	<p>Amend third bullet point green box page 31 to read: ‘A biodiversity report will be required for all applications to create 5 or more dwellings, or where there is evidence of a protected species or a strong likelihood of a protected species being present. The report should include...’ Move bullet point to new section on biodiversity.</p>
35.28		<p>Page 32 ‘Green Box’ first bullet point: The requirement to use predominantly native trees is noted, however the requirement that they also be locally sourced is onerous, and we consider an unreasonable provision.</p>	<p>Accepted.</p>	<p>Amend first bullet point green box page 32 to read: ‘To help establish identity for a new neighbourhood, a palette of tree species which are predominantly native or of local provenance should be established at the design code stage of the process.’</p>
35.29		<p>Page 32 ‘Green Box’ last bullet point: Whilst we do not disagree with the statement in the last bullet point about Green Roofs providing environmental benefits, we question its inclusion in a section</p>	<p>Accepted.</p>	<p>Amend title of section 3.4 to read: ‘Landscape, Public Space and Biodiversity’</p>

35.30		<p>about Landscape and Public Space. Would it not be more appropriate in a 'Sustainability / Biodiversity' section, or should this section be retitled 'Landscape, Public Space and Biodiversity'?</p> <p>3.4.22: The last sentence requires a maintenance regime for all public and private external spaces. The requirement for a maintenance regime for all private external spaces is considered overly onerous – in many circumstances private external spaces will be under the control of future occupiers, and so the developer cannot be expected to maintain them.</p>	Accepted.	Amend para 3.4.22, replace third sentence with: 'Proposed ownership and management responsibility for different areas should be clearly set out at the start of the planning process.'
35.31		<p>3.4.23: The year of the Audit Review on Open Space and Highway Adoption process is missing.</p>	Accepted.	Amend para 3.4.23 to read: 'The process is supported by the recommendations of the Audit Review on Open Space and Highway Adoption (2009).'
35.32		<p>3.4.24: Clarification is required about when the various stages (pre-submission, post submission, post determination) apply to the adoption process. For example steps (1) and (2) should be encouraged pre-submission, steps (3) and (4) are post submission, and steps (5) – (9) are post determination. Also, the SPD should make it clear that the planning officer is responsible for coordination of activities to Determination Stage.</p>	Accepted.	Amend para 3.4.24 to clarify different stages.
35.33		<p>3.4.26: This section has some key implications and we consider requires some re-ordering / changes to the text to provide a useful guide for developers.</p>	Without specific detail of what changes are considered necessary, it is	Will make drawing bigger, include caption and relate it better to relevant text.

		<p>We do not understand what the plan on page 36 is showing – this does not provide a useful reference and we suggest is removed or made clear to read and explained.</p>	<p>not possible to address this point. Accept that drawing is illegible and not clear what point of it is. There is existing text that relates to it, but this is on the previous page.</p>	
35.34		<p>3.4.32 'Green Box': PPG25 has been replaced by PPS25. In addition the years of the various Acts / best practice examples should be stated. This does not currently show the reader what best practice the Council is directing them to.</p>	<p>Accepted in part. It is considered sufficient to identify the organisations which provide the best practice.</p>	<p>Amend para 3.4.32 first three bullet points to read:</p> <ul style="list-style-type: none"> • Flood and Water Management Act 2010 • National Planning Policy Framework (2012) • Milton Keynes Drainage Strategy – development and Flood Risk SPG (2004)' and insert new bullet point to read: • BS8533: Code of Practice for Assessing Flood Risk in Development (2011)'
35.35		<p>3.5.5 – 3.5.6 and 3.5.8 – 3.5.10: We consider these paragraphs and the example diagram on page 39 unnecessarily prescriptive and question the urban design quality that would be achieved by the layout shown on page 39. Architects and urban designers will be aware of ways to orientate</p>	<p>It is accepted that the level of detail provided is unnecessary.</p>	<p>Delete paras 3.5.8-3.5.10 and diagram on page 39.</p>

35.36		<p>houses to maximise solar gain capture.</p> <p>3.6.1: We welcome Milton Keynes Council's commitment to the pedestrian first principle when considering a movement framework, however the other provisions of the SPD contradict this approach. The parking requirements in particular set out that the Council's priority is on accommodating the car in new developments. In addition, we question whether the layout example on page 39 would accord with the pedestrian first principle.</p>	<p>Not accepted. The pedestrian first principle does not preclude the Council for making appropriate provision for car parking. Drawing on pg 39 will be deleted.</p>	<p>No change.</p>
35.37		<p>3.6.12 – 3.6.14: Redways have a significant impact on the form and layout of residential developments (as set out on page 40, cyclists should be considered second in the Movement Framework Hierarchy) and we consider more prescriptive guidance on redway design necessary. It is currently unclear what the requirements are in terms of width, distance from front gardens, number of acceptable crossovers etc. Clear guidance should be included in this Design Guide and / or The Highways Design Guide. Example diagrams would be particularly helpful, with dimensions clearly shown.</p>	<p>Accepted.</p>	<p>Include new para in redways section to read: 'Redways should normally be 3 metres wide. Where they are located adjacent to parallel car parking spaces, there should be a 1 metre 'wobble strip' to avoid car doors opening over the redway. No building or wall should be within 500mm of the edge of a redway. No shrubbery with a mature height of 300mm should be located within 1.5m of the edge of a redway.'</p>
35.38		<p>3.6.26 'Green Box': All of the 'street trees' considered appropriate are shrubs. We consider it necessary to expand this list, and also include the English name for ease of reference.</p>	<p>Accepted, although will keep the shrubs section in – especially if they are low maintenance.</p>	<p>Amend green box para 3.6.26 to read: Avenue/boulevard</p>

			<ul style="list-style-type: none">• <i>Acer platanoides</i> 'Emerald Queen'. Norway Maple species.• <i>Tilia cordata</i> 'Green Spire'. Lime species.• <i>Carpinus betulus</i> 'Frans Fontaine'. Hornbeam species.• <i>Pyrus calleryana</i> 'Chanticleer'. Ornamental Pear species <p>Residential Street</p> <ul style="list-style-type: none">• <i>Fraxinus angustifolia</i> 'Raywood'. Claret Ash.• <i>Tilia tomentosa</i> 'Brabant'. Lime species.• <i>Prunus avium</i> 'Plena'. Cherry species.• <i>Betula pendula</i>. Silver Birch.
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			<p>Lanes/Mews.</p> <ul style="list-style-type: none"> • Acer campestre 'Streetwise'. Field Maple species. • Prunus x schmittii. Cherry species. • Sorbus aucuparia 'Sheerwater Seedling'. Mountain Ash species • Crataegus x laveallei Hawthorn species. <p>Specimens/Special Places.</p> <ul style="list-style-type: none"> • Betula utalis 'Jacquemontii'. Himalayan Birch. • Liquidambar straciflua. Sweet Gum. <p>Add sentence to end of para 3.6.24 to read: 'Appropriate species</p>
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35.39		Diagram on page 47: We would question whether the example shown accords with best practice.	The example shown is considered to accord with best practice.	include...' followed by existing list of species in green box after para 3.6.26.
35.40		3.6.27: We consider this level of detail more appropriate in the detailed Highways Design Guide. In any event, this paragraph should reference the Design Table for Roads and Streets at the bottom of page 48. With regards to the table, we question whether street type 10 is of sufficient width for an emergency vehicle. In addition, clarification should be given on which of these roads are adoptable, and any further reference to street types in SPD should be consistent with the table.	It is considered that the level of detail included within this section is appropriate. However, the table could be simplified to remove some of the technical detail. Street type 10 is of sufficient width for an emergency vehicle. Bucks Fire and Rescue Service have indicated that 3.1m is required for vehicle access. Housetypes 1-10 are potentially adoptable but this is only by agreement.	Amend para 3.6.28 to read: 'The street hierarchy (see Design Table below and street hierarchy diagram) should be designed to ensure that a network is created that...' Amend Design Table. Include note that street types 11-12 are not adoptable.
35.41		3.6.31, 3.6.32, and 3.6.33: With regards to para 3.6.31, there is a discrepancy between the inappropriate verge widths referenced in para 3.6.31 and the adjacent photograph.	Accepted. Parking spaces are to be 2.5m wide (regardless of whether right angled or parallel to street).	Amend para 3.6.30 second sentence to read: 'In addition to footways, they require a 2.5 metre (minimum) wide reservation on each side to accommodate a combination of verge and on-street parking (except where they pass through a

35.42				<p>local centre or other non-residential fronting development where the requirements will be specific to the context).’ Include para after 3.6.24: “Where housing fronts onto verges and on street parking is included, in order to allow residents to access the footpath or redway via a hard surface, the verge must either be only 2.5m wide or if it is wider then a section (the length of the on street parking spaces) of hardstanding should be incorporated between the edge of the parking spaces and the footway/redway. In all instances, where housing faces the verge, the verge should be narrower than 3m or wider than 5m. This is to avoid cars blocking the footpath by parking indiscriminately across the ‘link’ between the driveway and street.’</p>
		Para 3.6.32 - the text about narrowing is rather confusing. We consider it necessary to qualify that	It is confusing.	Amend para 3.6.32. Reword 4 th sentence to

		<p><u>in specific points</u> they can be narrowed further.</p>		<p>read, “In specific points they can be narrowed down further to accommodate redway or other dedicated pedestrian crossing points”</p>
35.43		<p>With regards to para 3.6.33, we have concerns with the statement that the highest densities should be along this street type. High density parts of developments (such as Oakgrove) are often located on a mix of street types but geographically concentrated towards shops and commercial uses, so as to encourage a more active centre. This statement is therefore overly restrictive as currently drafted.</p>	<p>It is accepted that high density development may occur elsewhere within the development. However, the avenue/boulevard as the primary street within a neighbourhood is most likely to be a bus route and contain local facilities. Consequently, it is appropriate as a focus for higher densities.</p>	<p>Amend para 3.6.33 to read: ‘The highest densities of the development will tend to be along this street type, especially if it is a bus route and/or contains local facilities.’</p>
35.44		<p>Page 51: The illustrative plan is useful, but minimum and maximum dimensions for verges, parking space widths etc (as set out in the table on page 49) should be added.</p>	<p>Accepted.</p>	<p>Amend plans on page 51 and 52 to include dimensions.</p>
35.45		<p>Page 54, para 3.6.41: What national policy has informed the subsequent criteria? A reference is required.</p> <p>We consider the first bullet point overly restrictive – DB 32 has always allowed 25 dwellings to be served by a shared surface road if there is one access, and 50 dwellings if a through route or served by a second access. Well designed shared surface roads can reduce traffic speeds and</p>	<p>DfT Local Transport Note 1/11 and Manual for Streets have helped to inform the criteria for level surface streets. The Council has also undertaken its own research into the experience of level surface streets in Milton Keynes.</p>	<p>No change.</p>

35.46		visually enhance the area (as recognised at para 3.6.39) Page 55, 1 st 'green box', last bullet point: This is highly prescriptive, and the last bullet point in particular is contrary to permitted development rights, which allow for a wall or structure up to 1m in height adjacent to a public highway.	DB32 has been superseded by Manual for Streets. It is considered necessary to be prescriptive with regard to level surface streets in order to ensure that they are successful. The objective of this bullet point is to provide visibility for small children moving from the defensible space to that part of the carriageway used by vehicles. It is accepted that the residents could subsequently place a wall or structure up to 1m within this area under permitted development rights. However, it is considered a good design principle to be followed in the interests of safety.	Amend last bullet point first green box page 55 to read: 'Anything located within the defensible space should be a maximum of 0.6m high to provide sufficient visibility for small children.'
35.47		Page 55, 3 rd green box, second bullet point: We do not understand what the following is trying to say: <i>"...all level surface streets should allow for 2 way traffic with a carriageway width a minimum of 4.8m is an absence of such a strip."</i> This requires some re-drafting and we consider the minimum requirement of a 4.8m width too	This bullet point is a typo. (Need to check with Dave Lawson as to whether 4.8m is appropriate – seems to conflict with the Design Table.) As a general point we will	Amend second bullet point in green box 'width' (p55) to read: "As a general minimum, all level surface streets should allow for 2 way traffic with a minimum carriageway width of 4.8m."

35.48		<p>prescriptive for level surface streets.</p> <p>Page 58: The use of the 'Culs-de-sac' is encouraged in the SPD, however CABE's publication, 'This way to better residential streets', states, 'The cul-de-sac solves specific problems such as enabling the intensive development of brownfield sites that have only a single point of access. However, when repeated across neighbourhoods it fails to create a connected network or to integrate new and existing neighbourhoods. Instead cul-de-sacs create places that are disconnected, inward looking and where people have car dependent lifestyles.'</p> <p>We accept that culs-de-sacs are appropriate in parts of residential developments, however there needs to be recognition that they should not be at the expense of a well connected, permeable neighbourhood.</p>	<p>check that there is no conflict with the widths/other dimensions in the table.</p> <p>Para 3.6.44 green box first bullet point states that culs-de-sac should be located within a wider connected movement network.</p>	<p>No change.</p>
35.49		<p>Page 59: The top left example diagram appears to include a long strip of unsurveilled parking to the rear of residential properties. This appears contrary to the provisions of Secured by Design (and the SPD).</p>	<p>The diagram is a little confusing – the parking shown serves apartments.</p>	<p>Amend diagram to show bigger gap between parking courts and more landscaping in court. Will also highlight apartments.</p>
35.50		<p>3.7.10: This is considered an ambiguous paragraph and unnecessary.</p>	<p>Accepted, will reword.</p>	<p>Amend para 3.7.10 to read: "Larger, square blocks can be achieved through the incorporation of short, direct culs-de-sac or a variation of this being</p>

35.51		3.8.1: We consider three housing forms to be missing: Flats; semi-detached, and Detached dwellings.	The existing housetypes can be arranged in terraced, semi-detached or detached forms. It is accepted that flats are not included. There are so many options with flats it is difficult to illustrate.	housing proposed around a front parking square.” Add sentence to end of para 3.8.1 to read: ‘The narrow and wide frontage housetypes can be arranged in detached, semi-detached or terraced forms.’ Add flats as bullet point in list of typologies in para 3.8.1 but with no drawing. Include note to table on page 54 to read: ‘Flats is another housing typology. However, there are too many variables relating to the design of flats to include them within the table.’
35.52		3.8.3: The second sentence provides that the 5 house types examples are based on the requirement for allocated spaces to be accessed independently. We disagree that this should be the primary driver for dwelling design.	Accepted.	Delete second sentence para 3.8.3.
35.53		Table on Page 64: This table is highly prescriptive and indicates that the starting point in considering the quality of urban design is from assessing the parking provision and requirements. Our interpretation of this table is that the Council will judge schemes to be poor unless ‘L-shaped’ or	Accepted. It is not intended that car parking should dictate housing typologies. The table and associated diagrams should be amended.	Amend housing typologies tables and diagram.

		<p>dual aspect units are provided. These are usually only appropriate for larger 4 bed typologies. How does this then impact on 2 and 3 bed units?</p> <p>There is also concern that this table will not be used as a guide, but a tick box exercise. This would result in some highly monotonous and unvaried developments.</p>		
35.54		<p>Page 65: The image examples of car parking arrangements and dwelling types push the car parking mainly to the front of the property, in view of the public realm. All examples of the proposed frontage parking is viewed as bad examples of residential development in CABE and other urban design guides as it leads to a car dominated development.</p>	<p>Partly accepted. Disagree that parking to the front is bad – what is important is a mix of parking solutions (it is bad when there is too much of it to the front).</p>	<p>Amend housing typology diagrams – to show parking to the side.</p>
35.55		<p>Pg. 66 – point 3.9.4: The requirement that unallocated spaces <u>must</u> be located in a public area is considered overly prescriptive as it implies that all types of road will have to be adopted. There will be situations where there is an unadopted road leading to a few houses which will be appropriate for unallocated parking, but the way that the document is currently drafted does not provide flexibility to cater for such a situation.</p> <p>This should be amended to be more flexible.</p>	<p>Any changes to the adopted 2009 parking standards need to be based on robust evidence. A review of current parking standards is to be undertaken. The Design Guide should include the current adopted 2009 standards as an appendix.</p> <p>Standards for HiMOs are better included within the HiMO SPD.</p>	<p>Delete paras 3.9.1-3.9.1, tables 1 & 2 and parking standards zone maps. Include extract from Addendum to Parking Standards (adopted 2009) in appendix. Amend para 3.9.11 to read: ‘The Council’s requirements for parking for residential development are provided by the Addendum to Parking Standards adopted in 2009. An extract from the</p>

				<p>Addendum is included at Appendix F. The parking standards for Houses in Multiple Occupation (HiMO) are contained within the HiMO SPD. Please note the following points in addition to the information set out in Appendix F:</p> <p>See changes above.</p>
35.56		Pg. 66- point 3.9.5: Where is Table 3?	HiMO standards are better included within the HiMO SPD.	See above.
35.57		3.9.6: This states that it is a last resort for a shortfall of the standards to be provided on-street. This is contrary to best practice guidance, which encourages imaginative ways of accommodating resident parking bays on street.	HiMO standards are better included within the HiMO SPD.	See above.
35.58		Pg. 67 Point 3.9.11, Parking Standards box: <i>'all parking spaces must be independently accessed (i.e. no tandem parking)'</i> . This is considered overly prescriptive, and will require a greater land take, adversely impacting on housing delivery. This objective is therefore contrary to the Government's objective to make efficient use of the land. Alternatively some developers will counter this by cramming in the same house type, which will be to the detriment of street scene variety and general urban design. It is therefore considered unreasonably onerous to have a blanket resistance to tandem car parking, which would be to the detriment of the future	<p>Comment partly accepted.</p> <p>Disagree that garages should count as parking. If they do, and residents still choose to not park in them even less on plot parking will result and even more indiscriminate/inappropriate on street parking will result. No change proposed.</p> <p>Is it likely that developers will</p>	<p>Delete para 3.9.15 and include new bullet point in green box after para 3.9.11 to read: 'Detached homes with 5+ bedrooms will generally be expected to have at least 2 on-plot, independently accessible parking spaces.</p> <p>For smaller homes (i.e. 4 bedrooms or fewer), independently accessible on-plot parking spaces are</p>

		<p>quality of places in Milton Keynes.</p> <p><i>'Garages do not count as parking spaces':</i> People will use garages to park cars if they are of a sufficient size and / or there are no viable alternatives. Other Local Authorities set minimum size thresholds for garages, which we consider an entirely reasonable approach for Milton Keynes.</p> <p><i>'There is no maximum requirement'</i>, This could result in a significant amount of parking spaces, which would dominate the street scene, to the detriment of soft landscaping and overall aesthetics.</p>	<p>provide more than the stated requirement. No change proposed.</p>	<p>preferred but tandem parking (including any similar layout where the spaces are not independently accessible) will be acceptable, provided that:</p> <p>The unallocated (on-street) provision is visible and in close proximity (within 15m from the front of the property) to those homes that have tandem parking (or any similar layout where the spaces are not accessed independently).</p> <p>The on-street provision does not encroach into the carriageways on bus routes and other primary residential streets (types 5-7) so as to allow for the movement of free flowing traffic, including service delivery vehicles.'</p> <p>No change.</p>
35.59		<p>Page 68 – Point 3.9.12</p> <p><i>'Location of parking is one of the most prominent issues in pre-application discussions'</i>,</p> <p>This statement contradicts the Council's</p>	<p>This is a statement of fact and reflects the difficulty of accommodating parking satisfactorily. It doesn't contradict the Council's commitment to the user</p>	

35.60		<p>commitment to consider the car last in the movement framework hierarchy.</p> <p>Pg. 69 Point 3.9.14:</p> <p>Features (such as bollards, low planting) can be designed into developments to ensure cars do not park on kerbs and verges. As advocated by CABE's best practice, streets should be designed to accommodate on-street car parking in appropriate ways.</p> <p>Points 1 – 5 listed in the green box can be addressed by good design. This should be acknowledged.</p>	<p>hierarchy set out in para 3.6.1.</p> <p>Comment partly accepted</p> <p>The section on on-street parking (para 3.9.27 onwards) promotes the accommodation of on-street parking.</p> <p>The Council's view is that for the reasons listed in the green box at end of para 3.9.14 rear courts are not an acceptable option. The council are not wanting to encourage rear parking courts – the Appendix D does provide guidance on rear parking courts so deals with this final comment.</p>	<p>Include new text after para 3.9.16:</p> <p>'Opportunities for inappropriate parking should be designed out of schemes, as far as possible. Providing sufficient designated on-street parking spaces in the right locations will assist in reducing the instances where residents feel the need to park on pavements or verges. However, inappropriate parking should also be prevented through the design of the street. A range of street elements, such as carriageway widths, street furniture and planting, (including trees and groundcover planting), can be manipulated to constrain or direct parking.'</p> <p>Delete para 3.9.18.</p>
35.61		<p>3.9.17 - 3.9.18: The minimum provided of 5.5m does not work. Two car parking spaces are 5 metres wide. Access to the front door of 1 metre and a 0.5 metre green buffer results in a width of 6.5m being necessary.</p>	<p>Accepted.</p> <p>Because of proposed changes to tandem parking from workshop on 29 Feb, wording for housetypes will</p>	

35.62		<p>Page 70, 3.9.20: The on-plot parking negates to mention car ports, and as set out above, we consider that garages and tandem parking should be recognised as appropriate solutions in some circumstances.</p>	<p>change. No dimensions to width of housetypes will be included in SPD.</p> <p>Comment partly accepted The Council does not accept that garages should count as parking spaces as there is no evidence to suggest that they will be used as parking spaces.</p>	<p>See earlier response on tandem parking. Drawings will change to reflect this.</p> <p>Include new para after 3.9.44 to read: 'Unlike garages, carports can be counted as on-plot car parking because they are unlikely to be used for storage. However, there are concerns where they are accessed from the public realm as they provide gathering spaces for youths, and are often poorly surveilled. Car ports are required to be open on two faces and to have minimum internal dimensions of 3.0m x 5.0m per space. Where the car port is located to the side of the house, any fence or wall provided to secure the rear garden should be at least 1 metre from the end of the car port.'</p>
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35.63		<p>Page 70 – illustrative examples and photograph: We doubt that the examples shown would result in a good quality public realm, and these examples are considered contrary to best practice in urban design.</p>	<p>Do not accept that parking to the front is automatically bad from an urban design point of view – if it is used sparingly and as part of a mix of parking options it is believed to be acceptable. However, there are other options for providing on plot parking which can be considered if tandem parking is not prohibited.</p>	No change.
35.64		<p>Page 71 ‘ Drive Through’: This arrangement is not workable if tandem parking is to be prohibited. Point 3.9.25 reinforces this by stating “rear gardens (and plot widths) would need to be quite large to accommodate the requirement for two independent accessible spaces”. Effectively ruling out drive throughs that require tandem parking to be an efficient use of land.</p> <p>In addition, we do not consider the solution shown on the diagram of the rear drive through car parking to be useable. As with any car parking and manoeuvring, the pull forward space (drive through) should be a minimum of 6.0 metres. This would make an even wider plot. In addition, the rear parking as proposed in the diagram results in very poor amenity space.</p>	<p>It is accepted that tandem parking is appropriate as a potential parking solution, in general and for drive throughs in particular.</p>	Delete para 3.9.25. Amend diagram on page 71 to allow for tandem parking.
35.65		<p>Pg. 72 ‘Right Angled Parking’: The bottom left example diagram provides an unpractical parking solution.</p>	Accepted.	Amend diagram in light of potential to now allow tandem parking.

35.66		Pg. 73 'On Street Parking': Problems will result from the examples requirement for unallocated spaces in adopted areas, and management between allocated and non-allocated spaces.	Comment accepted. The diagrams were simply trying to show how rear parking courts result in smaller rear gardens for developments of a similar density. This is not saying that the resulting streetscape might not suffer from being over dominated by parked cars	Delete diagrams on page 73 and para 3.9.28.
35.67		Pg. 74 Point 3.9.36: Wide fronted houses are a residential form, and would no doubt provide a greater percentage of on-street parking; however they are land hungry, and not always plot efficient, or visually desirable. How is unassigned visitor parking envisaged to be accommodated in this arrangement?	Paragraph 3.9.36 This is merely guidance (it is not mandatory) and simply illustrates an option to more easily achieve on street parking Unassigned visitor parking will be provided as in any street.	No change.
35.68		Page 75 'example diagram': The wider parking street sketch demonstrates inefficient land use and creation of a poor urban environment dominated by hard surface and vehicles. This is not appropriate in most situations.	Not accepted. This is not a poor urban environment. It is an efficient means of accommodating on street parking and certainly could be appropriate for higher order streets to help emphasise street hierarchy. It is not an inefficient use of land – rear courts are more inefficient as smaller rear	No change.

35.69		<p>Pg. 76 'example diagrams': Both plan examples result in a car dominated development and an inefficient use of the land.</p>	<p>gardens result. Not accepted. Both examples provide efficient means of accommodating parking and accord with principles of Manual for Streets.</p>	No change.
35.70		<p>Pg. 77 Point 3.9.46: Cycle parking ... 'could be in the form of a shed or garage'. Garages should be counted as a car parking space if the garage is 3x6 metres, which allows for secure cycle storage and refuse storage, as other Councils and Highway Authorities acknowledge. The car parking space requirements will increase to 6.5 metres to allow for the Life Time Homes car parking requirements.</p>	<p>The Council's view is that garages are not used by residents for parking, and therefore should not count as a parking space. Will explore whether Guide should refer to Lifetime Homes standards re parking spaces (Andy Swannell)?</p>	No change.
35.71		<p>Pg. 79 Point 4.2.2: It is not practical or commercially viable either from a design ambition or buildability perspective for residential buildings to be designed for later conversion to commercial use.</p>	<p>Adaptability is a key objective of urban design. Thinking about future uses of buildings is highlighted in 'By Design'. This is just guidance and the text states, need only be considered in <i>appropriate</i> locations.</p>	No change.
35.72		<p>Pg. 80 Point 4.2.5: The comment: 'CLG are currently reviewing Lifetime Homes.' is incorrect. This was revised in July 2010.</p>	<p>CLG are reviewing all residential design standards. However, reference to any review should not be included in the final version of the Design Guide.</p>	<p>Amend para 4.2.5: ' In accordance with Policy H9 of the Local Plan, developers are encouraged to meet "Lifetime Homes" standards for new dwellings. Under code for</p>

				<p>sustainable homes level 4, developers will need to meet all 16 lifetime homes points to achieve full credits. Lifetime Homes standards are designed to ensure that buildings are accessible, or are easily capable of future adaptation to meet the needs of mobility impaired and wheelchair users. Further information on Lifetime Homes can be found on the following website: www.lifetimehomes.org.uk</p>
35.73		<p>Page 80 Point 4.3.3: This paragraph states that the Council are preparing a separate residential space standards policy document. This has significant implications on the design of new housing and is essential to be referenced in this SPD. It is also essential that such standards do not conflict with existing HCA, HQI and LTH Standards.</p>	<p>The decision whether or not to prepare a SPD on residential space standards is a separate matter to be considered outside the Design Guide consultation process.</p>	<p>Delete paragraph 4.3.3.</p>
35.74		<p>Pgs. 81 & 82, Point 4.5.1 & 4.5.6: This is good urban design practice, however it contradicts aspects of Highways design mentioned later on (points 4.5.36 & 4.5.37), e.g. the requirement for forward visibility splays on curved roads.</p>	<p>Section 4.5 is to be redrafted. Guidance on visibility requirements will be included in the Highway Design Guide.</p>	<p>Delete paras 4.5.36 & 4.5.37.</p>
35.75		<p>Point 4.5.8: Where are the Road Types stated here cross referenced in the SPD? If it is the table on page 48, then some types are not in the table.</p>	<p>Road types are described in the table on page 48. Some of the types referred to in</p>	<p>Delete para 4.5.8.</p>

				para 4.5.8 are industrial streets and should not be included in the Design Guide. Section 4.5 is to be redrafted to remove technical highway guidance.	
35.76		Pg. 84: Turning Head diagram plans - what is the minimum road width?		It is considered that technical highway guidance should not be included in the Design Guide.	Retain turning head drawings without dimensions to illustrate that they should not dictate the form of public space.
35.77		Page 86: Where are the Major and Minor Road Types Cross-referenced. Is it the table on page 48?		It is considered that technical highway guidance should not be included in the Design Guide.	Delete paras 4.5.25-4.5.38.
35.78		Pg.87 Points 4.5.36 & 4.5.37: Forward Visibility. Are these for all road types? If so it contradicts previous design guidance on slowing traffic down with buildings etc. The green box Point iii) refers to Appendix A. Where is it? Currently Case Studies are shown in Appendix A.		It is considered that technical highway guidance should not be included in the Design Guide.	Delete paras 4.5.25-4.5.38.
35.79		Pages 81-87: General Comment: We consider it appropriate to have the detailed highway engineering content on pages 81-87 within the Highway Guide not in the Residential Design Guide. As previously stated, the Highway Design Guide will lead to duplication at best and contradiction at worst.		Accepted. This information will be included in the Highway Design Guide.	Delete paras 4.5.8-4.5.18 and paras 4.5.25-4.5.38.
35.80		Pg.88 Point 4.6.5: Houses and or built form will need to be set back from the road and footpath, by		Cars could be parked at an angle.	No change.

35.81		<p>a minimum of 5.0 metres to allow for perpendicular car parking.</p> <p>Pg.89 Point 4.7.5: The Guide states that '<i>Green Walls should be considered.</i>'</p> <p>Green Walls require maintenance, and this can be a significant burden to place on a future occupier. Instead of being so prescriptive on Green Walls, we consider a broad requirement for soft landscaping and planting to be considered.</p>	<p>Accepted. The reference to green walls is incorrect. Ivy screens as used in Oxley Woods is what we mean.</p>	<p>Amend para 4.7.5 second sentence to read: 'Where this does occur 'ivy screens' should be considered.'</p>
35.82		<p>Pg.90 Point 4.8.4: The paragraph encourages larger gaps (e.g. between 5-10 metres) between buildings'</p> <p>This is considered too prescriptive, a minimum of 3 metres between buildings is sufficient to provide a soft feel to the environment, and is a large gap.</p>	<p>Accepted. In practice, car parking to the side of a house, particularly if a double garage is used, can deliver this reduced continuity of frontage.</p>	<p>Amend para 4.8.4 first sentence to read: 'In lower density areas where detached and semi-detached forms are more prevalent and a softer feel is more desirable, the degree of enclosure is less important and larger gaps in excess of 3m between buildings (i.e. broken frontages) are appropriate.'</p>
35.83		<p>Page 91-Point 4.9.6: This is too prescriptive and overly onerous as it will result in inefficient use of land, reduced housing numbers, fewer smaller houses and a limited housing mix. In any event we do not consider it possible for only 25% of the frontage to be as a car port in such a scenario, and is the Council's final position that it supports car ports?</p>	<p>Maintaining active frontages is a valid urban design principle. However, setting a percentage of frontage that should be car ports/garages is probably too prescriptive.</p>	<p>Delete second sentence para 4.9.6.</p>
35.84		<p>Page 92: It is unclear how the two plan diagrams</p>	<p>Objections from other</p>	<p>Delete concave and</p>

35.85		<p>showing Convex and Concave development relates to the text. In addition, what are the parking solutions for these two options?</p> <p>Pg 92 –Point 4.10.4: We consider it important to state that parking on front is preferred on corner plots to rear parking. Rear parking should not be precluded, as it can be an appropriate arrangement in some cases.</p>	<p>respondents. Might be easier to leave it out.</p> <p>Partly accepted.</p>	<p>convex diagrams.</p> <p>Amend para 4.10.4 second sentence to read: 'Parking should, wherever possible, be provided adjacent to the dwelling rather than to the rear of the garden, where it not only tends not to be used but also increases the length of inactive frontage.'</p>
35.86		<p>Pg 93-Point 4.11.1: Privacy back to back distance of 22m should be the measured from the first floor. Otherwise people will be unduly precluded from having ground floor extensions (which are allowed under permitted development rights).</p>	<p>Accepted.</p>	<p>Amend para 4.11.1 to read: 'As a rule of thumb, for new residential developments, back-to-back privacy distances of 22 metres (measured from first floor level) should be the objective.'</p>
35.87		<p>Pg. 95: All three images are of 'traditional' designs, yet earlier in the SPD, the guide states that the design of dwellings should not be a pastiche and should be of their time. As per our previous comment, we consider that there should be a recognition that well designed traditional forms are appropriate in some instances.</p> <p>Page 96: There are four photographic examples, and it would be useful if the text explain why they are poorly proportioned buildings.</p>	<p>The message that the images are trying to convey is unclear and is subject to different interpretations. Para 4.12.6 accepts that well-designed traditional houses are appropriate. It is not considered necessary to add further explanation.</p>	<p>Delete photos on page 95, and amend first sentence of para 4.12.8 to read: 'The key with all buildings is good quality, honest architecture – in other words keeping it simple.'</p> <p>Delete top left photo. Add additional wording to bottom left caption to read; 'there is too much of a gap</p>
35.88				

35.89		<p>Page 97: The photographic example goes against what has been said before regarding modern design. Also successful towns and cities have a range of building styles and periods of buildings built opposite and next to each other, so it should not necessarily follow that <i>'it would be better if the same styles occurred on both sides of the street.'</i></p> <p>Point 4.12.14: The requirement that elements of an adjacent building must be included in the new buildings design could have adverse implications on quality. What if the building elements of existing buildings are of poor quality?</p>	<p>Comment partly accepted. Buildings facing each other across a street should not visually clash which the housing in this example does.</p>	<p>between first floor and dormer windows.'</p> <p>Reword caption to image on page 97 to make it clear that buildings should not visually clash.</p>
35.90			<p>Comment partly accepted. It is the positive elements of neighbouring buildings that should be included in the proposed buildings.</p>	<p>Amend second sentence para 4.12.14 to read: 'Positive elements of the design of buildings (that help reinforce character for that street) along key frontages should therefore be included in the neighbouring buildings.'</p>
35.91		<p>Pgs. 98 & 99 Point 4.12.15: In the table relating to Windows, bullet point 7, <i>'Where a more contemporary external appearance for the dwelling is sought, consideration should be given to:The Avoidance of cills and lintels',</i></p> <p>We consider this should be removed as all windows regardless of style will need a cill, and lintels can be modern.</p>	<p>Accepted.</p>	<p>Amend second bullet point page 99 to read: 'the avoidance of visible cills and lintels'.</p>
35.92		<p>Page 100: Where are tables C1 & C2 referred to in 4.12.19?</p>	<p>Accepted.</p>	<p>Amend para 4.12.19 to read: 'A development's choice of materials will in part be informed by the completion of tables C1</p>

				and C2 (Appendix C) which will help determine the dominant character in terms of materials in the surrounding area and whether this contributes to the character or identity of the street and / or area.'
35.93		Pg. 103: We question the visual quality of the buildings shown in the photograph demonstrating an 'interesting roofline'	Subjective view.	Will amend caption to say, 'This roofline adds interest and character to the street that the buildings address.'
35.94		Page 103, point 4.12.34: Where is the source of the statement that rooms behind dormer windows are seldom used? This is a sweeping statement to make and we consider it necessary to qualify further.	Accepted. Main concern with regard to dormers is avoiding cluttered roofscapes.	Amend para 4.12.34 second sentence to read: 'Excessive use of dormer windows should be avoided as roofscapes often become cluttered.'
35.95		Pg. 104 Point 4.12.39: There should be recognition that balconies can look appropriate with an external frame, and not all building design styles are appropriate for cantilevered balconies.	Accepted.	Add wording to para 4.12.39 to say, "Where external frames are used care needs to be taken that they complement the overall elevation design and are not seen as a 'bolt-on' that clutters the elevation."
35.96		Pg. 106 Point 4.14.4 : What is the minimum amenity area required for flats?	There is no minimum amenity area requirement for flats.	No changes.
35.97		Point 4.15.11: We consider that 'Electric Car Charging Points', should read 'Electric Vehicle	Accepted.	Amend para 4.15.11 heading to read: 'Electric

35.98		<p><i>Charging Points' (EVCP).</i></p> <p>In addition, it is extremely difficult for all terrace houses, flats etc to be provided with / provide a domestic EVCP due to site layout constraints.</p> <p>The bullet points in the Green Box are overly prescriptive and the wording should be amended to allow flexibility.</p>		<p>Vehicle Charging Points' and first bullet point to read: 'Where practicable, dwellings should be designed to enable the installation of a domestic EVCP to approved industry standards at a later date' and second bullet point to read: 'Ducting for fibre connectivity to each dwelling or, if appropriate in terms of flats and apartments, aggregated connectivity.'</p> <p>No change.</p>
36.1	David Lock Associates	<p>Page 108- Chapter 5: Design Quality Assurance. What is Mandatory and non-Mandatory tools?</p> <p>Our initial observation is what is the target audience for such a document? Undoubtedly it is designed for planning officers to inform their pre-application discussions but is it also for assessing planning applications? Or is it also for the use of the design community, in which you include architects, urban designers and landscape architects. If so, these designers may well be from in or around Milton Keynes or more often, wider afield. It therefore follows that the document should set out in the first section what are the main attributes of Milton Keynes. It should be immediately apparent what key factors a designer needs to be looking out for. To us this is not readily apparent in the front of this document.</p>	<p>Only Design and Access Statements are mandatory.</p> <p>Section 2 establishes the Milton Keynes context.</p>	<p>No change.</p>

36.2		<p>Consequently, at the forefront should be an expanded section on the true character of Milton Keynes; that of its rich landscape settings. The images on pages 29 and 30 do not instill a positive response to selling [to external developers and their designers] what is a fundamental principle of Milton Keynes. In addition, to this comment we believe that many principles set out in the document could be enhanced by being better illustrated with photos, too often the wording in the document is long and convoluted and the message or principle being explained is lost.</p>	<p>There is an existing section on the MK context which includes landscape. Positive images are included on pages 19 and 20. The photos on pages 29 and 30 are designed to illustrate important urban design principles.</p> <p>Photos can as easily be misinterpreted as wording. Photos have been included wherever possible to illustrate important points.</p>	No change.
36.3		<p>Related to the landscape attributes of MK, it should be reinforced that it is a well understood principle that the glue that binds a place together, is a consistent, high quality, well designed public realm. This has been shown throughout Milton Keynes and reinforces the principle that the landscape, routes, streets and spaces are what set the backdrop for successful residential areas whatever their architectural character.</p>	<p>Noted. It is considered that the importance of a high quality public realm is emphasised in para 3.4.2.</p>	No change.
36.4		<p>We note that an element of limited consultation was undertaken in July 2011 and that notes of the outcome of this meeting occur in the tables on page 11 & 12. We ask what credence should be given to these comments, which comments were left out [and why?] and what level of analysis was taken to decide to include those in the table? Just</p>	<p>The July 2011 workshop was arranged to establish some key design principles underpinning the layout of residential neighbourhoods. The workshop included members of the</p>	No change.

36.5		<p>because something was mentioned does not necessarily mean it should be included in a document of this type.</p>	<p>Development Control Committee, developers and their agents, planning and highway officers. The principles were established by consensus of those attending and are therefore considered to be robust.</p>	
		<p>We believe that the document still needs to be heavily edited. The document is too long to be actively used in developing schemes. We believe that the document can be substantially minimised by making reference to a number of standard nationally “adopted” documents such as:</p> <ul style="list-style-type: none"> • Manual for Streets 1 & 2 • Building for Life • Car Parking – What Works Where: We recognise that parking is an acutely complex issue in determining layouts. We acknowledge that it is often about bringing a balance of solutions to a scheme. The guide on p62 suggests in 3.7.10 that rear parking courts are not accepted yet in p76 3.9.44 it states that they are acceptable where street parking is not permitted. [There are similar contradictions within the document.] In a similar vein we also believe that tandem parking should be an acceptable option, 	<p>While it is accepted that the document is long, everything in it is believed to be required and in part is a result from addressing the responses from the previous consultation in 2010.</p> <p>Whilst the Design Guide has been informed by best practice guidance, it has been interpreted in the Milton Keynes context which has its own unique characteristics.</p> <p>It is now proposed to include tandem parking as a parking option. The reference to rear parking courts in para 3.7.10 is considered unnecessary and potentially contradictory.</p>	<p>Delete para 3.9.15 and include new bullet point in green box after para 3.9.11 to read: ‘Detached homes with 5+ bedrooms will generally be expected to have at least 2 on-plot, independently accessible parking spaces.</p> <p>For smaller homes (ie 4 bedrooms or fewer), independently accessible on-plot parking spaces are preferred but tandem parking (including any similar layout where the spaces are not independently accessible) will be acceptable, provided that: The unallocated (on-street) provision is visible and in close proximity (within 15m</p>

		<p><i>when used in conjunction with other parking responses, it should not be excluded but one that is acceptable if judicially applied.</i></p> <p>Indeed, if tandem parking is <u>never</u> to be an option then inevitably house type frontages will need to widen which will impact on density and ultimately may require additional land being required to accommodate projected housing figures and as such densities will be lower, catchment areas to local facilities will need to be larger and receipts for land in the city will be lower thereby negatively impacting on CIL and S106 contributions. Equally, whilst this is not a planning issue, land currently being transferred from the HCA to MKC assumes certain densities to deliver both numbers of units, values and levels of viability, if carried forward this restriction will lead to lower capital receipts for the Council. <i>We also take issue with the parking arrangements showed in the sketches on p71, with parking in the rear gardens, this in our experience is neither deliverable nor desirable but is shown merely to respect the design guides requirement of “independently accessible.”</i></p> <p>The benefits of referencing these national documents are that confusion does not arise over their interpretation in the MK document. Secondly, these are standard that should be understood by</p>		<p>from the front of the property) to those homes that have tandem parking (or any similar layout where the spaces are not accessed independently).</p> <p>The on-street provision does not encroach into the carriageways on bus routes and other primary residential streets (types 5-7) so as to allow for the movement of free flowing traffic, including service delivery vehicles.’</p>
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		<p>competent designers throughout the UK. The danger is that by extracting small elements out of these documents, vital information gets lost in transposition or merely omitted. This will inevitably lead to confusion, inconsistency and may end up with unnecessary delays in the delivery of much needed housing or the Council being forced to defend decisions at costly appeals.</p>		
36.6		<p>At a slightly more detailed level: Lifetime Homes – The document makes reference on all new dwellings having to achieve this status [p80,4.2.5]. We do not think this is correct and contrary to national policy. We are of the view that Lifetime Homes should be applied but not to all new dwellings. Some people when they eventually become ill or incapacitated will want to move to specially designed facilities, not all people will want to remain in their previous home; rather they will seek specialist care and facilities. We also underline this with the comment that whilst statements such as this are made on a design basis has any study been made on the implications this would have on developments coming forwards, with regards the cost and density of development, the ensuing affects on land values and the important aspect of affordability of new homes for MK's growing population. If not then such studies should be undertaken so solid empirical evidence can be used to substantiate this requirements at appeals.</p>	Accepted.	Amend para 4.2.5 first sentence to read: 'In accordance with Policy H9 of the Local Plan, developers are encouraged to meet "Lifetime Homes" standards for new dwellings.'
36.7		<p>We note that reference is being made to a possible forthcoming Highway Design Guide – our</p>	Accepted in part. Section 4.5 is to be redrafted to	Delete paras 4.5.4-4.5.18 and paras 4.5.25-4.5.38.

36.8		<p>immediate reaction is why? Manual for Streets 1 & 2 are in place, they are accepted as a good piece of national guidance. This will surely replicate the large section already included in the Residential Guide and will provide yet another tier of guidance adding to repetition and possible confusion.</p> <p>Site Context Appraisal Template – Reference is made in the document to “completing and agreeing” this. Is this another formality and additional process to be undertaken over and above any pre-application discussions or what would normally be included within Design and Access Statements prepared by any competent designer? We understand the sentiments behind this template but for any responsible designer this should be par for the course in preparing a site specific design response.</p>	<p>remove technical highway guidance.</p> <p>The template is to be used as part of pre-application discussions.</p>	<p>Delete third sentence of para 2.2.4. Include new sentence to read: ‘The Council will encourage applicants to complete the appraisal which will assist in establishing a suitable character for the new development.’</p>
36.9		<p>On page 15 2.3.9 the guidance states “Densities across Milton Keynes are however generally still low, largely because of all the open space.” We are curious as to what is deemed “still low” and what evidence has been produced to support this simplified comment particularly as strategic open space is excluded from density calculations?</p>	<p>It is accepted that the text needs clarifying. It is the gross densities which are low.</p>	<p>Amend paras 2.3.8-2.3.9 to read: ‘2.3.8 With the adoption of PPG3 (Housing) in the 1990s, net densities of new development have increased, particularly around local centres and along public transport routes. 2.3.9 Gross densities across Milton Keynes are however generally still low, largely because of the extension of linear parks</p>

				<p>and other strategic open space incorporated as part of new developments across the city. This is however a defining feature of MK and what makes Milton Keynes so desirable for its residents.'</p> <p>No change.</p>
36.10		<p>In summary, ultimately we are concerned that through the sheer volume of the document that the important things which need setting out in a document of this type, what is the essence of Milton Keynes, will be lost. We would like to think that this document will include more imagery in its final version to help set out the great points that make Milton Keynes what it is, a unique settlement. We also think the document should be desk-top produced to create a document of pride that ultimate people will want to review and use actively in designing their proposals. Too often documents of this type are produced that are wordy, unwieldy and ultimately used as a last resort.</p>	<p>While it is accepted that the document is long, everything in it is believed to be required and in part is a result of addressing the responses from the previous consultation in 2010.</p>	
37.1	Julian Thomas	<p>Parking: I think it is really encouraging to see the authors recognising that the previous regime of "restrict parking spaces to force people out of their cars" has been abandoned. I live in Grange Farm, which is approx 8 years old, and the parking situation is dangerous and unsatisfactory; most houses seem to have a garage which is too small to park a modern car in, so are rarely used. This leaves most homes with either 1 or 2 spaces on the drive, so on-street parking is rife. There are lots</p>		<p>Add new bullet point to green box after para 3.9.11 to read: 'Garages are an important design feature of residential developments, which if well designed can provide useful additional space for dwellings. Garages with minimum internal dimensions of 3 x</p>

38.1	Jason Bird	<p>of examples of parking too close to junctions, obscuring vision for drivers and pedestrians, and restricting access for emergency vehicles. It is important that: garages, if provided, can fit a modern car as well as having enough width to allow the car door to open; sufficient driveway parking is provided to protect cars from accident damage; sufficient on-street (preferably recessed from the carriageway) parking is provided for visitors.</p> <p>Most people in 2 bed flats have 2 cars, so 1 allocated space for flats is not enough. Any visitors are struggling to park as the road and visitor spaces are used up.</p>		7 metres are considered large enough for the average sized family car and cycles, as well as some storage space.'
			<p>Any changes to the adopted 2009 parking standards need to be based on robust evidence. A review of current parking standards is to be undertaken. The Design Guide should include the current adopted 2009 standards as an appendix.</p>	<p>Delete paras 3.9.1-3.9.1, tables 1 & 2 and parking standards zone maps. Include extract from Addendum to Parking Standards (adopted 2009) in appendix. Amend para 3.9.11 to read: 'The Council's requirements for parking for residential development are provided by the Addendum to Parking Standards adopted in 2009. An extract from the Addendum is included at Appendix F. The parking standards for Houses in Multiple Occupation (HiMO) are contained within the HiMO SPD.'</p>

				Please note the following points in addition to the information set out in Appendix F:
39.1	Kieran Evans	More affordable 1 bedroom flats/studio apartments are needed.		No change.
40.1	Hilary Saunders	Letterboxes need to be able to take A4 letters and not too difficult to post something through. I hope you can specify minimum size and also accessibility to letterboxes for flats.		No change.
41.1	Bucks Fire & Rescue Service	3.3 Community Safety – Strategic Issues The references throughout the SPD to ‘Secured by Design’ are complementary to this Service’s aims and are fully supported. The principles of ‘designing out crime’ have a positive impact on proactively reducing the dependence of communities on emergency services and can increase a sense of wellbeing and safety.	Noted.	No change.
41.2		Street design and parking – it is essential to ensure that developments and residential streets are designed to ensure adequate access for emergency service vehicles. The references to emergency vehicle access and street design are therefore welcomed but will need to be implemented, monitored and reviewed to ensure that suitable access is afforded to all new developments to which the SPDS applies.	Noted.	No change.
41.3		Section 4 servicing and manoeuvring – Access for fire appliances should be provided to within 45 metres of the dwelling’s footprint, not simply to the property.	Accepted.	Amend para 4.5.20 to read: ‘Residential roads and streets should provide adequate access for emergency vehicles and in

				<p>particular should permit access for fire appliances to within 45m of all points (the 'footprint') of all dwellings. An increase in this distance to no more than 90m may be acceptable, provided there is suitable provision of compensating features such as automatic fire suppression sprinkler systems and in consultation with the local Protection Officer at Buckinghamshire Fire & Rescue Service.'</p>
41.4		<p>To ensure that access requirements as identified in paragraph 4.5.20 are not compromised, it is necessary to ensure adequate access for fire appliances with a minimum height clearance of 3.7m and a minimum width at gates of 3.1m.</p>	<p>This is only needed if buildings are contained within the rear parking court. If the rear parking court only contains car parking spaces and no houses, then there would no need for fire appliances to get in there. The design guide is clear that there should be no homes within rear parking courts.</p>	<p>No change.</p>
41.5		<p>Security gate access – Bucks Fire & Rescue</p>	<p>Accepted.</p>	<p>Amend second bullet point</p>

		<p>cannot hold keys for premises or gates. It is therefore recommended that developments that include security gates or doors are provided with electronic key codes.</p>		<p>appendix D para D3 to read: 'electronic lockable gates (operated by key code so that in case of emergency, the code may be passed to emergency responders)'</p>
41.6		<p>Bin storage - Para 4.15.5 is helpful and will reduce the accumulation of combustible materials adjacent to the means of escape from premises in case of fire.</p>	<p>Noted.</p>	<p>No change.</p>