

DELEGATED DECISIONS
10 APRIL 2012
ROOM 3, CIVIC OFFICES
SCHEDULE

TIME	SUBJECT	DECISION MAKER	PAGES
5.30pm	Registrars On Line*	Corporate Director - Resources	2 to 4
To Follow	House in Multiple Occupation Supplementary Planning Document	Councillor A Morris	5 to 92
To Follow	Residential Design Guide Supplementary Planning Document	Councillor A Morris	93 to 443
To Follow	Milton Keynes Council Policy on Admissions Arrangements for Primary and Secondary Schools 2013 and 2014	Councillor Dransfield	444 to 472

* The public and press may be excluded during consideration of this item.

Wards Affected:*ALL WARDS***DELEGATED DECISION****10 APRIL 2012****Registrars Online Certification System - Approval to offer the product to other Authorities**

Decision Taker: Tim Hannam, Corporate Director – Finance & Resources

Author: Mike Hood, Assistant Director - Partnerships Tel: (01908) 254612

Executive Summary:

Through the Strategic Partnership with Mouchel, the Council has developed a system for the storage and retrieval of historic Registrars documents. This system replaces the current system used by the Registrars team, which is no longer supported by its provider. Through the links that the Council has with Registrars Teams across England and Wales, an opportunity has been identified to offer this product to other authorities. The project team predict the product could be sold to approximately 40% of Local Authorities in England with total revenue for the Council of £399,683 over 5 years. This paper seeks approval to proceed with this activity.

1. Recommendation(s)

- 1.1 That Milton Keynes Council proceeds to sell, support and maintain the Registrars Online Certification Software for other Local Authorities in England and Wales.
- 1.2 That Mouchel plc is appointed as the exclusive agent of Milton Keynes Council to offer the Registrars Online Certification Software to other Local Authorities.
 - (a) That a 50/50 profit share arrangement be agreed with Mouchel in regards to the net profit (or loss) of any sale. Based on a 40% market penetration rate, the income to the Council is anticipated to be £399,683 over the next 5 years.
 - (b) That Milton Keynes Council and Mouchel plc agree to equally share the costs associated with providing this product to other Authorities, subject to Mouchel plc being able to evidence the costs incurred on behalf of the Council. All costs will be deducted from the income generated before the profit is shared.
 - (c) That the agreement with Mouchel to act as exclusive agents run until the end of the current PPP arrangement (31st December 2015).

2. **Issues**

- 2.1 The Registrars Online Certification System was initially developed under the strategic partnership in response to a request from the Registrars Team to replace ageing software that was no longer fit for purpose.

The system has been running in Milton Keynes without issue for almost one year and as such can be considered to be stable.

After implementation, other authorities have expressed an interest in using the software to replace the same ageing system in their Registrars departments.

- 2.2 Following a request from Buckinghamshire County Council, a version of the software was made available to them on a trial basis to test the feasibility of providing this product to third parties. The software has proven itself to be stable, and support can be provided within existing ICTS structures. This trial has resulted in a further 15 authorities expressing an interest in purchasing the solution.

3. **Alternative Options**

- 3.1 Two alternative delivery models were considered to take this product to market:

- (a) Option 1 – Milton Keynes Council offers the product for sale directly to Local Authorities:

The possibility of Milton Keynes Council setting up its own internal team to sell and support the product was considered. To achieve this would require the transfer of specialist knowledge held by Mouchel, and the creation of a new team. This team would need to understand the product, be able to proactively market the product and provide ongoing support to users for up to five years. It was felt that the time and costs involved in this would unduly delay the release of the product meaning that the opportunity could be lost as competitors deliver their own products. It would also result in the Council incurring additional operational cost with no guarantee of income to offset these. Linking support with Mouchel means current ICT support arrangements can be used to reduce set-up and running costs.

- (b) Option 2 – Engage a separate third party to act as agent

A further option of engaging different third party to sell and support the software on behalf of Milton Keynes Council was also considered. However, given that the software was developed and continues to be supported by the members of the ICT development pool it was felt that the level of technical retraining required would be detrimental to the Council's desire to take the product to market as quickly as possible. It was also felt that the level of knowledge and depth of contacts within the Registrars community developed by Mouchel staff was a significant asset to the venture.

It was also feared that entering into a competitive tender process would unduly delay the sale of the product, handing a strategic advantage to our competitors.

4. Implications

4.1 Policy

The Policy is that this proposal pursues is OTP Strand 6 – Identifying Business Opportunities.

4.2 Resources and Risk

Annex A sets out the detailed financial implications and risks of this proposal for the Council. This shows that the costs will only increase as the system is sold to other authorities. This means that the maximum financial risk for the Council is the revenue of £9,793 from the sale of the system to Bucks County Council.

Any additional costs for the development of the system will be evaluated through a business case, before being made. These costs will be part of the profit share arrangement with Mouchel.

The Council will put in place professional indemnity insurance which will provide cover of £1,000,000 at a cost of £3976 + Insurance Premium Tax.

N	Capital	Y	Revenue	N	Accommodation
Y	IT	N	Medium Term Plan	N	Asset Management

4.3 Carbon and Energy Management

The software supports the Council's Carbon and Energy Management Policy by providing electronic copies of paper documents reducing the need for storage and transportation cost from the archives with Iron Mountain.

4.4 Legal

The legal team of the Council have been involved in drawing up a collaboration agreement between the Council and Mouchel. The legal team have also drawn up a licence and support agreement between Milton Keynes Council and Local Authorities who purchase the software.

The software is fully compliant with Data Protection Requirements.

4.5 Other Implications

There are no implications other than those outlined in this document.

N	Equalities/Diversity	N	Sustainability	N	Human Rights
N	E-Government	N	Stakeholders	N	Crime and Disorder

Wards Affected:

All Wards

ITEM 2**DELEGATED DECISION****10 APRIL 2012****Houses in Multiple Occupation Supplementary Planning Document**

Author: Nick Fenwick, Tel: (01908) 252492

Executive Summary:

The purpose of this report is to seek approval from the portfolio holder to adopt the Houses in Multiple Occupation (HiMO) Supplementary Planning Document (SPD).

1. Recommendation(s)

- 1.1 That the Houses in Multiple Occupation (HiMO) Supplementary Planning Document (Annex A) be adopted.

2. Issues

- 2.1 In October 2010 the Government made it 'permitted development' to change from a C3 dwelling house to a C4 House in Multiple Occupation thereby removing the need for planning permission from the local planning authority. In June 2011 the council confirmed two Article 4 Directions. These Article 4 Directions remove the permitted development right introduced in October 2010. Planning permission is therefore still required for a change of use in the urban area of Milton Keynes and from the 23 December 2011 planning permission will be required anywhere in the Borough
- 2.2 The Adopted Local Plan (2005) contains Policy H10 'Subdivision of Dwellings and Houses in Multiple Occupation' that sets the policy for the determination of planning applications pertaining to the change of use from a single dwelling to a house in multiple occupation .
- 2.3 Policy H10 covers issues of:
- Parking
 - Concentrations
 - Noise and Disturbance
 - Bin Storage and Drying Areas.
- 2.4 The SPD provides further guidance on these matters to provide clarity on how Policy H10 will be applied in Milton Keynes. The SPD was prepared taking into account comments from colleagues across a range of services such as housing, environmental health and waste.

2.5 The Supplementary Planning Document was published for 12 weeks public consultation from the 24 October 2011 to the 13 January 2012. Elected Members, town & parish councils, landowners, developers, planning agents, statutory consultees and other stakeholders on the planning policy consultation database were notified of the consultation. The draft SPD and supporting documents were also made available in local libraries, at the civic offices and on the council's website.

2.6 In total 30 individuals responded to the consultation:

- 7 Supported the SPD
- 11 Supported the SPD subject to amendments
- 3 opposed the SPD
- 3 were neither in support nor opposed
- 6 made no comment

Summary of comments

2.7 A number of comments sought clarifications or updating of the SPD. The main comments on the content of the SPD requiring detailed further consideration related to process, parking, the concentration calculation and the cumulative impact of the guidance.

Process

2.8 One representation questioned whether the council had met its duties under the Equalities Act, whether the SPD breached the Human Rights Act and whether it was appropriate to produce an SPD rather than a DPD. An Equalities Impact Assessment accompanies this report and due consideration has been given to equalities in the formulation of the document. It is accepted that limiting the number of HiMOs will impact on housing options for some groups in society such as the young, ethnic minorities and those from socio economic disadvantaged backgrounds. However, this has to be balanced against wider objectives of maintaining mixed communities and fostering positive community relations. It is considered that the SPD does not represent a breach of the Human Rights Act. It is appropriate to produce guidance through an SPD given that the council already has an adopted policy in the Local Plan.

Parking

2.9 Representations considered the car parking standards to be too high, whilst others considered them to be too low. Representations also sought amendments to the parking zones. The standards and zones in the HiMO SPD repeat the standards in the Parking Standards Addendum (2009) and any amendments will take place through a review of the Parking Standards SPD. The HiMO SPD has been amended to make this clear.

Concentration Calculation

- 2.10 Representations from landlord groups opposed restrictions on concentrations, whilst others felt the draft SPD threshold was too high. Some comments also questioned the approach to the calculations arguing that it was more appropriate to count the number of bedrooms in an HiMO as individual units, that households should be counted, and that 1 bedroom flats should be counted as a HiMO. There were also comments that the draft SPD was not easily understood or capable of being applied by landlords or residents. Some key changes have been made to the calculation of concentrations of HiMOs and these are set out below.

Cumulative Impact

- 2.11 Some representations argued that limiting HiMOs would have negative impacts by restricting accommodation for those on low incomes, those who wish to work and those who wish to study in MK and that the cumulative impact of the SPD would be too restrictive on the number of HiMOs.
- 2.12 A full list of comments and responses is set out in Annex B.

Amendments to the Draft SPD

- 2.13 Having collated all the representations, a workshop was held with Milton Keynes Council Members on the 22 February 2012 to consider the representations in more detail and to discuss possible changes to the SPD. The SPD was subsequently amended to take into account comments received through the consultation and the discussion at the workshop.

Key Changes

- 2.14 Aside from minor amendments providing greater detail/clarification/updates, two key changes have been made to the SPD. These relate to, cycle parking and concentration

Cycle Parking: A requirement for cycle parking has been added following the workshop discussion. The SPD now requires one cycle parking space for each HiMO bedroom. This has been adapted from the Councils cycle parking standards and in line with requirements placed on previously permitted HiMOs.

Concentration: The method for calculating concentrations has been amended in three ways.

1. Calculations are now to be based on HiMO bedrooms. Under the draft SPD a HiMO counted as a single unit regardless of the number of bedrooms. Under the amended SPD the number of HiMO bedrooms is counted, so a 5 bedroom HiMO would count as 5 units in the calculations.
2. One bedroom flats will be included with HiMOs when making the calculation of the number of HiMOs in an area.
3. The percentage threshold has been increased to 35%. Although this is higher than the 20% in the draft SPD, given the changes at 1 and 2 above, the higher percentage would be more restrictive.

Adoption

- 2.15 The amended SPD proposed for adoption is set out in Annex A. Once adopted, the SPD will become a material consideration in the determination of planning applications.
- 2.16 In accordance with Regulation 19¹ a copy of the adopted SPD, a consultation statement and an adoption statement will be made available at the Civic Offices, local libraries and on the council's website. An adoption statement will be sent to any person who asked to be notified of the adoption of the SPD.

3. **Alternative Options**

3.1 *The alternative options identified are:*

- (a) Do not adopt the SPD: this option would mean the SPD would not be used for determining planning applications
- (b) Adopt an amended version of the SPD: the SPD at Annex A represents a version that has been amended to incorporate consultation responses and the feedback from the Member HiMO Workshop; further amendments could be made.

4. **Implications**

4.1 Policy

The SPD is to provide additional guidance on the implementation of Policy H10 of the Local Plan and CS10 of the Core Strategy. There is a risk that the amendments to the SPD could be seen as unduly punitive, leading to the SPD being afforded less weight on appeal and/or encourage HiMOs in areas further from the CMK where there are fewer flats (when compared to Fishermead and Conniburrow).

4.2 Resources and Risk

There are existing gaps in data relating to bedroom numbers in flats and HiMOs. These gaps are currently in the process of being resolved (where possible). In addition to this, data for mapping concentrations will have to be updated on a regular basis. This will have significant resource (officer time) implications for the Development Plans team. Although the council can place the onus on the applicant to demonstrate the development is acceptable, where there is a lack of data, the possibility of inaccurate decisions in determining planning applications is increased.

N	Capital	N	Revenue	N	Accommodation
N	IT	N	Medium Term Plan	N	Asset Management

¹ Town and Country Planning (Local Development)(England) Regulations 2004 (as amended)

4.3 Carbon and Energy Management

No implications

4.4 Legal

The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) set out the statutory requirements for the adoption of Supplementary Planning Documents (SPDs). The requirements set out in regulations 17 and 18, for public participation in the formulation of SPDs and the consideration of representations prior to adoption must be complied with in order for SPDs to be adopted. These regulations have been met.

Once adopted in line with statutory requirements, the SPD will form part of the Council's Local Development Framework and will be a material consideration for the determination of planning applications.

4.5 Other Implications

Equalities and Diversity: An Equality Impact Assessment was completed on the Houses in Multiple Occupation (HiMO) Supplementary Planning Document and recommended to continue with the decision despite having identified some potential for adverse impact or missed opportunities. Details of the assessment can be found at: <http://bit.ly/EqIA2011-34>. The proposed policy provides additional guidance for avoiding the overconcentration of HiMOs within an area. This may have an adverse impact on the supply of housing of one particular type in an area. However this offset by the positive mix of housing types, including family and adapted homes that will benefit a wider range of local residents. It will also advance equality by producing a mix of housing within an area; allowing for a mix of age groups, different needs to be met and the fostering of good community relations.

Sustainability: The SPD seeks to achieve sustainable communities by maintaining a mix of properties in accordance with the objectives of PPS 3 Housing. The SPD has taken into account the role of HiMOs in meeting housing need and seeks to balance the need for planning controls with the need to provide suitable housing for the borough's residents.

A Strategic Environmental Assessment Screening Report has been produced to assess the need for Strategic Environmental Assessment under the Environmental Assessment of Plans and Programmes Regulations 2004 and the SEA Directive. This was sent to the three statutory bodies (English Heritage, Environment Agency and Natural England). The Screening Report concluded that there was no need for a full SEA.

E-Government: The SPD will be made available on the council website.

Stakeholders: Consultation with a wide range of stakeholders has been undertaken in accordance with the regulations and the council's Statement of Community Involvement.

Crime and Disorder: A common complaint in relation to HiMOs is that they attract anti social behaviour. Although anti social behaviour is not a planning consideration, limiting concentrations of HiMOs may impact on this area.

Y	Equalities/Diversity	Y	Sustainability	N	Human Rights
Y	E-Government	Y	Stakeholders	Y	Crime and Disorder

Background Papers:

- Local Development Framework Advisory Group
<http://cmis.milton-keynes.gov.uk/CmisWebPublic/Meeting.aspx?meetingID=9171>
- Article 4 Direction Confirmation Delegated Decision
<http://cmis.milton-keynes.gov.uk/CmisWebPublic/Meeting.aspx?meetingID=9849>
- Draft HiMO SPD Delegated Decision
<http://cmis.milton-keynes.gov.uk/CmisWebPublic/Meeting.aspx?meetingID=9869>

Adopted Houses in Multiple Occupation SPD

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1 Context

1.1 This Supplementary Planning Document (SPD) has been produced to set out the Council's approach to considering applications for a change of use from a single dwelling to a House in Multiple Occupation. The SPD expands upon Policy H10 of the adopted Milton Keynes Local Plan 2001 – 2011 and Policy CS10 of the Milton Keynes Core Strategy (see Appendix A for the policies in full).

1.2 The Council approved a HiMO Strategy on the 24 October 2009. This recognises that HiMOs are an important part of the Borough's housing stock and that many people rely on them to meet their housing requirements. It also recognises that there are potential problems often associated with HiMOs, including impacts on surrounding areas.

1.3 The report 'Evidence gathering - housing in multiple occupation and possible planning responses' (September 2008)⁽¹⁾ summarised the main possible impacts of HiMOs as being:

- anti-social behaviour, noise and nuisance
- imbalanced and unsustainable communities
- negative impacts on the physical environment and streetscape
- pressures upon parking provision
- increased crime
- growth in private rented sector at the expense of owner-occupation
- pressure upon local community facilities
- restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population

1.4 Some of the issues identified in the September 2008 ECOTEC report, such as increased crime or pressure on local facilities, have been found not relevant in Milton Keynes, or there has been insufficient evidence found to support these findings in Milton Keynes. This could be because these issues are linked to areas with higher numbers of HiMOs or student HiMOs. In Milton Keynes unlike many other towns and cities, HiMOs are generally not occupied by large numbers of students, although in the future this may change as the University Centre MK grows. Instead,

there are primarily two types of HiMO occupants, those on lower incomes to which HiMOs provide an affordable solution to their housing need; and higher earners who for example will occupy more expensive HiMOs as they may be new to an area and want to share and network with other like-minded professionals but do not require more permanent accommodation. For Milton Keynes, the main impacts are considered to be related to:

- Parking
- Waste
- Noise
- Mixed communities

1.5 In September 2010 the Council commissioned ORS to undertake an analysis of HiMOs in Milton Keynes, looking at the demographic and economic profile of occupants⁽²⁾. This report has helped inform the evidence base for this SPD.

1.6 It is not suggested that all these problems can be attributed to the presence of HiMOs, or that all HiMOs create such problems. Not all of the issues are capable of being solved directly through planning powers either. Nevertheless, the issues can be associated with a high concentration of HiMOs, and planning has an important role in reducing and managing impacts through working to ensure that the community as a whole is mixed and sustainable.

1.7 This document relates only to planning legislation and the planning process. In order to operate a HiMO legally, it is essential that landlords ensure they are in accordance with all legislation such as planning, housing and building regulations.

1.8 This SPD sets out the Council's approach to determining planning applications for a change of use to a House in Multiple Occupation. Compliance with planning requirements does not mean a HiMO is compliant with other legislation and requirements.

HiMO Licensing

1.9 The Housing Act 2004 allows the Council to ensure that properties used as a HiMO are of a certain standard, in order to protect tenants. The Act also

1 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/evidencegatheringresearch.pdf>

2 The ORS report is available within the HiMO SPD Supporting Evidence and Regulation 17 Documents from <http://www.miltonkeynes.gov.uk/planning-policy/DisplayArticle.asp?ID=75468>

1 . Context

requires all properties with three or more storeys and five or more occupants, forming two or more households, to be licensed.

Further advice about housing requirements can be found from:

<http://www.milton-keynes.gov.uk/housing-needs/DisplayArticle.asp?ID=17926>

2 Background

2.1 The Use Classes Order⁽³⁾ puts uses of land and buildings into various categories known as 'Use Classes'. In April 2010 the Use Classes Order was amended and a new Use Class (C4 Houses in Multiple Occupation (HiMO)) was created. The definition has been based on that used in the Housing Act (2004)⁽⁴⁾.

2.2 The General Permitted Development Order⁽⁵⁾ (GPDO) grants automatic planning permission for certain categories of development, meaning there is no need, in these instances, to submit a planning application. This is known as 'permitted development' and includes cases where a change from one Use Class to another does not require planning permission. In October 2010 the GPDO was amended to include the change of use from a Use Class C3 'dwelling house' to a Use Class C4 'HiMO' in the categories of permitted development, removing the need to apply for planning permission.

2.3 At the same time, the Government stated that where an authority wanted to retain planning control by maintaining the requirement to submit a planning application, they could use existing powers to do so. These existing powers are called Article 4 Directions. Article 4 Directions can remove permitted development rights. They are most commonly used in Conservation Areas; they introduce the requirement to seek planning permission for all types of development, in order to maintain control over the quality of the built environment.

2.4 In the case of HiMOs, an Article 4 Direction can be used to remove the permitted development right for a change from Use Class C3 to Use Class C4. The removal of permitted development rights in any area covered by an Article 4 Direction would mean that planning permission would be required for a change of use from C3 to C4, as it was prior to October 2010.

2.5 In December 2010 Milton Keynes Council introduced two Article 4 Directions. The first was a non-immediate Direction which was made on 22 December 2010. This provides 12 months notice before it comes into effect on 23 December 2011, and covers the entire borough of Milton Keynes.

2.6 The second Article 4 Direction was made on 29 December 2010. This direction covers only the urban area of Milton Keynes (so excludes the wards of Hanslope Park, Olney, Sherington and Danesborough), and came into effect on the 30 December 2010.

THE CHANGES IN MORE DETAIL

2.7 The amendments to the Use Classes Order created a Use Class for HiMOs and altered the definition of Use Class C3 dwellinghouse:

Class C3. Dwellinghouses

Use as a dwellinghouse (whether or not as a sole or main residence) by—

- (a) a single person or by people to be regarded as forming a single household;
- (b) not more than six residents living together as a single household where care is provided for residents; or
- (c) not more than six residents living together as a single household where no care is provided to residents (other than a use within Class C4).

Class C4. Houses in Multiple Occupation

Use of a dwellinghouse by not more than six residents as a 'House in Multiple Occupation'.

What is a 'House in Multiple Occupation'?

2.8 The amendments to the Use Classes Order essentially mean that for **planning purposes** a HiMO can now be defined in two ways:

- **Use Class C4 HiMO:** a property which is occupied by 3-6 **unrelated** individuals, who share one or more **basic amenities**.

unrelated - means that the occupants do not have a relationship by blood, marriage or co-habitation.

basic amenities means cooking facilities (such as kitchens), personal washing facilities (such as bathrooms) and toilets.

3 Town and Country Planning (Use Classes) Order 1987 (as amended)

4 <http://www.legislation.gov.uk/ukpga/2004/34/section/254>

5 Town and Country Planning (General Permitted Development) Order

2 . Background

- **Larger HiMOs:** Properties occupied by **more** than six people would not sit in Use Class C4 and may therefore be **Sui Generis** (in a class of its own), for which any change of use requires planning permission. It must be noted that a property does not automatically become a Sui Generis use just because it has more than six occupants. A change of use has to be “material” and it is possible that individual circumstances may mean that a HiMO with, for example, seven people could be assessed as **not** being materially different from a six person HiMO. In which case, a **material change of use** has not occurred and planning permission would not be required.

2.9 These changes have brought the definition of HiMO for the purposes of planning in line with those used in the Housing Act 2004. The Housing Act 2004 and full definition of a HiMO is available from <http://www.legislation.gov.uk/ukpga/2004/34/contents>.

3 Is planning permission required?

3.1 Where there is a material change of use, planning permission is required when:

- Converting a dwellinghouse (C3) or a HiMO falling under a Use Class C4, to a Sui Generis HiMO (a HiMO with more than six people).
- Converting a non-residential building to a C4 HiMO (between three and six people), or to a Sui Generis HiMO (with more than six people).

3.2 As a result of the two Article 4 Directions introduced by the Council, which withdraw the permitted development right for a change of use to a Use Class C4 HiMO, planning permission will be required when converting a dwelling house (C3) or non residential property to a Use Class (C4) HiMO anywhere in the borough.

Exceptions

3.3 There are some exceptions where planning permission is not required, for example, where an owner of a property is living with no more than two lodgers, or if no more than six residents are living together as a single household and receiving care.

3.4 It should also be noted that to change the use of a C4 HiMO into a single dwellinghouse does not require planning permission from the Council. Permission will, however, be required from the Council to change a Sui Generis HiMO, that is authorised in planning terms, into a single dwellinghouse.

3.5 This SPD provides guidance only. It is strongly advised that you contact the Planning Department for confirmation as to whether or not permission is required.

4. Determining Applications

4 Determining Applications

4.1 All planning applications are judged against the Council's Development Plan which contains a range of planning policies. These policies are set out in the Adopted Local Plan 2001 – 2011 which is the statutory plan for the borough of Milton Keynes. This SPD expands upon the "saved" Policy H10 'Subdivision of Dwellings and Houses in Multiple Occupation' and the emerging Core Strategy Policy CS10 'Housing'. Other Local Plan policies may also be relevant to the consideration of the application, depending upon the individual circumstances. For example, if a property is located within a conservation area, regard will be had to local conservation policies. Also, proposals in areas of flood risk may not be appropriate where previously unoccupied ground floor rooms such as garages are proposed to be converted to living space. The impact on local sewage capacity arising from an intensification of use should also be taken into account.

4.2 Policy H10 'Subdivision of dwellings and Houses in Multiple Occupation' has four main criteria against which an application will be assessed. In order for the application to be permitted, it must provide information to show how it meets the four criteria. If all of the criteria are met, then permission will be granted. Specifically the policy states:

Within the limits of development of settlements, planning permission will be granted for the sub division of existing dwellings into flats, or the creation of Houses in Multiple Occupation, if all of the following criteria are satisfied:

- i. Effective measures are proposed to minimise the effects of **noise and disturbance**
- ii. Off street **parking** and manoeuvring space is provided to meet the Council's standards or, if on-street parking is necessary, it would not result in unacceptable congestion in the surrounding area
- iii. Adequate outdoor space is available for **bin storage and a drying area**

iv. The proposal would not adversely affect the **character** of the surrounding area or lead to an unacceptable **concentration** of flats or Houses in Multiple Occupation within the area.

4.3 Every application will be different and every application will need to be considered on its individual merits. Appendix C shows the standard conditions that the council will normally apply when granting permission for a HiMO. Further guidance on the four main criteria is provided below.

Noise and disturbance

4.4 HiMOs, like any other home, can lead to problems with noise. With HiMOs there is a greater chance of noise issues arising due to the number of people living independently within a property. Noise is not just an issue for neighbours; HiMOs can also impact on the quality of life of their tenants.

4.5 In general, there are likely to be more occupants in a house used in multi-occupancy than for a single household. Self-closing devices which are fitted to doors (for fire safety reasons) result in increased impact noises from door slamming. Noise is substantially increased if soft closures are not fitted or adjusted properly.

4.6 The independent living of HiMO tenants means they are likely to spend more time in their rooms. Therefore, there is a likely increase in noise levels, as each occupant uses their own TV, stereo etc. There is also a likely increase in the number of journeys up and down stairs to use the kitchen, bathroom and to enter and exit the property. The communal facilities (e.g. kitchen) are in use for longer periods than in a single household.

4.7 Noise generated internally within a HiMO can be transmitted through party walls to adjoining neighbours. Through determining applications, the Council has been made aware of the inadequate construction of some properties in terms of their ability to insulate against noise. This likely increase in noise could lead to unacceptable impact on surrounding properties and between the individual rooms of the HiMOs, leading to a poor quality environment for tenants. It is, therefore, considered appropriate that minimum standards of noise insulation are achieved and demonstrated, to protect adjoining neighbours from the possible increased level of noise.

4.8 In order to ensure that 'effective *measures are proposed to minimise the effects of noise and disturbance*' (Local Plan Policy H10):

Applicants will need to show what measures are proposed in order to ensure that noise from the property would not have an unacceptable impact on surrounding properties.

In order to protect the amenity of tenants, the Council will require that applicants demonstrate, through submission of a noise assessment, that all internal bedroom walls, and (where there is a habitable room above or below) bedroom ceilings and floors, meet the sound insulation standard of a minimum value of 40 dB.

4.9 An applicant should appoint an appropriate acoustic consultant to undertake the noise assessment. Further information including details of qualified consultants is available from the Institute of Acoustics (IOA) ⁽⁶⁾ and the Association of Noise Consultants (ANC) ⁽⁷⁾⁽⁸⁾

Parking

4.10 Parking is an important consideration in HiMO conversions. It is important to ensure that adequate parking is provided for prospective residents so as to avoid traffic problems. Traffic problems can arise from a lack of parking which causes traffic obstructions, congestion and harms the amenity of the local area.

4.11 There are distinct differences in the layout of estates in Milton Keynes. In terms of parking provision, the older estates closer to Central Milton Keynes (CMK) can generally accommodate an intensification of occupants due to their wide, long and straight boulevards, often with central parking areas. In addition to this, the 2010 ORS work identified that 30.6% of HiMO occupants either walked to work or travelled by public transport, and 40% did not have access to a car compared to the average 19.2% of households across Milton Keynes. This is likely to be truer in older estates surrounding CMK where services and employment are only a short distance away.

4.12 By contrast, the newer estates located further from CMK do not generally lend themselves to significant increases in parking pressures. The roads are often narrower than, and not as straight as, the older estates. This limits the capacity for on-street parking in such locations, and off-street parking is often limited. In addition to this, services and employment opportunities are not as accessible, and so residents are considered to be more likely to require a car.

4.13 The Council has seen a large rise in planning applications for changes of use from residential dwellings to Houses in Multiple Occupation in the last few years. This highlighted the fact that the Council did not have parking standards for this type of accommodation. So, in April 2009 the Council adopted an addendum to the Parking Standards Supplementary Planning Guidance ⁽⁹⁾.

4.14 The Parking Standards Addendum identified two zones: A and B. Zone A relates to Town and District centres and the estates surrounding CMK, where the existing housing stock has good access to facilities and availability of support networks and public transport. Zone B is all other areas outside the Town and District centres where access to services and public transport is more limited. Appendix B shows the boundaries of the two zones. Any review of the parking standards set out in the Parking Standards Addendum will supersede the standards contained in this HiMO SPD.

4.15 In order to ensure that '*off street parking and manoeuvring space is provided to meet the Council's standards or, if on-street parking is necessary, it would not result in unacceptable congestion in the surrounding area*' (Local Plan Policy H10):

6 <http://www.ioa.org.uk/>

7 <http://www.association-of-noise-consultants.co.uk/>

8 Please note, the council does not endorse any consultant and cannot be held responsible for any consultant appointed.

9 <http://www.milton-keynes.gov.uk/transport/DisplayArticle.asp?ID=64105>

4. Determining Applications

The following minimum spaces⁽¹⁰⁾ will be required:

Proposed number of bedrooms	Parking Spaces Required	
	Zone	
	A	B
3	2	3
4	2	3
5	3	4
6	3	5
7	4	5

If an application for a HiMO is submitted with on-plot parking provision below the required levels, it will normally be refused unless the applicant can demonstrate that the shortfall can be satisfactorily accommodated within properly marked, or laid out, parking spaces in the highway fronting the site (see additional guidance below).

Provision should also be made to accommodate 1 cycle parking space per bedroom.

4.16 Parking in spaces remote from the site and not within the surveillance of the site will not normally be acceptable. The word “congestion” referred to in Policy H10 is considered to mean conditions where normal and safe use of the public highway is not possible. For example, where access to dwellings is prevented or made difficult, where manoeuvres at junctions are hindered and where large vehicles such as waste collection vehicles or fire engines cannot use turning areas in culs-de-sacs, or where access to a property is blocked. This means that the reliance on kerbside parking within residential streets to meet the parking standards will not normally be acceptable.

Kerbside parking

4.17 This SPD cannot set out every circumstance where kerbside parking either is, or is not acceptable and it will often depend on the circumstances of each individual application. See rules 238-244 of the Highway Code (2007) for guidance on where it is legal to park⁽¹¹⁾.

On-site parking

4.18 For on-site (on plot) parking, the size, location and accessibility of the spaces should be taken into account. The impact of the spaces on access to the dwelling and to other dwellings must also be considered. On plot parking should have the following characteristics:

- Spaces should be a minimum of 5m x 2.5m
- Each space must be independently accessible (no ‘tandem’ parking)
- Spaces directly accessed from the highway must have an appropriate dropped kerb crossover
- Spaces in front of garages or doors to dwellings must have an additional clear area of at least 1m beyond the space to allow for access
- A clear path of 1.2m should be maintained between the highway and the dwelling entrance
- Access to spaces must not involve driving along footways or redways
- Parking on shared accesses and driveways is not acceptable

Cycle Parking

4.19 Sufficient space for cycle parking should be provided. The Council's Parking Standards Supplementary Planning Guidance 2005 sets out requirements for cycle storage. For HiMOs the same requirement as student accommodation is considered to be appropriate with an additional exception whereby access to a garage or shed that can accommodate one adult bicycle per bedroom is sufficient and no additional cycle parking spaces are required. In cases where there is no shed or garage or a shortfall in communal cycle shortage facilities 1 cycle parking space per bedroom is required.

10 The Council does not count garages as a parking space.

11 Link to the parking section of the Highway Code:

http://www.direct.gov.uk/en/TravelAndTransport/Highwaycode/DG_069860

Bin storage and drying areas

4.20 A HiMO is likely to generate more waste than a regular family dwelling, meaning adequate storage space must be provided. Milton Keynes Waste Services state that it is important that the location, as well as the size, of bin storage should be suitable, so as not to impinge on the amenity of HiMO occupants or their neighbours. Often, ground floor rooms and garages are converted to bedrooms. When waste is placed outside the windows of these bedrooms, it can create smells that in a non-HiMO would not normally lead to problems, but when the room is a bedroom, it can become an issue for the tenant. This can result in waste being left in unsuitable locations beyond the property boundary.

4.21 The Milton Keynes Waste Development Plan Document provides advice on the storage needs of houses and flats. At present, all properties in Milton Keynes need to make adequate provision for storing waste receptacles. The Waste DPD notes that the need for storage will increase as household sizes increase. For HiMOs, it is reasonable to assume that each bedroom will equate to at least one person. Therefore, in order to ensure that '*adequate outdoor space is available for bin storage and a drying area*' (Local Plan Policy H10), the following provisions must be made:

15 square metres of storage space should be provided, as part of the change of use to a HiMO, for a drying area and storage of the following waste receptacles:

- 1 black sack per bedroom
- 1 pink recycling sack per bedroom
- 1 blue recycling box per 3 bedrooms
- 1 x 240 litre green bin for food & garden waste per 6 bedrooms.

Residents are required to bring their refuse and recycling containers to the front of their property boundary; the internal layout of HiMOs should not make this difficult.

Where waste is stored externally, the area should be:

- Secure and unobtrusive, to prevent vandalism – i.e. accessible to residents and collectors, but not to others
- Readily accessible from a road (collectors should not be expected to go up/down stairs, in lifts, across grass or inside parts of the building other than the refuse/recycling room)

4.22 At the start of the project, the following must be obtained from the Council:

- 1 roll of black sacks per bedroom
- 1 roll of pink sacks per bedroom
- 1 blue box per 3 bedrooms
- 1 x 240 litre green bin
- 1 food waste caddy should per bedroom.
- 1 battery bag per bedroom.

4.23 It is recommend that landlords contact the Milton Keynes Waste Services team to arrange for the above and to obtain an information pack containing the latest information about waste services to be provided to tenants or displayed within the HiMO.

4.24 In meeting the 15 square metre requirement, gardens and existing communal areas (that meet the space requirement) will be considered acceptable.

4. Determining Applications

Character & Concentration

4.25 The detrimental effect on the character of an area is often considered a prime reason for objections to applications for conversions to multiple occupation. There is often a perception that a HiMO will have a negative impact on the character of an area. The effect on the character of an area and the concentration of HiMOs are clearly linked. The guidance in this SPD should minimise the impacts on character by maintaining parking standards, reducing waste related issues and minimising noise. However, there is also an issue related to creating mixed communities.

4.26 Planning Policy Statement 3 'Housing' (PPS3)⁽¹²⁾ is clear in its aim to deliver mixed, sustainable communities. One of PPS 3's strategic housing policy objectives is to "create sustainable, inclusive, mixed communities in all areas, both urban and rural". Paragraph 20 goes on to state that "key characteristics of a mixed community are a variety of housing, particularly in terms of tenure and price and a mix of different households such as families with children, single person households and older people". Creating mixed communities is also reflected in Policy CS10 of the emerging Core Strategy.

4.27 An over concentration of any one particular type of housing or household would not be in-line with the aim of creating mixed communities. HiMO occupants are generally perceived as being younger and more transient than other residents within a community. In Milton Keynes, the evidence shows that HiMO occupants are more transient than average, with two thirds (66%) occupying a property for less than 12 months. This compares to the Borough wide average of just 13%. In terms of age 85% of HiMO occupants are under 35 years of age compared to 52% across the borough and no occupants were over the age of 40.

4.28 This can lead to wider effects on the character of an area and can give rise to a lack of community integration and cohesion, and less commitment to maintain the quality of the local environment.

4.29 In setting a threshold above which no further HiMOs will generally be granted planning permission, a balance needs to be struck. There is a need to maintain a mix of dwelling types in areas of high

demand for HiMOs, whilst not reducing the overall supply of HiMOs across MK and therefore limiting the housing available to meet the needs of the population.

4.30 In order to ensure that *'the proposal would not adversely effect the character of the surrounding area or lead to an unacceptable concentration of Houses in Multiple Occupation within a given area'* (Local Plan Policy H10) and to maintain a mix of dwellings:

The number of Houses in Multiple Occupation should not exceed 35% of the total number of properties within a 100 metre diameter buffer of the application property.

For the purposes of this SPD:

- HiMOs will be counted by the number of bedrooms (e.g. a 5 bedroom HiMO = 5 HiMO properties in the concentration calculation).
- Non HiMO houses will be counted as a single property, regardless of number of bedrooms (e.g. a 4 bedroom house = 1 non-HiMO property in the concentration calculation)
- One bedroom flats are counted towards the concentration of HiMOs and each flat is counted as a single property.
- Flats with more than one bedroom do not count towards the concentration of HiMOs and each flat is counted as a single property.

4.31 The HiMO concentration should not exceed 35% of the total number of properties. The council will use the 35% figure as a guide to when the concentration of HiMOs is too great. The character of the surrounding area will also be taken into account, but generally concentrations below 35% will be more acceptable.

4.32 In assessing applications records of HiMOs from Housing and Planning records will be used, this includes all licensed HiMOs, permitted HiMOs and those that do not require a license or planning permission but meet the definition of a HiMO.

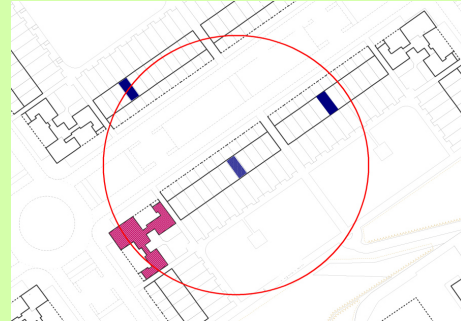
12 Link to PPS3: Housing: <http://www.communities.gov.uk/publications/planningandbuilding/pps3housing>

4 . Determining Applications

4.33 The council will use a Geographical Information System (GIS) to apply the buffer. Properties will be plotted by property extent and where any part of the property extent lies within the buffer, it will be included in the calculations.

4.34 Landlords should contact the planning department for a view on whether an area is close to exceeding the threshold at an early stage.

Worked Example



In the above example there are 50 properties within the 100 metre buffer consisting of:

- One bedroom flats x 5
- Two bedroom flats x 5
- Houses x 37
- Existing HiMO (5 bedrooms) x 2
- Application property (5 bedrooms) x 1

Calculation

Total Houses, Flats and HiMO Bedrooms = 62 (37 houses, 10 existing HiMO bedrooms, 5 proposed HiMO bedrooms, 5 one bedroom flats and 5 two bedroom flats)

Total Number of HiMO Bedrooms = (5 Bedroom HiMO x3) + (One bedroom flats x5) = 20

Concentration = $(100/62) \times 20 = 32\%$

Proposal is under 35% and would be acceptable.

4.35 A non-sandwiching approach will be applied to prevent any one property (HiMO or non-HiMO) being 'sandwiched' between two houses in multiple occupation. This will reduce the local impacts on neighbouring properties and will also prevent an over concentration at the localised level. The

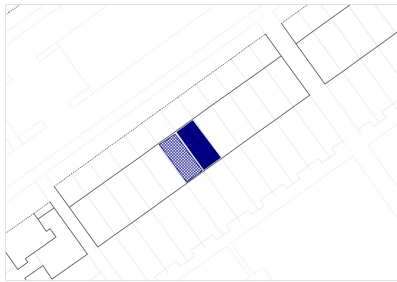
4. Determining Applications

non-sandwiching approach will apply to all types of properties, including detached and flats on the same floor. Where properties are separated by a public highway the sandwiching approach will not apply.

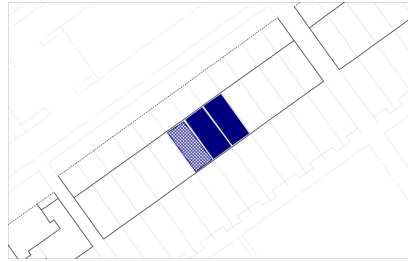
4.36 'Figure 4.3 Sandwiching' provides a visual representation of where proposals for a change of use to a HiMO would and would not be considered acceptable, using the non-sandwiching approach.

Figure 4.3 Sandwiching

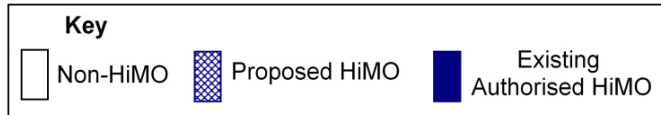
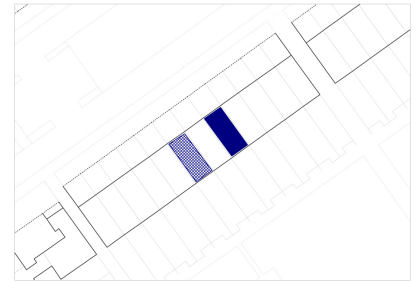
This proposed HiMO would not result in "sandwiching", so it would be considered acceptable



This proposed HiMO would result in "sandwiching" on a HiMO, so it would be considered unacceptable



This proposed HiMO would result in "sandwiching" of a non-HiMO, so it would be considered unacceptable



A Existing Policies

Figure A.1 Local Plan HiMOs Policy

HOUSING



- To ensure that houses built in the future are flexible, adaptable and accessible to their occupiers over time.

9.55 One of the principles of the original Master Plan for Milton Keynes was that there should be a mix of house types and tenures available throughout the City. This was in order to create balanced local communities and avoid social polarisation between areas, particularly within the catchment areas of facilities like schools and health centres. This approach is endorsed in PPG3. Policy H9, together with Policy H2, aims to continue the tradition of mixed housing schemes in Milton Keynes and also to promote this approach in the rest of the Borough outside the City.

9.56 "Lifetime Homes" refers to the standards that have been developed by the Joseph Rowntree Foundation. In the 1980s, the Foundation became concerned about the quality of British housing and how inaccessible and inconvenient many houses were for large segments of the population - from those with young children through to frail older people and those with temporary or permanent disabilities.

Joseph Rowntree Foundation, Building Lifetime Homes web site (April 2000).

9.57 Lifetime Homes have 16 design features that ensure that new homes meet the varying needs of most households in the same home over time. It has been shown that the standards are welcomed by occupiers, are feasible to introduce within most developments, cost very little and result in future cost savings for government, local authorities and individuals.

9.58 The Part M of the Building Regulations covers accessibility and applies to all new homes. The Lifetime Homes standards go a little further than the building regulations, in their requirements for adaptability and flexibility to be designed into the home. If developers and builders plan to meet the Lifetime Homes standards, all of Part M Building Regulations as well as the relevant parts of the Housing Corporation Scheme Development Standards will have been met.

Part M, The Building Regulations (as amended, October 1999).

HOUSING MIX
POLICY H9
 Development proposals that include 5 or more dwellings should incorporate a range of house sizes and types and all dwellings will be encouraged to meet the "Lifetime Homes" standards.

SUBDIVISION OF DWELLINGS AND HOUSES IN MULTIPLE OCCUPATION (HIMOS)

Objective of policy

- To ensure that subdivisions and conversions provide an acceptable standard of accommodation and do not adversely affect the surrounding area.

9.59 The planning system is only one part of the regulatory process that is used to control the conversion of single residence properties to multiple occupation. The Council's Building Control, Environmental Health and Trading Standards departments, as well as the Fire Service, all have a part to play in ensuring accommodation is of an

acceptable and safe standard.

9.60 The Council is formulating a more proactive and corporate approach to dealing with such conversions, to identify HIMOs and ensure that they are of an acceptable standard. However, even if a conversion is acceptable in terms of the other parts of the corporate policy, this does not mean that the scheme will necessarily be granted planning permission.

9.61 One of the critical factors will be whether a conversion leads to an unacceptable proliferation of HIMOs in an area. Rather than set out a uniform standard against which to judge all proposals, Policy H10 will be used to assess this issue on a case by case basis. This is because the Borough has a diverse range of residential areas and what may be an acceptable concentration of HIMOs in one area may not be so in another.

SUBDIVISION OF DWELLINGS AND HOUSES IN MULTIPLE OCCUPATION (HIMOS)	
POLICY H10	
Within the limits of development of settlements, planning permission will be granted for the sub division of existing dwellings into flats, or the creation of houses in multiple occupation, if all the following criteria are satisfied:	
(i)	Effective measures are proposed to minimise the effects of noise and disturbance
(ii)	Off street parking and manoeuvring space is provided to meet the Council's standards or, if on-street parking is necessary, it would not result in unacceptable congestion in the surrounding area
(iii)	Adequate outdoor space is available for bin storage and a drying area
(iv)	The proposal would not adversely affect the character of the surrounding area or lead to an unacceptable concentration of flats or houses in multiple occupation within the area.

"Adequate outdoor space" is defined as a minimum of 15 sq m.

LOW IMPACT DWELLINGS IN THE OPEN COUNTRYSIDE

Objective of policy

- To allow only the most innovative and sustainable proposals for low impact dwellings in the open countryside

PPG7: The Countryside - Environmental Quality and Economic and Social Development (1997)

9.62 The government has made clear its commitment to sustainability and it is regarded as a material consideration in planning decisions. PPG7 contains advice about the importance of rural sustainability but advises local planning authorities to draw up detailed policies to set out what is regarded as sustainable rural development in the local context.

9.63 Policy H11 has been drawn up against this government policy context and information in a recent report produced by the Rural Planning Group of "The Land is Ours". This report contains guidance to help decision-makers assess the

Figure A.2 Core Strategy policy C10

10 . Housing

Policy CS 10

Housing

The Council will work with Milton Keynes Partnership (or any successor bodies), developers and registered social landlords to meet the Council's housing requirement, as set out in Policy CS 2 'Housing Land Supply'.

New and refurbished housing should meet the needs and aspirations of the existing population and of the future residents by the provision of an appropriate range of sizes, values, styles, tenures and densities. Infill development should respect the style and scale of buildings and the mix of dwelling types on the surrounding area.

Housing should meet the Council's adopted standards of energy efficiency, renewable energy generation, carbon neutrality, safety and 'lifetime homes'. Some dwellings should support 'home-based working' and all homes should have high quality ICT connectivity.

Residential neighbourhood design should encourage access by walking, cycling and other forms of non-car travel within the neighbourhood and across the city. Car parking standards should meet the projected levels of car ownership (in addition to visitor parking).

The Council will plan to meet specific housing needs across the Borough including the following: affordable housing, multiple occupancy, elderly persons, special needs, single people, religious, ethnic or lifestyle groups. These requirements will be covered in further planning and housing management guidance.

Delivery

10.6 Local Plan saved Policies H4 and H5 currently require 30% affordable housing provision. This figure, any future targets and issues with the affordability at point of sale, will be reviewed in the Development Management DPD taking into account the needs of MK's current residents and their children, the demographic mix of people it is hoped will move to MK, and financial viability. Affordable housing in the Expansion Areas is provided under the Tariff agreement. The Affordable Housing SPD provides additional guidance on, for example, tenure mix. The SPD will be updated when necessary.

10.7 The affordable housing requirements in the Strategic Reserve Areas will be set out in the development framework for those areas.

10.8 The Site Allocations DPD will allocate a site for Travelling Showpeople and, if necessary, a new site(s) for Gypsies and Travellers, subject to the findings of a future MK Borough review. The Development Management DPD will contain detailed site criteria for the provision of Gypsies and Travellers Sites.

10.9 The Development Management DPD will include policy guidance on "Lifetime Homes" or equivalent standards.

10.10 Houses in multiple occupation (HIMOs), are a key issue which will be addressed by the development of a new Development Plan Document or Supplementary Planning Document.

10.11 The Residential Design Guide SPD will aim to raise the design standard and encourage innovation and creativity.

10.12 Shared ownership in Milton Keynes is different as it is commercially based and impacts on second stage and subsequent sales. Work will be undertaken in the Housing Services to develop the Council's policy on this issue.

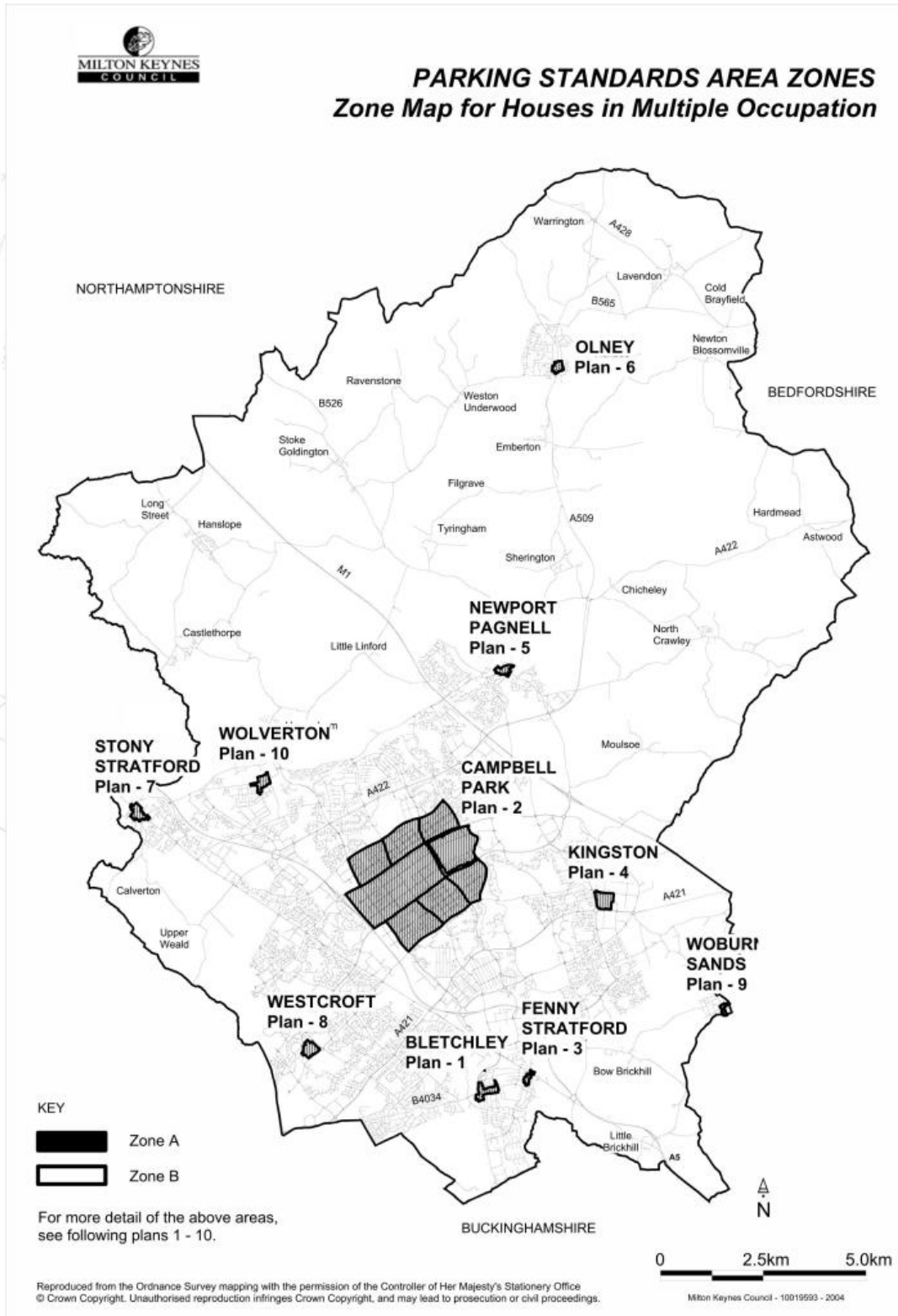
Milton Keynes Council Core Strategy: Revised Proposed Submission, October 2010

Milton Keynes Council Adopted Houses in Multiple Occupation SPD

B. Parking Zones

B Parking Zones

Figure B.1 Parking Standards Area Zones



C Example Conditions

C.1 The following conditions are indicative of the conditions the council will normally apply when granting planning permission. Actual wording may change and actual conditions will vary for each application.

Number of rooms

The house shall not be operated with more than ^insert number here^ lettable rooms at any time.

Reason: To control future intensification of the application property.

Noise Insulation to be provided

The noise insulation measures shown in the approved drawings shall be provided prior to the first occupation of the development hereby permitted and be retained in perpetuity.

Reason: To safeguard the appearance of the area and the amenities of local residents.

Noise Insulation details to be submitted

Prior to the commencement of the development details of a scheme for internal noise insulation (to include where appropriate insulation of party walls, floors and any new walls or partitions) shall be submitted to and approved by the local planning authority. All works which form part of the approved scheme shall be completed in accordance with the approved plans before any of the proposed dwelling units are first occupied.

Reason: To avoid nuisance from noise and vibration between the proposed dwelling units and between adjacent properties and the proposed dwelling units.

Refuse Storage to be provided

The refuse store shown in the approved drawings shall be provided prior to the first occupation of the development hereby permitted and be retained in perpetuity.

Reason: To safeguard the appearance of the area and the amenities of local residents.

Refuse Storage details to be submitted

Prior to the commencement of the development details of on site bin storage for the storage of household refuse and recyclables shall be submitted to and approved in writing by the local planning authority. Prior to the first occupation of the development the storage facilities shown in the approved drawings shall be provided and retained thereafter.

Reason: To ensure satisfactory facilities and to prevent harm to the amenities of the area.

Bicycle parking - to be provided

The bicycle parking area shown in the approved drawings shall be provided prior to the first occupation of the development hereby permitted and be retained in perpetuity.

Reason: To safeguard the appearance of the area and the amenities of local residents.

Bicycle parking – details to be submitted

Prior to the first occupation of the development hereby permitted details of the proposed bicycle parking shall be submitted to and approved in writing by the Local Planning Authority and the scheme approved shall be provided and subsequently be permanently retained.

Reason: To ensure that adequate parking facilities are provided to serve the development.

Drying Facilities to be provided

The rotary driers/drying area shown in the approved drawings shall be provided prior to the first occupation of the development hereby permitted and be retained in perpetuity.

Reason: To safeguard the appearance of the area and the amenities of local residents.

Drying facilities – details to be submitted

Prior to the first occupation of the development hereby permitted details of the proposed clothes drying facilities for the occupants of the development shall be submitted to and approved in writing by the Local Planning Authority and the scheme approved shall be subsequently permanently retained.

Reason: To ensure that adequate parking facilities are provided to serve the development.

Houses in Multiple Occupation Supplementary Planning Document: Consultation Responses

The following table sets out the representations received during the draft HiMO SPD consultation and the council's response.

Consultation Response		MKC Response	Changes
HiMO1 Mr Brian Barton , Committee and Member Services Manager , Woughton Community Council			
1	I feel this document is a good step in the right direction in regulating HIMO's, I understand that the general concerns by local residents living in areas of high occupation rates of HIMO's are concerned about parking, rubbish, noise and anti - social behaviour but I understand that this document is purely centred on planning issues and regulation of HIMO's and these points have been amply made in other consultations and representations.	Comments noted	None
2	I believe that HIMO's should be tightly regulated to ensure that the property is well maintained and safe to live in and that Landlords are accountable to the community living around their property.	Private Sector Housing has powers to ensure properties are safe. This is outside the scope of the SPD.	None
3	I agree with having quotas of HIMO's in each residential area to ensure the community has a balance of tenures and properties.	Comments noted	None
4	Also it is imperative that Milton Keynes Council has enough resources to enforce planning regulations to tackle irresponsible Landlords.	The issue of resources for enforcement will be looked into.	None
HiMO2 Ms Judi Moore			
5	This seems to me a thoughtful, sensible and practical approach to increasing use of HiMOs. The need for rented property, often shared, is only going to increase as a need to move to find work becomes more and more important and young people are unable to fund house purchase (the days of expecting to own one's own home may be behind us). The document appreciates that quality of life for those in HiMOs is as important as quality of life for neighbours of HiMOs: good. It provides guidance, without being proscriptive, on acceptable and unacceptable aspects of HiMOs that I can think of : good.	Comments noted	None
HiMO3 Ms Karen Goss, Clerk Emberton Parish Council			
6	The parish council would like to respond that it has no further comment to make regarding this	Comments noted	None

	supplementary planning document.		
HiMO4 Luton Borough Council			
7	<p>Thank you for the opportunity to be consulted on then above document.</p> <p>However, the Borough Council does not have any views on the above document.</p>	Comments noted	None
HiMO5 Natural England			
8	Natural England has no objection to the draft Houses in Multiple Occupation Supplementary Planning Document, which does not raise significant concerns in terms of potential effects upon statutory biodiversity or landscape designations.	Comments noted	None
9	It does occur to us that if there were a large increase in houses in multiple occupation there is potential for a cumulative increase in foul sewage flows and increased pressure on local sewage treatment works. That may in turn cause adverse effects upon the ecology of the river system into which they discharge. The Council may wish to consider whether there is a need for sewage treatment capacity considerations to feature within the document. Our colleagues at the Environment Agency will be able to advise.	Additional text will be added to highlight this potential problem.	Reference to potential impacts of large numbers of HiMOs on the sewage system.
HiMO6 Mr Dominic Warner, Acting Clerk Campbell Park Parish Council			
10	<p>The Planning & Policy Committee of Campbell Park Parish Council considered the draft document at its meeting on 7th November 2011.</p> <p>Campbell Park Parish Council welcomes the development of a supplementary planning document guiding the implementation of planning policy relating to HiMOs, which it has regularly suggested to Milton Keynes Council that it should produce.</p>	Comments noted	None

11	<p>The Committee made the following detailed comments.</p> <p>1: Paragraph 4.10</p> <p>This paragraph makes two points: that occupants of HiMOs are less likely to own a car than other residents, and that in any case streets in estates near the city centre (by implication, all those in Campbell Park Parish) were better able to absorb parking not possible on the house itself. The committee disagreed with both assertions.</p> <p>The draft compares the car ownership by individual occupants of HiMOs (60%) with car ownership by Milton Keynes households (80%); this is not comparing like with like. Indeed, as the average occupancy of a HiMO is 5 or more individuals, these figures suggest that each HiMO will have 3 cars attached, in contrast to the Milton Keynes household average of 0.75 cars.</p>	<p>The figures for car ownership in the SPD were intended to show that on the 'doughnut' estates surrounding CMK, not all HMO occupants will own a car and provides further support for the two zone approach that was adopted in the Parking Standards Addendum (2009) where zones within easy access of key facilities have lower parking standards.</p> <p>This approach is considered justified. Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD.</p>	<p>Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.</p>
12	<p>It then asserts that HiMO occupiers in the central grid squares do not need cars as a) they walk or take public transport to work, and b) are close to employment areas. The former assertion is clearly unconnected with car ownership - indeed MK policy is to persuade car owners to use other ways of travelling to work; the latter is simply not true - MK employment areas are scattered around the New City as they were designed to be in the City's master plan.</p>	<p>It is reasonable to expect that residents living in close proximity to CMK are less likely to need a car, and the figures would support this.</p> <p>CMK offers large employment opportunities for central grid square residents and beyond.</p> <p>Parking Standards in the HiMOs SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD.</p>	<p>Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.</p>
13	<p>It may superficially seem that grid squares such as Fishermead have the capacity to absorb more cars, but in fact in many streets the parking areas are fully used and indeed in total do not meet Milton Keynes Council parking standards.</p>	<p>Local capacity will be considered as part of each application and compliance with the parking standards assessed, it remains true that compared to other</p>	<p>None</p>

	The committee considered that the section on parking should be reconsidered taking these points into account.	areas, the layout of grid squares such as Fishermead.	
14	2: Paragraph 4.16 Applicants for permission for HiMOs in Campbell Park Parish have pointed to unused adjacent spaces in on-road parking to compensate for lack of on-site parking. It would appear that successive applications for adjacent applications have used the same spaces. Records should be kept to prevent this double counting of on-road spaces.	Each application is considered individually, based on an assessment of the parking situation at that point in time. Specific spaces in public parking areas are not linked to any particular property.	None
15	3: Paragraph 4.20 Observation by councillors living near HiMOs would suggest that the figures for rubbish and recycling are underestimates, and the space required for their storage should be adjusted accordingly	The waste requirements are to be updated in line with advice from waste services. However, the overall space requirement will remain unchanged at 15sqm.	Update waste requirements to reflect guidance from waste services.
16	4: Paragraphs 4.23 and 4.24 The council welcomes the recognition of these points which it has been making for some time.	Noted	None
17	5: Paragraph 4.27 The committee would prefer a threshold of 15% to one of 20% (taking the points in paragraphs 4.23 and 4.24 into account). It would also suggest that the area of the buffer should relate to the geography of the street rather than be a simple 100m diameter circle - in the example given, a proposed HiMO closer to the road junction would appear to be less concentrated because a larger part of the buffer zone would be roundabout and road, but have the same effect on the ground to the rest of the street.	A percentage approach was selected to avoid this problem. Using a percentage instead of a fixed figure means that, regardless of how many houses fall within the buffer, the proportion would never exceed 20%. E.g. if there were 10 houses in the buffer, only 2 could be HiMOs and if there were 40 houses in the buffer, 8 could be HiMOs.	The approach to calculating concentrations still uses a percentage figure but now to be based on HiMO bedrooms with 1 bedroom flats counting towards the concentration. Revised 35% represents in practice a reduction in number of permissible HiMOs.
18	6: Paragraph 4.28 The council welcomes this approach to over-concentration of HiMOs.	Noted	None
HiMO7 Mr Andy Barton, Forward Plans Manager, Aylesbury Vale District Council			
19	I can confirm we have no comments to make on the proposed document, however would like to be kept informed on progress of this document and other documents within the LDF	Noted	None

<p>20</p>	<p>The population of Milton Keynes is growing rapidly and has become increasingly more diverse. The child population is growing by 1000 a year and over a third of school pupils are now from BME communities.</p> <p>Milton Keynes does not have the stock of large Victorian houses that are found in most cities of its size. It is difficult for families new to Milton Keynes to find affordable rented accommodation. Milton Keynes has a vibrant economy and relatively low unemployment despite the recession and this attracts inward migration to MK, including many people with limited means.</p> <p>The corporate plan puts an emphasis on economic growth and jobs for the existent and in-coming population. In order to attract people to work in MK and generate that growth, there is a need for affordable housing. HMOs are part of the housing make up of any city. They are often the first step on the ladder for new families moving in. Therefore it can be seen as in line with the Council's priorities to promote the growth of HMOs and to remove any unnecessary barriers to their use, provided health and safety requirements are met.</p> <p>MKC children's services finds itself with a statutory responsibility to small numbers of children and families who have no other means of accessing housing except funded by us. These groups are:</p> <ul style="list-style-type: none"> • Homeless 16 and 17 year olds • Asylum seeking young people aged 16+ • Asylum seeking young people 18+ without recourse to public funds who have been in MKC care • Families with children without recourse to public funds <p>MKC has a responsibility to ensure that the above groups have housing provision. An efficient and effective way to provide this for the Council and the children and families concerned (they have no right to social housing) is through renting houses from landlords where children and families can live in groups - i.e. by renting HMOs. HMOs are the most cost effective way of meeting these groups' housing needs and by sharing housing these children and families develop mutual support and minimise social</p>	<p>The draft SPD's proposed approach to HiMOs is not intended to be a barrier; rather it aims to guide the location of HiMOs, to prevent over concentration. The SPD will be monitored through the AMR and If the threshold figure is considered to be preventing the development of HiMOs, then a review of the SPD can be undertaken.</p>	<p>None</p>
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	isolation. In general HMOs provide more living space per family than individual privately rented property at similar cost.		
21	The Council's discretionary planning rules on HMOs make the provision of housing for these groups to whom the Council has a responsibility, more costly and more difficult to arrange. None of these children and families have cars, so parking is not an issue.	Comments noted.	None
22	There is also a good economic case for easing the planning restrictions around HMOs to encourage growth and a diverse workforce in Milton Keynes.	Comments noted	None
HiMO9 Mrs Amanda Wilmot, Clerk, Kents Hill & Monkston Parish Council			
23	In the HIMO consultation the proposal is for a density limit for any area; the density limit proposed is 20%. The Council believes that this proposed limit is too high a concentration in any given area. The members suggest that 10% density is a more realistic limit.'	The SPD has been amended to change the way in which the concentration is calculated. Although the threshold percentage is now proposed to be higher, it results in a more restrictive approach than the draft SPD in line with suggested reduction.	Concentration threshold now to be based on number of HiMO bedrooms with 1 bedroom flats counting towards the concentration threshold of 35%.
HiMO10 Ms Gill King, Programme Manager, Milton Keynes Council			
24	<p>I have had a look at the space requirements for bin storage in the HIMO consultation documents and agreed with waste colleagues that they need to be updated as follows:</p> <p>Storage space should be allowed for</p> <p>0.75 black sacks per bedroom</p> <p>1 pink recycling sack per bedroom</p> <p>1 blue recycling box per 3 bedrooms</p> <p>1 x 140 litre green bin for food & garden waste per 6 bedrooms. If garden waste is also to be included, this should be a 240 litre bin.</p> <p>At the start of the project, the following must be obtained from the Council:</p> <p>Enough black sacks to supply 0.75/week/bedroom</p> <p>Enough pink sacks to supply 1/week/bedroom</p>	The storage requirements within the SPD will be updated accordingly.	Update bin storage requirements to reflect latest guidance from Waste Services.

	<p>1 blue box per 3 bedrooms</p> <p>1x140 litre green bin per 6 bedrooms or 1 x 240 litre green bin if garden waste is to be included</p> <p>1 food waste caddy should be supplied for each bedroom.</p> <p>1 battery bag should be supplied per bedroom.</p>		
25	<p>The waste service would also request that landlords put up posters 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>	<p>Comments noted. Wording to be added to the SPD to include additional guidance requesting landlords obtain and display the relevant information.</p>	<p>Add additional advice to landlords recommending they contact waste services to obtain and display relevant information</p>
<p>HiMO11 Mr Tony Cook East Sussex County Council</p>			
26	<p>East Sussex County Council's Planning Service has received your consultation however as we are a County Planning Authority and therefore do not deal with housing applications we have no formal comments to make</p>	<p>Noted</p>	<p>None</p>
<p>HiMO12 Mr Richard Peats, Historic Buildings and Areas Adviser , English Heritage</p>			
27	<p>Thank you for consulting English Heritage regarding this supplementary planning document. Unfortunately, as our team is temporary without a planner to give the appropriate specialist advice, we cannot comment on this occasion</p>	<p>Noted</p>	<p>None</p>
<p>HiMO13 Cllr Jenni Ferrans</p>			
28	<p>I would like to ask whether the rubbish quantities have been checked recently, as I am surprised at a ratio of nearly 2:1 of black to pink sack rubbish.</p> <p>I guess it's of little importance if the residents are using pink sacks as they can put whichever they have in the enclosures, but if separate containers of a different type are provided, it will matter.</p>	<p>The waste storage requirements are being updated in line with an update from MKC Waste Services.</p>	<p>Update bin storage requirements to reflect latest guidance from Waste Services.</p>
29	<p>Could we consider a condition that the waste enclosure have a protected notice (ie in a weather-resistant container) of what can be put into each type of sack? The lack of this knowledge as tenants change often reduces the amount of recycling.</p>	<p>Wording to be added to the SPD to include additional guidance requesting landlords obtain and display the relevant information.</p>	<p>Additional text added to provide advice to landlords recommending they contact waste services to obtain and display relevant information</p>
30	<p>I would also comment that the diagram about concentrations is somewhat misleading as very few</p>	<p>The concentrations are dependant on the</p>	<p>None</p>

	streets in MK have nearly 40m between fronts of facing properties! 25m is much more common and that would include another row of buildings!	percentage and not the number of dwellings within the buffer.	
HiMO14 Cllr John Bint, Councillor			
31	1. I very much welcome the creation of this draft SPD. The Council and its officers, Councillors (especially DCC Members), residents and applicants will all benefit from this greater clarity on the subject.	Comments noted	None
32	2. I would request additional text at some suitable point in the document to say that HiMOs serve a wide range of economic circumstances, in some cases being a very low-price form of housing in some areas, in other cases being a premium offering for young, high-fliers needing a base, and an instant social network, for a short period of living in MK.	Additional text will be added to the SPD to clarify this.	Amend paragraph in introduction to state that HMOs in MK are not generally occupied by students, although acknowledge that this may change with the growth of the University Centre MK. They are occupied either by individuals as a cheap form of accommodation or professionals requiring temporary accommodation
33	3. I welcome both the approach to parking and the figures, in respect of Zone A, where history suggests most HiMOs are towards the lower end of the price spectrum (so car ownership can be expected to be lower), access to public transport is better, and where most street layouts can absorb overflow parking.	Parking Standards in the HiMOs SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD.	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.
34	4. I urge further thought for the parking requirements for Zone B, where many HiMOs are an attractive premium offering for well-paid young professionals in highly mobile careers. These HiMOs attract occupants with effectively one car per person. The large rooms with en-suite facilities - typically, the master bedroom and principal guest bedroom - often attract double occupancy, again with one car per person. Moreover, these newer, larger properties, further from the city centre, are often in newer areas built with smaller streets, and less overflow capacity. I therefore urge that for Zone B, there should be an additional car space required	Parking Standards in the HiMOs SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD.	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.

	for each "big" bedroom - this will need officer guidance, but perhaps 120 sqft is about right - to recognise the tendency to double occupancy in such larger rooms. I have avoided linking additional parking to en-suite facilities as this would create an unwanted incentive for the owner to not build extra en-suite facilities.		
35	5. I also urge that some allocation for additional visitor space is required in Zone B, over and above any pre-existing allowance of "one space per 4 dwellings" or similar. I urge that for any C4 application in Zone B, one visitor space should be required, and for any "Big HiMO" application, with 7 or more occupants, two visitor spaces be required. These figures are broadly consistent with our other standards for visitor parking, and I can see no justification for not doing so (and plenty of anecdotal evidence to suggest that actually a higher figure would be better).	Parking Standards in the HiMOs SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD.	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.
36	6. I request that the portions of the documents indicating a "demand" exists for HiMOs - and implying that there is a greater demand for the HiMO Rooms being created than for the family dwellinghouse being destroyed - should be redrafted to avoid indicating this demand, absolute or relative. MK Council has no data to indicate a greater demand for HiMO rooms than for any other type of dwelling.	The documents do not state that there is a greater demand for HiMOs than there is for family housing.	None
37	7. I urge further thought to the mix of households (and therefore of dwelling sizes) we regard as desirable and sustainable. The proposals allow for an urban mix of 4 family homes for every one 4-5 room HiMO - -in other words, more HiMO rooms than family homes! I believe this mix is incompatible with the national policies stated in the draft document. I suggest that for our sustainable community reasons stated, there should be upto one HiMO room (plus 1-bed flats, studio units, etc) per 2 remaining dwellinghouses. So for every 4-bed HiMO, there must be 8 remaining family dwellings! And where there are already 6 small flats at the end of a road, if there's an application for a 4-bed HiMO then there needs to be 20 remaining family homes, and so on. Allowing up to 33% of our occupancy units to be one-bed flats and HiMO rooms seems well on the high side, given our SHMA demand data, and barely providing the community sustainability MK needs.	SPD to be amended to include 1 bedroom flats in the concentration calculation and count HiMOs by number of bedrooms.	Concentration threshold now to be based on number of HiMO bedrooms with 1 bedroom flats counting towards the concentration threshold of 35%.
38	8. I recognise that the suggested diameter for use when counting the density of HiMOs (plus, I suggest,	Comments noted.	None

	one-bed flats) is somewhat arbitrary, but having a specified distance (rather than the risk of debates over the bounds of an immediate vicinity or neighbourhood) is to be commended. I also support the proposed 100m diameter.		
HiMO15 Mrs Diane Farmer			
39	<p>Unfortunately the MK portal does not appear to show this consultation however as you have sought opinion I will provide that in this mail; consequently I apologise if I have not followed the correct layout.</p> <p>I have lived for a long period in an area where large numbers of properties have been converted into houses of multiple occupation - predominantly large former Victorian mansions, and the consequences are many.</p>	Comments noted	None
40	Parking is a particular problem with the owners or renters of each flat typically parking one/two cars. Flats are frequently bought by landlords for the purpose of letting and large vans which renters need to park are both an eyesore but also add to the parking chaos as they take up so much space in streets that are routinely quite narrow.	Parking Standards in the HiMOs SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD.	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.
41	Converted properties rarely have the correct soundproofing, and occupants find it easy to disturb neighbours above and below sometimes with the most minor noises.	Comments noted	None
42	Provision for bin storage needs to be very clear so bins are not left blocking pavements and are also locked away so as not to create an eyesore for all local residents.	Comments noted	None
43	I also found that the whole character of the neighbourhood I lived in changed over a very short period when a large multiple occupancy development was allowed	Comments noted	None
HiMO16 Mr Martin Small, Streetcare Localities team/MKC			
44	My comment is that the policy development needs to both address HIMO-related problems which have arisen in MK, but shouldn't prejudice the possibility of housing for a future university / student body in MK. The introduction of a university in MK will be a huge economic and educational boost for the city and the area, and HIMO policies developed now	As the university grows there will need to be consideration as to the provision of purpose built student accommodation.	None

	should be flexible enough to enable the provision of cheap short-term accommodation in the city for a student body, without the need for a further policy review		
HiMO17 Mr David Cox, National Landlords Association			
45	An Article 4 Direction is undoubtedly a powerful tool for local authorities when used appropriately. However, it should be a targeted instrument rather than a tool to be applied liberally to combat perceived societal problems. We therefore remain unconvinced that Milton Keynes Council has provided sufficient evidence to justify the onerous conditions proposed for determining the outcome of planning applications under the council's Article 4 Direction.	The Article 4 Directions have been confirmed by the Council, the SPD will provide additional guidance for determining planning applications.	None
46	Background Last year's Comprehensive Spending Review changed the shared room rate age threshold for Local Housing Allowance from 25 to 35, meaning that single benefit recipients under this age can only access shared housing. It has been suggested that 88,000 extra rooms in Houses in Multiple Occupation (HMOs) will be required when the changes come into force in January next year.	Comments noted.	None
47	The Article 4 Direction and proposed new SPD are specifically aimed at reducing the future availability of good quality private accommodation in shared housing and will therefore have a detrimental effect on vulnerable and low-income households; potentially increasing homelessness applications to the Council. This SPD is specifically designed to act as a barrier to the provision of good quality shared accommodation in the preferred areas. This will have two effects. Firstly, it will reduce the volume of available property, potentially pushing people towards those 'rogue' landlords who pay little regard to regulation and will be prepared to exploit a vulnerable market. Secondly, it will force people to look for property further away from their desired locations. This will transplant the supply side problems of low availability elsewhere and reduce the quantity of shared housing accessible by low income households in those areas.	The SPD aims to guide HiMOs to suitable locations and avoid over concentrations.	None

48	<p>Paragraph 4.22 of the SPD states the desire to create mixed, balanced communities. This Article 4 Direction will have the opposite effect. It will push LHA tenants out of Zone A and create two communities; those who can afford to live in Zone A and the rest who cannot.</p>	Comments noted.	None
49	<p>Further, it states at paragraph 1.3 that one of the main impacts of HMOs are the problems associated with the anti-social behaviour, noise and nuisance. Like any other tenancy, rights and responsibilities lie both on the landlord and on the tenant. As with any other household, those in shared housing are required to behave in a socially acceptable way. Where reality does not match up to these expectations, both the landlord and the local authority have powers that can be used to tackle unacceptable behaviour.</p> <p>Where a particular issue related to shared housing concentration has been identified, local authorities and enforcement agencies have extensive existing statutory powers to deal with such issues. The NLA argues that these powers should be explored and exhausted before an Article 4 Direction is made.</p> <p>These powers require local residents to identify particular cases of unacceptable behaviour so that they can be dealt with. Landlords can neither continually monitor the behaviour of their tenants, nor do anything that may constitute harassment.</p> <p>Frequently local residents develop the false impression that it is the house itself rather than the household that cause problems. They build up a 'general feeling' based on the observation of generally unrelated phenomena about particular localities. This is particularly prevalent in areas of dense shared housing, without looking to see whether particular problems have been dealt with.</p> <p>This aggregation of issues, particularly grievances and 'general feelings' about a community can quickly make residents feel that a 'tipping point' has been reached. This problem is compounded where residents are not made aware of any specific action taken by a landlord or local authority against a particular household and so are ignorant of any work being undertaken to tackle issues important to them.</p>	The Article 4 Directions have been confirmed by the Council, the SPD will provide additional guidance for determining planning applications.	None

50	<p>Where local authorities have come together with other community stakeholders, including local landlords, to tackle particular problems or issues, then there have been successes.(ECOTECH (2008), "Evidence Gathering - Houses in Multiple Occupation and possible planning responses", CLG). Although the Government's ECOTECH research focuses on student and migrant sections of the population, it does identify a number of effective local level initiatives which show stakeholders coming together). However these initiatives do require active engagement by local authorities and only solve the problems associated with negative perception if their outcomes are publicised.</p>	Comments noted	None
51	<p>Immediate Article 4 Direction</p> <p>It is noted at paragraph 2.6 of the SPD that an Immediate Article 4 Direction was made on 29 December 2010 and came into force on 30 December 2010, covering the urban area of Milton Keynes. This SPD was published for consultation on 24 October 2011 - almost eleven months into the Immediate Article 4 Direction and yet paragraph 2.6 is the only reference to it anywhere in either the SPD or Supplementary Evidence.</p> <p>We would argue that after almost eleven months, Milton Keynes Council should have some evidence on whether the Immediate Article 4 Direction has had an impact on:</p> <ul style="list-style-type: none"> a) Reducing noise and disturbance complaints; b) Alleviating parking problems; c) Decreasing problems with incorrect waste disposal; and / or d) Improving the character of the areas. <p>There is also no information on:</p> <ul style="list-style-type: none"> a) How many planning applications have been made under the Direction? b) How many have been granted? c) How many have been refused? 	The Article 4 Directions have been confirmed by the Council. The SPD provides additional guidance for the determination of planning applications.	None

	<p>d) Why the applications were refused?</p> <p>e) What enforcement action, if any, has been taken against the rogue operators who have ignored the Direction?</p> <p>We would argue that without any information or evidence on the effectiveness of the existing Immediate Article 4 Direction, Milton Keynes Council is pursuing a Non-Immediate Direction without any regard to whether the policy already in force has achieved its aims.</p> <p>We would strongly recommend that you review the effectiveness of the existing Article 4 Direction in relation to the four provisions in this SPD consultation before embarking on further regulation.</p>		
52	<p>Noise and Disturbance</p> <p>The NLA is not convinced that the unsupported assertions made at paragraphs 4.4 - 4.8 of the SPD are sufficiently robust to justify the noise and disturbance provisions. Further, the information at Chapter 5 of the Supplementary Evidence does not state how many of the complaints were acted upon, how many resulted in enforcement action or how many would have been reduced if soundproofing had been installed.</p> <p>We would also argue that levels noise and disturbance are unlikely to be greatly different in a property shared by three unrelated renters to a family with teenage dependents. This position is supported by the recent Lancashire planning appeal Ref: 100-067-072 which stated:</p> <p><i>"The continued use of an end of terrace house in Lancashire as a house in multiple occupation was allowed, an inspector reasoning that noise should be little different from that made by a typical family. The next-door neighbours referred to disturbance from televisions, people moving around the property and doors slamming, claiming that it extended well into the evening on occasion. However, the inspector reasoned that in properties in family use many bedrooms occupied by children, and particularly teenagers, contained televisions and audio equipment. Thus, whilst tenants might be inconsiderate on occasion, the same could be said of any type of occupier. Moreover, she found no</i></p>	<p>The SPD requires a landlord to only provide noise insulation for internal rooms which is considered appropriate in order to protect the amenity of occupants. For external properties applicants would only need to demonstrate what measures they propose where noise would be unacceptable for surrounding properties.</p>	None

	<p><i>evidence to support the generalised assertion that occupiers of an HMO were intrinsically more disposed to coming and going in the late evening or early morning hours than occupiers of other property types. She acknowledged that some tenants could work on a shift basis or during night time hours but given the limited number of occupants she did not consider that the comings and goings would be materially different from that associated with a typical household."</i>(Planning Appeal Decision Ref: 100-067-072, A Roland (Inspector), 2010 http://www.compasssearch.co.uk/compass/faces/ca_sebook2.jsp)</p> <p>It is important to note that when considering noise nuisance, all a landlord can do is warn the tenant about their behaviour and then pursue possession proceedings through the courts, if that behaviour does not improve. This does not solve such problems; it merely moves the problem elsewhere. Placing onerous requirements on landlords will not have any impact on the behaviour of tenants.</p>		
53	<p>However, we do not oppose the soundproofing requirements in the provisions but suggest that you provide advice to landlords on how to obtain a noise assessment.</p>	<p>Agreed.</p>	<p>Additional text with advice on obtaining noise assessments will be added.</p>
54	<p>Parking</p> <p>We consider the proposals for the provision of car parking spaces to be overly onerous and in most cases completely impractical. They run contrary to Milton Keynes Council's evidence base and are likely to result in almost every C4 planning application being refused.</p> <p>At Figure 2 of the Houses in Multiple Occupation Report 2010, it notes that 48.9% of properties in Milton Keynes are terraced houses and 19.1% are part of a dwelling. Whilst the supplementary evidence makes no reference to existing on-site parking provisions for such properties, it is probable that in most cases, there will be no or only very limited on-site parking available. Therefore, 68% of properties in Milton Keynes need to rely predominantly on kerbside parking.</p> <p>When considering the 2.9% of properties that are purpose built flats, it is unlikely that a three-bedroom flat would be sold with three car parking</p>	<p>Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD.</p>	<p>Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.</p>

	<p>spaces (as would be required by these proposals).</p> <p>Further, when considering the 29.2% of dwellings that are either detached or semi-detached properties in Milton Keynes and may have garages, it is also noted in these provisions that the Council will not count garages as parking spaces.</p>		
55	<p>The SPD states that "if an application for a HiMO is submitted with on-plot parking provision below the required levels, it will normally be refused unless the applicant can demonstrate that the shortfall can be satisfactorily accommodated within properly marked, or laid out, parking spaces in the highway fronting the site". Paragraph 4.15 then states that "reliance on kerbside parking within residential streets to meet parking standards will not normally be acceptable" and paragraph 4.16 states "a shortfall of two or more spaces with reliance on kerbside parking will not be deemed acceptable".</p> <p>Therefore, the car parking provisions have excluded most of the 68% of terraced or part of dwelling properties in Milton Keynes from being granted planning permission. They have also excluded the vast majority, if not all, of purpose-built flats and made it very difficult for the detached or semi-detached properties to get planning permission.</p> <p>It can be concluded that the only way a landlord could comply with these proposals is to have sufficient space in their front garden to accommodate the necessary number of car parking spaces. Based on the information contained in the supplementary evidence, it would appear there are very few places in Milton Keynes where this is possible.</p> <p>Therefore, the car parking provisions within this SPD will effectively mean that planning permission for the creation of a new HMO will always be refused. We would consider this as being so onerous it is punitive and will effectively stop any new HMOs from being created.</p>	<p>Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD. The additional paragraphs provide clarification on the approach.</p>	<p>Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.</p>

56	<p>There is also no explanation in the SPD of how the minimum number of parking spaces was decided. They appear to be arbitrary figures and not based on an evidential need. The Supplementary Evidence notes that 88% of HMO households have less than three cars and almost 40% do not have access to a car. Based on these figures, there does not seem to be any evidential link between the minimum number of spaces and the actual need for car parking spaces.</p>	<p>Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD</p> <p>The supplementary evidence provides additional context and supports the zone A/zone B approach.</p>	<p>Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.</p>
57	<p>It should also be noted that the minimum standards in Zone A are lower than in Zone B and yet paragraph 6.4 of the Supplementary Evidence notes that "in terms of parking provision, the older estates closer to Central Milton Keynes (CMK) can generally accommodate an intensification of occupants due to their wide, long and straight boulevards, often with central parking areas.</p> <p>Therefore, the additional parking requirements are more likely to be achievable in these areas". We must therefore question why there are lower standards in Zone A and yet more parking provisions?</p>	<p>The standards are lower in Zone A to reflect the locations are areas where car ownership is likely to be lower as there is good access to services. It is an observation that the 'doughnut' estates around CMK also happen to have more space for parking than other areas. Low capacity in one area does not mean the standards should be lowered.</p> <p>Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD</p>	<p>Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.</p>
58	<p>Finally, Milton Keynes Council operates a Parking Permit Scheme - i.e. Residents cannot use kerbside parking unless they display a valid parking permit. Therefore, we would argue that as such a scheme already exists, these proposals are somewhat redundant and any issues relating to car parking can be better dealt with through the existing Parking Permit mechanism (by only issuing a single permit per property for example).</p>	<p>Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the</p>	<p>Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.</p>

		standards in the HiMO SPD. The parking permit scheme currently only operates in a few streets in a small number of areas; the parking standards are Borough wide. However, we note that this may be a useful avenue to explore in the future.	
59	We would therefore suggest, in view of the punitive nature of these provisions, the lack of evidence to justify the minimum standards and the existence of a fully functioned Parking Permit scheme, the car parking provisions should be removed from the SPD altogether.	Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD.	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.
60	Bin storage and drying areas It should be highlighted there is no evidence to suggest that bin storage and drying areas are a problem for HMOs in Milton Keynes. The assertion at paragraph 4.19 of the consultation document that properties occupied as HMOs "can result in waste being left in unsuitable locations beyond the property boundary" is not made out in the supplementary evidence where it states at paragraph 7.3 that the "difference is marginal" between HMOs and non-HMOs in Milton Keynes.	The bin storage requirements are part of the adopted Policy H10, there is a need for adequate provision to be made.	None
61	There does not appear to be any reasoning behind the requirement to have 15sqm of storage space for a drying area and waste receptacles. This is a significant amount of space and where there is no rear garden, it is impractical to make such onerous requirements as it would significantly limit the number of properties with enough available space. It is also not clear from the consultation document whether this is a flat requirement for all HMOs or whether it is dependent on size/occupancy. We would therefore recommend that the provision be amended to require "adequate space for drying clothes and storing waste receptacles". This would allow decision makers to exercise common sense when making planning decisions.	The 15sqm requirement is taken from the adopted Local Plan. It is not considered to be onerous, or that it would significantly limit the number of properties that could be converted to a HiMO.	Additional text to clarify what areas count towards the 15sqm storage area requirement.
62	We assume the 15sqm will include rear gardens so in	The requirement includes	Additional text to

	<p>most cases this will not be a problematic requirement if this provision is enacted. However, there are certain exceptions that should be included:</p> <p>a) Purpose built flats. We assume that communal rubbish and recycling areas will be classed as acceptable compliance with these provisions as it would be impractical to require 15sqm for rubbish storage in an individual flat.</p> <p>b) Part of dwelling - where there is no access to a rear garden (for example a second floor flat in a converted building). Again, we would suggest that communal rubbish and recycling areas which would have been a requirement of the conversion's original planning permission should be classed as compliance with these provisions.</p> <p>We would be very concerned if communal rubbish and recycling areas (which are highly likely to have already been subject to planning consent) are not classed as acceptable compliance with these provisions. We would argue that additional planning requirements over and above those which have already gained planning consent are unduly onerous.</p>	<p>any area within the curtilage of the property including communal areas. Additional text to be added to clarify this.</p>	<p>clarify that communal bin storage and drying areas are acceptable for meeting requirements.</p>
63	<p>7 We agree that 0.75 black sacks per bedroom; 1.5 recycling sacks for every 4 bedrooms; 1 blue recycling box for up to 6 bedrooms; and 1 green recycling box for up to 6 bedrooms are appropriate requirements for waste receptacles.</p>	<p>Comments noted, the requirements have been updated following advice from Waste Services, however this does not impact on the overall space requirement.</p>	<p>Update requirements following advice from Waste Services</p>
64	<p>We would also suggest that when moving waste receptacles from a storage area in a rear garden in order to comply with the "bring[ing] their refuse and recycling containers to the front of their property boundary" provisions, it is acceptable to do so through the internal, common parts, of a property. This is especially important for terraced properties where there may not be any direct external access from a rear garden to the front boundary.</p>	<p>This would be acceptable under the SPD.</p>	<p>None</p>
65	<p>Again, we assume waste receptacles stored in a rear garden will be classed as acceptable compliance with the "secure and unobtrusive" and the "readily accessible" provisions. If not, we would argue this requirement is unduly onerous.</p>	<p>Where not accessible then residents would need to bring to the front of the property for collection.</p>	<p>None</p>
66	<p>Character and Concentration</p>	<p>Comments noted</p>	<p>None</p>

	When considering the character of an area, we fully support the views outlined at paragraph 8.4 of the supplementary evidence that "there is no evidence that HMOs in general have a particular visual impact on the character of an area. There may be isolated properties where maintenance is poor, but from site visits, this was found to be just as prevalent in non-HMO properties".		
67	When consider concentration, we are pleased that Milton Keynes Council have decided not to adopt the National HMO Lobby's 'Tipping Point' as the basis for their policy and instead made an evidence based assessment of current HMO concentrations (outlined at Chapter 8 of the Supplementary Evidence).	Comments noted	None
68	<p>However, the NLA does not believe that placing arbitrary limits on the number of HMOs in an area is the most appropriate method of implementing an Article 4 Direction. This view has been supported by Planning Inspectors in both Portsmouth and Manchester. For example in Portsmouth:</p> <p><i>"The Inspector is concerned about the justification for the 10% threshold; the application of the policy throughout the City; the reliability of the figures; the apparent lack of consideration of alternative ways to address the matter; and the quality of the evidence regarding the detrimental effect that the concentration of HMOs may have on a community"</i>³</p> <p>http://www.portsmouth.gov.uk/media/ID_6_Inspector_Note_on_HMO_Policy.pdf</p>	It is considered reasonable to place a limit on the number of HiMOs in order to ensure mixed communities.	None
69	We therefore do not believe that Milton Keynes Council should implement an arbitrary limit and do not see the necessity of creating a 'non-sandwiching approach'. We consider it excessive micro-management of the housing stock. We would suggest that in order to 'create sustainable, inclusive, mixed communities' as noted at paragraph 4.22 of the SPD, it would be more appropriate to look at concentrations within 'communities'. A 'community' is not within 100m of a property - it is the area in which the property is located (for example a Council Ward, a Parish or a grid square as noted at Figure 8.1 of the Supplementary Evidence).	An approach based on the ward, parish or grid square level would not result in the local issues being addressed.	None
70	There are reasons why HMOs develop in certain areas (close to a Higher Education institution such as University Centre Milton Keynes for example). By adopting a 'community' based approach, it will allow	Given that the evidence shows that impacts of HiMOs are felt most intensely at the localised	None

	<p>HMOs to develop in response to market forces without creating over-concentrations or unnecessarily micro-managing the housing stock. We would therefore suggest that instead of instituting a 20% threshold within 100m, if the Council feels the need to create arbitrary limits, it would be more appropriate for the limit to be 20% within a Council Ward, Parish or Grid Square - at a 'community' level.</p>	<p>level, it is considered the most appropriate way of managing the impacts.</p>	
71	<p>We are also concerned that when considering whether to purchase a property with the intention of creating an HMO, landlords have no way of knowing whether it would breach a 20% threshold. Therefore, we would strongly recommend that Milton Keynes Council's Planning Department puts a facility in place to inform landlords who contact them whether converting a certain property into an HMO will breach the 20% threshold (irrespective of whether a landlord owns the property). This will then allow landlords to make informed decisions on potential future investments.</p>	<p>The council will look at ways of making this information available. In the interim the SPD will be amended to recommend that landlords contact the planning department.</p>	<p>Amend SPD to recommend that landlords contact the planning department. Further clarification to the application of the buffer to be added.</p>
72	<p>Potential Consequences of Arbitrary Limits</p> <p>The trends in future UK housing demographics and in the future growth of Higher Education, along with the current lack of available housing finance and supply of affordable housing, point to a greater need for shared housing in the UK.</p> <p>The flexibility and affordability that HMOs and shared housing provide are critical for many who either cannot afford or do not want the liabilities involved in owning their own home. This view is supported at paragraph 8.22 of the Supplementary Evidence which notes "it is clear that HiMOs are an essential part of the housing stock for Milton Keynes. At a time when house prices have been rising, pushing owner occupation out of the affordability range of many current non-owners, sharing a dwelling with other similar households represents a rational response to market conditions. HiMOs in Milton Keynes appear to be fulfilling a vital role in the Borough, providing accommodation for young workers in low income jobs who would otherwise struggle to afford to live in the area. Any attempt to control their location must always consider that HiMOs are a necessity and should not attempt to restrict the overall numbers. In some locations HiMOs will contribute positively towards creating mixed communities. Whatever approach the Council</p>	<p>The SPD will be monitored through the Annual Monitoring Report. If there did become a point when certain grid squares were nearing the threshold, a review of HiMO policy could be carried out.</p>	<p>None</p>

	<p>takes, it is essential to remember that HiMOs play a vital part in providing an affordable form of housing".</p> <p>The Government-commissioned review of the private rented sector published in 2008 identified a clear growth in the number of young professionals renting instead of turning to home ownership. 20 to 29 year olds now account for 79 per cent of all renters.4 4 (Julie Rugg and David Rhodes (2008), "The Private Rented Sector: its contribution and potential", p.16) While accurate statistics do not exist in this area, it is likely that the majority of this is shared housing.</p> <p>In addition to young professionals, migrants and students make up an important part of the shared housing market across England in general and Milton Keynes in particular. For obvious economic reasons and for flexibility, shared housing is an important source of housing for these groups. However, demand is not static. Recent research suggests that emigration out of the UK by economic migrants is increasing5 and current projections for student numbers point to the majority of future student growth over the next couple of decades being amongst post-graduates and part-time undergraduates. (Finch et al, 'Shall We Stay or Shall We Go? Re-migration trends among Britain's immigrants', IPPR, 2009)(The future size and shape of the higher education sector in the UK: demographic projections', Universities UK research)</p> <p>The overwhelming characteristic between these groups is that they are necessarily transient. These households are not intended to 'grow roots' or stay in the same home for a generation. HMOs and shared housing are popular amongst these socio-economic groups precisely because they provide a fluid housing option.</p>		
73	<p>In conclusion, it is the NLA's contention that Milton Keynes Council has not provided satisfactory justification or sufficient evidence for its proposed actions. As such we believe this SPD should be reconsidered.</p>	Comments noted	None
<p>HiMO18 Mrs Eirwen Tagg ,Parish Manager, Great Linford Parish Council</p>			

74	<p>Most HiMOs in the GLPC area are in either Conniburrow or Downs Barn on streets laid out as predominately-terraced properties. Using the 100m diameter buffer in terraced streets will create anomalies, which could lead to confusion and misinterpretation of the actual concentration on HiMOs relevant to a new application.</p> <ul style="list-style-type: none"> • It is a theoretical line on a plan, which is difficult to appreciate 'on the ground'. • Local residents or councillors cannot easily see and then work out if a new HiMO will be above or below the 20% threshold. • The circle will cut through property, with some clearly in the 20% catchment and others with perhaps just a few feet possibly in the 20% catchment. • If part of a property is only just in the 100m diameter circle it could lead to arguments about the credibility of the outcome of the buffer - have they been counted in or out. 	<p>Accept that this may be a problem. However the approach provides greater consistency over what constitutes the "surrounding area". Given that some houses are on corners or in cul-de-sacs etc, it is considered that a 100m diameter circle around a property is the most reasonable approach.</p>	<p>Additional wording to clarify how buffer will be applied.</p>
75	<p>PROPOSAL & RECOMMENDATION</p> <p>GLPC notes and welcomes the HiMO SPD which will bring much needed clarity to the consideration of HiMO applications.</p> <p>GLPC strongly recommends that the following suggestions should be adopted by MKC for inclusion in the SPD.</p>	<p>Comments noted</p>	<p>None</p>
76	<p>On streets laid out as predominately-terraced properties, a far simpler and more easily understood measure of Concentration would be: -</p> <ol style="list-style-type: none"> 1.To calculate the buffer by measuring along the frontage of the proposed HiMO 50 metres either side from the centre of the property. 2.Any property or part of a property within the 50m line would be counted in the 20% calculation. 3.This 100m line would be reflected as a mirror image on properties on the opposite side of the street for them to be included or not in the 20% calculations. 	<p>As with the circular buffer method, a 50m line approach would not overcome the issue of whether or not a particular property falls within the defined area. All part properties could be included in a circular buffer, just as they could a linear buffer. Not all houses are in neatly defined rows, so this method would be difficult to implement in areas other than those where streets comprise of straight rows of properties.</p>	<p>None</p>

77	<p>Further to your consultation paper and request for comments regarding Houses in Multiple occupancy (HiMO) in Milton Keynes I would like to respond to the Council's draft planning document.</p> <p>First of all I would like to give my complete support to the Council's efforts to bring a higher degree of regulation to the creation of HiMO's in Milton Keynes. I believe that the draft consultation document makes a significant contribution to the key areas of concern for local residents who either wish to live in a HiMO or who are impacted by a HiMO being located near to their homes.</p> <p>The four main areas noted in the consultation document touch on the key concerns of residents and I would comment as follows:</p>	Comments noted.	None.
78	<p>Noise and disturbance:</p> <p>I note the contents of the draft with which I agree and I would also add that the likelihood that individuals living in a HiMO would have a greater number of cars and other vehicles, and given the possibility that their domestic and working arrangements as such that they do not behave like a family in leaving or arriving at the premises at the same or similar times of day, it is a consequence that there will be more noise and disturbance from vehicle movements over a longer period of the day. This can be very disruptive particularly late at night or early in the morning.</p>	Noted	None
79	<p>Parking:</p> <p>The Council have carefully addressed the issues around parking and I note that the draft consultation document differentiates between areas in or near the city centre with better public transport and also increased on street parking options and those areas outside the immediate area of the city centre where parking may be more restricted and where more individuals are likely to have a car.</p> <p>I note that the Council is suggesting that, for example, a 5 bedroom HiMO in Zone B would require 4 parking spaces and a 6 bedroom HiMO would need 5 spaces. It is on this issue only which I would disagree with the Council's proposal. Having had experience of the problems relating to HiMO parking it is clear to me that a five bedroom property outside</p>	<p>Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD</p> <p>The supplementary evidence provides additional context and supports the zone A/zone B approach.</p>	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.

	<p>the immediate area of the city centre will attract tenants with one car each. Therefore five bedrooms equates to the need for five car parking spaces. When you add into this the very likely possibility of visitors calling to see the tenants of the HiMO plus occasional overnight guests then actually more than five spaces will often be required just to maintain enough spaces to prevent tenants from the HiMO encroaching on the parking provided for other residents of the area. I would therefore suggest that the requirement for on-site parking within the property be at least one space (individually accessible not via tandem parking etc) per resident with a further one or two spaces for on street parking which will not impact the entrance or egress of other residents.</p> <p>The space allocation for parking and the requirement to not have "tandem" parking seem very sensible; as do the stipulations that any parking should not be on shared driveways, access areas etc.</p> <p>Residents living near a HiMO will be concerned about on street parking where this prevents easy access to property or where it means having to step into the road to get past vehicles parked on the pavement. Furthermore I would be concerned about access for waste and emergency service vehicles on smaller, narrower streets. All of these concerns are covered in the draft consultation document but I would urge to Council to take a robust approach in ensuring safety and welfare are of paramount importance when considering any planning application for a HiMO.</p>		
80	<p>Bin Storage and Drying Areas</p> <p>Clearly adequate and hygienic storage of bins is needed for HiMO's but I would also note that the issue of responsibility for leaving waste out for collection and for correctly sorting rubbish from recyclable materials be considered. Tenants in a HiMO are likely to only take responsibility for their own rubbish and not that of fellow tenants. This could result in items being discarded with no consideration for recycling and also for bin bags to be left uncollected as each tenant thinks "someone else will do the bins". I have personally observed that this can result in bins not being cleared for weeks on end and for pink recycling sacks to contain all manner of waste that means nothing gets recycled. I</p>	<p>It is not within the powers of planning policy to stipulate who is responsible for waste disposal at a particular property.</p>	<p>None</p>

	would suggest that it is a requirement of granting HiMO planning permission that the landlord or their agent holds responsibility for waste disposal and that enforcement measures regarding recycling be considered.		
81	<p>Character & Concentration</p> <p>It is obvious that the creation of a HiMO in a particular residential area will have an impact on the character of the area. I would agree with the Council's proposals regarding concentration as it would not be desirable for a large number of HiMO's to be located in the same area with a concentration of the issues noted above in a single area.</p> <p>In addition the creation of a HiMO in a street of, mainly family homes, can impact on the stability of a particular community. Occupants of a HiMO are less likely to be concerned about local amenities and the longevity of the community. In addition the potential for stress caused by the items noted above can impact, and ultimately destroy the contentment of the majority living in a particular area. Having been the "victim" of the negative impacts of a HiMO I can see the direct and unpleasant side effects of a HiMO which does not comply with any of the proposed recommendations. If the Council were to adopt the proposed consultation in addition to the suggested changes above it would go a very long way to alleviating the concerns and stresses caused to the council tax payers of Milton Keynes.</p> <p>Should you wish to discuss my comments further please do not hesitate to contact me via my email address.</p>	Comments noted	None

HiMO20 Mr Simon Elcock, Strategic Project Director, Places for People

82	We recognise the important role that houses in multiple occupation play in helping to provide accommodation for a diversity of needs within society but also recognise the potential harm that such living environments can have on the amenity of new tenants and existing neighbouring residents. We therefore support the Council's approach in introducing two Article 4 Directions that withdraw the permitted development right for a change of use to a Use Class C4 HiMO that results in the need for planning consent, and thus a more considered approach, for converting a dwelling house (C3) or non residential property to a Use Class (C4) HiMO	Comments noted	None
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	<p>across the Borough, including Brooklands.</p> <p>We also therefore support the principle of having an adopted supplementary planning policy document that provides further guidance to decision-makers and applicants on planning applications for HiMOs. This representation will focus on the four key areas identified by the draft SPD for determining planning applications.</p>		
83	<p><i>Noise</i></p> <p>The draft SPD is correct to highlight the greater potential for higher levels of noise that can be generated as a result of a greater number of people living independently within a property: a unique characteristics of HiMOs. In light of this higher risk and the greater need to minimise its detrimental impact upon neighbouring properties, we suggest that paragraph 4.8 be revised to include an additional requirement for post completion testing where a conversion of a dwelling is proposed from a dwelling house (C3) or non residential property to a Use Class (C4) HiMO as part of the Council's measures to minimise the effects of noise. The SPD should also identify the requirement for remedial work where the tests do not show that the construction provides the required level of sound reduction.</p>	<p>The SPD as currently worded requires HMOs to meet the necessary standard.</p>	<p>None</p>
84	<p><i>Parking</i></p> <p>We welcome the Council's recognition of HiMOs as a distinct land use through its adopted parking standards, requiring HiMOs to meet specific parking requirements. Brooklands is identified in zone B of the Council's Parking Standards Addendum; a broad area that is acknowledged to accommodate HiMOs less well than more central areas identified in zone A. With this in mind we believe that the wording of this section requires tightening up. For instance, paragraph 4.15 should read:</p> <p><i>" Parking in spaces remote from the site and not within the surveillance of the site will not normally be acceptable. The word "congestion" referred to in Policy H10 is considered to mean conditions where normal and safe use of the public highway is not possible. For example, where access to dwellings is prevented or made difficult, where manoeuvres at junctions are hindered [add: or made difficult] and</i></p>	<p>The word "normally" should be retained, as there may be exceptional circumstances, which would be considered acceptable.</p> <p>The addition of "or made more difficult" does not add any additional meaning to the policy.</p>	<p>None</p>

	<i>where large vehicles such as waste collection vehicles or fire engines cannot use turning areas in culs-de-sacs, or where access to a property is blocked. This means that the reliance on kerbside parking within residential streets to meet the parking standards will not normally be acceptable ."</i>		
85	<p>Waste</p> <p>We agree with the draft SPD that a HiMO is likely to generate more waste than a regular family dwelling. HiMOs therefore require a greater provision of waste storage space which can conflict with wider issues of local amenity, health and safety. We support the guidance set out by this draft SPD.</p>	Noted	None
86	<p>Balanced Communities and Local Character</p> <p>My client's support for the creation of new mixed and balanced communities is clearly demonstrated by their commitment to providing a diverse range of housing types and tenures as part of delivering the masterplan for Brooklands. A balanced community does not mean the concentration of one property type or community over another within a locality and the draft SPD is correct to touch on this aspect. The draft SPD is also correct to raise the point that HiMO residents can demonstrate a greater level of transiency and this can influence the character of an area.</p> <p>In light of this, we believe that it is reasonable for Milton Keynes Council to set out guidance to avoid excessive concentrations of HiMOs. An excessive concentration of HiMOs can have a detrimental impact on a local area by affecting the balance of the population with consequences for the provision of local services and facilities as well as adversely affecting residential amenity and the character of an area. We disagree with the 20% blanket approach applied by the draft SPD as it fails to consider the variety within the urban morphology of Milton Keynes - some areas will have narrower streets and higher built densities (such as Wolverton) compared with other newer estates that include landscaped open spaces and wider streets. Using the draft SPD's approach we calculated that a residential area within Phase 1 of the Brooklands development could yield a range between 8-11 HiMOs within a 100m diameter. This is a high yield particularly given the embryonic stage of Brooklands and the importance of providing</p>	Using a percentage rather than a fixed number of HiMOs for concentration means that the density of an area is automatically taken into account in the calculation. The policy aims to create a mix and where there is a larger number of non-HiMO properties it is reasonable to allow a larger number of HiMOs. The method of calculation has been amended to count HiMO bedrooms. Although now setting a 35% threshold, the change in calculation makes the SPD more in line with a 10% figure under the draft document.	None

	<p>the best planning framework to encourage stable communities early on. A more sensitive approach, we believe, would be to adopt a percentage figure related to the average housing densities found within a measurable planning unit such as different grid squares or electoral wards within the Borough. Failing this, a lower overall proportion closer to 10% of total residential stock within a 100m diameter buffer would be better suited to minimise the risk of grouping too many HiMOs in different parts of Milton Keynes.</p> <p>In summary, we support many of the initiatives set out within the draft SPD but believe it could be improved if the suggested amendments are taken on board.</p>		
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HiMO21 Mr Don Head, Citizens MK

87	<p>Housing is an issue which has concerned Citizens MK since its first meetings. While it has not been possible to assemble a group to discuss the proposals in detail there are clear statements of the policy that Citizens MK would wish to see adopted in relation to future housing supply and the management of the existing housing stock.</p> <p>It is accepted that multiple occupation of houses provides the opportunity for the provision of housing accommodation at the lowest levels of rent. It would appear that there are many individuals and families in MK who are unable to afford market rates for discrete housing units such as purpose built apartments or houses.</p> <p>Multiple occupation in houses originally built as single occupation units creates the problems outlined in paragraph 1.4 of the document:</p> <p>Parking Waste Noise Imbalanced Communities.</p>	Comments noted	None
88	<p>Citizens MK support the proposals for preventing "sandwiching" and for adoption of the Lifetime Housing Standards as set out in the Rowntree Foundation reports.</p>	Noted.	None
89	<p>Citizens MK are also concerned that security and fire safety are also significant factors. The death of a mother and young child in Fishermead is still foremost in the thoughts of those who live there and influence our response to this issue. It is also important that there is fair sharing of common</p>	Noted. Comments will be passed to the Housing team for consideration.	None

	<p>facilities for toilet/bathrooms, washing and food preparation/cooking.</p> <p>We note that these might be considered as property management concerns and as such not included in proper reasons for the granting or withholding of planning permission. Citizens MK are of the opinion that these are important issues for the local authority. Paragraph 1.9 refers to the licensing of units with three storeys or more than six sub-units in a house. There are still dangers for those units with five or fewer units. Five or fewer units could involve many more than five residents in a building.</p> <p>How are these to be monitored if there is no licensing?</p> <p>What provision is being made for resources to monitor those units requiring a licence?</p>		
90	Citizens MK would wish to support MK Council in its proposals to require planning permission for multiple occupation as defined in the proposed SPD.	Noted	None
91	Citizens MK would wish to support MK Council in using the Special Planning Directive as a means of identifying houses in multiple occupation so that these can be adequately monitored to avoid the problems included in the SPD and the matter of security, fire safety and equitable access to shared facilities for those who occupy the sub units.	Noted	None
HiMO23 Mr J Mountford			
92	<p>Paras 4.10, 4.11, 4.13, and appendix B: Considering some of the estates, possibly referred to as "Older" estates, eg Heelands, Loughton, Bancroft, Blue Bridge, Old Bradwell, Most of these estates have relatively narrow and bendy roads which already have a measure of parking and congestion problems associated with 2-4 cars per dwelling, and are, according to this document, assigned to Zone A. This doesn't make sense. Furthermore, the Appendix B Map does not make it clear what is included in Zone A. I cannot see the additional plans referred to in this diagram within the document.</p>	<p>Zone A represents areas with better access to facilities and so a lower parking standard is reasonable.</p> <p>Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD</p>	<p>Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.</p>
93	Para 4.27 (and elsewhere. There are many estates	The SPD has been amended	SPD to be based on the

	within MK - as in other parts of the UK, where a concentration of HIMO in excess of 5% would be extremely detrimental to the character and community of the area. A concentration of 20% fundamentally alters the nature of the area, as the result would be a dominance (eg 80%) of population within HIMO dwellings. This is unacceptable.	to now be based on the number of Bedrooms in a HIMO and with 1 bedroom flats counting towards the concentration figure thereby reducing the 'dominance' of population within HiMO accommodation within an area.	number of Bedrooms in a HIMO and with 1 bedroom flats counting towards the concentration figure.
HiMO22 Mr J Mountford			
94	I have already made comments in Para 4 which relate to this section. Please consider these as comments on this diagram	Noted	None
HiMO24 Mr Paul Cranfield			
95	The content is generally welcomed. Two issues to raise, however:- Reference is made to the fact that HIMO cannot feature in a 'sandwich' with non-HIMO properties. How does this apply to HIMO in blocks of flats? Are there any procedures to ensure that HIMO on different floors of a block of flats are not sandwiching other flats. Are there any guidelines with regard to adjacency by floor?	Comments noted	Add additional text to clarify the approach for flats where a non-sandwiching approach should apply to flats on the same floor.
96	Whilst it is accepted that CMK would be in Zone A due to the availability of street parking, this does not pertain to Campbell Park. It is our view that Campbell Park should be in a Zone B area.	Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.
HiMO25 Ms Rose Freeman, Planning Policy Officer, The Theatres Trust			
97	The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that <i>'The Theatres Trust exists to promote the better protection of theatres.</i> It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include <i>'development involving any land on which there is a</i>	Noted	None

	<p><i>theatre .'</i></p> <p>Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and as this consultation is not directly relevant to the Trust's work, we have no comment to make but look forward to being consulted on further LDF documents especially town centre area action plans, development management policies and planning obligations.</p>		
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HiMO26, Mr Richard Jones, Policy Director, Residential Landlords Association

98	<p>Use of Supplementary Planning Guidance</p> <p>2.1 The Association contends that the use of an Supplementary Planning Document (SPD) in this context would not be the correct approach and that the Council should produce a Development Plan Document (DPD) because of the significance of this issue.</p> <p>2.2 Paragraph 6.1 of Planning Policy Statement 12 (PPS 12) states that</p> <p>"SPDs should not be prepared with the object of avoiding the need for examination of the policy which should be examined". We contend strongly that this Policy is of such overwhelming significance that it is wholly inappropriate to introduce it by way of an SPD. Whilst SPDs carry less weight and are a "material consideration" for the purposes of development control it is extremely difficult for an individual appellant to challenge a high level policy such as this if the details were to be incorporated in an SPD. The proposed constraints on concentration are at the heart of the matter. To restrict and ration the number of houses in multiple occupation (HMOs) in the way proposed is something of such importance as to merit independent scrutiny via the DPD process; and not such as should be left to an SPD.</p> <p>2.3 The proposed National Planning Policy Framework (NPPF) discourages the use of SPDs, starting at paragraph 21.</p> <p>Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances.</p>	<p>The use of an SPD is considered appropriate as it is providing additional guidance to assist with the application of Policy H10 of the Adopted Local Plan and policy CS10 of the emerging Core Strategy.</p> <p>PPS12, Paragraph 6.1 states that:</p> <p>'A planning authority may prepare Supplementary Planning Documents (SPDs) to provide greater details on the policies of its development plan documents. Supplementary planning documents should not be prepared with the aim of avoiding the need for the examination of policy which should be examined'.</p> <p>Local Plan Policy H10 has been tested at examination. The SPD provides greater details on the application of the policy which is in accordance with the advice in PPS12.</p> <p>The NPPF is still a draft document and subject to change. However, given the need to provide additional guidance to Policy H10 and</p>	None
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	<p>Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should only be necessary where their production can help to bring forward sustainable development at an accelerated rate, and must not be used to add to the financial burdens on development.</p> <p>2.4 The Council should, if it is to proceed at all with a more details policy relating to HMOs, proceed via a DPD not an SPD.</p>	<p>the benefit in determining applications it is considered that there is a clear justification for the production of the SPD.</p>	
99	<p>HMOs generally</p> <p>3. By way of background, the genesis of imposing restrictions on HMOs lies in arguments over "studentification"; arguments which claim that students cause imbalanced communities, are guilty of anti social behaviour of varying degrees and lead to the closure of local amenities such as corner shops and schools. This is not the case in Milton Keynes. However, even though these claims may underlie this policy and have led to its introduction, the realities have changed following the introduction of the new Class C4 for small HMOs/bedsits as well as the revision of the existing Class C3 relating to single dwellings. One also has to bear in mind that there are larger HMOs which are also involved as a sui generis use. As a result of these changes to the Use Classes Order the policy must be looked at against the background of the housing demands and needs of single people generally, especially single sharers. These encompass many and diverse types of occupiers. It extends to young professionals, working people, and those who are out of work or between work. Traditionally, these are not categories of occupiers to whom the planning system has paid a great deal of attention. One can break the categorisation down even further to include groups such as nurses, including student nurses, as well as various essential workers. We are, therefore, talking about those who play a vital part in the economic wellbeing of the area. All these demands must, in our view, be properly catered for. Housing is vital for them in good quality suitably located accommodation. We must also recognise that a supply of decent economically affordable housing is essential for companies and businesses in the area to flourish.</p> <p>The policy recognises this on the face of it. However,</p>	<p>The SPD provides additional guidance to Local Plan policy H10 and seeks to direct HiMOs to suitable locations.</p>	None

	the reality is that the outcome of the policy will be different and will be detrimental as it will not cater for the housing needs and demands of sharers.		
100	<p>Draft National Planning Policy Framework</p> <p>4. In our view, the policy must be considered against the draft National Planning Policy Framework (NPPF) which is an emerging document.</p>	One of the objectives of the draft NPPF is to create 'sustainable, inclusive and mixed communities' and in relation to affordable housing refers to 'the objective of creating mixed and balanced communities'. Although the NPPF is only in draft form, the SPD supports these objectives.	None
101	<p>Human Rights</p> <p>5. We also consider because of the extremely restrictive nature of the proposed Planning Policy under consideration and its content, it is not compliant with Articles 8, 11 and 14 and Article 1 Protocol 1 of the European Convention on Human Rights as incorporated in English law by virtue of the Human Rights Act 1996.</p>	Satisfied that the SPD does not contravene the human rights act.	None
102	<p>Equality Impact Assessment</p> <p>6.1 It is well recognised that the type of person generally who lives in a shared house is normally under the age of 35 and ,although not unknown above that age, living in shared housing is much less common after that age. This is acknowledged in the evidence base where in Milton Keynes the upper age is even lower at around 30. Also in Milton Keynes the evidence base shows that proportionately more ethnic minorities live in shared houses. Thus, the proposed policy would have a disproportionate effect on these two sections of the community, the young and ethnic minorities.</p> <p>6.2 The proposed policy would authorise restricting availability of shared accommodation. Both age and ethnicity/race are protected characteristics under the Equality Act 2010. In relation to the young the policy would adversely impact on a group of people by reference to their age so clearly this protected characteristic is engaged.</p> <p>6.3 As a result the provisions of Section 149 of the Equality Act 2010 apply.</p>	Equality has been considered in the preparation of the SPD. The Council has prepared an equality impact assessment for the work of the development plans team. The final SPD will be accompanied by an EqIA setting out how equality has been considered before it is adopted.	None

<p>6.4 In particular it is important to draw attention to paragraphs (b) and (c) in Section 149. To paraphrase slightly the public authority must "have due regard to the need to (b) advance equality of opportunity between persons who share a relevant characteristic and persons who do not share it and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it".</p> <p>6.5 It is the duty of the local planning authority to ensure that there is a supply of housing of all types and for all the different groups within Society including the young and ethnic minorities. This is repeated in paragraph 28 of the draft NPPF. Clearly, the proposed policy is intended to restrict the provision of such accommodation and set quotas limiting numbers throughout the Borough.</p> <p>6.6 In particular, it is important to remember that this proposed Policy and results from a clash of attitudes between those who live in family homes and, young single people who want/need to share. The Policy in part is based on one sector of the community perceiving that their lifestyles (and the values of their properties) as being under threat allegedly because of harm to residential amenity. As a result the duty to have due regard to the need to foster good relations as set out in paragraph (c) is particularly important in this context.</p> <p>6.7 The Council have so far not carried out their obligations under Section 149. No such assessment has been carried out despite the evidence base showing that the young and ethnic minorities would be adversely affected by the proposed policy.</p> <p>6.8 In his judgment in R (on the application of Kirsty Green) -v- Gloucestershire County Council (and a related application relating to Somerset County Council) His Honour Judge McKenna sets out a very useful summary of the Council's obligation under Section 149. The key factors are as follows:-</p> <p>(a) The equality duty is a duty to have due regard to the need to achieve the goals of eliminating unlawful discrimination, promoting equality of opportunity and good relations. For these purposes what is "due regard"? It is the regard that is appropriate in all the circumstances. These circumstances include on the one hand the importance of the areas of life of the</p>		
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<p>members of a disadvantaged group that are affected by the inequality of opportunity as well as the extent of the inequality. On the other hand you have to consider such countervailing factors as are relevant to the function which the decision maker is performing (this sets out the principles as enunciated by the Court of Appeal in R (Baker) -v- Secretary of State for Communities and Local Government).</p> <p>NB: In this context one's home is very important particularly if there are difficulties in obtaining accommodation.</p> <p>(b) This does not impose a statutory duty on the public authorities to carry out a full equality impact assessment when carrying out their functions. However, the authority must consider taking such an assessment along with other means of gathering information to consider whether it is appropriate to have one in the particular case.</p> <p>(c) The decision maker must be aware of its duty to have "due regard" to the identified goals.</p> <p>(d) The due regard duty must be fulfilled before and at the time that a particular policy is being considered. This involves a conscious approach to the state of mind. Trying to make out later ex post facto that the duty has been complied with does not suffice.</p> <p>(e) Importantly, the duty must be exercised in substance with rigor and with an open mind. The duty has to be integrated within the discharge of the public functions of the authority. It is not a question of "ticking boxes".</p> <p>(f) The fact that the public authority may not have specifically referred to the relevant section is not determinative of whether the duty has been performed or not, although it is good practice to do so.</p> <p>(g) The duty is not delegable.</p> <p>(h) The duty is a continuing one.</p> <p>(i) The authority must keep a proper record.</p> <p>The above mentioned principles are drawn from the</p>		
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<p>Brown decision.</p> <p>6.9 Importantly, the question is whether the duty has been carried in substance by the decision maker rather than whether a document referred to as an Equality Impact Assessment has been produced. The substance of the analysis is the key in this area (see paragraph 118 of Judge McKenna's judgment)</p> <p>6.10 No Equality Impact Assessment or other proper consideration of these issues as been made in relation to the proposed policy. Case law makes it abundantly clear that it cannot discharge the Section 149 duty by after the event justification. Section 149 is integral to the actual decision making process; hence the reference to substance and form. It has to be integrated into the discharge of a duty (see paragraph 121 of Judge McKenna's Judgment). As Judge McKenna points out (in paragraph 130), the real question is whether there was a conscious directing of the mind by the decision makers to their obligations under the legislation and, in particular, to the need to exercise the duty to have due regard in substance and with rigour and based on sufficient information, appropriately analysed.</p> <p>6.11 It is clear on the basis of the published documentation that there has been a total failure to comply with this obligation. This policy proposed by the Council has failed to "have due regard" to the need to achieve the goals set out in paragraphs 8 (a) (b) and (c) in Section 149(1) of the 2010 Act. This situation needs therefore to be rectified.</p>		
<p>Why the Policy is not appropriate</p> <p>7. In summary the policy is not appropriate for a number of reasons:</p> <p>(1) The use of supplementary planning guidance is the wrong way of proceeding.</p> <p>(2) The policy is proposed on the basis of an undefined and unsubstantiated notion of a so called "balanced community" which is not a valid concern of planning law.</p> <p>(3) It is not the function of the planning system even in terms of land use, to specify in percentage or other terms the number of occupants of a particular street or area by reference to their status or</p>	<p>Individual comments considered separately below.</p>	<p>See below</p>

	<p>occupation.</p> <p>(4) The proposal misunderstands and misapplies the concept of a mixed community and sustainable community in terms of National Planning Policies.</p> <p>(5) There is no evidence justifying the use of planning powers in this way.</p> <p>(6) Other justifications such as noise, waste and car parking are flimsy and unsubstantiated and can be addressed in other ways.</p> <p>(7) Importantly, on reading the evidence base, one is left with a feeling "what is all the fuss about?" particularly when one looks at the arguments raised by other local authorities concerning much greater concentrations of HMOs than exist in Milton Keynes. The numbers of HMOs involved are overall very low in comparison with elsewhere. The Council seems to have lost its sense of proportion on this issue to the extent of wasting its Council Tax Payers money pursuing an abortive application to through the Courts to challenge the Government's changes which introduced new permitted development rights.</p>		
	<p>Strategic Housing Market Assessment (SHMA)</p> <p>8.1 According to the evidence base no SHMA has been carried out specifically relating to shared housing or bedsits. The current SHMA looks at accommodation merely by reference to numbers of bedrooms. Attempting to conflate single room accommodation and shared accommodation/bedsits is a wholly inappropriate approach. One is dealing with completely different accommodation.</p> <p>8.2 No population projections have been produced in relation to likely numbers of sharers. This is a fundamental aspect of the evidence base. There is no proper evidence as to the need/demand for shared housing provision in the Borough over the likely lifetime of the policy.</p>	<p>The supporting evidence provides sufficient justification for additional guidance to support Policy H10.</p>	<p>None</p>
<p>103</p>	<p>Impact on various groups</p> <p>9.1 Considering the evidence base produced one is struck by the low numbers involved. Actual evidence involved shows these figures to be less but the Council's projection is that at best there are some 900 properties potentially currently in use as HMOs,</p>	<p>The supporting evidence provides sufficient justification for additional guidance to support Policy H10. The SPD seeks to achieve a mix a of housing types.</p>	<p>None</p>

	<p>as a maximum. This whole policy therefore seems to be very much the proverbial "sledge hammer to crack a nut". This is particularly so as it is a Borough wide policy.</p> <p>9.2 The Association considers that it is incumbent upon the Council to provide a proper evidence base and in particular an assessment of the impact of the proposed policies in relation to the different groups that are affected. The new Class C4 does not differentiate between different types of occupants; it affects all HMOs.</p> <p>9.3 Provision of shared accommodation is of particular importance having regard to the changes to the shared accommodation rate for local housing allowance under which the qualifying age will be raised to 35; essentially the age at which most people stop sharing anyway. In our view, it is key that the Council properly investigates and obtains evidence of and analyses the varying impacts on the different groups who live in shared accommodation. Otherwise, there will be serious consequences for the economic well being of the Borough and the policy could well shut off this supply of labour or constrain it significantly.</p> <p>9.4 In particular with regard to the local housing allowance changes it is clearly going to be the result of the Government's policy that under 35s will no longer be able to access self contained accommodation e.g. their own flats where they are assisted by benefits, whether in work or out of work. The introduction of restricted planning policies along the lines of those proposed by the Council will bear down particularly hard on this Sector of the private rented market. Only the private rental market that provides accommodation for young sharers. By definition they cannot access owner/occupied property and the social sector does not provide accommodation for them.</p>		
104	<p>Lack of evidence</p> <p>10.1 The policy is also not appropriate because no significant evidence at all is put forward to justify why restrictions on HMOs are appropriate e.g. to deal with any noise issues. On the contrary the evidence demonstrates the reverse.</p> <p>10.2 It is not just a matter of the lack of a proper</p>	<p>The Local Plan sets the criteria against which HiMO applications are assessed. The SPD adds additional guidance for how this policy is to be applied. The evidence paper supports the additional guidance within the SPD.</p>	None

	<p>Strategic Housing Market Assessment and no population predictions, but the concession that there is little or no evidence justifying the policy in relation to noise waste and car parking calls into question the need for such policy. A policy which dictates where people can or cannot live is a very serious interference in peoples rights and it has completely unknown consequences for the functioning of the housing market in the Borough. It is imperative therefore that there is a full and complete evidence base to justify the policy which otherwise cannot be appropriate.</p>		
	<p>Families and Single People</p> <p>11. The effect of the proposed policy would be to restrict the number of conversions of family homes into small HMOs. Unfortunately, what we appear now to have as a result of this policy is a squabble between families on the one hand and single people, including sharers, on the other over what is often a scarce resource namely housing when in reality it should be the responsibility of the Council to cater for all sectors of the community. All of them need to be housed. Importantly, associated with this is, in our view, the right for individuals to choose where they live and not to be directed by a local planning authority as to where they may or may not live.</p>	<p>It is a legitimate aim for planning to create mixed communities, such as through ‘pepper potting’ of affordable housing or creating a mix in the size of houses in a development.</p>	<p>None</p>
105	<p>Discrimination</p> <p>12. We have looked at the specific issues affecting two protected groups but the Association believes more generally that potentially a policy of this kind has worrying undertones. The consequence here is that the Council is in reality limiting the number of black people and other ethnic minorities who can live in a street because they are a disproportionately high number of sharers. We believe that stipulating in such a way according to an occupiers status or occupation is equally perturbing. What would happen if the Council, fearful of having to provide social care to older residents, were to prohibit the number of older residents in a particular area? The policy smacks of social engineering of a worrying kind. Is this the function of the planning system?</p>	<p>It is a legitimate aim for planning to create mixed communities, such as through ‘pepper potting’ of affordable housing or creating a mix in the size of houses in a development.</p>	<p>None</p>
106	<p>Extent of planning powers</p> <p>13. The remit of the planning system is limited, not just because it can only affect future development. Three of the matters supposedly justifying the policy</p>	<p>Other powers deal with issues once a problem arises. The proper planning of areas can help prevent these problems occurring. It is</p>	<p>None</p>

	(which are non existent or weak anyway) can be addressed using other powers. These are issues concerning noise disturbance waste and car parking.	proactive rather than reactive.	
107	<p>Use of larger properties</p> <p>14. On looking through the evidence base it is clear that according to the Council in the Borough within certain limited areas there are a number of larger properties available which lend themselves to use to provide multi occupied accommodation. This should be welcomed by the Council; not castigated. There is a clear need to provide accommodation for sharers which is suitable to their needs. This larger type of accommodation may well not be needed by families and is suitable for conversion and use in this way. If it is not used in this way where else in the Borough is the need for accommodation to be met. By introducing an Article 4 Direction, at least by inference, the Council must consider that there is going to be increasing demand for this kind of accommodation. Otherwise, the Article 4 Direction would have been unnecessary. Despite this no population projections have been produced in support of the argument or projected need/demand, as we have pointed out already above.</p>	The Article 4 Directions have been confirmed by the Council. The SPD provides additional guidance for the determination of planning applications within the Article 4 areas.	None
108	<p>Backdoor constraints on HMO accommodation</p> <p>15.1 We are perturbed that we have a case here on the face of it where the Council are trying to stop HMO accommodation by the backdoor. This is despite the fact that the policy itself acknowledges the need and importance for this kind of accommodation. This objective supported by the Report prepared by Opinion Research Services which concludes HMOs in Milton Keynes appear to be following a vital role in the Borough providing accommodation for young workers in low income jobs "who would otherwise struggle to live in the area".</p> <p>15.2 What appears to be happening is that by excluding/reducing the number of larger properties which can be used for HMO accommodation so that one has to be used for HMO accommodation so that one has to start looking at smaller accommodation you then lay down rules which makes it impossible for those properties to qualify. The policy does not just look at the issue of concentrations but seeks also to impose requirements in relation to noise and the</p>	<p>The noise requirements are considered appropriate for the protection of the amenity of tenants. Waste requirements are good practice and it is considered unlikely that a property could not comply with the requirements.</p> <p>Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD</p>	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.

	<p>need for provision to deal with waste, along with restrictions on car parking. The noise restrictions make it expensive to convert properties. Requirements regarding the location of waste and the size of the waste receptacles may simply be incapable of being complied with because of the size and layout of properties. Even more sinister, is the requirement in relation to car parking. The Council are wanting to impose requirements as to numbers of car parking spaces to be provided. They simply cannot be catered for within the accommodation and in many areas on street car parking is not available. In relation to car parking despite the fact that as the evidence base concedes tenants of this type of property are more likely to walk to work and are less likely to have use of cars. Nevertheless, high numbers of car parking spaces are being required for these properties. This demonstrates that the claim that HMOs are vital is simply "window dressing" by the Council, who want to constrain them.</p>		
109	<p>Noise and disturbance</p> <p>16.1 Looking at paragraph 5 of the evidence base one unfortunately sees yet another example of statistics here twisted to suit a case. The Council, when it is convenient, argues for a higher number of HMOs around 900 but when it comes to analysing the noise complaints it uses the lower number 0.5% of the total housing stock when it should on this basis be higher. The evidence put forward in Section 5 is flimsy to say the least. The statistics provide that there is no significant evidence to justify the claims that there are higher noise problems. Even the document itself concedes that it is not acceptable to prejudge the occupants of an HMO as being anti social.</p>	<p>The evidence paper is clear that in order to allow for consistent analysis, the approximately 500 HMO figure has been used. This is because the 900 HMO figure is an extrapolation of the household survey and there is no firm evidence of their existence.</p> <p>The noise requirements seek a landlord to show where noise between properties could be reduced but more importantly it seeks to protect the individual occupants with noise insulation between rooms.</p>	None
110	<p>Parking</p> <p>17. We have already made the point in relation to parking that in paragraph 6.3 it is stated that 30.6% of HMO occupants either walk to work or travel by public transport. 40% of them do not have access to a car compared to the average of 19.2% of households in Milton Keynes. The majority of the households involved anyway are around the centre of Milton Keynes. High car parking space</p>	<p>The figures have been included by way of additional background for the SPD and provide context to the two zone approach adopted in April 2009 Parking Standards Addendum.</p> <p>Parking Standards in the</p>	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.

	<p>requirements therefore militate against permitting conversions to HMO accommodation if the policy is adopted imposing unnecessary demanding requirements. This is particularly so in the case of the newer estates and paragraph 6.6 concedes that it will mean achieving the required standards in those areas will be more difficult. We would say that they are likely to be impossible.</p> <p>In any case, if there are particular problems traffic regulation powers can be used to deal with these; not planning powers.</p>	<p>HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD</p>	
111	<p>Bin storage and drying areas</p> <p>18. Again, the justification for a planning policy of this kind based waste disposal issues is flimsy in the extreme. Based on the 1% figure (i.e. the higher figure of potential HMOs) the number of notices is in line with the overall relationship of a number of these properties to the wider population. In any event, as pointed out elsewhere, there are such other powers to deal with any such problems.</p>	<p>The 900 figure is not a reliable basis for comparing with other statistics. The evidence paper is clear and consistent in its use of approx. 500 HiMOs.</p>	None
112	<p>Extent of the area involved</p> <p>19. Of major concern is the extent of the area to which the planning restrictions are intended to apply, being the whole of the Borough. We along with the National Landlords Association have applied to the Secretary of State to revoke the Article 4 Direction made by the Council because of its extent and this application is currently under consideration. The Council have been notified of this application by us separately.</p>	<p>The Article 4 Directions have been confirmed by the Council. The SPD provides additional guidance for the determination of planning applications within the Article 4 areas. The SofS has confirmed that no action is to be taken.</p>	None
113	<p>Restrictive nature of policy</p> <p>20. Another concern is that the policy is very much stated to be by way of restriction, rather than positive policy or a policy of encouragement to relocate of HMOs to other areas, where it will be practicable and suitable for such areas to be brought into existence.</p>	<p>The policy would apply equally across the borough.</p>	None
114	<p>Use of a fixed percentage</p> <p>21.1 The Association would challenge the application of a fixed percentage even though it does allow some flexibility. When looking at Section 8 of the evidence document it is clear yet again how limited this problem is in Milton Keynes (if it is a problem at</p>	<p>Comments noted. As with all of the analysis in the evidence paper, for consistency this is based on the 500 HiMOs as opposed to the higher ORS 900 figure.</p>	None

	<p>all). The number of HMOs is insignificant compared with the population overall. There is clearly, in this instance, the application of double standards. There are page after page of streets listing areas listed where there are zero HMOs or the number involved is less than 1%.</p>		
115	<p>21.2 Surely, if the Council wants to ensure mixed and balanced communities then HMO accommodation needs to be introduced into these areas to get the balance. This does not sit easily with paragraph 5.1 where with noise and disturbance there is concern particularly where family dwellings are predominant on typically quiet residential streets of low activity. The result of getting a balance elsewhere could result in concerns regarding noise and disturbance and other issues being introduced into these existing quiet residential areas. This will be the direct consequence of the Council's proposed policy in relation to concentrations because HMOs could go elsewhere where they current do not exist.</p> <p>21.3 We consider that the application of percentages is wholly inappropriate. We deal with the issue of so called balanced communities in detail below but believe that it has to be a matter of judgment so that only where there are substantial concentrations based on a somewhat wider geographic area (rather than the 100 metre rule proposed by the Council) should the question of potential restriction even arise . There is nowhere currently in Milton Keynes which even justifies this having regard to the low numbers involved. If a policy of this kind were to be introduced (which we, of course, oppose) it should be written in far more general terms as at present.</p> <p>21.4 The objective should be to maintain a diverse housing stock that would cater for all sectors of the population including families and single people across the Borough as a whole or at least looking at matters on a settlement by settlement basis. The objective should be to prevent serious erosion of the range and choice of housing types and tenure i.e. in terms of mixed communities (using that word in a wide sense); rather than trying to introduce notions of out of balance communities formulated in any percentage terms. Policy measures should be dealt with by maintaining diversity in the housing stock and tenure; again rather than restrictions in terms of numbers, but only where there is a serious threat. This is most certainly not the case in Milton Keynes</p>	<p>The Local Plan sets the criteria against which HiMO applications are assessed. The SPD adds additional guidance for how this policy is to be applied. The evidence paper supports the additional guidance within the SPD.</p> <p>The SPD applies equally across the borough. As stated in the evidence paper, in areas with no HiMOs then conversion to multiple occupancy could improve the housing mix in that area.</p> <p>The SPD seeks to achieve mixed communities.</p>	None

	<p>having regard to the numbers involved.</p> <p>21.5 It is important that the Council updates itself in relation to how other policies proposed by other local authorities are fairing. Paragraphs 8.30 and 8.32 of the evidence document are now out of date. In the case of Manchester the Inspector conducting the public examination has indicated in her notes that a more flexible approach needs to be adopted and an across the board 10% figure is not acceptable to her. The 20% figure referred to is out of date because Manchester had tried to introduce a 10% restriction which, as stated, is not acceptable to the Inspector. Portsmouth City Council, as a result of the objection by this Association, have withdraw their policy and are now proposing an overarching policy to be dealt with later by a further development plan document. The Inspector has again indicated that he did not think the 10% across the board approach to be appropriate. Portsmouth City Council has based its plan on the National HMO Lobby's views which are wholly unsubstantiated and nothing other than a claim by the lobbying body. It has absolutely no justification or evidence base which was another reason why Portsmouth City Council were constrained to withdraw their proposal. So far the rigid application of percentages is in tatters following these two public examinations.</p> <p>21.6 At the end of the day all that seems to be happening here is if there are problems then they are being moved around. It is not a question of planning for the community as a whole, i.e. the Borough, but yet another example of nimbysm.</p>		
116	<p>Defining the areas/sandwiching</p> <p>22. The Association disagrees with the approach adopted by the Council. It is simply micro management of the area. A street by street basis is not appropriate. We very much doubt that it is capable of proper monitoring/enforcement in any case. The calculations are very difficult to make. A much wider area should be adopted. We also disagree with the "sandwiching" approach proposed by the Council. We do not think it is necessary and it places inappropriate restrictions on development. There is a case for ensuring a proper juxtaposition of room between different properties, e.g. making sure that bedrooms are not adjacent to living rooms then this could be addressed on each application. In such</p>	<p>The sandwiching approach is an effective way to prevent smaller concentrations.</p>	<p>None</p>

	<p>a case why cannot sound insulation be provided if it is demonstrated that the existing structures are insufficient to impede the transmission of noise in such situations. We have already pointed out the lack of evidence anyway to support the policy based on noise complaints.</p>		
117	<p>The need for small HMOs</p> <p>23.1 Certain sections of the community need HMO accommodation in small HMOs. Only the private rented sector (PRS) provides this accommodation. Rarely, do social housing providers rent out this kind of accommodation. Tenants needing this kind of accommodation can only find it by renting from a private landlord. Restricting small HMOs will have a direct impact on supply. If supply is reduced this will have the consequence of driving up rent levels, reducing the supply of economically affordable accommodation. Importantly, by definition, if you restrict demand in an area which is popular for this kind of accommodation it is going to lead to a general increase in rental levels. This is contrary to the recommendations set out in the opinion of Research Services Report which highlights the need for cheaper accommodation. The Council's proposals are therefore directly contradicting the recommendation of this report.</p> <p>23.2 Due to its non self contained nature, renting in a shared house or HMO is usually cheaper than obtaining self contained flat or similar property. Frequently, this kind of accommodation provides the first rung on the housing ladder. This kind of accommodation is vital to the mobility of the workforce. It is the way in which people going to a new town often find accommodation for the first time, as the evidence base shows.</p>	<p>Local Plan and SPD will be monitored through the Annual Monitoring Report and the threshold could be reviewed if necessary.</p>	<p>None</p>
118	<p>Local planning authorities duty to cater for the need for small HMOs</p> <p>24.1 Each local planning authority is under a duty to ensure that sufficient levels of small HMO accommodation is provided in their area. This is required by PPS3 and the duty is replicated in the NPPF. Small HMOs including bedsits are an essential element of overall housing provision. There can be considerable demand for this kind of accommodation especially from single people including sharers. In common with the rest of the</p>	<p>Comments noted</p>	<p>None</p>

	<p>Country we imagine that the population of the Borough is growing and household sizes are becoming smaller meaning that more, smaller units of accommodation are required. This, of course, includes provision for those who want to live in small shared houses and bedsits.</p> <p>24.2 Land has to be used more intensively if we are to avoid the use of green field sites to provide the requisite for new housing which is required. However household size is declining with more and more single households and at the same time the overall population is growing. Many of those who have to be catered for are just the kind of people who will be looking for shared housing or bedsit accommodation. This confirms the need for this type of accommodation in the Borough.</p> <p>24.3 The Council must therefore address this responsibility. Trying to ban this kind of accommodation or restrict it in particular areas can be counter productive and contrary to its responsibilities towards the Borough as a whole.</p>		
119	<p>Provision of HMO Accommodation</p> <p>25.1 If restrictions are imposed the policy should have to say where smaller HMOs are encouraged. To meet need, other areas will have to be designated to encourage small HMOs instead. The Council cannot duck this obligation to say where else in their areas the need for shared accommodation is to be met.</p> <p>25.2 Where will alternative provision for HMOs in the Borough be located to ensure that demand is met. What will be the attitude of local residents of those areas where HMOs will be deliberately introduced as alternatives as part of the local plan policies? A policy which fails to address this issue is not appropriate.</p>	The policy applies equally across the borough. As stated in the evidence paper, in areas with no HiMOs then conversion to multiple occupancy could improve the housing mix in that area.	None
120	<p>Reductions in property values</p> <p>26.1 We have already highlighted the increased rents as a result of this policy but there is likely to be an adverse impact on capital values which may well upset many of the voters who have argued for a policy of this kind. In the short period from when the original Use Class and Permitted Development Rights regulations came into force on the 6 th April 2010 and the changes made from the 1 st October 2010 it</p>	Comments noted	None

	<p>quickly became obvious that planning restrictions will mean that two properties side by side could have significantly different values. A property which could only be used as a single dwelling because of planning restrictions would be worth UP TO ⅓ LESS than a similar adjoining property which can be used as a single HMO. At least 15% to 20% or as much as ⅓ would be shaved off the value of properties which could not legally be occupied as a small HMO because of planning rules. We have to emphasize that this is not scaremongering. The situation in Nottingham, for example, became so bad that some Estate Agents were refusing to sell single dwellings as the April 2010 changes meant that planning permission could not be obtained for Class C4 use. Agents in the area concerned were down valuing properties by ⅓. Likewise, in Leeds properties were being significantly down valued by local agents around 15%/20%. This situation will return in any area where planning restrictions are imposed. Have local owner/occupiers been warned of this?</p> <p>26.2 A further risk is that when owner/occupiers realise this there will be an indecent scramble to obtain planning consent for a change of use (particularly as no fee may be payable). If the local plan sets limits for numbers, as proposed the first 20% will not be opposed anyway and their owners will be the winners financially whilst the rest, who will be the losers, will see the values of their properties significantly reduced in comparison. Is this a desirable function of the planning system?</p>		
121	<p>The Fallacy of the "Balanced Community"</p> <p>27.1 The Council is advocating controls on HMOs speaking of needing "balanced communities". However, the Council seem to be somewhat confused. The Council are conflating mixed communities and balanced communities. In planning terms the two are not the same. Because of the numbers involved in reality there is absolutely no threat to there being mixed communities anyway. The idea of a mixed community is therefore being misapplied to try to justify the social engineering concept of balance and supposedly avoiding "imbalanced" communities. For example PPS3 which is about "mixed communities" not "balanced communities" is being used to justify the policy of such engineering which the Council is seeking to adopt in relation to the concept of a so called</p>	<p>The SPD does not rely on the HMO Lobby 'balanced communities' approach. The use of the term 'balanced' in the SPD is in a general sense of 'mixed and balanced' communities. In terms of HMOs the Ecotec report makes reference to 'balanced communities and more generally the draft NPPF acknowledges how affordable housing can contribute to the objective of 'creating mixed and balanced communities'. The SPD is trying to promote mixed and balanced</p>	<p>Remove reference to 'balanced community' to avoid incorrect assumption that this is implying support for the National HMO Lobby 'balanced community' approach.</p>

<p>"balanced community".</p> <p>27.2 Importantly, there is no definition of what is a balanced community under planning law and it should not be employed to fix quotas based on status/occupation as already indicated above. The Council seem to rely on the unproven and un-researched HMO Lobby concept of a balanced community without even including it in their evidence base. Examinations of the Lobby's publications shows the flimsy nature of the arguments advanced by them. This is a one sided view on the part of the anti student faction. Ironically, the situation in Milton Keynes has nothing to do with students but the HMO Lobby propaganda documents are all about students. Many of the arguments used in documents relate to issues such as properties being left vacant in holiday times which has absolutely nothing to do with accommodation occupied by working people as is the case in Milton Keynes. It is wholly without any kind of scientific or research basis.</p> <p>27.3 What the Lobby try to do is to first define the locality for a community to suit their argument and then proceed with the argument as if the case is proven on this basis. In other words you pick an area with boundaries that suit your case. However, the argument fails to address what should be the locality for this purpose. Should it not be the whole of the town at least a much wider area than the particular locality which is conveniently identified to suit the case? Surely it should not be done on a 100 metre radius basis as is proposed by the Council.</p> <p>27.4 The HMO Lobby then go on to argue that each locality or community should be divided up in proportions relative to housing tenures. At the moment this would be roughly 68% owner/occupier; 18% social sector and 14% private rented sector. One can then of course adjust the boundaries of the "locality" to ensure that these proportions are met if one wished!</p> <p>27.5 Would local groups like to impose these proportions in those areas which are leafy suburbs? The Association suspect that the residents there would have their own views on such a proposal! Of course the answer is NO! Reality intrudes so when it suits them these campaigners say that they do not feel that all communities have to match these</p>	<p>communities through a mix of housing. However for clarity, and to avoid confusion with the HiMO lobby approach, reference to 'balanced communities' will be removed from the SPD. This does not alter the aim of creating mixed communities.</p>	
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	<p>norms! Only the areas which concern them because they live there! Indeed if one reads their propaganda you will see that they have to rapidly draw back from pursuing the argument to its logical conclusion of introducing shared accommodation into owner/occupied areas. At the same time these campaigners fail to recognise demographic changes which have occurred. There is a very real need for single person accommodation especially for sharers and one has to accept and recognise the reality of this.</p> <p>27.6 The HMO Lobby also argue that you should divide up the population according to age ranges. Again, this is a nonsense.</p> <p>27.7 The argument then develops to say that we have to accept that there is a "tipping point" at which point communities change and become "unbalanced". They put forward often 10%. How can you definitely say that a community (whatever that may mean) begins to feel unbalanced when any of the five main age bands exceed a particular percentage of the population or because of different tenure ratios? What evidence is there for this assertion other than it suits someone's own viewpoint? There is not a shred of evidence to support this. In reality this is a self serving argument with no known basis other than campaigners' personal views because they simply do not like living in student communities.</p> <p>27.8 There is a pseudo social scientific arguments which are put forward to justify restrictions particularly as legally you must not look at the status of the occupant; instead you have to consider small HMOs of all kinds irrespective of who lives in them.</p> <p>27.9 The Council, of course, do not put forward the 10% figure but equally what justification is there for a 20% figure? None in our view. It is why a much more flexible approach is needed to address any problem.</p>		
122	<p>Calculating the percentage</p> <p>28. We are pleased to note that the Council is not excluding flats from the calculation. This would skew the calculation and would be a wrong approach. As proposed by the Council flats should not be excluded, in our view.</p>	<p>See other comments. Flats are to be counted but 1 bedroom flats are to count towards the concentration of HiMOs.</p>	<p>1 bedroom flats to count towards concentration calculation.</p>

123	<p>Enforcement/implementing the policy</p> <p>29.1 It is not uncommon to find policies such as those limiting the number of takeaways. However, you can work out easily whether a property is or is not a takeaway by driving or walking past. They can be counted simply. It is impossible to work out what is going on behind the front door of an ordinary house. You have no idea at all whether a family are living there simply by looking at it externally or whether it is being occupied by a group of sharers.</p> <p>29.2 The Council acknowledges, as do other local authorities, that they do not have the information available to operate the policy and it is not information that is readily obtainable. Furthermore, it is objectionable because insofar as information is available at all e.g. Council Tax information it is solely at the disposal of the Council. It is impossible for a potential applicant for planning permission, developers or their advisers, to establish whether or not the required percentage level is or is not met. This situation is made worse by the breadth of the Article 4 Direction</p> <p>29.3 Therefore are these rules really enforceable? We believe not. Firstly, supported by case law, in many many cases will there really be a material change of use involved if what was a single dwelling is occupied by a group of unrelated people. Secondly, will the Council be able to keep track of changes of use of this kind anyway? Thirdly, do Council's have the resources to carry out the necessary enforcement work? They do not even know where exactly HMOs are based. Such a policy which is incapable of enforcement cannot be appropriate.</p>	<p>The policy will operate on the basis of all known HiMOs. These include all HiMOs that meet the Housing Act definition regardless of whether they are licensed or with planning permission .</p>	None
124	<p>The cost</p> <p>30. With the current cut backs facing the Council is this something which a local planning authority should be embarking on at all? Will it have the resources to implement the Article 4 direction and deal with the consequent planning applications especially if they are free of charge? Will it have the resources to investigate possible breaches and enforce the new legislation? It is particularly alarming that the Council has made an Article 4 directions through the whole of the Borough with the consequent costs which will be entailed in such a</p>	<p>The Article 4 Directions have been confirmed by the Council. The SPD provides additional guidance for the determination of planning applications within the Article 4 areas.</p>	None

	<p>move Should not local resources be better utilised e.g. as we have already suggested to actually deal with any particular problems as they arise?</p>		
125	<p>Affordable housing and homelessness</p> <p>31. The proposal will of necessity constraint the supply of affordable accommodation especially for younger people. We are particularly concerned that although at the moment the 20% limit may not pose a problem there are major issues surrounding the application of matters such as car parking standards. This constraint will damage the local economy and damage the relationship between the older and the younger generation which is increasingly coming under strain. A policy of this kind sets one section of the community against another. The intergenerational pact is under threat and measures of this kind simply increase the antipathy of the older sections of the community against the younger. Bearing in mind that any restrictions have to apply to all small HMOs, irrespective of by whom they are occupied, it is wrong to reduce the supply of accommodation for working people, young professionals, migrants etc in the areas where they choose to live. Otherwise, the local economy is adversely affected and a greater price will be paid with all the problems surrounding homelessness and overcrowding, because of the lack of available housing, as well as increased rents. Social cohesion will be damaged.</p> <p>We quote:</p> <p>The majority of rental housing is spread around neighbourhoods of quite old, terraced and semi detached houses and flat conversions within this house type (Ball, 2008; Glascock and Turnbull, 1994). New properties in blocks of flats - through often thought to be typical buy to let territory - are, in fact, comparatively rare within the private rental stock. New rental properties are often derived from renovations and conversions of previously single-family properties into flats. This has the spin off benefit of making intensive use of the existing stock in places where it might be otherwise under utilised and poorly maintained. Such conversions and modest upgrades are often found in neighbourhoods of relatively moderately priced properties. This can assist in regeneration and in avoiding neighbourhoods slipping over into cumulative</p>	<p>The policy aims to help create mixed communities and could help foster positive community relations.</p>	<p>None</p>

	<p>decline.</p> <p>Ball, M (2010), the UK PRS as a source of affordable accommodation, Joseph Rowntree Foundation.</p>		
126	<p>Impact on the environment and transport</p> <p>32. One of the problems of spreading small HMOs around the Borough is the adverse impact on the environment. At the moment they tend to be concentrated. Where accommodation is close occupiers can walk and the same applies to others. This is already recognised in the evidence base which shows that a significant number of none car owners walk to work. If, instead, small HMOs are dispersed around the town then there will be increasing demand for travel by car to get to work or college. The policy flies in the face of sustainability policies. Minimising travel distances is at the heart of the concept of sustainability.</p>	Comments noted	None
127	<p>The inevitability of change</p> <p>33. Unfortunately, it is a fact of life that the character of our towns and cities change over time. Populations shift and demographics change. As is so often the case, many left behind find this unpalatable but, as with the operation of market forces, this kind of change is unavoidable. It may be far better to try to adapt than try and stop it, Canute like.</p>	Comments noted	None
128	<p>The alternative</p> <p>34. If there are difficulties in an area local authorities already have other extensive other powers e.g. to deal with noise disturbance. Working where appropriate with others they can be implemented to deal with these concerns. Very importantly, these can have an immediate impact rather than waiting for much longer planning processes to operate, if they work at all. Accreditation schemes for local landlords can also be utilised. We have already questioned how far the use of planning powers is appropriate.</p>	Other powers deal with issues once a problem arises. The proper planning of areas can help prevent these problems occurring. It is proactive rather than reactive.	None
129	<p>Existing small HMOs</p> <p>35. Equally, there is the issue of properties which were already shared houses as at 6 th April 2010. This is a very important issue which needs careful consideration now that the local planning authority</p>	Flexible planning permission would have benefits for landlords. However, it could lead to further restriction of HiMOs. Once a threshold was reached no more HiMOs	None

	<p>have decided to make an Article 4 Direction. Flexibility in the housing market is very important. One year a landlord may let such a property to a group e.g. a group of nurses but in another year to a family. Landlords will not rent out properties which have been used by groups to families if they do not have the right to relet them subsequently to a group. Thus, in our view, any local planning policies need to make it clear that there are "preserved rights" i.e. if the property was already a shared house as at 6th April 2010 or it subsequently gains planning permission for this use it can be used interchangeably between Class C4 small HMOs and Class C3 single dwellings without the need for planning permission, even if there is a material change of use involved. This can be done by indicating that planning permission will be granted for these changes backwards and forwards in such circumstances. It is therefore proposed that if the policy were to be adopted whether in its existing or an amended form that an exception should be made to bring about this preserved right.</p>	<p>would be permitted, yet under the flexible permission, none of the permitted HiMOs may be operating as such.</p>	
130	<p>The broader view</p> <p>35. In reality is there not an attempt by local politicians trying to be seen to do something because there have been calls from local residents to introduce Article 4 directions to stop the spread of small HMOs. It is vital that the broader picture is looked at not least because the highly questionable effectiveness of the proposed policy. The danger is simply to compartmentalise certain local neighbourhoods and ignore the wider picture and the benefits to the wider economy of the Borough as a whole by ensuring that small HMO accommodation is provided where there is a demand for it. Undoubtedly small HMO accommodation will help the local economy, the local labour force and job mobility. Communities where there are small HMOs often bring with them services and amenities which would not otherwise be provided to cater for their needs. In turn these benefit local residents. We acknowledge that on occasion, unfortunately, there are problems but there are other powers to deal with these. We do not believe, however, that the planning system which can take many years to work is the solution. Existing HMOs are not affected. The local authorities already has an extensive armoury of powers to deal with problems.</p>	<p>Comments noted</p>	<p>None</p>

131	<p>Conclusion</p> <p>36. For all the reasons outlined in this submission the policy is, we would submit, inappropriate in its entirety and ought to be abandoned. In particular, it is wholly inappropriate to attach percentages in this situation especially in view of the absence of evidence of the numbers of HMOs or adverse impact. The areas to which they are applied are far too small. The policy is predicated on an unsubstantiated so called "imbalanced" community which is unfounded and inappropriate. There is no need for this approach to be adopted as outlined in the policy. Rather any issues should be addressed on a case by case basis and by using appropriate powers. A policy of this kind is pandering to a clash of cultures between owner/occupiers and young people.</p>	Comments noted, see responses above.	None
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HiMO27 Mr Stephen William Bates

132	<p>Having had a HIMO next door to us for many months I feel that we can comment fairly and objectively.</p> <p>Without doubt, car parking is a problem. There are frequently five cars at No.38, Hanmer Road, Simpson, sometimes six, one of them being a large people carrier/minibus size.</p> <p>We do get on alright with most of them and so they are as careful and thoughtful as we can expect but perhaps we are lucky with the residents. Less considerate ones would, I'm sure, be far less cooperative. There is limited space for cars and my other neighbours do suffer the inconvenience of people parking in areas they use themselves for visitors.</p>	Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD	Add text to SPD to clarify that it repeats the standards set out in the council parking SPD and any replacement document/standards.
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133	<p>It is interesting to note that we have lived here since March, 1980 and last weekend was the first time there has been any problem with overflowing sewers. This could well be attributed to more than the normal number of people using the toilets and contributing to the rate of flow exceeding its ability to cope. I didn't get feedback from the man who was clearing the sewer to establish what he thought the cause was but he was from Anglian Water.</p>	Comments noted.	Reference to potential impacts of large numbers of HiMOs on the sewage system.
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HiMO28 Councillor Mike Galloway

134	<p>Paragraph 1.4 states "Some of the issues identified in the September 2008 ECOTEC report, such as increased crime or pressure on local facilities, have</p>	The SPD accepts that in some cases no evidence was found.	Amend text to clarify that in some cases evidence was not
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	<p>been found not relevant in Milton Keynes, or there has been insufficient evidence to support these findings in Milton Keynes." There is insufficient evidence with the evidence base to be able to state definitively that these issues "have not been found" in Milton Keynes or that there is "insufficient evidence" to support these findings in Milton Keynes. On the face of it the ECOTEC research which was wide ranging should be taken as evidence unless shown not to be the case. The lack of evidence merely indicated the evidence may not have been gathered rather than there is no evidence.</p>		found.
135	<p>Paragraph 1.7 states "This document relates only to planning legislation and the planning process. In order to operate a HiMO legally, it is essential that landlords ensure they are in accordance with both planning and housing legislation." Amend to reflect that there is more that just planning and housing legislation:</p> <p>"This document relates only to planning legislation and the planning process. In order to operate a HiMO legally, it is essential that landlords ensure they are in accordance all applicable legislation, including but not limited to planning, housing and building regulation."</p>	Comments noted.	Update text to reflect other legislation is applicable.
136	<p>What is a 'House in Multiple Occupation'?</p> <p>2.8 onwards The detail here is not entirely correct and so should be amended to accurately reflect the legislative situation.</p> <p>In particular:</p> <p>It should be made clear that the definition of HiMO within Planning law is by re-using the definition within the Housing Act.</p> <p>The words "basic amenities include" should be amended to "basic amenities are defined as".</p> <p>The legal position of "flats" and "bedsits" should be explored in more detail and included within the SPD, drawing as appropriate on legislation and case-law. This is not limited to specific planning case-law, as the Housing Act definitions have been re-used in Planning law and themselves include reference to Building Act definitions. Need for additional paragraph(s) in SPD</p>	Comments noted. Further text to be added to the SPD to clarify definition of HMO. 'Bedsits' to be omitted from SPD as there is no single definition as to what this actually constitutes and the definition for a HiMO is set out in the Housing Act.	Amend definition to read "basic amenities are defined as' Add reference to Housing Act definition.

	<p>In addition, given the use of the terms "bedsit" and "small bedsit" within the current CLG guidance, the opportunity should be taken to discuss and come to a conclusion on what the effect of this is. Reference should be made to the case-law deriving from "Barnes" that should be used as guidance. If the conclusion is that there is not any absolute definition of "bedsit" or "small bedsit" for a planning (or Housing Act) purposes then that point should be stated.</p>		
137	<p>Noise and disturbance</p> <p>4.4 onwards</p> <p>The discussion here ought to give details of and draw distinction between "student" shared households type of HiMOs which are common elsewhere but not in Milton Keynes and the situation more common in Milton Keynes of entirely independant living with no sharing other than that of one or more basic amenities. In student type HiMOs it is more likely that the occupants will live more like one household and so pay more regard to other individuals in the household, whilst in planning law are defined as a HiMO as they are not related. Whilst student HiMOs are less common in Milton Keynes there are believed to be a significant number of properties occupied in a similar way, but by young professionals often living in a similar "single household".</p>	<p>Comments noted. It is not considered necessary to repeat for each section. Propose inserting paragraph to introduction to explain the type of HMO generally found in MK.</p>	<p>Introduction to state that HMOs in MK are not generally occupied by students, although acknowledge that this may change with the growth of the University Centre MK. They are occupied either by individuals as a cheap form of accommodation or professionals requiring temporary accommodation.</p>
138	<p>Parking</p> <p>The policy should include provision for the parking requirement for HiMOs with more than 7 bedrooms, continuing the table with an additional parking space for each additional bedroom. Unlike C3 dwelling houses an additional bedroom is far more likely to have a need for additional parking.</p>	<p>Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD.</p>	<p>Add text to SPD to clarify that it repeats the standards set out in the council parking SPD and any replacement document/standards.</p>
139	<p>Character & Concentration</p> <p>4.21 onwards</p> <p>Similar considerations to this issues on Noise and Disturbance so a similar reference should be made to the differing effect of different types of HiMO. 4.26 and 4.27</p> <p>In considering concentration it should be the number</p>	<p>The SPD is to be amended to be based on the number of bedrooms within a HiMO. 1 Bedroom flats are to be counted towards the concentration calculation.</p>	<p>Amend SPD to be based on the number of Bedrooms in a HiMO and with 1 bedroom flats counting towards the concentration figure.</p>

	<p>of households that are counted not the number of buildings. Flats should be counted although potentially on a case by case basis depending on the type of flats and whether constructed as flats or converted. Further consideration should be given to the exact methods of calculating the effect on character and concentration. If considering an application for conversion to self-contained flats then within a single building each flat would for density/concentration purposes be counted as individual units. For most of the known HiMOs in Milton Keynes, they are not "shared households" as in the student house type of situation where there is true sharing, but much closer to individual flats. A block of flats with (say) 6 flats is counted as 6 units. Where there are very clearly separate rooms as in the MK type of HiMO then the impact from a HiMO is very similar to a block of flats of the same size, and possibly even greater given the potential lack of space in a converted (small) often terraced dwelling house to a HiMO.</p> <p>The rationale in the evidence base (8.40 onwards) about occupancy of flats is flawed and there is incomplete evidence of occupancy of flats. There is evidence of HiMOs being occupied by families. There is likely to be a difference between properties converted to flats and properties constructed as flats in the first place. In 8.41 use is made of the term "bedsit" without any definition of what the term is being used to describe, it must be clear what is being referred to, 8.41 starts with "The Council has no evidence of the number of occupants in flats" but later goes on to attempt to extrapolate that 57% of flats "must be occupied by couples of families". It is also said that flats will have been built to appropriate standards. This may not be true and indeed is recognised within the Housing Act definitions (as imported into Planing) which provide for certain flats to be treated for Housing Act purposes as HiMOs.</p>		
HiMO29 Cllr Jenni Ferrans			
140	<p>4.20 Waste Storage</p> <p>I believe a comma has been omitted after "for a drying area" in the statement in this policy, to indicate that the waste storage space is in addition to the 15 sq m drying area.</p> <p>Can it be re-instated please! Clarifying text might be</p>	<p>15 sqm is for both bin storage and drying area as per the local plan policy H10.</p>	<p>None</p>

	useful too, in 4.20.		
141	<p>4.26 Concentration</p> <p>Although in the example given a 100m diameter circle only includes some 30 or so dwellings, or perhaps 38 including flats, there are numerous neighbourhoods and street designs in the borough, both in the older towns and in the newer, higher density areas, where such a circle might include 60 to 100 houses - and a few where the number might be as high as 200 where large blocks of flats are included. This would mean that 20% could often be 12-20 HiMOs and could be as large as 40. And many of these areas are now attracting HiMOs. Within such an area, the HiMOs themselves then also tend to cluster, so that we could get a density in a small area within that 100m circle of over 50%, involving up to 20 HiMOs in many cases. I believe that this would totally change the character of that sub-area.</p>	<p>A percentage approach means that the mix of properties remains the same regardless of density. Where flats are included this could mean more houses are possible HiMOs. However the sandwiching approach would still prevent all family dwellings from being converted.</p>	None
142	<p>I am also unclear as to what counts as a "dwelling" - eg does a HiMO count as one or many dwellings? And similarly, flats?</p>	<p>Paragraph 2.7 of the draft SPD contains a definition of a dwellinghouse (use class C3) and a HiMO (use class C4).</p>	None
143	<p>Where an area consists of a large block of flats with houses adjacent to it, the policy could lead to a 50% concentration of HiMOs in the adjacent houses, since there would probably be none in the flats by existing evidence. Again, I think that this would cause an unacceptable change of character, and therefore would propose to omit flats completely from the definition of households in an area for this purpose.</p> <p>I would prefer to work in terms of the nearest x households, to allow for these variations. However, in rural areas with very low densities, the area would be large, and defining a very large area as a neighbourhood for this purpose would not stand up to scrutiny, so I propose a combination of both approaches.</p> <p>I therefore propose that the "area" be defined as the nearest 50 households excluding flats, or the households excluding flats within a 100m diameter circle, whichever is the lowest number of households. This would not change the total number of HiMOs permissible, as the 20% concentration would still apply, but would ensure a more even distribution within an area, reducing the extent of</p>	<p>A 100m buffer was considered appropriate as it generally best reflects the 'local' area and can be applied on a consistent basis to aid decision makers.</p>	None

	possible clustering.		
144	<p>Sandwiching</p> <p>Can you define how sandwiching would apply around corners and junctions please? I would propose adding "Households on either side of a corner or road junction are considered adjacent for this purpose." Otherwise a 16-HIMO cluster could be permitted around a cross-roads on a narrow road.</p>	The sandwiching approach applies to consecutive dwellings. If separated by a road, it would not apply.	Add further explanation to the application of 'non-sandwiching' approach and clarify that separation by a public highway would not constitute 'adjacent'.
HiMO30 Ms Sally Weldon, Clerk, Wolverton and Greenleys Town Council			
145	Multiple Occupancy within the radius to be reduced from 20% to 10%.	The amended SPD has a higher percentage; however, the change to counting HiMO bedrooms and including 1 bedroom flats in the calculations will reduce the overall concentration of HiMOs.	None
146	The figures provided on the HiMOs appear to very low for the parish.	The figures were based on all known or suspected HiMOs as of April 2010	None
147	The Council were concerned that the parking spaces to meet the criteria of three per four bedroom house should be accessible in reality and not just created on paper to meet the regulations.	Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.
HiMO31 Mr Derek Francis, Secretary, Campbell Park West Neighbourhood Action Group			
148	We do not believe that HiMOs are a solution to the shortage of housing. The solution is to build more accommodation that is affordable.	Noted. However, the reality is that where people are unable to afford their own property (to purchase or to rent) then sharing is a logical solution. Some HMO occupants may choose to share regardless of affordability due to the flexible nature of the accommodation.	None
149	In areas where there are high concentrations of HiMOs, the social cohesiveness of the neighbourhood is threatened as the HiMO tenants	Comments noted	None

	are often temporary and have little or no stake in the community. The presence of a HiMO also tends to attract other landlords to convert neighbouring family homes to multiple occupancy dwellings thus developing a ghetto.		
150	Parking. Many single HiMO have six or more tenants with cars, parking congestion therefore becomes a problem for our neighbourhood,	Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the standards in the HiMO SPD	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.
151	Litter and refuse. It has become noticeable that HiMO properties in our parish are more prone to this problem.	Comment noted	None
152	If a HiMO is unregistered, the local authority does not have accurate data to plan local services, education, refuse and litter collection. If HiMOs are required to have planning permission and registered, the local authority is enabled to limit their number and provide safeguards for the tenants. In view of the foregoing, we therefore urge you to set up a compulsory registration scheme for HiMOs in Milton Keynes.	Noted. Licensing is outside of the scope the SPD. Comments have been forwarded to the Private Sector Housing team for consideration.	None
HiMO32 Peter Errington, The Wolverton Action Group			
153	With a drive to implement a sound policy on the HiMO situation may we as the Wolverton Action Group put our views forward, namely that, Wolverton being a conservation town and having dwellings that were built specifically for families worked on the railway works do not lend themselves well to being Homes in Multiple Occupancy the reasons are listed below.	Comment noted	None
154	PARKING. The congestion that is now at a critical state in some roads within the town this can clearly be seen with vehicles not only parking on double yellow lines, but on walkways severely restricting pedestrian egress. Also an increase in parking in service roads. Domino Pizza has had to change the delivery vehicle to a smaller van due to the narrowing of Aylesbury Street by illegal pavement parking meaning a less efficient delivery system. All	Parking Standards in the HiMO SPD reflect the Parking Standards Addendum (2009); Any change in parking standards and parking zones will be through a review of the parking standards guidance and will supersede the	Additional text to clarify that parking standards and zones will be reviewed via the Parking Standards Addendum.

	of this congestion may prevent an emergency vehicle from gaining entrance to a situation at any time.	standards in the HiMO SPD	
155	ANTISOCIAL ACTIVITIES. Within Windsor Street, one HiMO has had police attention and callout many times, in 2009 six, in 2010 two, in 2011 two callouts were recorded. In the last 10 months two vehicles have been clamped and removed by the DVLA due to lack of up to date documentation. Another HiMO was badly damaged by fire and on investigation was found to have been a cannabis factory, not a good way of running a HiMO.	Comment noted	None
156	REFUSE. Up to six separate internal dwellings can be made for six persons generating extra bags of refuse which will have to be removed by the council, at whose expense? This added workload will fall on the ratepayers not on the occupants.	Comments noted.	None
157	UNDERGROUND SERVICES namely sewage. The system in Wolverton is mainly Victorian and was not built for extra bathrooms, showers and lavatories the increase in effluent flow may have financial consequences in the future.	Additional text will be added to cover highlight this potential problem.	Reference to potential impacts of large numbers of HiMOs on the sewage system.
158	RETROSPECTIVE PLANNING. A good deal of HiMO housing was implemented through retrospective planning and appeals and on and on and on. Can this be stopped?	Landlords should apply for planning permission prior to conversion.	None
159	Legislation needs to be tightened with proper rules that are adhered to and no grey areas for loopholes to manifest themselves to the detriment of the electorate.	Comments noted.	None

Members HiMO Workshop 22 February 2012

On the 22 February 2012 the consultation responses were considered at a HiMO workshop held with elected members. The workshop focussed on the responses received and looked in detail at the issue of noise, waste, parking (including cycle parking), and concentrations. The discussion largely reflected the issues raised in the consultation period. A summary of the issues discussed and the changes to the SPD are set below.

Workshop view	Action
1 bedroom flats should count towards the concentration of HiMOs	1 bed flats to be counted in SPD
HiMOs should be counted by the number of bedrooms	HiMOs to be counted by number of bedrooms
Requirements for cycle parking should be included	Requirement for cycle parking to be added
Waste storage requirements should deal only in whole numbers	Whole numbers only in waste storage requirements
Delete paragraph 4.16	Deleted
Include standard conditions in the SPD	Standard conditions added as an appendix
Further text to explain approach to concentrations, sources of data, GIS, data protection	More detail added to how the buffer will be applied.
Further text to explain sandwiching approach, 'adjacent' does not cross public highways	Clarified that 'sandwiching' does not apply across a public highway.

A number of changes for consistency, clarification, updating and amending typos have also been made to the SPD. These do not affect the guidance contained within the document.

Wards Affected:

All Wards

NEW RESIDENTIAL DEVELOPEMENT DESIGN GUIDE SPD

Author: David Blandamer, Urban Designer Tel: (01908) 254836

Executive Summary:

The New Residential Development Design Guide is listed within the Council's Local Development Scheme (LDS). It will have Supplementary Planning Document (SPD) status within the Local Development Framework.

The Draft Residential Design Guide has been prepared to help raise the overall design quality of residential developments across the whole of Milton Keynes. It will help developers understand what is expected from them in terms of the design and layout of new housing development.

Consultation was undertaken on the Design Guide during a seven-week period in December 2011-February 2012. The results of that consultation were considered by ward members at a workshop on 12 March 2012.

The comments received during the consultation have been considered and changes proposed to the Design Guide. A schedule of the comments and the proposed changes is attached at Appendix B. Key issues raised related to tandem parking, parking standards, residential space standards, and highway design guidance.

Authority is sought to adopt the revised New Residential Development Design Guide (attached at Appendix A) as a Supplementary Planning Document.

1. Recommendation

That the New Residential Development Design Guide Supplementary Planning Document (Appendix A) be adopted.

2. Issues

- 2.1 The Draft New Residential Development Design Guide has been prepared to help raise the overall design quality of residential developments across the whole of Milton Keynes. It will help developers understand what is expected from them in terms of the design and layout of new housing development.
- 2.2 The Design Guide, which is listed within the Council's Local Development Scheme (LDS), will have Supplementary Planning Document (SPD) status within the Local Development Framework. It will be used by the Council in the determination of planning applications and reserved matters.
- 2.3 Formal consultation on the Draft SPD was undertaken during a seven-week period in December 2011-February 2012. The results of the consultation were

considered by ward members at a workshop on 12 March 2012. Additional comments raised at the members' workshop are included at Appendix D.

2.4 Consultation was undertaken in accordance with the Council's Statement of Community Involvement. It involved:

- Copies of Design Guide displayed in libraries and Civic Offices
- Document published on Council's website
- Notice given of the document in an advertisement in a local newspaper
- Copies of Design Guide sent to parish councils, ward members
- Notification of consultation sent to interest groups, statutory bodies, developers etc
- Presentations to Olney and Wolverton & Greenleys Town Councils
- Presentation to representatives of parish/town councils (notes of meeting attached at Appendix C)

2.5 Representations made on the draft Design Guide are included at Appendix B. A summary of each representation is included together with a response and recommended change, where appropriate.

2.6 The key issues raised by respondents were:

- **Tandem parking** – objected to the requirement that all parking spaces should be independently accessible. In their view, this would result in car-dominated streets, poor quality built form and an adverse impact on the viability of schemes. It is proposed to amend the Design Guide to allow tandem parking subject to certain criteria.
- **Highway Design Guidance** – commented that the Design Guide includes technical highway guidance that should be included in the Highway Design Guide. It is proposed to remove the technical highway guidance from the Design Guide.
- **Parking Standards** – commented that the parking standards should not be updated through the Residential Design Guide. It is proposed to include the current adopted residential parking standards as an appendix to the Design Guide. The parking standards for HiMOs are to be removed, and to be considered through the HiMO SPD. The current residential parking standards are to be reviewed as a separate exercise.
- **Residential Space Standards** – requested that space standards be included in the Design Guide. It is not proposed to include space standards within the Design Guide. The introduction of space standards should be taken forward through a separate SPD.

3. **Alternative Options**

The alternative option is to not adopt the New Residential Development Design Guide as a Supplementary Planning Document. This is not considered to be an appropriate option, as it would leave the Council without an important source of design guidance for use in the determination of planning applications for residential development.

4. Implications

4.1 Policy

The Design Guide is in accordance with Local Plan policies D1-D4, H8-H9 and L3. It also accords with policies in the Submission version of the Core Strategy. It is not a Key Council Document, nor is it a Development Plan Document.

4.2 Resources and Risk

Adoption of the Design Guide as a Supplementary Planning Document will potentially create more certainty for developers and speed up the process of assessing planning applications. In both respects this will therefore potentially speed up the delivery of houses and therefore increase receipts from New Homes Bonus, Community Infrastructure Levy / Tariff / s106 contributions.

Y	Capital	Y	Revenue	N	Accommodation
N	IT	N	Medium Term Plan	N	Asset Management

4.3 Carbon and Energy Management

The Design Guide promotes layouts that encourage cycling and walking, as well as measures to improve environmental sustainability, including designing layouts for passive solar gain.

4.4 Legal

The Design Guide will have the status of a supplementary planning document in accordance with Planning Policy Statement 12. It will be a material consideration in determining planning applications and may come under scrutiny if applications are refused and taken to appeal.

The measures for community involvement relating to the SPD conform to statutory requirements and the MKC Statement of Community Involvement.

4.5 Other Implications

Sustainability

The design of new residential development has a key influence on sustainability. For example, housing layouts can encourage cycling and walking, and higher housing densities help to support local services.

Equalities / Diversity

It is a fundamental principle of urban design to create places that meet the needs of all sections of the community.

Crime and Disorder

The Design Guide has been drafted in consultation with the Council's Crime Prevention Design Advisor.

Stakeholders

The Design Guide will be used by Milton Keynes Council in the determination of planning applications.

Y	Equalities/Diversity	Y	Sustainability	N	Human Rights
N	E-Government	Y	Stakeholders	Y	Crime and Disorder

Background Papers:

Milton Keynes Local Plan 2001-2011 – adopted December 2005

Project file of consultation responses

New Residential Development Design Guide

Supplementary Planning Document

April 2012



www.milton-keynes.gov.uk/Urban-Design



This document has been prepared by
Milton Keynes Council's Urban Design and
Landscape Architecture Team

For further information please contact:

Urban Design and
Landscape Architecture
Planning, Economy and Development
Milton Keynes Council
Civic Offices
1 Saxon Gate East
Milton Keynes MK9 3EJ

T +44 (0) 1908 252708

F +44 (0) 1908 252329

E Neil.Sainsbury@Milton-keynes.gov.uk

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Executive Summary

This Design Guide for New Residential Development in Milton Keynes is intended to ensure a high quality of development for the future growth and regeneration of Milton Keynes. This is especially pertinent for Milton Keynes with its large growth forecast and commitment to regenerating its deprived estates.

The Guide will have relevance for the entire borough, both for large greenfield sites as well as small infill sites. It is intended to both serve as a Development Management tool for assessing planning applications and reserved matters, as well as provide clarity to developers about what the Council expects in terms of the quality of new residential development.

The Design Guide is intended to be specific to the Milton Keynes context and will build on those elements of a neighbourhood that are popular with residents. It is not another generic design guide, although it acknowledges best practice in urban design as a given that must be respected. In this respect its guidance has been informed by two elements which form the content of the Guide:

1. The character of Milton Keynes and what have been its positive defining features since its growth commenced over 40 years ago. The design guide builds on this.
2. The regular occurring issues/problems that come up at pre-application discussion that affect the quality of new residential development in Milton Keynes. This document will provide guidance on these issues.

Appreciating the Context: Character of Milton Keynes

Milton Keynes is defined by the following positive design characteristics which should act as a design cue for the future:

- A strategic grid road network with associated landscaped grid road reserves
- A flood attenuation system which doubles as a strategic linear open space network
- Extensive planting within streets and public spaces
- Innovative and architectural interest and variety of early estates built and managed by the Development Corporation
- Innovative low energy housing and other projects designed to raise energy efficiency.

Section 2 establishes how these can be interpreted in the 21st century Milton Keynes and in the context of the sustainability agenda.

The Design Guide includes tabled criteria which require a developer to assess the local context which will result in the positive features of the site and the surrounding area being reflected in the new development.

Building a Place

Section 3 of the Design Guide focuses on guidance around the structuring elements that make up a large development in particular. This includes the movement network, block structure and how to accommodate the car.

Detailing the Place

Section 4 is focussed on the provision of design guidance at the scale of the individual dwelling and the relationship it has to the street and adjacent dwellings. It includes amongst other guidance setbacks, boundary treatment, frontage conditions and design appearance of buildings. Together these all have an important impact on the overall character of a development and the streetscape in particular.

Regarding detailed design appearance of buildings, the Design Guide does not advocate a particular style of architecture but as a new town with a history of innovation it does not support poor quality pastiche types that do not add to the character or identity of a development.

Design Quality Assurance

Section 5 focusses on Design Quality Assurance and includes a Design Checklist, as well as other methods of ensuring high quality residential developments in Milton Keynes..

Section 1 : Introduction

The way places and buildings are planned and designed matters to us in many ways. The built environment can be a source of everyday joy or misery. Its quality is an important influence on crime, health, community cohesion and prosperity. It also has a major impact on climate change.

1.1 Purpose of the Design Guide

1.1.1 This Design Guide has been prepared by Milton Keynes Council (MKC) to help ensure high quality residential developments are achieved in Milton Keynes. The Guide will:

- Be used by the Council in the determination of planning applications and reserved matters;
- Help developers understand what the local planning authority will expect from them particularly in terms of the design, layout and landscaping of new residential developments in growth areas as well as areas of regeneration and hence assist with the preparation of planning applications.

1.1.2 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. In this respect, Appendix A outlines case studies of various places in Milton Keynes that people like to live in and reflect many best practice urban design objectives.

1.1.3 The Design Guide will also serve as an important informant for the production of strategic masterplans, site specific development briefs and design codes in terms of general layout and design principles.

1.2 Scope of the Design Guide

1.2.1 The Design Guide will apply to the whole of the borough for all sizes of residential development. While urban design principles are still applicable, it is likely to be of less relevance to Central Milton Keynes (CMK) where requirements for key elements such as parking and density for example, are different to suburban residential development. There is in addition already detailed site specific design guidance covering CMK.

1.2.2 The Local Plan and Revised Proposed Submission Version of the Core Strategy contain a number of design policies for new development. The purpose of this Design Guide is to interpret the policies as they relate to residential development and to provide the level of detail required to assist both developers and the local planning authority.

1.2.3 The Design Guide provides requirements, practical advice and solutions, based on best practice, for many of the common design issues in Milton Keynes that Development Control officers are facing on a regular basis through pre-application discussions. These include:

- The character/identity of new developments (large ones in particular);
- The requirement to accommodate the car in the most appropriate way;
- The movement network;
- Development blocks;
- The detailed design appearance of buildings.

- 1.2.4 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.
- 1.2.5 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.

What the Design Guide does not cover

- 1.2.6 The Design Guide is not providing guidance regarding urban design related issues that aren't typically discussed at pre-application meetings or in the preparation of masterplans and design codes. This therefore includes:

- An assessment of success and failures of the urban and landscape structure of Milton Keynes;
- New forms of structures for the city as it grows;
- Guidance relating to sustainable construction as this is covered by an existing SPD entitled "Sustainable Construction SPD".

1.3 Status of the Design Guide

- 1.3.1 The Design Guide has been prepared as a Supplementary Planning Document (SPD) under the Local Development Framework (LDF) system. It will be used by Development Control officers in the determination of planning applications.
- 1.3.2 The guide accords with and reinforces government 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.'
- 1.3.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England. These policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 1.3.4 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.

Neighbourhood Plans

- 1.3.5 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.'

1.4 Lifespan Of Design Guide

- 1.4.1 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.

1.5 Relationship of SPD to Existing Planning Consents, Briefs and Design Codes

- 1.5.1 Extant planning permissions and reserved matters approved prior to the adoption of this SPD, can be implemented as approved. The council would however always entertain re-submitted applications that accord more closely with the principles and guidance contained within this new SPD.
- 1.5.2 For some sites, planning permission has been granted subject to legal agreements and planning conditions which require developers to submit future reserved matters applications in accordance with approved pre-existing design codes. Where applications for reserved matters come forward in these areas, the Council will expect developers to follow the requirement of those pre-existing design codes but acknowledge that in submitting reserved matters applications, they may wish to incorporate the principles and guidance contained in this new SPD where they conflict with the content of the approved pre-existing design codes. 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.

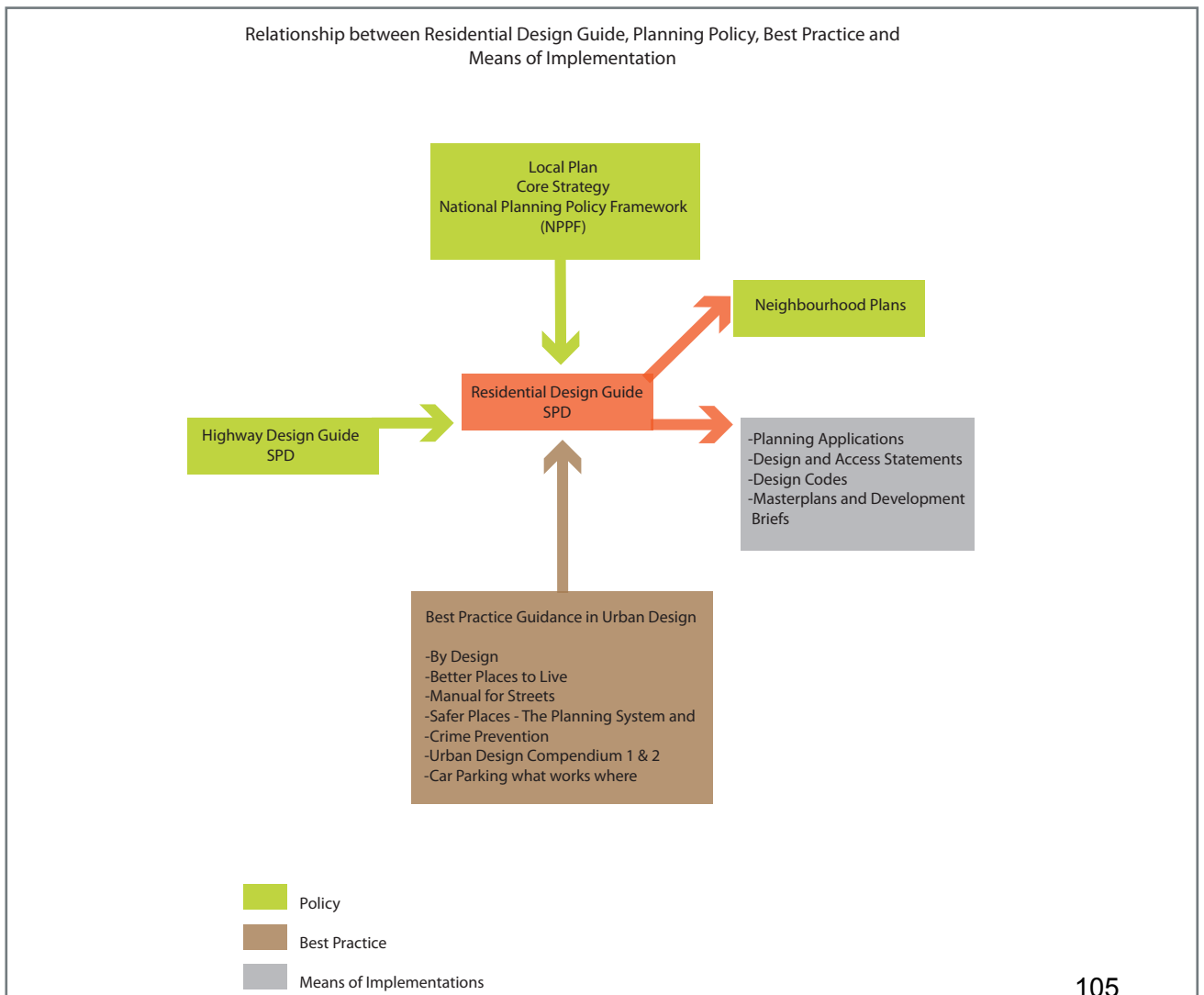
- 1.5.3 Planning Applications, Reserved Matters Applications (not linked to a legal agreement or conditional upon adherence to a design code) and other forms of design guidance (e.g. design codes) submitted after the adoption of this SPD will need to have been prepared, wherever possible and/or appropriate, 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.
- 1.5.4 The above does not negate the need for formal consents or variations to existing legal agreements.

1.6 Planning Policy and Best Practice Design Guidance Context

1.6.1 The diagram below reflects firstly the key policy and design guidance that all new developments must reflect and secondly, it identifies the (same) policy and guidance that has informed the production of the Design Guide. The best practice design guidance is not repeated in this Design Guide, but must, wherever possible, be taken into account by developers.

1.6.2 The diagram also identifies how the Design Guide influences various means of implementation.

1.6.3 The Design Guide includes highway design guidance where the latter has urban design implications. Detailed technical highway engineering requirements and standards will be covered by a separate document – the Highway Design Guide SPD.



1.7 Structure of the Design Guide

The content of the Design Guide has been structured such that it follows the sequence of steps that should be taken in the development process in so far as the 'urban design process' is concerned.

Section 1 sets out the purpose, scope and content of the Design Guide together with the relevant planning policy context.

Section 2 sets out guidance for appraising the context and then establishes at a city-wide scale what the key existing character of Milton Keynes is and how this can be used at a strategic level to inform the character and identity for new development in the city.

Section 3 is entitled 'Building the Place' and outlines the strategic elements that are involved in preparing a masterplan and site layout and lists requirements and practical advice and solutions on how to implement them.

Section 4 is entitled 'Detailing the Place' and provides practical advice, solutions and, where 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.

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.

1.8 How the Design Guide relates to Design Principles

1.8.1 A workshop was held in July 2011 on the subject of the layout of residential estates. The workshop included members from the Development Control Committee, developers and their agents (architects), as well as officers from the urban design, planning and highway teams, and the Council’s Crime prevention Design Advisor. The object of the workshop was to help understand what the important principles are that underpin the layout of residential neighbourhoods. A number of key design principles were agreed for incorporation into the Design Guide.

1.8.2 The table below shows how the contents of the Design Guide relate to:

- the design principles agreed at the Residential Estates layout workshop;
- the seven Urban Design Objectives outlined in the DTLR Publication ‘By Design’. (2000)

Chapter	Neighbourhood Layout Workshop Design Principle	‘By Design’ Urban Design Principle
1. Introduction	n/a	n/a
2. Appreciating the Context	<ul style="list-style-type: none"> - Sense of community/identity - Variety of experience - Part of MK identity (landscaping) - Develop a mixed community <ul style="list-style-type: none"> Mix of people (age, gender, culture) Mix of buildings (styles and sizes) Mix of shops (shops, leisure,health) 	Character Diversity

<p>3. Building the Place</p>	<ul style="list-style-type: none"> - Sense of community/identity - Easy to access other places. - Maximise the use of non-vehicular routes. - Access to facilities - Feel safe - Know where you are - Develop a mixed community <ul style="list-style-type: none"> Mix of people (age, gender, culture) Mix of buildings (styles and sizes) Mix of shops (shops, leisure,health) - An attractive well-maintained environment - Management of parking levels. - Appropriate permeability - Vibrant and safe local centre 	<p>Character Ease of Movement Continuity of Frontage Legibility Diversity Quality of Public Realm Adaptability</p>
<p>4. Detailing the Place</p>	<ul style="list-style-type: none"> - Sense of community/identity - Easy to access other places. - Maximise the use of non-vehicular routes. - Access to facilities - Feel safe - Know where you are - Develop a mixed community <ul style="list-style-type: none"> Mix of people (age, gender, culture) Mix of buildings (styles and sizes) Mix of shops (shops, leisure,health) - An attractive well-maintained environment - Management of parking levels. - Appropriate permeability - Vibrant and safe local centre 	<p>Continuity of frontage Character Diversity Quality of Public Realm Adaptability</p>
<p>5. Design Quality Assurance</p>	<p>n/a</p>	<p>n/a</p>

Table 1: Contents of design guide - relationship to design principles

Section 2 : Appreciating the Context

2.1 Introduction

2.1.1 Understanding the context of the site is the first step in the design process. This analysis will inform a wide range of subsequent design decisions, including the layout, scale and massing of development, detailed design appearance and mix of uses.

2.1.2 In addition to the contextual appraisal for the site itself and surrounding area, it is important to determine what are, for Milton Keynes as a whole, the dominant character and defining features. This will add another layer of contextual information to inform the design of the site itself. Section 2.3 will address this.

2.2 Context Appraisal

2.2.1 Developers should consider the context at a number of different levels, from the site itself, through its immediate surroundings, to the wider local area. At the site level, (see Appendix C, Table C1) developers should identify the key existing features, including its landscape and ecology, buildings, routes and land uses.

2.2.2 The site's relationship to its immediate surroundings should be analysed, including important views into and out of the site, existing routes and access points, and the character of adjoining development. At the local area level, developers should identify the availability and location of facilities and employment opportunities.

2.2.3 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.

2.2.4 The Design Guide includes an appraisal template for the surrounding area (see Appendix C, Table C2). It will be used to establish the context of the surrounding area to identify the positive features to be used as layout and design cues. The Council will encourage applicants to complete the appraisal tables to help establish a suitable character for the new development. It will be used to establish the local context and to identify the positive features to be used as design cues.

2.2.5 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.

2.2.6 Once the contextual character appraisal has been undertaken, the developer will need to determine which of the predominant features of the area are positive and have reinforced the character of the area. These elements should then be used to help determine the character of the new development alongside other factors, such as policy requirements (e.g. relating to sustainability, density, open space) and those derived from an appraisal of the site context (e.g. existing landscape and other features, views into and out of the site, routes to key destinations).

2.3 The MK Context and Character– What is it?

- 2.3.1 While the previous contextual analysis will inform the character based on the immediate site and surrounds area, it is important for the Design Guide to briefly analyse what some of the dominant character/identity and defining features/elements for Milton Keynes as a whole are as this will add another layer of contextual information to inform the design of the site itself.
- 2.3.2 The network of grid roads and associated roundabouts and reserves as well as the city's linear parks are undeniably the features that most strongly define the character of Milton Keynes. The Council has resolved to not only maintain the grid road structure but also to extend grid roads and reserves, if required, into any major urban extensions of Milton Keynes. The extension of linear parks is also a well established and accepted principle.



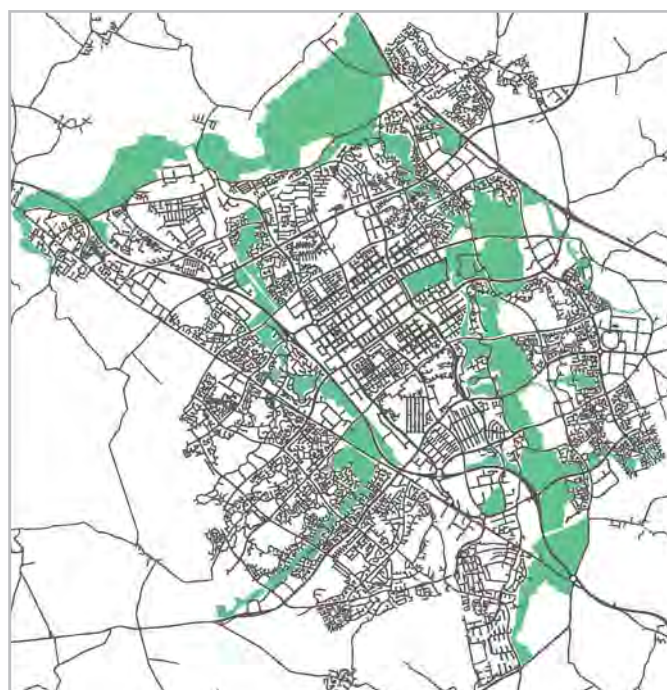
Grid road

Variety and Sense of Place

- 2.3.3 A study of the Milton Keynes Planning Manual, produced by the Milton Keynes Development Corporation (MKDC) in 1992, identified Variety as a key defining feature of the city. The MK Planning Manual states *“The overriding aims for residential areas are environmental quality, variety and a sense of place.”* This is evidenced by what is visible on the ground today. This variety can be examined in five primary ways:

1. Layout

- 2.3.4 The masterplan for Milton Keynes as produced by the MKDC deliberately did not provide firm guidelines on street layout or patterns of development in residential areas and, as a result, the city has a great variety of residential layout (MK Planning Manual p23). The early parts of the city became a pepper pot of different structuring ideas which in turn had an impact on the sense of place or identity created.



Linear Park System

2.3.5 Many early estates had an overall structure based around various forms of a rectilinear grid comprising both a connected grid as well as culs-de-sac, while later estates started taking on a more curvilinear approach which over time has included two forms, initially a circuitous structure of spine and culs-de-sac and more recently, in accordance with best practice guidance from publications such as *Manual for Streets*, a more fine grained curvilinear pattern of perimeter blocks. The curvilinear approach to estate structure was to firstly, reduce vehicle speeds, and secondly, to discourage rat-run movements.

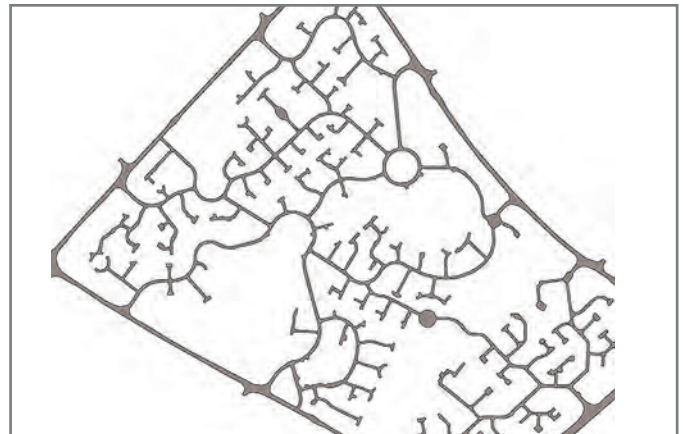


Plan of Coffee Hall, Beanhill and Netherfield showing grid and straight streets

2. Densities

2.3.6 While the masterplan established the principle for a low density city, there was to be wide local variation to provide a choice of living environments with some places expected to be hard and urban in character.

2.3.7 In reality however, the choice of living environments envisaged in the original masterplan has been lost to a rather uniform density across the city with very little density variation within grid squares, as development intensity has rarely responded to local features such as local centres (City Structure, MKDC, 1980).



Plan of Emerson Valley showing spine and cul-de-sac

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 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.



Plan of a part of Ashland showing curvilinear perimeter block

3. Buildings: Massing

2.3.10 The original masterplan identified that no buildings (other than CMK) were to be taller than three storeys. While some taller buildings have recently been used to highlight gateways and key corners in Milton Keynes, a key feature of Milton Keynes is the fairly uniform building height of three storeys and below.

4. Detailed Building Design Appearance

2.3.11 While the designated new town boundary of Milton Keynes did include eleven existing villages and four small towns, which needed to be respected and preserved as the city grew, the new development of the city occurred entirely on greenfields with very little context.



Pattinson Lane, Woolstone



Bradwell Common



Downhead Park

2.3.12 As with residential layout, there was very little guidance given on architecture. Variety in design was sought. Architects were given in effect a 'blank sheet of paper', with little need to be concerned by the surrounding context as each estate was separated from the next by grid roads and associated swathes of landscaping. The result was substantial innovation - Milton Keynes was seen as a test bed for architecture - and a great variety of architecture with no predominant style and appearance resulted.



Oxley Woods

2.3.13 Some estates, such as Great Linford, were subdivided into parcels for a number of different architects to work on, with the result that there is great architectural variety within the estate. The variety in building appearance between estates however does not visually clash as each estate is separated by extensive and mature landscaping, comprising the grid road reserves.

2.3.14 In terms of building appearance there was hence no one identifiable character across the early estates. It could be argued therefore that Milton Keynes in its early years in terms of architectural appearance had a "patchwork" character. The patchwork was generally created per grid square rather than within grid squares – clash of building appearance across streets did not generally therefore happen.

2.3.15 Some more recent interesting and contemporary buildings have also been as varied as in early estates. The detailed design appearance of these developments has helped create identity for the development (see adjacent photos).



Broughton Gate



Ashland

2.3.16 There have however been instances in Milton Keynes in the past 10-15 years, particularly on the greenfield flanks, where the detailed design appearance of new housing has been such that it has not helped create a sense of identity for a development and has not added to the creativity, ambition and innovation which was evident in many early estates. In these cases, the building appearance for each estate is very similar resulting in an unidentifiable character for each estate. This contradicts the patchwork character and variety that was prevalent in earlier estates.

2.3.17 Identity in many early estates was established through the use of a common building material. For example, in the 'doughnut estates' ringing Central Milton Keynes the use of large amounts of buff brick gave an identity to these estates.



Grange Farm - detailed elevation design has not added to the character of the development



Conniburrow - the use of one dominant material helps to provide an identity for the estate

5. Landscaping

Existing landscape structure and features

- 2.3.18 The retention and inclusion of existing landscape features (woodland, trees, hedges, ponds etc.) has been widely used to structure new development and create opportunities for open space.
- 2.3.19 The landscape structure furthermore provided a framework for development to occur, differentiating one area from another, accentuating point of interest, framing views, screening incompatible uses and providing open space for activities.

Landscaped Boulevards and 'Main Local Routes'

- 2.3.20 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.



Existing structural planting in Oakhill



Main local route in Shenley Brook End



Existing structural planting in Shenley Church End



Conniburrow Boulevard

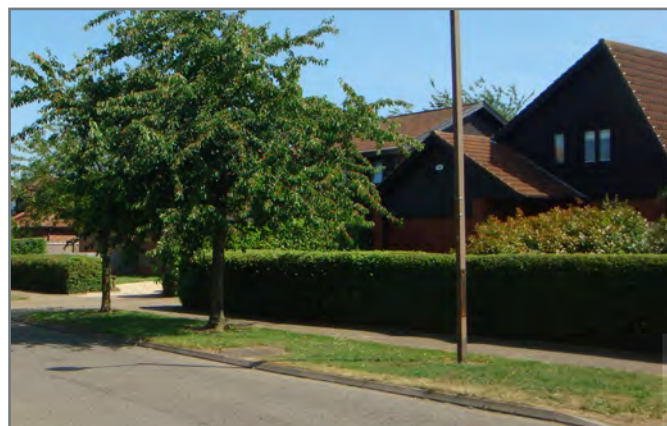
Streetscape Design

2.3.21 Much attention was focussed on streetscape design, with planting, hard and soft treatments, special features and building frontages combined to create a sense of place, particularly along main local routes. Significant hedge planting in some estates along front boundaries served to help provide a unifying character to the development.

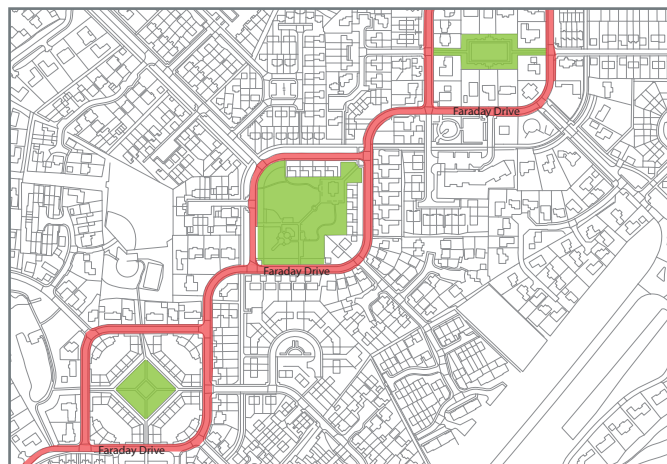
Other Key Features of Milton Keynes

Innovation

- 2.3.22 The layout of residential development and design of buildings was particularly in the days of the Development Corporation driven by innovation.
- 2.3.23 The layout of a part of Shenley Lodge for example, contained a linked system of squares while a part of Pennyland was designed with east-west aligned streets and houses all with south-facing gardens to capture solar gain.
- 2.3.24 Milton Keynes has led the way in low energy housing and other projects designed to raise energy efficiency. Architects were attracted to Milton Keynes as a city where it was possible to test innovative ideas for low energy and sustainable homes.
- 2.3.25 Early experiments focused on gaining free energy from the sun. These homes also included much higher levels of insulation than were normal in Britain at the time. Although many were in small developments, some tested ideas and set standards that were later adopted across the new city and the UK as a whole.



Hedges help create a unifying character to Colesbourne Drive in Downhead Park



The squares along Faraday Drive, Shenley Lodge



Florin Close, Leopard Drive, Noble Close in Pennyland - buildings positioned to capture solar gain

2.3.26 The work on low energy housing since the early 1970s, and most notably in Shenley Lodge during the late 1980s, has given rise to a wealth of experience upon which central government has based its ongoing work on Part L building regulations. The work also led to the adoption of national standards 'beyond the regs' by HCA. 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.



Shenley Lodge (Energy World)

2.3.27 Other examples of innovative energy efficient housing schemes include Future World at Kents Hill, 'Homeworld' in Bradwell Common, and more recently Oxley Woods in Oxley Park.



Bradwell Common (Homeworld)

2.3.28 Recent development in Stantonbury Park has shown how accommodation can be innovatively arranged. In this instance, accommodation that would normally be arranged within an apartment block has been built as a townhouse at affordable prices.



What would normally be a 2 bed room apartment represents a 3 storey 'townhouse' with terrace garden

2.4 Development within Rural Villages, Conservation Areas and Listed Buildings

Rural villages

- 2.4.1 In addition to the main built-up area of Milton Keynes, the administrative area of Milton Keynes Council includes a significant area of countryside within which are set a number of villages. These rural villages have their own locally distinctive vernacular character. Any new development within these villages should respect the existing character of the settlement.

Conservation Areas

- 2.4.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 gives Local Planning Authorities the power to designate Conservation Areas. These are areas that are 'of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'. There are 27 conservation areas in the Borough, ranging from towns such as Wolverton, Stony Stratford and Olney to small rural villages like Clifton Reynes and Newton Blossomville. The location and boundaries of these conservation areas can be obtained from the Council's website or from the Council's Conservation and Archaeology Team.
- 2.4.3 Any development which takes place within a conservation area is required to preserve or enhance the character and appearance of the area. This requirement will also apply to any development outside of the conservation area which would affect its setting, including views within, into or out of the area. Discussion should be held with the Conservation and Archaeology Team prior to the submission of any application.

- 2.4.4 For sites in or near a conservation area, a more detailed appraisal would be required.

Listed Buildings

- 2.4.5 Listed Buildings are buildings of national significance that are entered on the statutory list of Buildings of Special Architectural or Historic Interest. These buildings are afforded statutory protection making it a criminal offence to alter them in a way that affects their character without first obtaining listed building consent.
- 2.4.6 Where sites include listed buildings there will be a strong presumption for their retention. Only very rarely and in exceptional circumstances is a listed building allowed to be demolished. Where a building is in need of repair to ensure its long term preservation, development on the remainder of the site will be expected to secure such works, completing them at an appropriate stage to be agreed with the local planning authority. Where a new use is required, the local planning authority will expect the applicant to follow national guidance on securing uses that are compatible with the character and special interest of the building.

2.4.7 Some sites may not actually include listed buildings but may be within their setting. If this is the case, the setting of the listed building(s) must be preserved. The extent of setting will vary from building to building and will ultimately depend up on the type of building and the nature of its surroundings. Where setting is likely to be affected, in drawing up initial proposals the applicant should demonstrate how the following has been considered:

- The current setting of the building(s);
- Whether it is desirable to preserve this setting (e.g. whether there are harmful features that may be removed)
- Principles as how best to preserve (or improve) this setting;
- How the proposal achieves the preservation of the setting.

2.5 Small-scale Infill Development

2.5.1 Much of the guidance within this Design Guidance relates to larger scale development involving the creation of new street networks and block structures. However, the principles of good urban design are just as relevant to small-scale infill development.

2.5.2 The immediate context of the site is critical in the design of small-scale residential schemes, particularly where development infills within an existing streetscene. The 'area character appraisal template' (see Appendix C, Table C2) should be used to assess the

character of development adjoining the site. In particular, account should be taken of the existing:

- Building line and setbacks;
- Building heights, scale and massing;
- Building types;
- Continuity of frontage;
- Materials;
- Roof form
- Materials;
- Fenestration;
- Front boundary treatments.

2.5.3 The analysis of the immediate area should identify what aspects of the context are important to reflect in the new development. It may be that there is a uniform use of materials, a consistent building line, or predominant building type.

2.6 Character and Identity for the Future of MK – Lessons from the MK Context

Design Aspirations / Vision

- The character of new development must be developed from an understanding of the positive attributes of the site itself and surrounding natural and built forms;
- Where this is absent, as may be common in Milton Keynes, the challenge will be to create new distinctive places with their own identity;
- The elements of a development that a developer can use to create and affect character or identity of a place are primary street layout, densities, massing, detailed design appearance and landscaping and public realm;
- 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 site and 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. Small infill sites might need to respond very closely to the existing development within which it sits, while larger greenfield developments in particular may need to generate a larger variety in terms of layout and design appearance;



The use of render and light tones helps establish an identity for Ashland



Dominant use of buff brick and red roofs has helped establish an identity for this part of Downhead Park

TABLE 2: FEATURES THAT INFLUENCE THE CHARACTER OF A STREETSCAPE

STREET ELEMENTS	
Street surfacing materials	
Shared surface or pavement/carriageway	
Street trees and other planting	
Car parking, e.g. on street, off street, on plot etc.	
Street geometry, e.g. straight, curved	
Street furniture and lighting	
EDGE CONDITIONS	
Enclosure (height to width ratios)	
Continuity of built frontage	
Building forms, e.g. detached, semi-detached, terraced etc.	
Building heights	
Setback/ defensible private spaces	
Boundary treatments	
Appearance of buildings	120

- 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 (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;

- With respect to the potential for design appearance (or architecture) to influence the character of, in particular large greenfield developments, a careful balance needs to be struck between too much variety in terms of building appearance, which may give the impression of an architectural "zoo" and hence undermine a coherent identity for the development from being created and not enough variety which could lead to an overly monotonous character. As a general rule, a limited palette of materials is believed to lead to the creation of a stronger character for a development. Development briefs and/or design codes should specify what the requirements are regarding the design appearance of the development with a view to creating a strong character for the development;

- Character and identity is principally established and perceived in the most public areas of a development, most notably the streets as well as the buildings that enclose them. These areas require the most careful attention with respect to design;

- This makes the features that comprise the streetscape fundamental in influencing the character of the development. Table 2 outlines those features that will vary according to street type and how the designer chooses to use /design them.

- The landscape framework must provide a structuring element and framework for the entire development;
- For larger developments the presence of local facilities such as shops, schools, open spaces and play areas must be located and designed to contribute to the character of the development;
- The requirement for improved sustainability standards should be exploited and seen as a positive way of influencing the character of a development with respect to layout, landscaping and detailed design appearance;
- While 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.

Section 3: Building a Place

3.1 Introduction

- 3.1.1 This section provides guidance, advice and solutions regarding the “structure” of a place, which refers to the pattern or arrangement of development blocks, streets, buildings, open space and landscaping. It’s the interrelationship between all these elements, rather than their particular characteristics that bond together to make a place.
- 3.1.2 The overall urban and landscape structure of a place or development is informed by the context appraisal outlined in the previous chapter as well as the requirement to accommodate the intended development components. Together they should inform a vision and concept which when underpinned by best practice urban design principles influences the masterplan and detailed layout.
- 3.1.3 The following principles reflect a summary of what is required when approaching the overall urban/landscape structure or masterplanning stage of a large development in particular.

Design Principles

- Existing positive site features should be used to structure the entire development (established as part of the context appraisal);
- Development should be based on a permeable movement framework, which builds on pedestrian desire lines and is connected, where possible and appropriate, with adjacent street networks;
- At the masterplanning stage, the movement network must be designed and laid out such that pedestrians are considered first, followed by cyclists, public transport users, service delivery vehicles and finally cars;
- The movement network should be arranged so as to maximise passive solar gain capture;
- Non residential uses such as schools, local centres and open spaces should be overlain onto the movement network in the most accessible places;
- A hierarchy of street types should be established with different characters based on their importance with regard to their role as a place and as part of the movement network;
- Schools, shops, and other community uses, should be co-located to, amongst other benefits, reduce the amount of parking required. The surrounding street network should be masterplanned to minimise walk distances to these community facilities;
- A range of densities should be included that are contextually appropriate and take into account the site's size and its level of accessibility to public transport, facilities, shops, employment opportunities, open space and the rural edge. A range of densities will encourage a range of housetypes to be provided that suit a range of needs;
- Buildings in general to be arranged in perimeter block format with private backs and public fronts;
- Wherever possible allow for direct access to plots and / on street parking - this implies locating a street to the front;
- Clearly demarcate public and private space, as well as required service access;
- Layouts should be such so as to allow as much parking as possible to be on plot and on street - so long as all other best practice urban design principles can be achieved;;
- Where appropriate (e.g. to mark gateways and key corners, help with wayfinding, reinforce street hierarchy and vary character) taller buildings should be used.

3.2 Local Centres

3.2.1 If a development is of such a size and/or is in a location that it requires a local centre, the following principles should be adhered to with respect to the location and design of the local centre:

- The local centre should be located in the most accessible location for pedestrians and cyclists, as well as cars. It should therefore be located at a junction of the highest order streets within the development;
- 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;
- Local centres must be designed as areas of social gathering and hence must have a high quality public realm. In this respect careful consideration needs to be given the location of servicing so that it does not undermine the quality of the public realm and the pedestrian experience;
 - 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.



Concept plan for local centre showing relationship between various elements

3.3 Community Safety – Strategic Issues

- 3.3.1 A key requirement of “sustainable communities” is “neighbourhoods which are designed to minimise crime and anti-social behaviour”. The layout of a residential area can have a significant impact on crime against property, cars and pedestrians as well as anti-social behaviour. 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. “Secured by Design” is the Police initiative supporting the principles of “designing out crime”.
- 3.3.2 National guidance on community safety is provided by “Safer Places: The Planning System and Crime Prevention” (ODPM, 2004). The guidance identifies seven attributes of safe, sustainable places. Achievement of the first five attributes are very much concerned with the strategic layout of a development.

3.4 A Place that is Accessible for All

- 3.4.1 The CABI 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.

Access and movement -

places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security;

Structure -

places that are structured so that different uses do not cause conflict;

Surveillance -

places where all publicly accessible spaces are overlooked;

Ownership -

places that promote a sense of ownership, respect, territorial responsibility and community;

Activity -

places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times;

Physical protection -

places that include necessary, well-designed security features;

Management and maintenance -

places that are designed with management and maintenance in mind, to discourage crime in the present and the future.

Seven attributes of safe, sustainable places

3.4.2 The following principles, based on the CABE guidance, represent good practice and will help in the development of an accessible neighbourhood:

- Involving people in design 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/);
- 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;
- Make reasonable adjustments - in particular considering the multi-users of environments; including motorised-wheelchair users, the needs of those with a sensory disability in signage, the need for dropped kerbs and lighting.

3.5 Landscape, Public Space and Biodiversity

General Principles

- 3.5.1 Public space (also often referred to as “public realm”) is made up of the green spaces, parks, streets, squares and other outdoor places that we use or pass through in our everyday lives.
- 3.5.2 Good quality public realm, which is attractive, inviting, safe and well-maintained, must be

the aim of any new development since it is a key element of the character and perception of a place. Open space in all its forms has a major influence on the well being of the whole community and that value should be fully recognised as integral to the quality of the development as a whole.

- 3.5.3 Landscape quality and management of public space is a central theme of overall design and should be considered and designed in early in at masterplan stage. It should be used to structure and articulate the entire development. The inherent landscape assets should be used and integrated within the open space infrastructure and help form and guide the development.
- 3.5.4 Public green space associated directly with residential areas should be easily accessible for all the community. Opportunities to co-locate open space with other public amenities, community buildings, schools and shops should be sought.
- 3.5.5 Residential open space should normally be fronted by development to exploit the mutual benefits of that design relationship. Some categories of green space, for example: District Parks, Linear Parks, Country Parks and some Local Parks would not be expected to conform



Public open space integrated into and fronted by development 126

universally to the “front on” concept. It is however essential to ensure the principles of good access, passive surveillance, quality design and management and local “ownership” are built into the delivery and management of all categories of open space.

3.5.6 New play areas are to be included according to current requirements (see Appendix B) and the following locational/design principles should be applied:

- Need to be designed into the overall layout of the new development from the outset;
- Must be located in an accessible location, so along a redway or other pedestrian desire line;
- They should feel safe and hence should be overlooked by development;
- A street should occur to the front of the houses that overlook the play area to provide a defensible buffer between the two, as well as improve surveillance through increased passers-by;
- 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. Surveillance could still be achieved by locating it adjacent to a key pedestrian

desire line such as a redway, where regular passers will help to make the play area feel safer.

3.5.7 Residential layouts must avoid “**left over space**” which typically provides little benefit or relevance to the residential area. The test of relevance should focus on the positive contribution a space makes to the neighbourhood. A space which does not make a positive contribution, such as behind rear gardens, inaccessible corners, over-enclosed corridors must be avoided. The costs of maintenance are not balanced by the benefits, they are frequently under-used and may become prone to anti-social behaviour and fly tipping. Appropriately designed and integrated open space would eliminate “left over space” and optimise resources for the provision of good quality open spaces.



Left over space behind rear gardens can become prone to fly-tipping



These sort of 'left over' spaces with no function should be avoided

The Milton Keynes Context

3.5.8 A key aspect of Milton Keynes, much appreciated by residents is the green environment. Consultation on the Community Strategy identified this as the most important influence on the quality of life. Consequently, any new development should reinforce the existing 'green' character of the city and seek opportunities to support the established principles. The Milton Keynes Open Space Strategy supports and guides the Authority's approach to open space.

3.5.9 The importance of green space in the city's growth does not mean however that future development will be provided in the same way as in the past. The provision and management of open space in the future needs to balance differing needs not least of which are issues of crime, fear of crime and ongoing maintenance costs. A key point to recognise however, is that open space is delivered largely through development and the character of the city is reflected through both existing and new residential developments. It should be further recognised that higher housing density and increased pressure on land generally requires that open space "performs" a multifunctional role. Open space can deliver the optimum multifunctional benefits through the following:

- The masterplanning of new developments particularly on the periphery of the city must ensure that where appropriate and achievable, existing linear open space corridors are extended into new developments. Where these do not occur, large new

- developments in particular should be structured around open space corridors that serve to integrate development rather than divide them and that accommodate the multifunctional uses required of modern development;
- The retention and use of existing landscape assets as part of new developments should be a guiding principle. This not only enhances the biodiversity where the long established features are often the richest assets, but provides a sense of maturity to developments. Using elements of former landscape character and land use helps to integrate new development within their locality;
- Good landscape design can help legibility, create focal and reference points, enhance biodiversity and enhance the overall quality of the external environment. The form, texture and colour of plant material can compliment and enhance new and existing building materials. 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. Non-native species, where used, should be selected for known wildlife value;

- Developers should integrate landscape within the built development, rather than viewing it as a separate entity confined solely to areas of public open space. The green character of the city can be reinforced in a variety of other ways, including street trees, verges, green front gardens, green roofs and green walls;
 - Green roofs can provide a number of environmental benefits including insulation and cooling of buildings, significantly reducing rainwater runoff from roofs, improving air quality and promoting biodiversity. They can also provide outdoor private amenity space, particularly within apartment developments where the demands on available space are at premium. Consideration should be given to including domestic fruit trees or other appropriately sized trees within rear gardens;
 - 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.
- 3.5.10 The Milton Keynes Green Infrastructure Plan (Feb 2008) is an important document to draw upon. It should be used to help inform connectivity of green space and biodiversity with surrounding natural green space and target areas. This plan identifies the natural assets and how these can be linked with the urban environment within and surrounding developments.
- 3.5.11 The Open Space Strategy provides guidance on the landscape infrastructure with a primary focus on the City area.
- 3.5.12 Policy L3 of the Local Plan requires that new development meets minimum standards for the provision of public open space which are set out in Appendix L3 of the Local Plan.
- 3.5.13 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.'

Biodiversity

- 3.5.14 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.
- 3.5.15 Biodiversity features which might be incorporated in the design and layout of new developments could include:
- (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."
- 3.5.16 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).

Soft Landscaping

- 3.5.17 "Soft" landscaping refers to natural features, which provide screening, shade, habitat, texture, form and colour as well as privacy, security and a recreational environment. The

Open Space Strategy outlines the hierarchy of open spaces in Milton Keynes and the range of use each is expected to provide.

- 3.5.18 Careful consideration should be given to the types and species of new planting used within spaces to accord with their functions. A further important consideration is the need to design in and specify for "low maintenance".
- 3.5.19 Tree planting has substantial benefits in a residential area, providing shade, visual interest, cooling, habitat, carbon and pollution capture. 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. The emphasis should be to design holistically, where landscape and particularly trees and built elements exist in a positive and complementary relationship.



The use of particular tree forms or species can aid legibility

- 3.5.20 The appropriate choice of trees, bearing in mind not only their intrinsic qualities but likely size and root systems is paramount. Tree planting along a street can add definition and enclosure to a street, provide shade, increase biodiversity and help frame important views and vistas. Attention should be given to the local environment and its capacity to accommodate trees as they mature (see Highway Design Guide which includes details of street trees and species).

Hard Landscaping

- 3.5.21 “Hard” landscaping refers to the man-made elements of a landscape scheme including paving, walls and fencing, tree grilles, street furniture (seating, litter bins, bollards, railings and lighting) and public art.
- 3.5.22 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.
- 3.5.23 Materials and street furniture need to be aesthetically pleasing structurally robust, resistant to vandalism, have good weathering characteristics and only require simple maintenance. When choosing materials and street furniture, consideration should be given to the availability of replacement products, particularly when more bespoke designs are used.
- 3.5.24 Where a development is phased, street furniture should be compatible with other phases of the development.
- 3.5.25 A varying palette of surface materials can be used to emphasise a hierarchy of streets and to add interest and variety to the street. The surface materials chosen should complement the building.

Maintenance

- 3.5.26 Developers are required to identify the public and private external spaces within their development. They must identify the size of each of these spaces, highlight them clearly on a plan as well as identify the specification for the spaces. Proposed ownership and management responsibility for different areas should be clearly set out at the start of the planning process.

Public Art

- 3.5.27 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.

Landscape Adoption Process/Requirements

- 3.5.28 The process is supported by the recommendations of the Audit Review on Open Space and Highway Adoption (2009).
- 3.5.29 Milton Keynes Council has an established process for the adoption of open spaces which is based on the following key stages:-

Pre-Submission

- 1] Developer contacts the Council's Open Space Adoptions Officer at pre-application stage to discuss design principles and open space requirements for the proposed development. [This is in liaison with the Development Control case officer who is responsible for coordination of activities to Application stage];
- 2] 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;

Post-Submission

- 3] Developer submits draft open space design with Application. Open Space Adoptions Officer advises Planning and provides stage 1 approval;
- 4] Developer submits design details/ specs and layout for approval. Open Space Adoptions Officer advises Planning and provides stage 2 approval;

Post-Determination

- 5] Developer implements open space in accordance with stage 2 agreement;
- 6] Open Space Adoptions Officer and Developer liaise during implementation to Practical Completion Certification;
- 7] Open Space Adoptions Officer provides Final Completion Certification after 12 months or agreed establishment/defects liability period;
- 8] Open Space Adoptions Officer instructs legal adoption and freehold transfer to MKC;
- 9] Open Space Adoptions Officer accepts adoption/transfer from Developer and instructs Landscape Maintenance to undertake ongoing maintenance responsibilities on behalf of MKC.

A full step by step version of the Open Space Adoption Procedure is available from the Open Space Adoptions Officer.

For further guidance : The Open Space/ Highways Adoption website provides further detail, guidance and site adoption status.

<http://www.milton-keynes.gov.uk/landscape-roads/>

Landscape Quality Assurance – the required process

- 3.5.30 Milton Keynes Council expects suitably qualified ecologists and landscape architects to be employed to advise on all biodiversity and landscape matters.
- 3.5.31 The following provides guidance on how the Council expect developers to appraise the existing landscape and open space character of their sites and surroundings:

- Typically, developers/applicants should employ Landscape Architects to address these issues with the Council relying heavily on the Landscape Architect's competence to assess the landscape character and context. With large scale developments, typically within the expansion areas, the overall landscape infrastructure will have been established within a Development Framework document and supported by Design Codes. This provides the "master plan" from which individual site related designs can be prepared to suit the character and scale of the development. Notwithstanding this, each respective planning application must be supported by a Design & Access Statement (DAS), to demonstrate how the proposed landscape approach addresses the wider landscape character, framework, codes and local needs. Infrastructure, drainage strategies

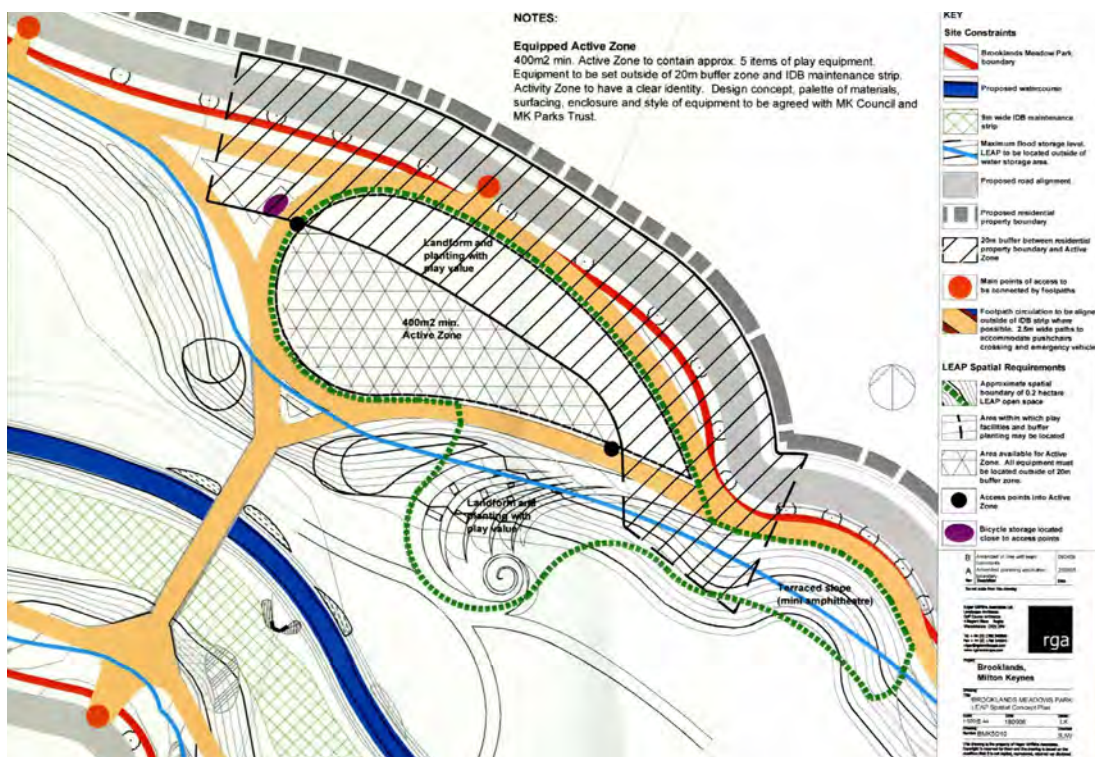
etc, must be included as part of the design process and may offer further design opportunities, such as working with sustainable drainage systems [SUDS];

- The principle also applies for smaller applications/proposals with the requirement for landscape principles to be covered within the planning DAS, a landscape master plan and then finally details. If required, MKC can request landscape character and visual impact assessments to help inform of the suitability of proposals, particularly within a sensitive context;
- If applications fall within the category that requires an Environmental Impact Assessment, there may be a requirement to provide a much more detailed and analytical landscape approach that would almost certainly include a comprehensive landscape/ environmental evaluation including visual, ecological and character assessment;

- The use of concepts/narratives/catalysts to drive a design, are welcomed. An example of the approach to be taken is shown adjacent with respect to the play area designs in Brooklands in which a number of agencies have evolved the designs and a clear design methodology was created. More frequently however, a request from MKC to the applicant (or Landscape Architect) would be the route through which a design would be brought forward and developed in liaison with the applicant, using the Open Space Adoption process as the driver;
- MKC expect landscape design, on all levels to adhere to good practice,

including national guidance, local guidance, [Open Space Strategy, Local Plans, Supplementary Guidance / Planning Documents, CMK Handbook and all other recognised good design guides, such as British Standards, Building Regulations etc;

- Pre-application discussions are essential to highlight open space expectations and ensure an appropriate landscape approach is adopted. It is the responsibility of the DC case officer to set up pre-application discussion among MKC interested officers and the applicant or agent, in accordance with the Open Space & Highways Audit Review recommendations.



Landscape design for play area in Brooklands

Flood Risk Management

- 3.5.32 Strategic and integrated flood risk management infrastructure has an important role to play in the amelioration of flood risk of a development as well as the potential to contribute to the overall quality of a development.
- 3.5.33 The Milton Keynes open space hierarchy includes a number of linear parklands with lakes within floodplains which have accommodated the flood run-off. This innovative, strategic and integrated flood management infrastructure that has become an important part of the City green infrastructure as linear parklands that are a known characteristic of Milton Keynes.
- 3.5.34 The use of SUDS is intended to ameliorate flood risk within a development rather than transfer the problem “downstream”. The design of SUDS should not only consider flood risk but enable a substantial contribution to the open space infrastructure of an area and a range of related benefits, including biodiversity. Applicants should take note of the Council’s SUDS brochure that sets out emerging legal requirements, as well as guidance on SUDS principles and standards.
- 3.5.35 Strategic and integrated drainage infrastructure requirements (rather than piecemeal proposals) must be included at the onset of design consideration of large new developments to ensure that it can be constructed and maintained effectively, alongside the other elements of the development, such as residential areas and movement networks. It is also vital that all strategic and integrated drainage infrastructure is designed to allow access for maintenance, often this means access for machinery. Without this, drainage assets will

deteriorate and fail to deliver their design standard of service. This will cause flooding.

- 3.5.36 It is the role of tender brief documentation and site specific masterplans to identify specific contextually appropriate design criteria for the on-site flood risk management facilities.
- 3.5.37 Applicants should take note of the following design-related flood risk management guidance:

- Flood & Water Management Act 2010;
- National Planning Policy Framework (2012);
- Milton Keynes Drainage Strategy – Development and Flood Risk Supplementary Planning Guidance (2004);
- BS8533: Code of Practice for Assessing Flood Risk in Development (2011);
- Best practice examples from DEFRA, EA, CIRIA, Bedford Group of IDBs

3.6 Layout for Passive Solar Gain Capture

- 3.6.1 Typical energy savings of 8-10% can be made from passive solar houses within a passive solar layout.
- 3.6.2 The two key factors in passive solar residential layout are the orientation of houses (which is closely aligned to the road layout) and the degree to which south-facing glazing is free from overshadowing (implications for internal layout will be covered in section 4).

Street Layout

- 3.6.3 Because a good principle of urban design is for houses to front onto streets the street layout is a major factor in determining the orientation of housing within a scheme. For optimum orientation of house plots, roads should preferably be aligned east-west. East-west streets can cause issues at sunrise/sunset with the sun being low in the sky causing glare or directly affecting the driver's ability to view the road ahead. They need careful design to ensure that these issues are addressed.
- 3.6.4 Orientating as many houses as possible so that the elevation with the most glazing faces within 30 degrees of south will maximise solar gain, as well as the opportunity to fit photovoltaic panels to roofs.
- 3.6.5 For north-south aligned streets there are a number of ways in which houses can be given southerly orientation:

- Placing larger detached houses one plot deep along the street
- Arranging houses around front parking courts or short culs-de-sac that at right angles to north-south streets

- 3.6.6 For diagonally aligned roads, living room elevations can be made to face within 30 degrees of south by skewing the plots in relation to the street or by skewing the houses within the plots.

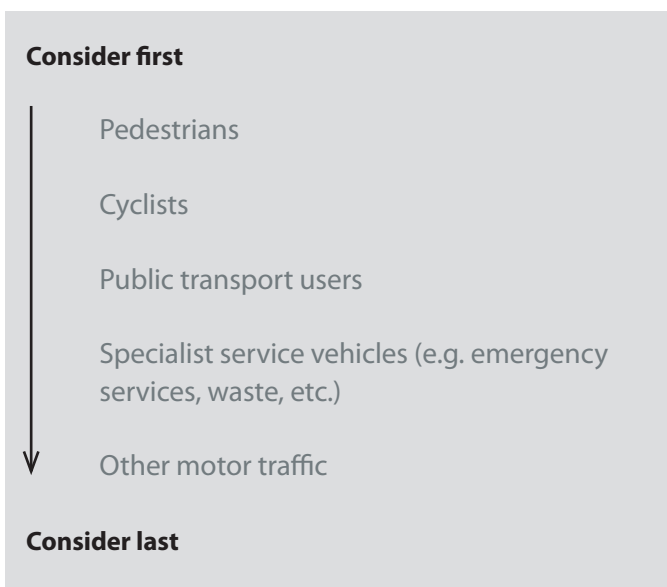
Overshadowing

- 3.6.7 If full advantage is to be taken of a southerly orientation, the site layout should ensure that the south facing elevations are not obstructed by other buildings or planting. Complete freedom from overshadowing is rarely possible, but it can be minimised by:

- Locating taller buildings to the north of the site or to the south of the road intersections or open space such as car parking which need less or no sun;
- Locating low rise buildings such as bungalows on the south side of the site;
- Locating semi-detached and detached housing to the south of the site to allow some penetration of sunlight between houses;
- Using low pitched and hipped roofs or constructing the first floor as part of the roof space;
- Designing planting with appropriate species and heights in mind. If trees and tall evergreen shrubs are positioned so that they overshadow the south facing elevations of houses, many of the benefits of a passive solar layout will be negated. Trees that will eventually grow above the 'shadow line' such as larger specimen trees should preferably be deciduous.

3.7 Movement Framework

3.7.1 In designing the movement network in a new residential development, the following user hierarchy should be followed:



3.7.2 The hierarchy does not mean that it is always more important to provide for pedestrians. However, they should be considered first.

Overall Network

3.7.3 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 or rural main roads. Indeed very large developments might even require new grid roads as part of their development.

3.7.4 The masterplanning of growth areas, as well as infill sites should be based on a connected and permeable movement network, because it:

- promotes pedestrian and cycle movement;
- makes it easier to find one's way around;
- spreads traffic more evenly, so avoiding the need for distributor roads with no frontage development; and
- eases access for refuse and emergency vehicles.

3.7.5 New streets required for development, within the existing urban area in particular, should be connected into the established movement network, to ensure that new housing has good access to existing facilities.

3.7.6 Streets that are likely to be used by public transport should be identified at an early stage in the design process, so that they can be designed to be as direct as possible. Careful consideration must be given to the location of on-street parking on streets which are to be bus routes to ensure parked cars don't obstruct the free flow of buses. Parking along bus routes must be carefully designed into designated parking bays.

3.7.7 The street network must be designed so that, wherever possible, direct access onto plots and on-street parking is allowed. This not only promotes a more active frontage but also reduces reliance on rear parking courts.

Design Layout for Pedestrians/Cyclists

- 3.7.8 The layout of new developments should be such that it encourages people to walk or cycle to local facilities. 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. The routes in order to be used, must feel safe and hence be overlooked.
- 3.7.9 Particularly with regard to the design of the environment around schools, early discussion should take place with the Council's Road Safety team regarding drop-off parking, sight lines, crossing points and planting all of which affect the safety and hence prospects of children walking to school.
- 3.7.10 In Milton Keynes cycling/walking trips usually involve a mixture of residential streets, and redways. These provide the essential routes between residential areas and play areas, parks playing fields, and allotments as well as to schools, colleges, shops and work. This movement is encouraged by the linear parks, which provide continuous cross-city routes for cyclists and walkers. It is important, therefore, that new residential development continues to follow this principle and not block off long established links to the surrounding countryside.



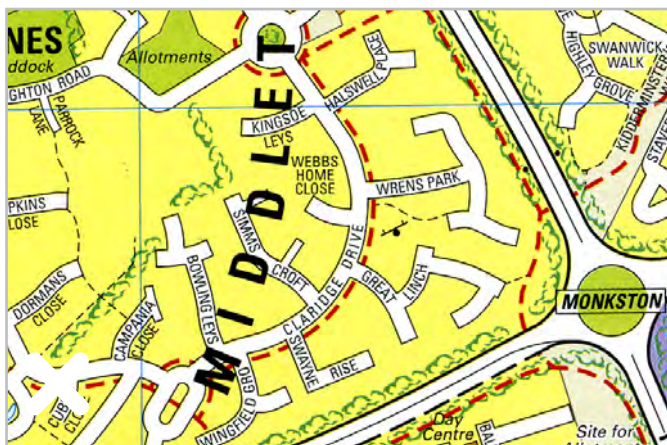
Redways and/or footpaths should generally follow streets



Segregated pedestrian and cycle routes provide no natural surveillance and should be omitted from schemes

3.7.11 Pedestrian routes should generally follow streets and are overlooked by housing rather than on routes segregated from vehicular traffic and not overlooked by housing unless they are wide, short and overlooked (exceptions of course apply to those routes located within linear and district parks). This is a requirement in “Safer Places” and is required because:

- Pedestrians and cyclists are afforded a greater sense of security from being seen by drivers;
- Accommodating pedestrians within the street network reinforces the perimeter block form and ensures that the rear and sides of properties are more secure.



Claridge Drive, Middleton showing local redway following carriageway in order to provide a lively street scene.

Redways

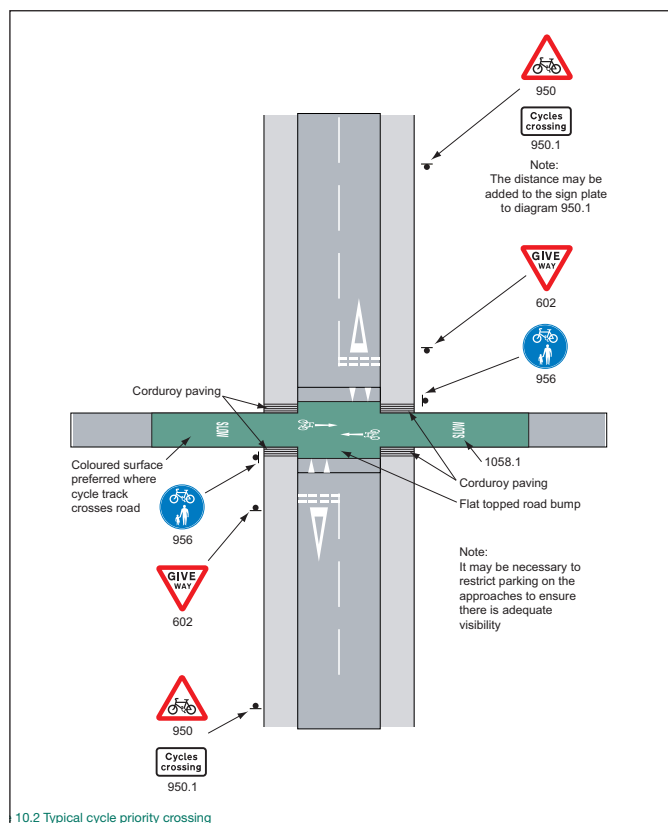
3.7.12 The Council will be seeking a network of redways within new developments.

3.7.13 There are three locations within which redways will be provided, all of which may be required depending on the size of the development. All three enable surveillance from either passers-by in cars or from adjacent properties and hence should feel safe for all users:

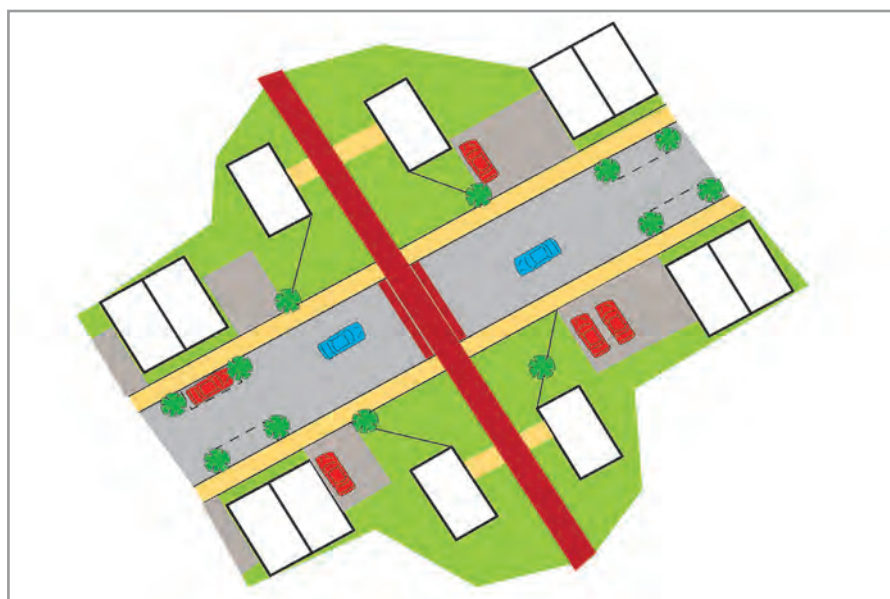
1. Adjacent to Avenues and Boulevards

- In new developments, main local routes are to be viewed as the equivalent of boulevards and avenues (see paras 3.7.36 – 3.7.42) and are the most important and connected routes within a development – ones that are public transport routes and link up with shops and facilities. It is along these routes that redways are to be included;
- Where new redways included as part of future residential developments cross streets, and hence the appropriate safety/visibility requirements at this junction can be designed into the development, priority should be given to redway users i.e. cyclists and pedestrians (see diagram from Local Transport Note on Cycle Infrastructure overleaf);

- This priority can be emphasised through the inclusion of a raised table over which the redway runs or a change in surface material where the redway crosses the street;
- Typical of many existing estates where redways follow streets internal to them, it is permissible for driveways to cross the redway. Care needs to be taken however that cars, cyclists and pedestrians leaving houses located adjacent to redways have good visibility over redways to the front to avoid accidents with cyclists in particular. To ensure appropriate visibility there must be a 2m strip of adoptable highway between the redway and the property boundary. Front boundary treatment in these cases should be no more than 1m in height.



Redway crossing a street: t: Diagram from Local Transport Note on Cycle Infrastructure



Redway crossing a street: conceptual layout showing priority for redway users with sufficient visibility plays

3.7.14 The second and third locations of redways to be included in new developments are for cyclists who want to travel greater distances at increased speeds with less interruptions from crossing streets (and no crossings by private driveways):

2. Redways that follow grid roads – they are afforded safety from passing cars on grid roads. redways should be included alongside all grid roads.
3. Redways through linear parks – they are afforded surveillance from users of the linear park and adjacent properties. A key requirement is that they are kept relatively direct.

3.7.15 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.'



Furzton - a good example of a redway through a linear park



Redway alongside grid road



Redway within linear park overlooked by adjacent development

Bridleways

- 3.7.16 Bridleways currently criss-cross Milton Keynes. They should be included in large new developments so as to extend their network. As currently exists they should generally relate to the redway network, where they pass through linear parks in particular.
- 3.7.17 Where bridleways cross streets, crossing areas should be designed in line with recommendations from the British Horse Association and within the Design Manual for Roads and Bridges such as TA 90/05.



Bridleway next to redway

Underpasses

- 3.7.18 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 following:

- 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 provided;
- Landscaping around the approach to the underpass to be low level to ensure good visibility;
- The needs of people with mobility problems should be taken into account with regard to path gradients;
- Walls to be graffiti-proofed. Consideration to be given to public art on underpass walls.



Good surveillance of underpass from neighbouring housing 142

Bus Stops

- 3.7.19 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.
- 3.7.20 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.



Two possible layouts to achieve safe pedestrian access to a bus stop

Geometry

- 3.7.21 Straight streets are efficient in the use of land. They maximise connections between places and they can better serve the needs of pedestrians who prefer direct routes. However, overly long straight streets can be monotonous and lead to higher traffic speeds. More irregular street patterns (deformed or irregular grid) add variety and can act as a traffic-calming measure without excessively increasing walk distances for pedestrians. However, layouts that use gratuitous curves, for no contextual reason, should be avoided as they increase walking distances which can serve to encourage car travel. They also can make on street parking difficult and reduce visibility. Building form should dictate the street layout, not the other way around.
- 3.7.22 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.
- 3.7.23 It is important that streets are designed to reflect the needs of waste and emergency vehicles. Detailed guidance on street geometry matters such as carriageway widths, junctions, and visibility will be provided in the Highway Design Guide. It is crucial however that these matters are designed in from the outset and incorporated within the overall street design and character for that particular street.

Streets with frontage access

- 3.7.24 Wherever possible, direct access to properties by vehicles should be allowed from the street. In the past this has often been restricted where traffic flow is high or more recently where dedicated bus lanes have been included. The consequence has been a requirement for rear parking courts and associated less pedestrian activity along the street (less active frontages).
- 3.7.25 The Highway Design Guide will provide details of where frontage access is to be allowed. 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. Where direct access is not allowed, parking will be provided either through the use of service lanes or rear courts.

Streets to the front of buildings

3.7.26 Buildings should generally have streets to the front of them rather than just segregated footpaths and/or open space. The benefit of having a street to the front is that it:

- Allows for on plot and on-street parking;
- Removes need for rear parking courts;
- Provides ease of access for waste, emergency and delivery vehicles;
- Can reduce the need for large turning heads;
- Makes for more secure backs;
- Improves pedestrian activity to the front of houses;
- Improves access to public open space;
- Improves the public ownership of the green space to the front;
- Provides additional defensible space to the front of properties.



These houses have no street to the front and therefore rely on rear parking court



Buildings front street

Landscaping within streets

- 3.7.27 Greenery within streetscapes is considered one of the most important aspects contributing to the neighbourhoods that residents like to live in. Greenery generally comprises verges, street trees and setbacks/private defensible space (the latter covered in section 4.6). These need to be carefully considered in all new developments.
- 3.7.28 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. Highway requirements normally for clear visibility splays restrict the height of this planting to 300 - 400mm. Appropriate species include:

- Cotoneaster 'Coral Beauty';
- Euonymus fortunei (normally the variegated species);
- Lavendula 'Hidcote';
- Lonicera pileata;
- Symphoricarpos chenaultii 'Hancock'.

- 3.7.29 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



Verges, street trees and hedges contribute to a pleasant street scene

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 footway by parking indiscriminately across the 'link' between the driveway and street.

- 3.7.30 Street trees can help create character for a street and a development. They are easiest to include in verges but many streets particularly those lower down the hierarchy do not have verges. Where numerous driveways join the street, it is more challenging to accommodate trees. For streets at the bottom end of the hierarchy, such as level surface streets, trees can be located within the carriageway. 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. Consideration needs to be given to the use of root protection barriers, to avoid problems of damage to highways, buildings or pipes.

- 3.7.31 Selection of trees species should be based 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 appropriate species include:

Avenue/boulevard

- *Acer platanoides* 'Emerald Queen'. Norway Maple species.
- *Tilia cordata* 'Green Spire'. Lime species.
- *Carpinus betulus* 'Frans Fontaine'. Hornbeam species.
- *Pyrus calleryana* 'Chanticleer'. Ornamental Pear species

Residential Street

- *Fraxinus angustifolia* 'Raywood'. Claret Ash.
- *Tilia tomentosa* 'Brabant'. Lime species.
- *Prunus avium* 'Plena'. Cherry species.
- *Betula pendula*. Silver Birch.

Lanes/Mews

- *Acer campestre* 'Streetwise'. Field Maple species.
- *Prunus x schmittii*. Cherry species.
- *Sorbus aucuparia* 'Sheerwater Seedling'. Mountain Ash species
- *Crataegus x laveallei*. Hawthorn species.

Specimens/Special Places.

- *Betula utalis* 'Jacquemontii'. Himalayan Birch.
- *Liquidambar straciflua*. Sweet Gum.



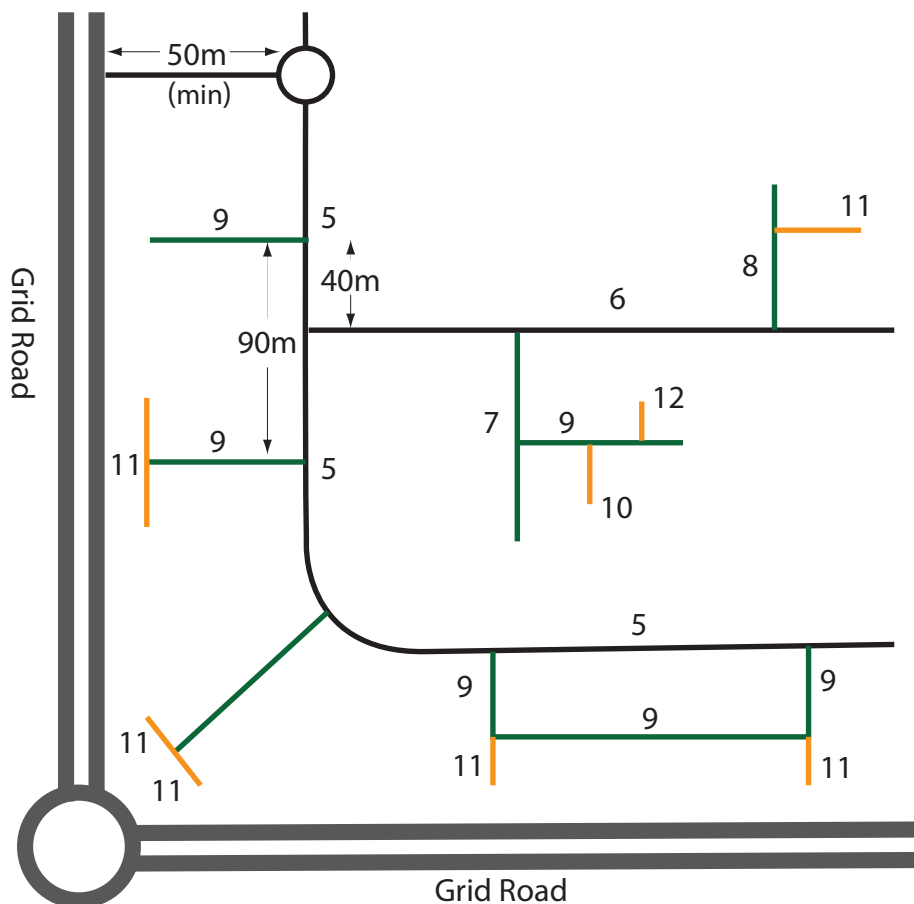
Root protection barrier detail

Street Hierarchy

3.7.32 The Guide cannot and does not provide detail on each street type within a development's hierarchy as this will vary according to the context. However, it does provide guidance on some of the key residential street types that would be in a development depending on its size. In particular, detailed guidance is provided on level surface streets, as these are a frequent point of discussion at pre-application meetings with much confusion about their design.

3.7.33 The street hierarchy (see street hierarchy diagram below and Design Table overleaf) should be designed to ensure that a network is created that:

- is easy to understand and navigate;
- is connected;
- includes a variety of street types; &
- encourages through traffic to use the higher level streets.



Conceptual plan showing street hierarchy -see table below

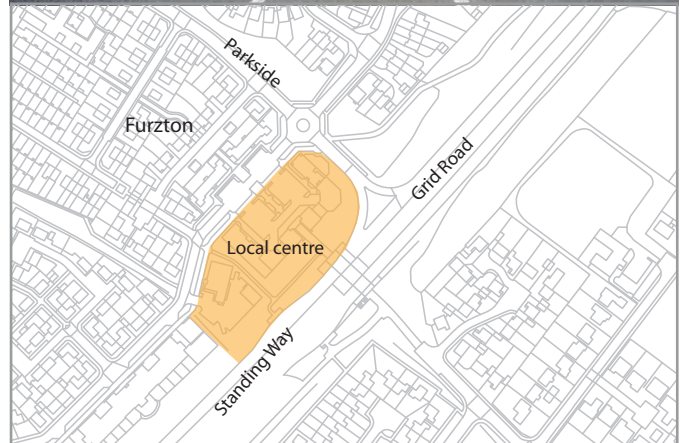
Street Design Table

TYPE	NAME	SERVES	WIDTH (m)	FOOTWAY	VERGE ³	DESIGN SPEED mph (kph)	JUNCTION SPACING ¹ (m)		ACCESS	
							ADJ	OPP	FROM	TO
ROADS										
1	Primary Distributor	N/A	Refer to the Design Manual for Roads and Bridges							
2	District Distributor	N/A	Refer to the Design Manual for Roads and Bridges							
5	Local Distributor	300+ Dwellings	6.75	2 x 2m	2 x 1m	30 (50)	90	40	1, 2	6-9
RESIDENTIAL STREETS										
6	Principal Street	100-300 Dwellings	5.5 ⁴	2 x 2m	None	25 (40)	50	25	2, 5	7-11
7	Major Street	50 to 100 Dwellings	5.5	2 x 2m	None	25 (40)	30	15	5, 6	8-12
8	Street	25 to 50 Dwellings	4.8	1 x 2m	1 x 1.2m	20 (32)	30	15	5-7	9-12
9	Minor Street	Up to 25 Dwellings	4.8	1 x 2m	1 x 1.2m	20 (32)	20	5	5-8	10-12
LEVEL SURFACE STREETS										
10	Level Surface Street	Up to 25 Dwellings	Min 3.2	Integrated	Min 0.5m ²	<15 (24)	N/A	N/A	6-9	11-12
11 ⁶	Shared Drive	3 to 5 Dwellings	3.2 to 4.1	Integrated	2 x 1.2m ⁵	<10 (16)	N/A	N/A	6-10	N/A
12 ⁶	Shared Crossover	2 or 3 Dwellings	3.2	Integrated	None	N/A	N/A	N/A	7-10	N/A

1. Measured Centreline to Centreline. The minimum distance to the first junction on a road/street is 50m for types 1-6 or as per the relevant adjacent "ADJ" distance for types 7-9.
2. To be determined in conjunction with statutory undertakers and the Council's Highway Adoptions team.
3. This is a minimum requirement for highway purposes. Wider verges will be acceptable where they meet urban design objectives.
4. Where the road is part of a bus route the width should be increased to 6.2m.
5. Verges are required for adoptable Shared Drives. On private Shared Drives verges are not required.
6. These street types are not adoptable.

3.7.34 In order to create a suitable and safe environment for all users in that part of a neighbourhood or new development where the boulevard/avenue joins the grid road the following principles should be adhered to:

- 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 ;
- 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' ;
- The sort of uses that would be encouraged within this 50m 'zone' would include allotments and local centres (or other uses) which don't require access onto the boulevard/avenue within this 50m zone.



Furzton - roundabout used to slow down traffic as it exits grid road. Local centre located within 50m zone between grid road and first side access street.

- 3.7.35 In addition to grid roads and their reserves, the following street types need to be included, the range and inclusion of which will depend on the size of the development.

Avenue and Boulevard

(Street type 5,6)

- 3.7.36 These street character types will be at the top of the street hierarchy, and will tend to carry the highest volumes of traffic within a neighbourhood including through-traffic. 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 local centre or other non-residential fronting development where the requirements will be specific to the context). This will help give an “avenue” effect which was a key feature of many earlier estates in Milton Keynes (e.g. Emerson Valley, Great Linford, Shenley Church End, Two Mile Ash, Middleton) and will help maintain a legible street hierarchy.

- 3.7.37 One problem with some of the verges in the above mentioned estates is that the verges were frequently too wide – and when they are in excess of 2.5 metres the extension of the private driveway between carriageway and footpath typically becomes used as a parking space. This results not only in cars overrunning the footpaths but also in an untidy and cluttered street scene which is to be avoided.



Low maintenance groundcover planting is an alternative to grass and is less likely to be parked on



Verges between 3 and 5 metres wide should be avoided to discourage indiscriminate parking

3.7.38 These streets should avoid being excessively curved because firstly they will have redways running adjacent to them and secondly they will accommodate buses. The Highway Design Guide will provide further information on necessary street widths to accommodate buses. The design of these streets should be such that on-street parking is accommodated without narrowing the street below the width required to allow two buses to pass easily. In specific points they can be narrowed down further to accommodate redway or other dedicated pedestrian crossing points. They can also include raised tables where redways cross over them.

3.7.39 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.

3.7.40 In order to signify their importance in terms of movement and place and reinforce the avenue effect of these streets setbacks should be more generous than some other street types and should be a minimum of 3 metres from the back of the redway or footpath (other than where it passes through or non-residential frontage where it will vary according to the specific context).

3.7.41 The increased setbacks will allow buildings to be taller along these streets helping signify the place in the street hierarchy that it occupies.



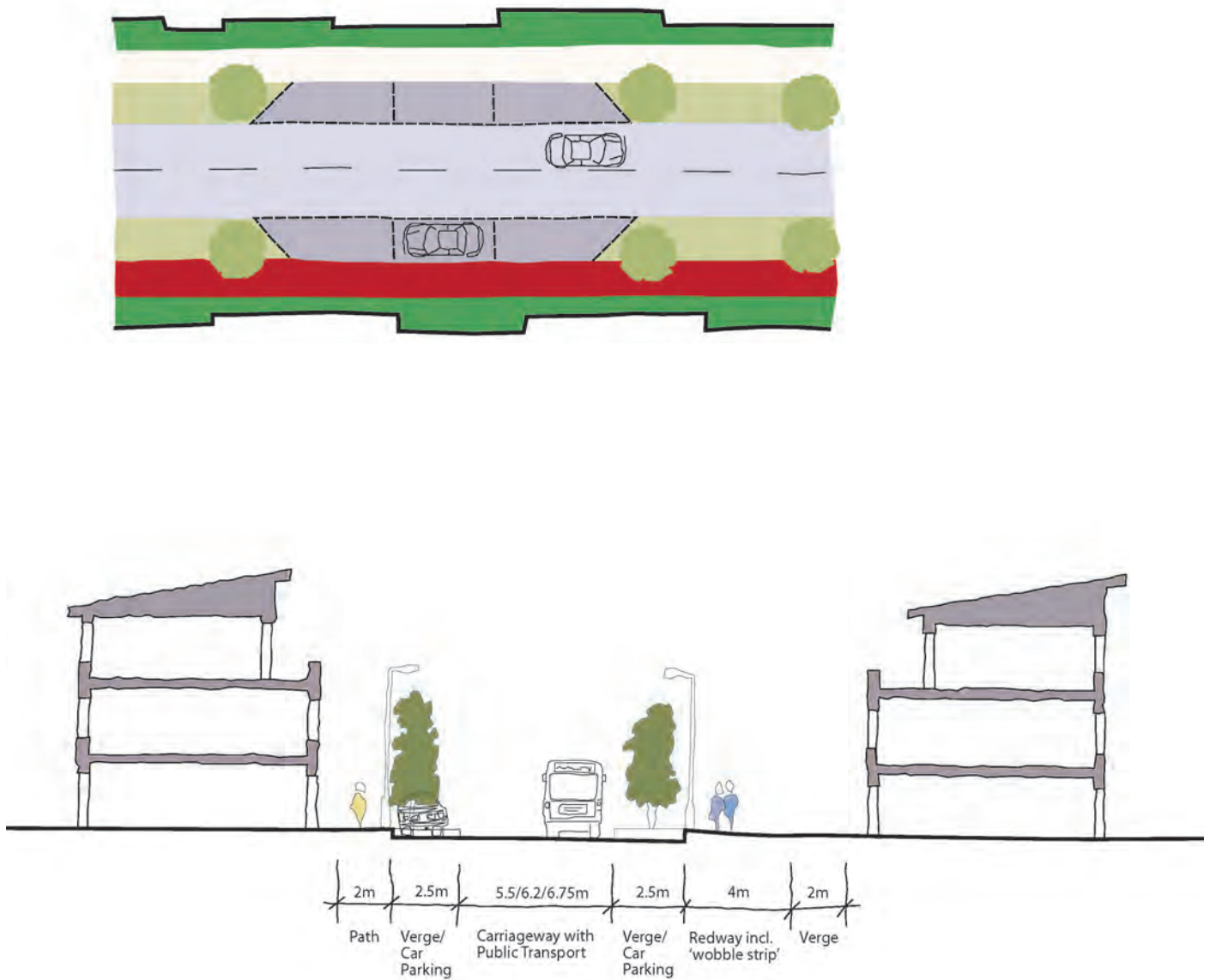
Primary streets that are bus routes should generally be straight and feel like more significant streets



Tree lined primary street.

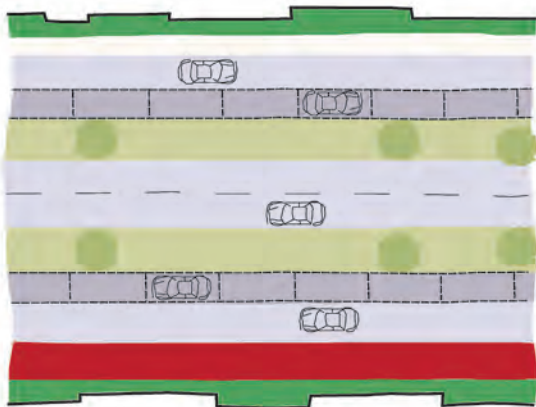


This primary street bends too much, is not green enough and does not give the impression of being at the top of the development's street hierarchy

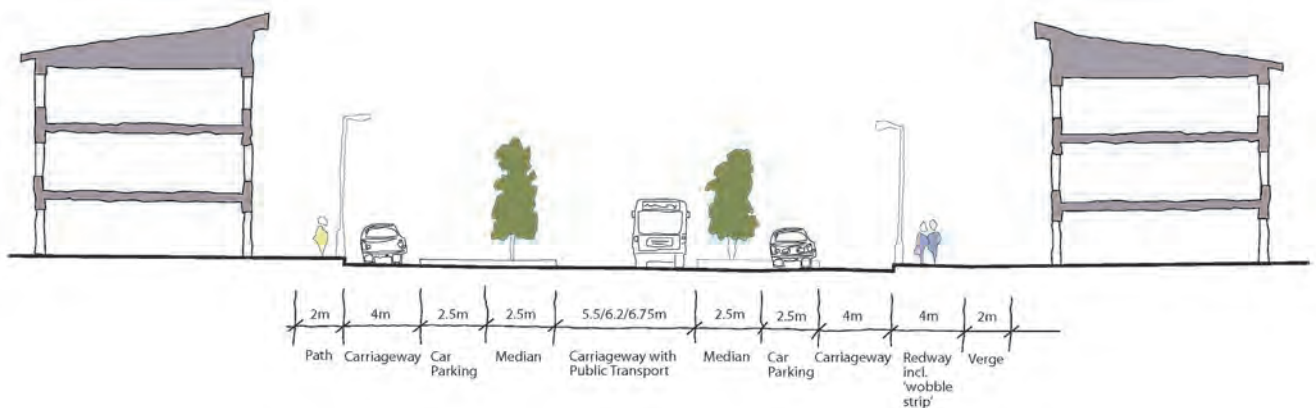


Illustrative plan and section of an avenue

3.7.42 An alternative form of street to the avenue is the boulevard. This street type has a central roadway for through traffic, together with access roads serving frontage properties. The central roadway is separated from the access roads by a planted median. On-street parking is provided along the access road. This street type is particularly appropriate where the volume of traffic would normally preclude frontage access to buildings.



Conniburrow Boulevard



Illustrative plan and section of a boulevard

Residential Street

(Street types 6,7,8,9)

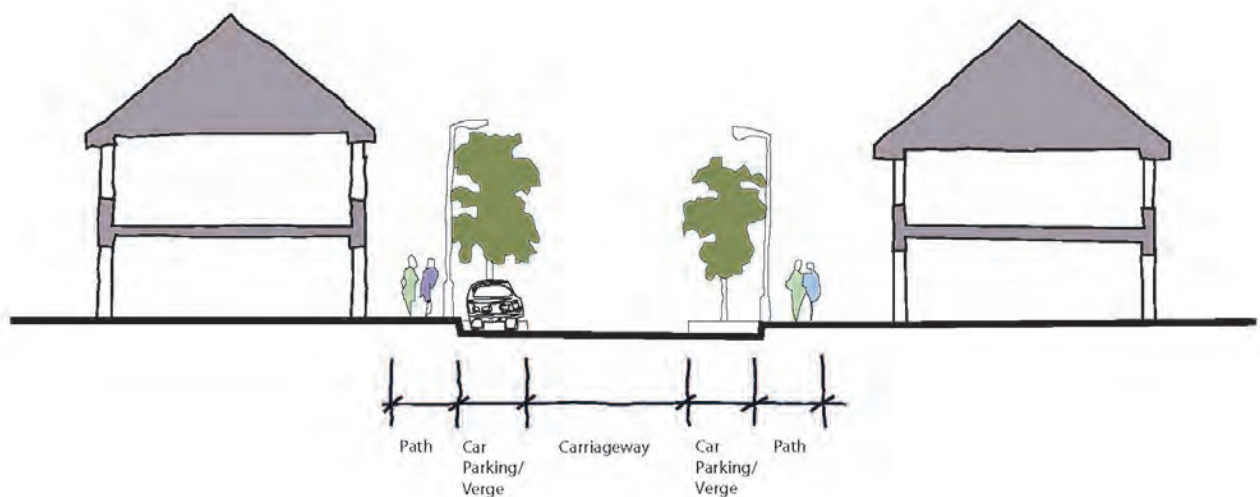
- 3.7.43 A 'residential street' is designed to serve residential properties and is not intended to carry through traffic, including buses. It will be characterised by a carriageway and footways (on either side of the street for streets with homes on both sides).



Grange Farm - example of a residential street



Example of a residential street



Level Surface Streets

(Street type 10)

- 3.7.44 Level surface streets are defined as “A street surface with no level difference to segregate pedestrians from vehicular traffic”(DfT Local Transport Note 1/11, October 2011).
- 3.7.45 In an appropriate setting, the benefit of level surface streets is that firstly, they provide for a better quality pedestrian environment by giving over a greater part of the street for the use of pedestrians, and secondly, it allows for a variety of character to occur across a development.
- 3.7.46 Level surface streets have not however always been seen as successful environments to live on in Milton Keynes for the following reasons:

- No areas of the level surface street have been set aside for pedestrians who do not feel safe using the carriageway (e.g. young children, the elderly, disabled and partially sighted);
- Streets without a combination of footways and required design features have been labelled shared streets without achieving an appropriate shared space environment;
- Too much through traffic because inappropriate street selected as level surface street (too connected, too long and serving too many houses);
- Lack of adequate defensible space to the front of properties;

- No clear delineation for cars to park and hence parking in inappropriate places has occurred;
- Too narrow which has been exacerbated by lack of ‘designed-in’ on street parking that together have not allowed easy access through for emergency and waste vehicles;
- Lack of speed restraint measures.



Level surface street too narrow, with poorly defined and overly sinuous edges resulting in vehicles overrunning the carriageway and being unable to pass through when cars are parked in the street.

Key Design Principles

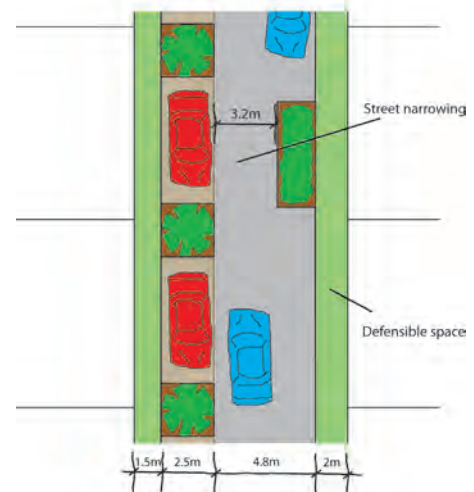
3.7.47 Level surface streets as part of new residential developments will therefore only be acceptable in Milton Keynes if the following criteria and design guidance are adhered to. These have been informed by national policy, lessons learnt as well as surveys of residents who live on level surface streets:

Location and Design Speed

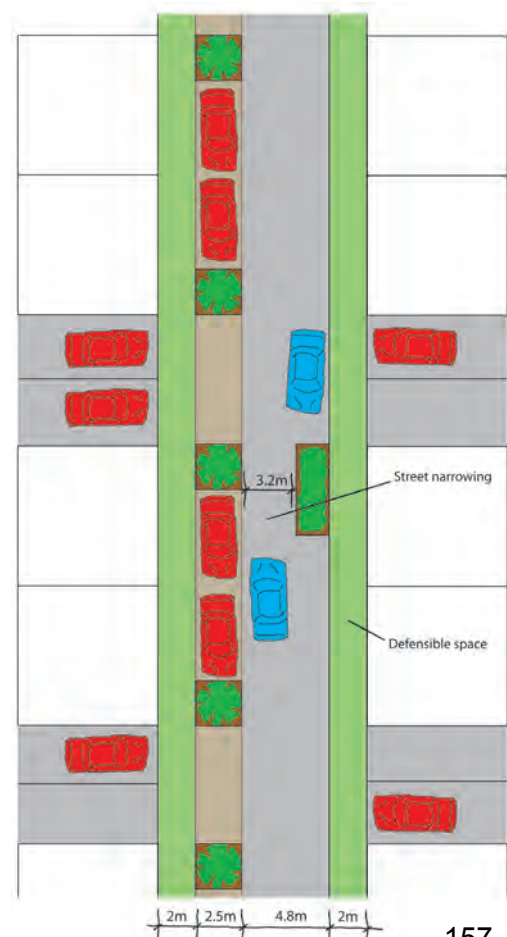
- They are most appropriate for streets at the lowest end of the hierarchy and should not be subject to vehicle flows greater than 20 vehicular movements per hour (which equates to a street serving a maximum of 25 houses);
- They must not occur off higher level streets such as primary streets (street types 1,2,5). They should rather occur off secondary (residential) streets (street types 6-9);
- They are designed to a maximum 15mph speed and hence the layout must be such to ensure that this speed limit is adhered to.

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;
- Anything located within the defensible space should be a maximum of 0.6m high to provide sufficient visibility for small children..



Illustrative layout of level surface street showing designated parking areas



On-street Parking

- Parking spaces must be designed into the street to minimise the opportunity for inappropriate parking and be clearly delineated through contrasting colour paving material;
- On-street parking (as in all cases) will be unallocated if placed within the adoptable highway.



Level surface street with planting and places to park

Width

- The level surface street must be sufficiently wide that it can at the very minimum accommodate on street parking (where appropriate) and a clear route for large vehicles areas to pass through unimpeded. A swept path analysis must be undertaken to ensure that this can occur. Appropriate visibility splays must also be achieved;

- As a general minimum, all level surface streets should allow for 2 way traffic with a minimum carriageway width of 4.8m;
- The location and design of utilities must be discussed at an early stage with the Council.

Variations in carriageway width occur primarily because of 2 factors:

- The additional inclusion of right angled parking which requires 6.0m for reversing;
- Narrowings. In order to improve the overall environment of the street for the pedestrian as well as slowing traffic down, the 4.8m carriageway can be narrowed for short stretches to a single lane that still allows for the largest required vehicles to pass through. This should not occur for stretches longer than 5m. Pinch points can typically occur through planters, trees, kerbed islands or bollards.



Good quality level surface street - New Hall, Harlow

Drainage Channels

- Drainage channels should be located so as to avoid unintentionally demarcating either footways or parking, neither intended for that purpose.



Drainage channels leading to confusion as to whether parts of the level surface are for parked cars or footpaths

Speed Restraint Measures

- In order to improve the overall environment of the street for the pedestrian, various speed restraint measures should be included in the design to slow traffic down to maximum speeds of 15mph. There are various ways of achieving this:
 1. Designing the layout of development to ensure streets including building lines have significant variation in horizontal alignment (i.e. creating bends in the street)



Wide level surface street that accommodates on street parking, street trees and space for through traffic

2. Where the building line remains predominantly straight, horizontal deflection of the carriageway can be caused by (in preferential order):
 - Enclosure of the street
 - Trees and Planting
 - Planters
 - Other street furniture such as bollards and lighting
 - Narrowings
 - 'Designed-in' car parking spaces at different angles with different surface material (to create chicane effects)

Given the required design speeds vertical traffic calming measures would not normally be acceptable.

Materials

- In order to emphasise their difference from conventional streets and thus help to vary the character across a development, level surface streets must be surfaced in block paving rather than blacktop asphalt. Research undertaken for Manual for Streets has furthermore shown that block paving rather than asphalt surfaces helps reduce traffic speeds.



Level surface streets frequently include highway verges. In this example it would have been better for the soft verge to have been a continuation of the block paving to make a wider carriageway.

Speed Restraint

- 3.7.48 In new residential developments speed restraint should be achieved by the horizontal alignment of the carriageway and by incorporating changes in direction and/or priority. In addition to this, the location of buildings or other vertical features close to the carriageway, as well as the careful use of materials and landscaping can further reduce the ability or temptation to drive at inappropriate speeds.
- 3.7.49 Features such as build-outs, islands, false roundabouts, pedestrian refuges, road narrows (pinch points), chicanes, gateways, table junctions, traffic islands, overrun areas, mini roundabouts and small radius bends can all be used as part of speed restraint proposals. Some of these features can also be used for traffic calming schemes on existing roads.
- 3.7.50 On-street parking in a variety of forms can also usefully traffic calm streets.



Right-angled parking can serve as a traffic-calming feature

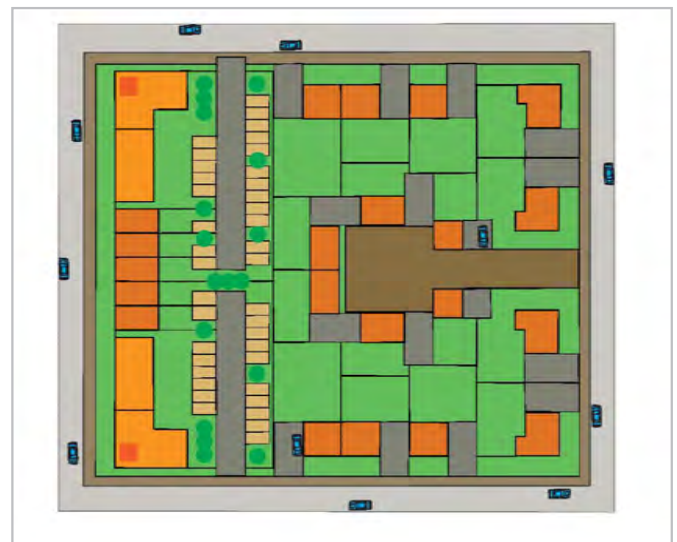
Culs-de-sac

- 3.7.51 Many older estates and developments built up until the late 1990s in particular in Milton Keynes are characterised by numerous culs-de-sac and they represent environments many people choose to live in.
- 3.7.52 They are useful where through routes aren't allowed, where larger blocks are desirable or where there are any topographical, physical features or boundaries that prevent streets connecting up. They may also be used in low density areas where they can help accentuate the quiet nature of the area.
- 3.7.53 For culs-de-sac to complement the overall movement network and neighbourhood / development they should adhere to the following principles:

- They should be located within a wider connected movement network for ease and choice of access across the wider development;
- They should be arranged and designed such that they don't overly concentrate traffic impact on a small number of dwellings (those at the end of the cul-de-sac that joins the wider connected network);
- They should not be arranged and designed such that they reduce legibility and wayfinding across a development;



Culs-de-sac have been used to break up a larger block of approx 110m x 110m in Bradville

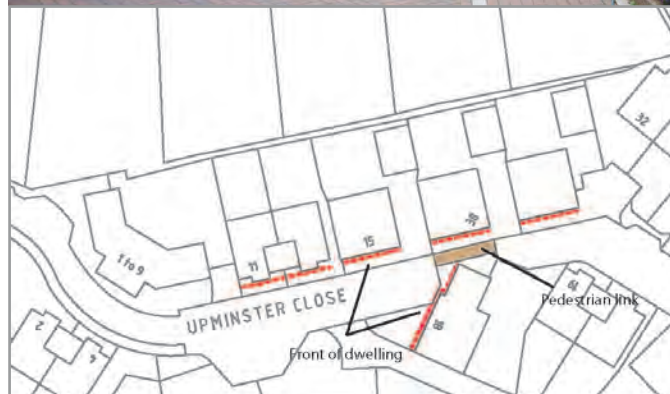


Single, short and direct cul-de-sacs are permissible to break up large blocks. They are also useful where through routes are not possible

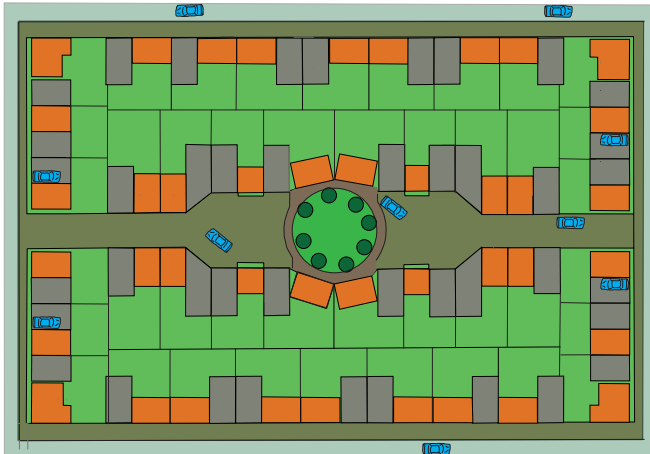
- As a rule, there should be no segregated pedestrian routes emerging from cul-de-sacs. They should be closed. Research shows that closed culs-de-sac have reduced crime than open ones with footpaths leading off them;
- Where footpaths off cul-de-sacs are deemed acceptable, or where appropriate are to be encouraged, is when it creates a shorter route to a destination by foot/cycle than by car. 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;
- 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;
- Careful consideration needs to be given to how large vehicles will turn at the end of culs-de-sac. Turning areas could for example be designed around an attractive open space or a parking court.



Not a good example of a footpath connecting two culs-de-sac - it passes right in front of someone's front door, not feeling very public



Upminster Close - short linked cul-de-sac with good natural surveillance of pedestrian link

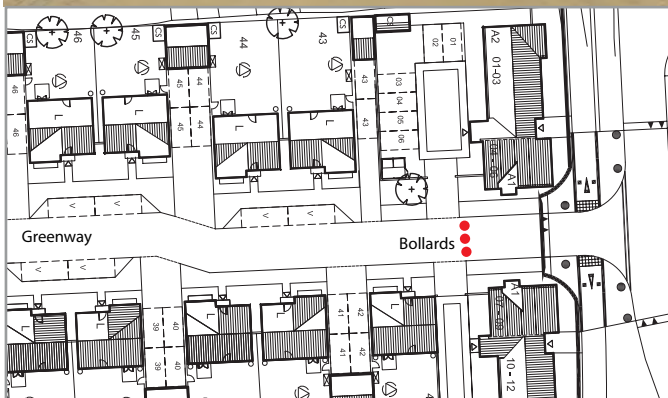


Cul-de-sac with turning area designed around a parking court - Greenleys

Open space designed into layout to provide safe pedestrian link between two culs-de-sac



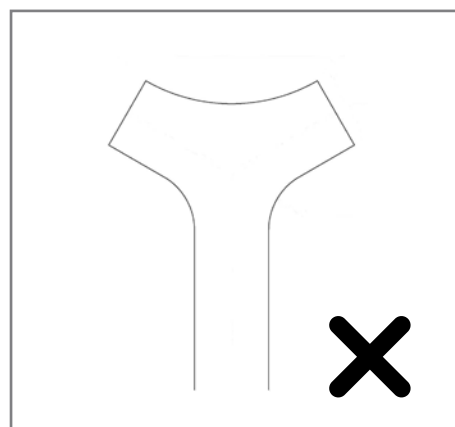
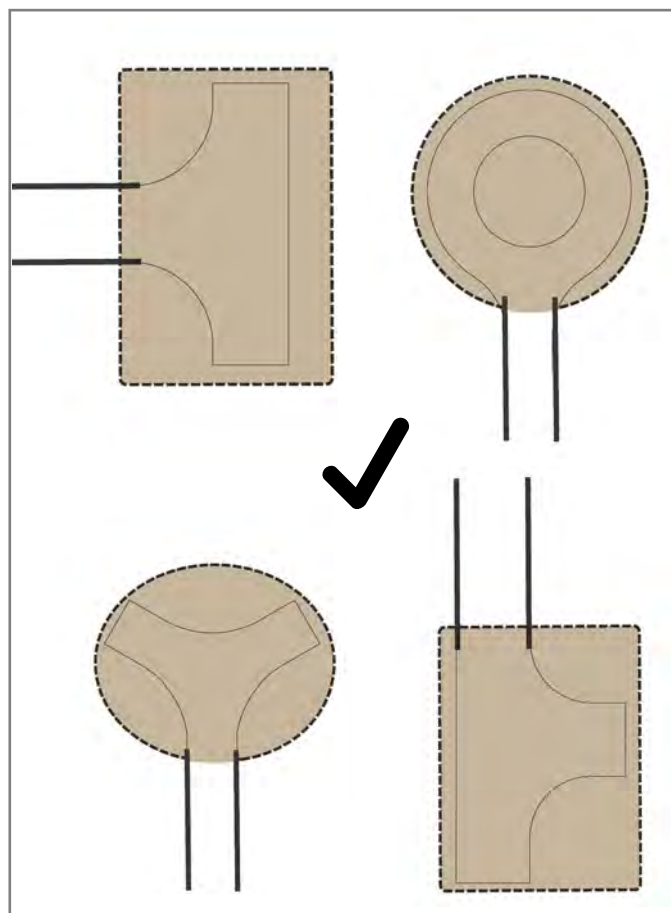
Courtyard designed as a cul-de-sac



Greenway - short linked cul-de-sac with good natural surveillance of pedestrian link

Servicing & Manoeuvring

- 3.7.54 Residential developments sometimes require servicing by large vehicles for things such as refuse collections, deliveries of mail, milk, parcels and larger items including removal lorries. The design of road layouts should take into account these servicing needs; however provided that the road layout has been carefully designed they can all be accommodated.
- 3.7.55 Residential roads and streets should provide adequate access for emergency vehicles and in 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.
- 3.7.56 Access for refuse collection vehicles should be provided to within 25m of collection points for houses and within 9m of grouped stores for flats or apartments.
- 3.7.57 To assist the movement of larger vehicles, all new culs-de-sac should terminate with either loops or turning areas, which allow these vehicles to perform a 3-point turn.
- 3.7.58 The location, layout and availability of turning areas will determine how well used they are. For this reason the layout of residential developments should discourage inappropriate parking within, or close to, the turning area. The most effective way of preventing parking within turning areas is to locate accesses or separate visitor parking spaces adjacent to them and to provide adequate parking to nearby dwellings.



- 3.7.59 The turning space provided should relate to its environment, not specifically to vehicle movement (see diagrams above). 164

3.8 Block Principles

- 3.8.1 Buildings must be arranged whereby they face outwards with a public front and private back. This typically takes the form of a perimeter block with buildings fronting a public street and their backs secured by other private space.
- 3.8.2 This arrangement also meets the needs of 'Safer Places' which states that *"access to the rear of dwellings from public spaces, including alleys should be avoided - A block layout with gardens in the middle is a good way of delivering this."*
- 3.8.3 A perimeter block can take on a variety of forms; the key point is that whatever layout is proposed it must provide for a clear public front and secure private back. Sites must be masterplanned so that their block and movement network accommodates these two principles.
- 3.8.4 As a rule, if a block is divided by a through-route (i.e. has two entrances), it must be designed as a clear public route with active frontages on both sides – there must be no ambiguity as to whether it is a public or private space. If active frontages can't be achieved on both sides it would be better to turn this route into two culs-de-sac which by definition are more private.



A poor example of a public street in Broughton (see photo of same street below)



Poor example of a public street - with no ground floor active frontages

Blocks with one side that have no permitted front access for vehicles

3.8.5 In Milton Keynes there have been streets within new developments that have not permitted any access for vehicles from the front. This has been for reasons of the strategic importance of the route, the volume of traffic and/or the inclusion of bus lanes. In this case, parking must be accessed from the rear. In order to create active frontages to all sides of the block and attractive streets, the following solutions can be explored:

- Dual aspect housing types;
- Parking for frontage dwellings provided within cul-de-sac;
- Parking for frontage dwellings accessed off street fronted by “flats over garages (FOGs)” or “flats over parking (FOPs)”.



Parking for frontage dwellings provided within cul-de-sac

3.8.6 If it is anticipated that cars will park on the street to the front, parking should be designed into the streetscape so as to avoid parked cars impacting negatively on the strategic nature of the vehicular route.



Accordia dual aspect type unit

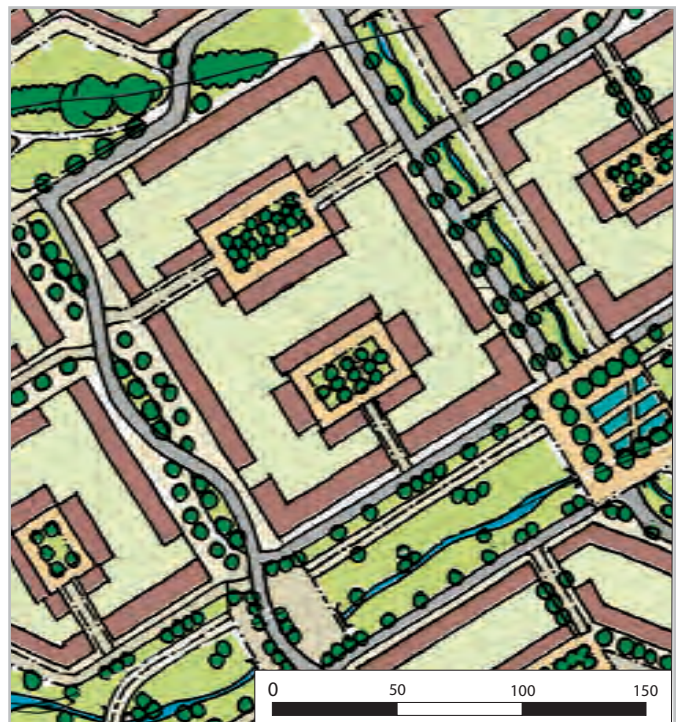


Block with FOG/FOPs fronting street at back

- 3.8.7 Block dimensions can and should vary in size as this is a good means of creating variety, interest and character across large sites in particular and should therefore be thought about at the overall masterplan level. Block width is the important dimension and should generally be in the range of 35-110m (while length should be between 60-110m).
- 3.8.8 Small blocks provide good pedestrian permeability and provide more locations for on street parking and are thus more appropriate in higher density areas close to shops, facilities and public transport which also coincides with a predominance of terraced units. Larger blocks (at the upper end of the above ranges) are more appropriate in lower density areas.
- 3.8.9 Thin blocks (approximately 35-40m in width) are largely achievable in traditional layouts where private rear gardens back directly onto each other. Care should however be taken to avoid numerous thin blocks in a row as this can result in little active frontage along the side street especially if corner buildings do not sufficiently turn the corner.
- 3.8.10 Larger, square blocks can be achieved through the incorporation of short, direct culs-de-sac or a variation of this being housing proposed around a front parking square.



Numerous thin blocks can create inactive frontages along side streets and should be avoided



Conceptual drawing showing large blocks with culs-de-sac designed around front parking courts or open spaces

3.9 Housing Typologies

3.9.1 Most housing in new residential developments can utilise 5 different forms:

- Narrow frontage types;
- Wide frontage types;
- L – shaped types;
- Dual aspect types;
- Bungalows;
- Flats.

The narrow and wide frontage housetypes can be arranged in detached, semi-detached and terraced forms.

3.9.2 Depending on which type is used it will have an important impact on the following elements which contribute to the layout, quality and identity for a development:

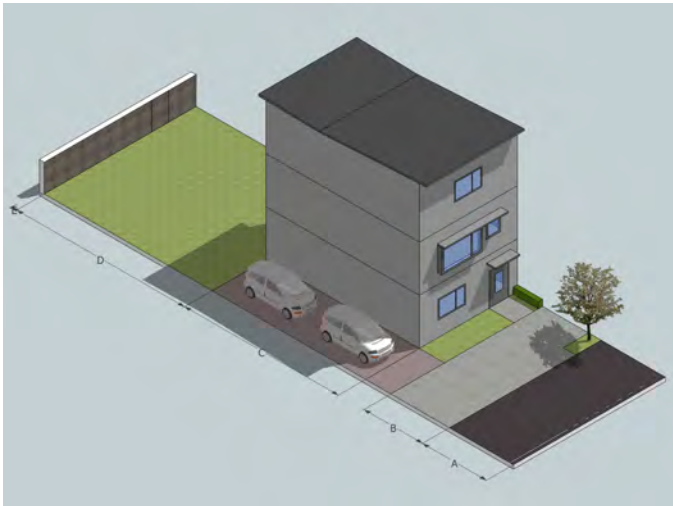
- On street parking and quality streetscape;
- Allocated parking and ease of use;
- Quality of housing frontage (in terms of the extent to which firstly the front garden/ defensible space is dominated by hardstanding and or cars and secondly, the extent to which the house is setback from the street and the relationship it therefore can have with the street);
- Continuity of built form along the street and hence enclosure.

3.9.3 The 5 housetypes and impacts on these above elements are illustrated and explained below. It is not intended as a set of rules to enable 'rubber stamping' of compliance, but rather as guidance to enable balanced and valued judgements.

	Narrow frontage	Wide frontage	L-shaped corner units	Dual aspect types	Bungalows
On street parking	No on street parking if part of terrace. Individual bays can be accommodated if allocated parking occurs to side of house (semi-detached units).	Yes	Yes, if sufficient spacing between units.	Yes	Yes, if allocated parking to the side of house.
Allocated parking	Either to the front or to the side.. Front parking courts.	Either to the front or to the side.	To the front of the house.	In car port to the rear underneath accommodation	Either to the front or to the side.
Quality/greenery of housing frontage	Very limited unless parking located to the side of house (very difficult as part of terraces)	Can still be achieved	Can still be achieved	Can still be achieved	Can still be achieved
Setback	At least 5-6m if part of terrace so fairly poor street enclosure. Better enclosure if parking occurs to the side.	At least 5-6m if part of terrace so fairly poor street enclosure. Better enclosure if parking occurs to the side.	Part of building can protrude forward of parking, so reduced setback and better enclosure.	Choice of setbacks and hence enclosure can be delivered.	By definition bungalows create reduced enclosure.
Continuity of frontage (and hence enclosure) along the street	Poor if parking only occurs to the side	Poor if parking only occurs to the side	More continuous built form created. Has potential to provide active frontage to two streets, when located on corner plot.	More continuous built form can be delivered	Poor if parking only occurs to the side

Table: Housing Typologies

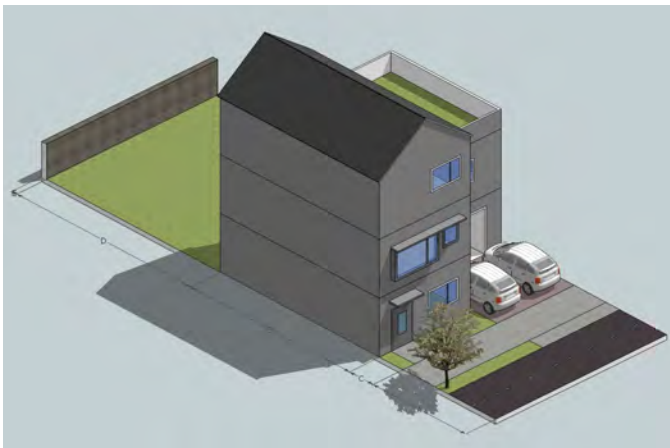
Note: Flats is another housing typology. However, there are too many variables relating to the design of flats to include them within the table.



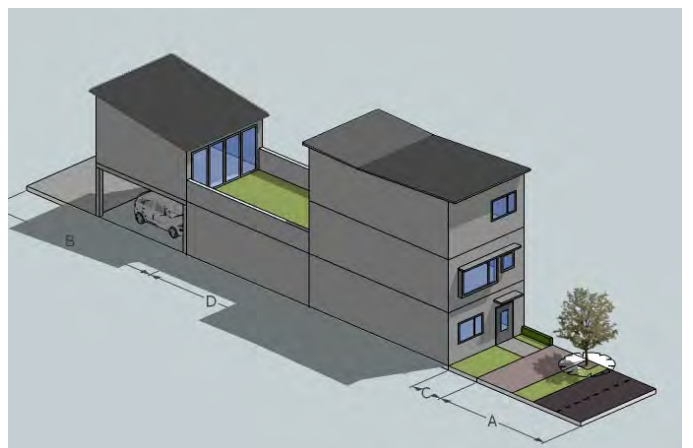
Narrow frontage



Wide frontage



L-shaped corner unit



Dual aspect type



Bungalow

3.10 Parking

Parking Standards

3.10.1 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:

- These standards show the minimum requirement for parking provision;
- Garages do not count as parking spaces;
- 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;
- Detached homes with 5+ bedrooms will generally be expected to have at least 2 on-plot, independently accessible parking spaces.

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, 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).
- 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.
- There is no maximum requirement;
- Parking for flats should be clearly and suitably signed from all approaches.

Car Parking Locations

3.10.2 The location of car parking has an important influence on block structure and is therefore included in this section on "Building a Place". It has a fundamental influence on the quality of a development, the streetscape in particular, and is a significant factor in the desirability of a place to live. Location of parking is one of the most prominent issues in pre-application discussions.

3.10.3 The National Planning Policy Framework has given local authorities increased autonomy to establish their own parking standards according to its own context and particular circumstances.

3.10.4 In Milton Keynes, an increasingly common problem associated with new developments (and in particular terraces) is cars parked on verges, on pavements and on streets that are not designed to accommodate parked cars. This is partly because car ownership is higher than average in Milton Keynes. More importantly, however, rear courts, which have to date generally been the chosen form of allocated parking (particularly for terraces), have not been well used by residents. This is due to a number of factors:

1. Parking spaces are too remote from the front door;
2. Rear parking court feels unsafe/insecure;
3. Rear gate of garden is not lockable from both sides (hence is often not practical possible to use);
4. No footpath through rear garden further discourages use;
5. Surveillance of the rear parking area blocked by garden fences.

3.10.5 The result of parking on verges, on pavements and on streets that are not designed for on-street parking is:

1. Bin lorries and emergency vehicles cannot get through;
2. Unsafe streets are created because, for example, sightlines are blocked;
3. Cluttered and “untidy” street scenes;
4. Verges becoming unsightly which further undermines the streetscape;
5. Footpaths become impassable.

3.10.6 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.

Hierarchy of Preference

3.10.7 For these above reasons, the following hierarchy of preference should be adhered to when providing car parking for new residential developments:

1. On plot, located at the front or side of the dwelling;
2. On street to the front of dwellings;
3. If 1 and 2 above can't be achieved alternate methods of providing parking should be discussed at an early stage with the Council.

3.10.8 The following sections provide guidance and solutions on how to accommodate parking.

On Plot Parking

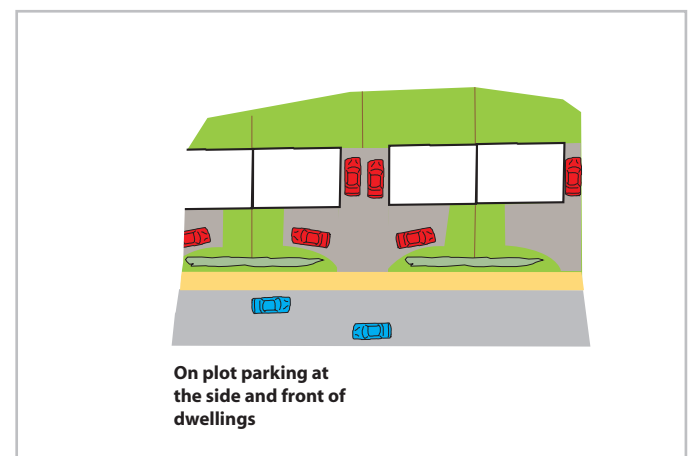
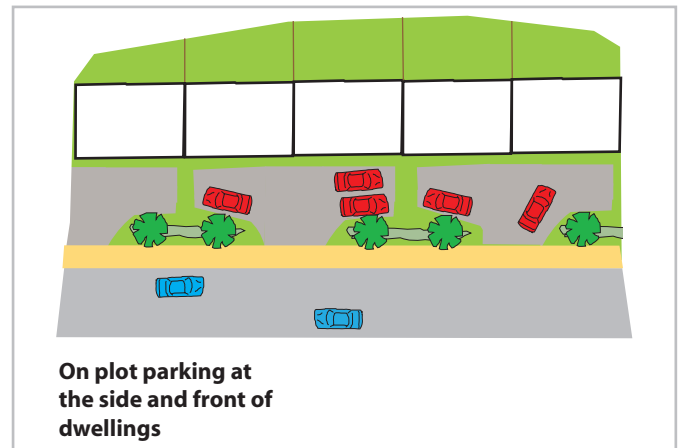
3.10.9 On-plot parking can be provided:

- to the side of dwellings (in front of garage or on hardstanding);
- as a "drive through" to hardstanding within the rear garden; or
- to the front as right-angled, or parallel parking.

3.10.10 This is a very common and acceptable way of accommodating parking for detached and semi-detached housing.

"Drive Throughs"

3.10.11 These are in effect car ports but are open at the back to allow parking either within the building and/or within the rear garden. The advantage of "drive throughs" to hardstanding



Independently accessible on plot parking spaces

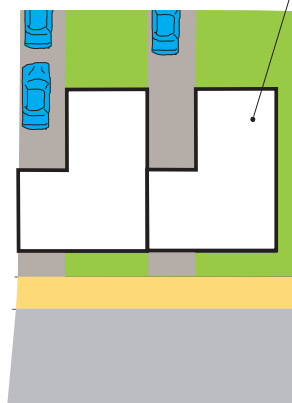
or garages in the rear garden is that continuity of frontage can be maintained whilst retaining on-plot parking. 1.8 metre high fencing or walling is required around the parking to provide security to the rear garden. Minimum width should be 3.5m.

3.10.12 “Drive throughs” to hard standing within the rear garden can create blank frontages and make ground floor internal layouts less



Drive-through parking within rear garden

Reduce visual impact of parked cars



Drive-through on plot parking accessed from the front

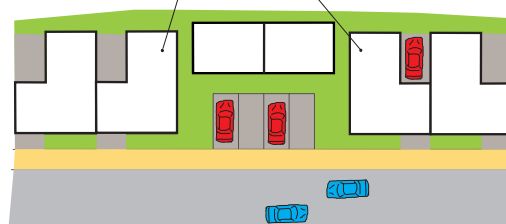
practical, and therefore need to be designed with care. They are best incorporated within wide frontage dwellings, which enables “active rooms”, such as living rooms and kitchens, to still be provided fronting the street at ground floor level.

3.10.13 Where “drive throughs” are incorporated in narrow frontage dwellings, balconies or bays at first floor level are one useful means of creating interest and activating the frontage. They must have active ground floor frontages on the other side of the street to provide overlooking of the drive through.

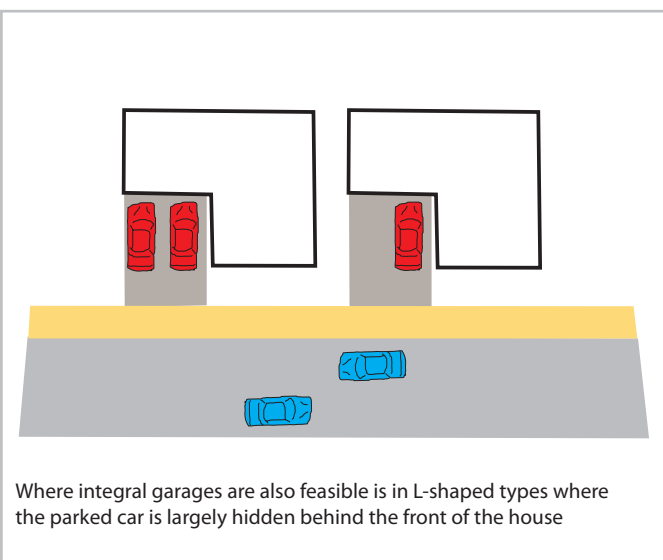
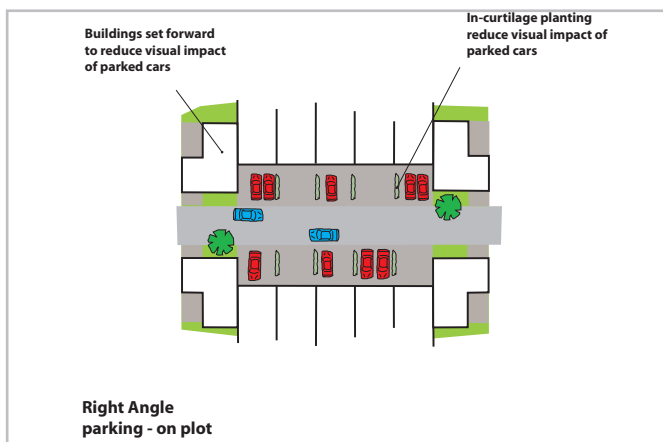
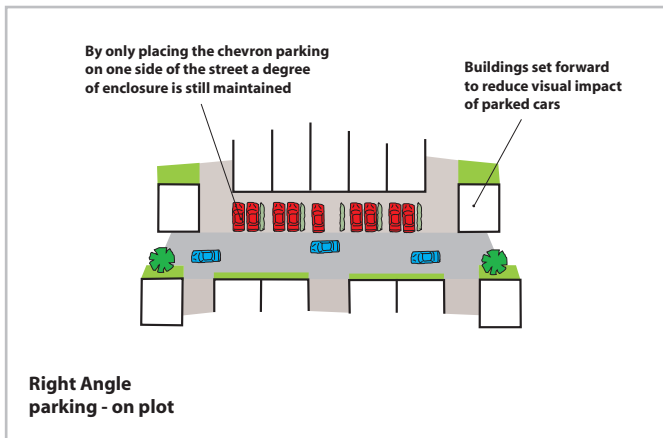


On-plot parking to the front

Adjoining buildings reduce visual impact of parked cars



Front parking - on plot



Right-angled Parking to the Front

3.10.14 A variation of the on-plot parking solution is the provision of right-angled parking to the front of the dwelling. In the examples opposite, the cars are parked within the curtilage of the properties and therefore constitute allocated spaces. It is important to note the annotations on each of the sketches as they hold important design information. Right-angled parking could include an integral garage but then wider frontage types (9-11 metres) are encouraged.

On Street Parking

3.10.15 On-street parking has a number of benefits, including:

- assisting with speed restraint as part of an overall package of elements that together affect driver behaviour;
- adding vitality to the street;
- acting as a buffer to pedestrians on the pavement from passing traffic;
- making efficient use of land, as the street provides the means of access and parking spaces are shared.

3.10.16 On-street parking should be built into the layout design and should be clearly defined, through use of different surfacing materials, kerbs, street furniture and/or planting.

3.10.17 Where possible, parking should be provided in groups of 3-5 bays. If there are more than 5 bays in a row they should be broken up by landscaping.

- 3.10.18 Visitor parking must always be provided on-street.
- 3.10.19 On-street parking can be provided in two different configurations: **echelon or parallel.**
- 3.10.20 Where echelon or right angled parking is used on higher level streets, buildings need to be taller to compensate for the wider street. Landscaping should also be used to break up the possible visual dominance of the cars.
- 3.10.21 Parallel parking can either occur adjacent to the carriageway or within the carriageway. 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.
- 3.10.22 Wide frontage housing (9-11m) allows a greater percentage of on-street parking to be provided and is an important consideration when designing layout and housetypes (see section 3.8 on housing typologies).
- 3.10.23 Streets with single-sided development, facing open space, provide opportunities to accommodate on-street 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.
- 3.10.24 In order to try and encourage more on-street parking and reflect where Milton Keynes residents like to park, the Design Guide outlines three more innovative, less conventional, ways of providing parking on street which it is hoped developers will build into their layouts.



Parallel parking within the carriageway -Woburn Sands

“Parking Streets”

- 3.10.25 Developments should include carriageways wide enough to allow parallel parking on both sides with space between for two cars to pass. Street trees within the pavement will reduce the visual impact of parked cars.
- 3.10.26 It has often been a challenge to fit in on street parking spaces when numerous detached and semi-detached houses are included in a layout because of the requirement to accommodate and keep open private drives onto the carriageway. Individual parking bays are generally not supported where the footpath diverts its alignment continually to get around them. The sketch opposite however shows that where wider ‘Parking Streets’ are incorporated into a development, individual parking bays can be incorporated between driveways with the footpath remaining on its existing alignment. Two designs can result, either a tree can be included at the front and back of each parking space or the parking spaces can be delineated with a different material. In both cases, but particularly the former, the features still result in traffic calming if the cars are absent.



Public Squares

3.10.27 Public squares have the benefit of incorporating parking within a space which can also provide townscape and recreational benefits. The square can be used to provide parking for residents within an adjacent busier street. In more formal layouts, parallel parking can be arranged around a landscaped central space, which could be in the form of a square or circus. In more informal layouts, parking can be provided within a predominantly hard-surfaced space.



Example of formal public square layout accommodating parking around its edge



3.10.28 Public squares must be designed into the layout at the masterplanning stage – it is not advisable to try and retrofit them into a layout at a later stage.

Central Reservations

3.10.29 Parking can be provided within a central reservation with cars arranged both sides of a strip dividing traffic flows. Landscaping should be provided to reduce visual impact.

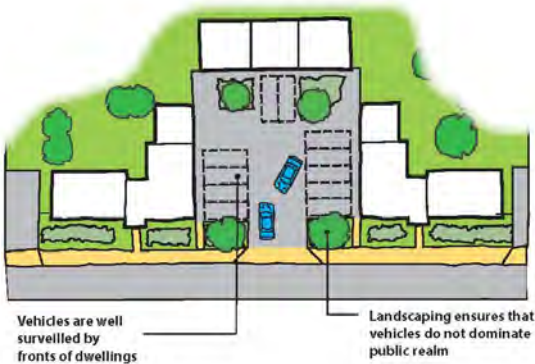


Parking in the central reservation - Oxley Park



Front Parking Courts

3.10.30 These are in effect rear parking courts located at the front where people like to park and where parking can be overlooked and be close to front doors.



Rear Parking Courts

3.10.31 Rear parking courts have proved unpopular as parking choices for residents and are therefore not supported as a parking option in Milton Keynes. It is however accepted that for certain streets, frontage access for vehicles from the street can't be achieved or is not permitted. In these cases small private and secure rear parking courts may therefore be required. The Design Guide does therefore in Appendix D outline guidance on what makes for a good quality rear parking court.

Car Ports

3.10.32 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.'

Parking for Leisure Uses

3.10.33 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.

Size of Parking Space

3.10.34 Parking spaces should normally be a minimum of 5 metres by 2.5 metres (diagram 1). Where the parking space adjoins a wall/ fence (diagram 2) or dwelling (diagrams 3 & 4) additional space should be provided. 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.

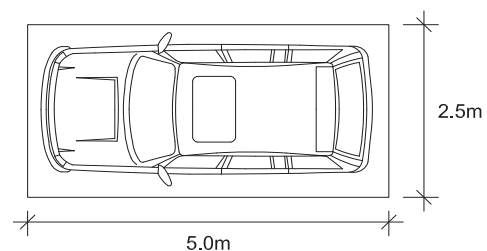


Diagram 1: Parking space

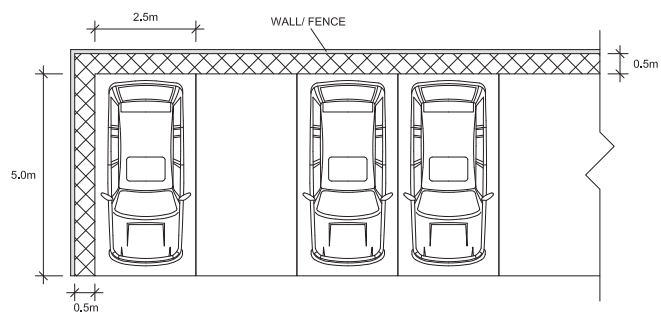
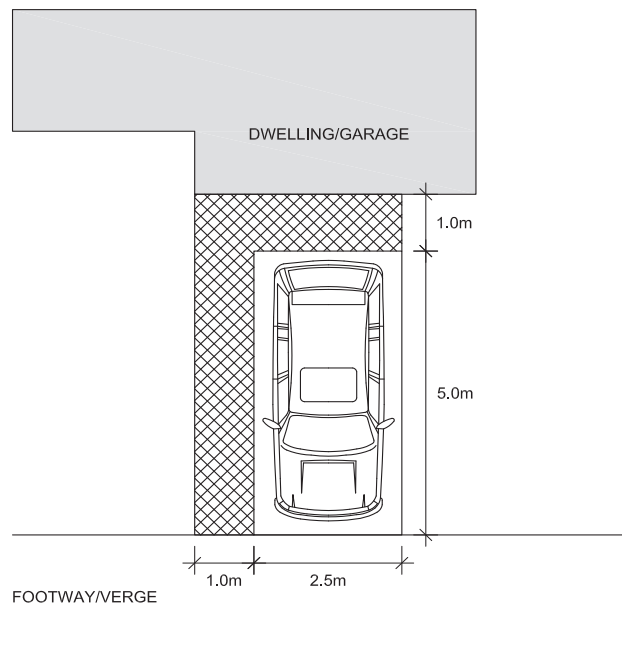
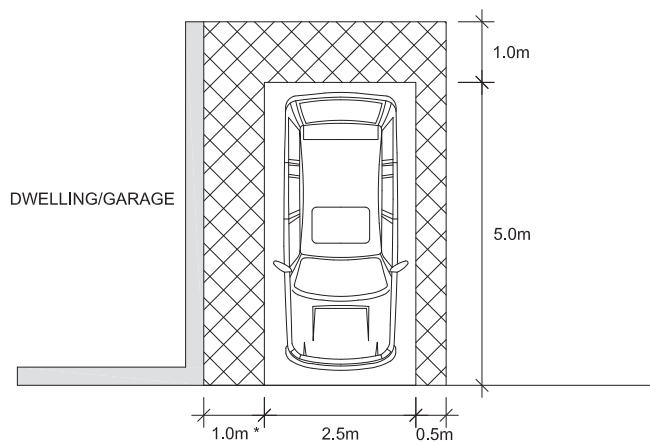


Diagram 2: Parking spaces adjoining a wall or fence



Diagrams 4: Parking space adjoining a dwelling/garage



* 1.0m if required for access to rear of dwelling. Can be reduced to 0.5m if no access is required.

Diagrams 3 :Parking space adjoining a dwelling/garage

Cycle Parking

3.10.35 Providing enough convenient and secure cycle parking at people's homes for both residents and visitors is critical to increasing the use of cycles. Cycle parking needs to be considered at the outset and should be within a covered, lockable enclosure. For individual houses, this could be in the form of a shed or garage. For flats, either individual lockers or cycle stands within a lockable, covered enclosure are required. The cycle parking should be secure, easily accessible and convenient to use.

3.11 Landmarks, Vistas and Focal Points

3.11.1 Key focal points and gateways can be marked by buildings, public art or distinctive landscaping. Landmarks help to emphasise the hierarchy of a place, with the most important buildings being located at the main centres of activity. They also make it easier for people to navigate their way through an area by acting as markers.

3.11.2 Corners and public squares are particularly appropriate locations for landmarks.

3.11.3 Landmark buildings should be designed to stand out from neighbouring buildings. Their landmark status may be articulated through:

- the building's use;
- its form and appearance (varying roofstyle and bold coloured render, for example); and/or
- an increase in scale or height in relation to adjacent buildings.

3.11.4 The layout of a development can be arranged in two ways in so far as vistas are concerned:

- Streets can be orientated to focus on landmark buildings, in order to close vistas and to aid legibility. Offsetting the landmark building at the end of the vista helps to lead people through the space and increase their sense of surprise;

- In higher density areas in particular, streets can be arranged so that vistas are kept open – this is especially useful if there is an attractive landscape feature within the vista. The inclusion of this openness and greenery in the vista has the effect of making high density 'feel' like low density.



Landmark buildings help people to navigate their way through an area

Section 4 – Detailing the Place

4.1 Introduction

4.1.1 This section discusses and provides guidance on the important elements in and around the home and street that impact on the creation of a high quality environment.

4.2 Flexible Homes

4.2.1 A key requirement of “sustainable communities” is “an urban fabric and individual buildings which can meet different needs over time”. Places need to be adaptable at different levels from the neighbourhood down to the individual home. Developments should be accessible to and inclusive for all potential users.

4.2.2 Within appropriate locations, such as high streets, public squares and corners of busy streets, consideration should be given to designing buildings which are capable of conversion to commercial use. Floor-to-ceiling heights and the scope for enabling independent access to upper floors should be considered to ensure flexibility for conversion to other uses at a later date. Potential future commercial servicing and parking requirements should also be taken into account.

4.2.3 Flexible homes provide the opportunity to cater for a variety of different housing needs and lifestyles within the same building form. They would allow a householder to live in a home for longer periods of time, perhaps over their entire lifetimes, with the dwelling being easily adaptable to changing circumstances. In turn, this will help to promote strong and

stable communities. Examples include people choosing to work from home, and growing families, with several generations living together.

4.2.4 There are a number of ways in which flexibility can be built into new homes, including:

- buildings designed to provide additional future floor space through conversion or extension;
- buildings with capacity for internal flexibility or adaptation;
- unallocated space, which could be used as multifunctional space or for a variety of different uses over time. Such unallocated space might include a room above a garage, basements, or a courtyard that can be converted from amenity to internal space.

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 sustainable homes level 4, developers will need to meet all 16 lifetime 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.

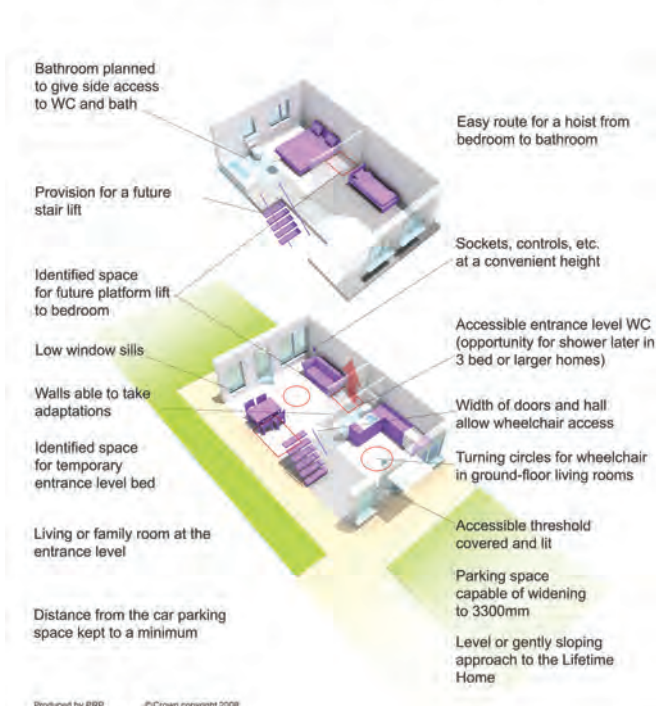
4.3 Community Safety – Physical Protection

4.3.1 Section 3 listed the 7 attributes of safe, sustainable places as identified in Safer Places. Most of them relate to the overall layout of a development. One is however more specific and deals with the dwelling and its curtilage:

- Physical Protection – places that include necessary, well designed security features.

4.3.2 The Secured by Design Standards for new housing include a set of standards relating to the environmental design and physical security of residential developments. Environmental design standards relate to the layout and design of the development. Physical security standards relate to building construction issues, such as doors and windows of enhanced security standards, laminated glass. More information on Secured by Design Standards can be found on the following website: www.securedbydesign.com

Lifetime Homes Diagram



4.4 Creating Designs that are Accessible for All

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.

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:

- Obstacles and protruding elements in the path of travel;
- Low overhanging signs and foliage;
- Lack of warning signs around obstructions.

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:

- Lack of or improper design of street furniture;
- Obstructed pathways;
- Inaccessible street facilities and signs.

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:

- Changes in level and uneven kerbs 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.

4.4.5 Accessible parking facilities should be provided as close as possible to the point of 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.

4.5 Setbacks

- 4.5.1 The setback of a dwelling from the street has a significant impact on the character of the street as it influences traffic speeds, and hence pedestrian amenity of the street, impact on the perception of density and the extent to which the building interacts with the public realm.
- 4.5.2 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.'
- 4.5.3 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.
- 4.5.4 Furthermore, within a more urban area, building lines and therefore setbacks should be more consistent, not varying along the length of a street by more than 2 metres. In lower density areas, building lines (and therefore setbacks) can vary more.
- 4.5.5 Setbacks greater than approximately 4 metres will allow on plot parking to the front. Sufficient planting should be provided to help soften the impact cars may have on the streetscape.
- 4.5.6 For south-facing housing along east-west aligned streets, there may be a case for larger setbacks and hence larger front gardens for solar gain capture.
- 4.5.7 Notwithstanding the benefits of solar capture large front gardens should generally not occur at the expense of small rear gardens.



Different setbacks provide different character



Larger setbacks allow for on plot parking and a softer edge to the street.

4.6 Boundary Treatment

4.6.1 The nature or type of front boundary treatment in particular can add considerably to the character and identity for a development and a street in particular.

4.6.2 It is a fundamental urban design principle to clearly demarcate public and private space and hence appropriate boundary treatments are required. All planning applications should be accompanied by details of treatments for all boundaries - front, side and rear.

4.6.3 Boundaries (particularly front boundaries) should be clearly defined, using appropriate boundary markers, such as gates and gateways, hedges, fences and walls. In some cases, it may be appropriate to mark the boundary between public and private space through a change in hard surfacing or through groundcover shrub planting. This may be particularly appropriate in courtyards, and mews where the objective is to create a more intimate enclosed space. An appropriate use of materials or planting can ensure that pedestrians and motor vehicles are kept away from ground floor windows, thereby protecting residents' privacy. Boundary treatments should respect the required vehicle and pedestrian visibility splays

4.6.4 As a general rule, low walls and/or metal railings are more appropriate as front boundary treatments in more urban areas along higher level streets, while soft planting, hedging and picket fencing is more appropriate in lower density areas which have a more rural character.



Hedges are appropriate boundary treatment in lower density areas



Railings are appropriate boundary treatment in more urban areas



Side boundary walls can be softened through planting 186

- 4.6.5 Lengths of side boundary walls/fencing onto the public realm should be kept to a minimum. Where this does occur “ivy screens” should be considered. They not only soften the wall but can add to the character of the street.

4.7 Continuity of Frontage

- 4.7.1 The degree of continuity of a frontage is an important factor in varying character and density across a development.
- 4.7.2 A building line with few breaks creates continuity of frontage, provides improved surveillance and enclosure of the street as well as a clear public-private interface. A “hard” streetscape can however result and appropriate front boundary treatment and tree planting may be required to soften the streetscape.
- 4.7.3 Continuous frontages are most easily achieved with terraced housing and flats, in other words in higher density areas.
- 4.7.4 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. What is vital though is that through the use of high quality walls, fences and hedging as linking elements between homes a continuous frontage is created to ensure a clear public-private interface is maintained.
- 4.7.5 It is likely in Milton Keynes because of the desire to have on plot parking, that building frontages will generally have larger breaks (i.e. broken frontages will be a common feature).

4.8 Active Frontages

- 4.8.1 The primary means of access for all dwellings should be from the street. This not only makes the street more of a social space but the comings and goings make it feel safer.
- 4.8.2 Frontages should be as ‘active’ as possible particularly at ground floor levels. Rooms such as living rooms and kitchens provide the most natural potential level of surveillance.
- 4.8.3 No blank gables must face onto the public realm and even gables with a single small window will generally not be supported.
- 4.8.4 Long lengths of blank wall, particularly in higher density areas should be avoided as they have a deadening effect on the frontage.
- 4.8.5 The Council has in the past received applications where garages and/or car ports have been utilised to secure perimeter blocks. This results in an inactive frontage and lack of enclosure and will generally not be allowed.



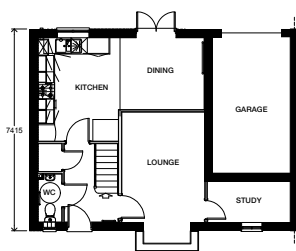
Active frontages

- 4.8.6 Where drive throughs or garages are included in the front elevation of a house, wide frontage (9-11 metre) housing should be used, as this minimises the impact of garages on the streetscape and still allows for active ground floors.
- 4.8.7 On streets with no permissible vehicular frontage access, garages and/or car ports have to be accessed from the rear. Potentially, this could result in the rear elevations of garages or car ports facing the street. This results in a blank frontage and will not be permitted. Some developers have addressed this problem by including a room, typically an office or study, in front of the garage to animate the street elevation (see illustrations below).

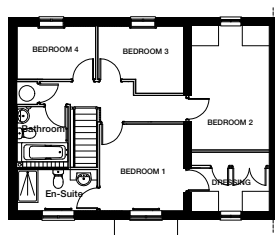
- 4.8.8 All ground floor apartments should, wherever possible, have separate ground floor entrances. As a minimum, there must be a front communal ground floor entrance to apartments from street level.



Dwellings with no frontage access, with garage accessed from rear



Ground Floor



First Floor



Room in front of the garage animates the street elevation

4.9 Turning Corners

4.9.1 Where a building is on a corner, it must 'turn' the corner by providing an active frontage to both streets. The entrance to the building should be on the more important of the two streets, as established through the hierarchy of street types for the development.

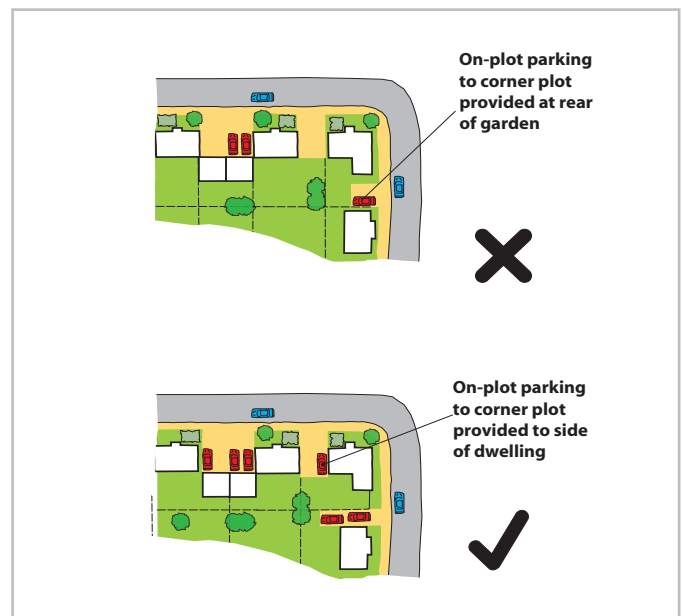
4.9.2 Through the use of single aspect dwellings, corners can be turned effectively whilst still maintaining continuity of built frontage. In order to effectively turn the corner, it may be acceptable to provide a dwelling without garden provision. Corner locations are particularly appropriate for flats, or 'L' shaped buildings with short side boundaries.

4.9.3 Deep plan buildings with long gardens should not be used on corner plots, as these result in a long length of dead frontage along the secondary street. Conversely, wide frontage houses work well on corners as a different garden configuration can allow for the same size garden yet shorter blank side boundary walls.

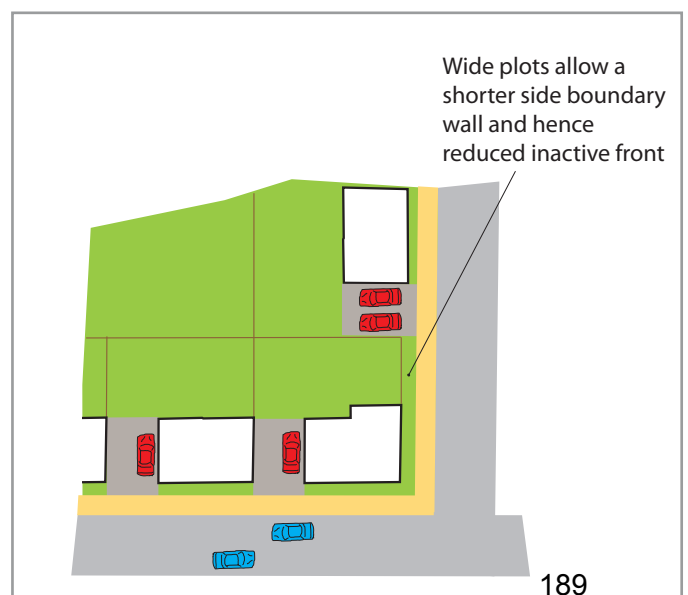


Building turns the corner with active frontage to both streets

4.9.4 Parking for corner plots needs careful designing. 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.



Detached corner houses should, wherever possible, have parking located to the side/front rather than at the rear



4.10 Residential Amenity

Privacy/Back-to-back Distances

4.10.1 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. Where housing is proposed as part of infill development, to avoid overlooking for existing houses, a minimum of 22 metres (back to back) or 13.7 metres (rear to flank) must be applied.

4.10.2 There are a number of innovative solutions that can be employed to maintain privacy including: incorporating single aspect dwellings; creating varied floor levels; staggered facing windows; using louvres or opaque glazing; and high/low level and shaped windows.

Residential Space Standards

4.10.3 In order to protect the amenity and well-being of the future occupants, each dwelling should be adequate for the family or household which is likely to occupy it. New housing is expected to be big enough to meet the needs of the occupants for living, cooking, dining, sleeping, washing and storage of household goods with convenient access to adequate residential amenity space. Developers must show that rooms are functional for their purpose and that dwellings provide sufficient room for storage.

4.10.4 Developers need to be aware that they will be required to meet residential space standards in the following circumstances:

- Any dwelling on HCA land;
- Any dwelling which will attract funding through the HCA;
- Any dwelling which will be an affordable unit managed by a Registered Social Landlord.

Daylight

4.10.5 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.

4.11 Detailed Design Appearance

- 4.11.1 This Design Guide is not advocating and being prescriptive on a particular style of architecture for new residential development in Milton Keynes. The Guide also does not want to constrain design skills and architectural creativity.
- 4.11.2 The Design Guide does however argue that (as stated in Section 2) the detailed design appearance of housing is important in so far as it can contribute to or undermine the character or identity of a development. This is in part because the external appearance of a building creates an important and visual backdrop to the public realm.
- 4.11.3 It also maintains that as a general principle the appearance of buildings should reflect the city's ethos of a forward thinking, innovative, modern and unique city. Policy CS13 of the Core Strategy supports this and states that:

"all new developments should provide a choice of contemporary, innovative and exemplar architecture that reflects Milton Keynes' reputation as an ambitious, forward thinking, innovative 21st century city."

- 4.11.4 These should be particularly encouraged in prominent locations such as key frontages that represent the 'public face' of the city.
- 4.11.5 The over-riding principle for the appearance of the built form is that the buildings are 'of their time and place'. Poor quality pastiche types will not be supported as they do not help create an identity for a development and do not reflect the city's forward-looking ethos.

- 4.11.6 Good contemporary design can sit alongside traditional established development types done in a traditional manner if appropriately designed.
- 4.11.7 Innovation should not however be encouraged where its only merit is to be different for the sake of being different. Conversely, the Council strongly encourages the innovative design of new housing in terms of the role it can play towards the requirement for zero carbon developments.
- 4.11.8 The key with all buildings is good quality, honest architecture - in other words keeping it simple. Much of the guidance below provides advice on how to achieve this.
- 4.11.9 The remainder of this section focuses on various elements of the building envelope that contribute to the composition of the external appearance and help create character and identity for a development. It aims to provide guidance, practical advice and solutions too many of the issues discussed the regarding design appearance of housing that arise at pre-application discussion.



Well designed traditional buildings are acceptable in the right context

Proportions

- 4.11.10 Buildings should be well proportioned. Buildings can be proportioned in a vertical, horizontal or a combination of the 2 manner. This can be achieved through the massing and height of the building, the positioning and shape of windows, elevational materials as well as roofscape.
- 4.11.11 Articulation can add interest to the building and should be provided through recesses and projections which can help create a rhythm for a frontage.



These two buildings have good symmetry and act as 'one'



Poorly proportioned building - there is too much of a gap between first floor and dormer windows



Better proportioned building

Buildings on Key Frontages

4.11.12 These are the buildings that will be seen by the most people and therefore help establish an image for an area. They primarily pertain to the avenues and boulevards as discussed in section 3 or to existing primary streets through a development and need greater attention to design detail. Elements that need to be considered include:

- Height;
- Roof Style;
- Window detailing ;
- Elevational materials (including the use of coloured render);
- Vertical proportions may want to be emphasised to give the impression of height. In this case windows should be designed so that their vertical axis is greater than the horizontal and/or dividing each panel into a series of vertically proportioned glazing panels. Sometimes horizontally proportioned windows can be given more vertical emphasis by incorporating vertically proportioned glazing panels.

4.11.13 In order to reinforce the character of a key frontage, the buildings on both sides of the street should be designed holistically with a small selection of materials so that they can be “read as one”.

4.11.14 Care needs to be taken that the buildings along key frontages blend in visually with buildings in the immediate surroundings, particularly those along the same street. 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.



Buildings either side of a street facing each other should not visually clash. The ground floor render in the contemporary building does however at least give some coherence to buildings on both side of the street

Windows

4.11.15 The position, shape and size of windows has a profound effect on the elevation and are important to consider:

- Care needs to be taken to ensure that the windows are of an appropriate scale to the façade and that each window in the façade has some relationship to each other. Key to this is identifying the appropriate shape, position and size of the windows;
- Some elevations can be unduly monotonous because of the number of repeated windows. The risk of this is greatest in large facades, particularly when small windows are used, where they can appear lost within the elevation;
- Both vertically and horizontally aligned windows can be included on the elevation. In this instance care needs to be taken that the elevation does not end up being untidy and cluttered;
- Glazing bars are important to consider as they potentially can look cumbersome, clutter the elevation and restrict daylight entering the house if too thick;
- The positioning and colour of glazing bars can also add potential interest and character to the dwelling as a whole and are also important to consider;



Poor proportion of glazing relative to wall



Good proportion of glazing relative to wall

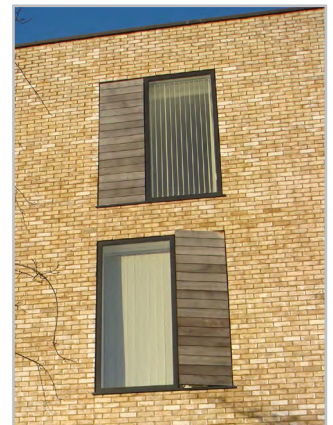


Over fussy glazing bars clutter the elevation

- Careful consideration must be given to window reveals – structural depth can be created by employing deep window reveals which can enliven the façade through contrasts of light and shade;
- Where a more contemporary external appearance for the dwelling is sought, consideration should be given to:
 - Full height windows (particularly on south facing elevations) ;
 - Wrap around corner windows. The latter not only help the building turn the corner and bring more sunlight into the dwelling but also create a more distinctive character to the dwelling;
 - The avoidance of visible cills and lintels;
 - Particularly for terraces and apartments, the vertical staggering of windows using alternative materials such as louvres or panels of a different material.



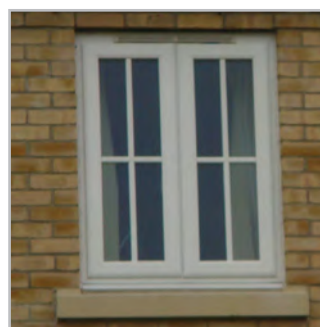
Position of glazing bars alters the character of the building



Vertical staggering of windows adds interest to elevation. Alternate material adjacent to window adds further interest



Window frames of different colours should be considered. as they can help create character for a building



Over predominance of glazing bars



Simple window detailing

Windows for Solar Gain Capture

4.11.16 It is not necessary for passive solar houses to have very large south-facing windows. However it is important to ensure that the glazing area is biased to the south rather than the north and that north-facing windows are no bigger than they need to be for adequate daylighting (at least 15% of a room's floor area). South-facing glazing can be avoided in the kitchen in order to minimise overheating from a combination of solar gain and internal heat gain.



Windows that turn corners can be utilised on key elevations

Materials

4.11.17 Use of different materials can help to articulate and add interest to a façade.

4.11.18 Milton Keynes does not have a traditional local building material. Most buildings are made of a variety of red and buff brick and indeed a wide variety of materials have been used through its development.

4.11.19 A development's choice of materials will in part be informed by the completion of tables C1 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.

4.11.20 It is the role of site specific design codes or development briefs to provide a greater level of clarity on materials required.

4.11.21 A simplistic approach to materials must be taken, both in type of materials used and the extent of the palette:

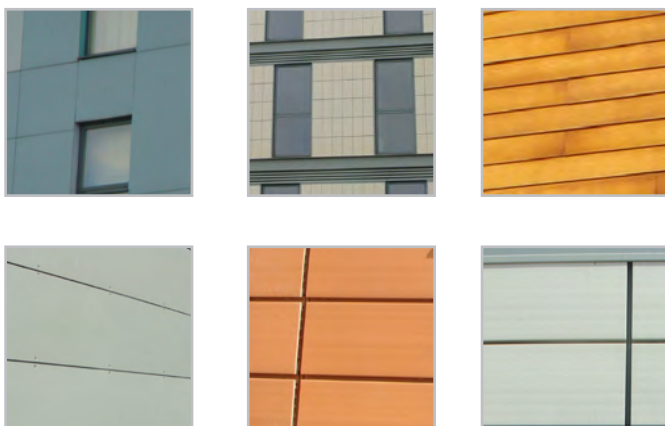
- Traditional materials such as brick and render are strongly encouraged and can be used effectively in both contemporary and traditional designs;
- To retain the coherence of an elevation or street frontage (to avoid it being untidy or too busy), it is generally a good idea to restrict the number of materials and to employ the same material in different parts of the façade or frontage – generally no more than three facing materials should be used per elevation or street frontage. This is particularly important if materials are to be the key feature used to give identity to a neighbourhood.



The use of render can create a strong identity for a street: Oxley Park



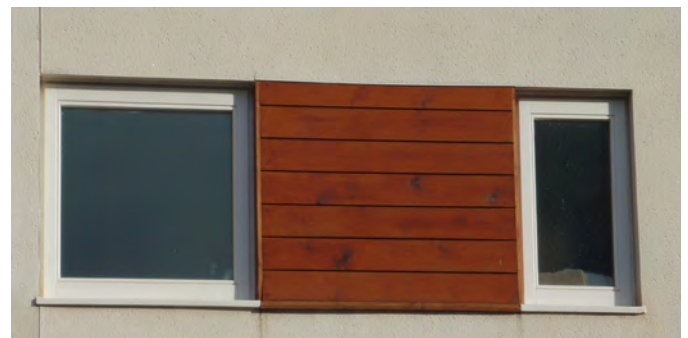
Traditional materials can be used effectively in contemporary designs



Other cladding materials can also be used

4.11.22 Other materials such as timber and other cladding materials panels such as zinc, copper and lead are also encouraged particularly in prominent locations such as key frontages and on landmark buildings

4.11.23 Light and bold rendered colours should also be considered as they can be used to add character and create a sense of place for a development.



The element of timber helps group the two windows

4.11.24 Materials can be used as a framing device to group elements such as windows.

4.11.25 Consideration needs to be given to the finish of the brick i.e. whether it has smooth or rough finish and whether it is just one shade of colour or whether it has a mottled look. as this can affect the perceived character of the building.

4.11.26 There will be a preference for materials with low embodied energy.

4.11.27 Materials must be selected that wear well with age and last a long time.

4.11.28 Materials that work best together often have a contrasting grain as well as colour; for example brick, render, metal and timber

Roofs

4.11.29 The following elements need to be considered regarding roofs:

- Primary and secondary roofing materials;
- Construction form and detailing.
- Roof pitch and shape such as plain, gable, hip, flat, monopitch etc;
- Eaves, fascias, bargeboards and overhang;
- Dormers and rooflights;
- Parapets.

4.11.30 A variety of roof styles should be used across a large development . However, a limited range should be used per neighbourhood if roofs are to be the device to establish an identity for a neighbourhood.



Curved roofs have helped create a distinctive character in Grange Farm



The roof over dominates this house. The location of the dormers furthermore make for poor proportions

4.11.31 Developments should not just include the traditional pitched roof but particularly on key frontages should consider incorporating alternative styles such as mono-pitch, flat and curved as they can help create a more distinctive character.

4.11.32 Pitched roofs which over dominate the building should be avoided.

4.11.33 A series of detached or terraced houses with each individual roof turned through 90 degrees so that a gable end fronts the street



Gable ends can provide an interesting roofscape

should be considered. This not only provides for a more interesting building frontage and street scene, but it can also provide additional enclosure to a street through the extra attained height.

4.11.34 Similarly, mono-pitch roofs which have their tall side facing the street can provide verticality onto a street that requires a greater presence. Excessive use of dormer windows should be avoided as roofscapes often become cluttered. There is a preference for eaves to be full height and roof spaces, if they are used, to be integrated with floors below with windows in gables or double height bays.

4.11.35 Monopitch roofs also provide a greater roof area for the inclusion of PVs.

4.11.36 While lengthy stretches of pitched roof on terraces at the same ridge height must be avoided they must not be over complicated. The massing of roof forms can be broken by vertical protrusions through the eaves into the roof. Variations of the conventional pitch form to a projecting bay should be considered.

4.11.37 Careful consideration must be given to the use of dormers. They can clutter the roofscape and spoil the proportions of the building if they are used excessively, made too large and over-complicated in design. Conversely a well-designed dormer can add interest and quality to the building.

4.11.38 There is a preference for eaves to be full height and roofspaces, if they are used, to be integrated with floors below with windows in gables or double height bays.



Sensitive use of dormers.



Dormers over-dominate this building.



This roofline adds interest and character to the street that the buildings address

Balconies

4.11.39 Balconies can add interest to an elevation but care needs to be taken that firstly they maintain the privacy of nearby properties and secondly, to ensure they do not overly clutter the elevation. In this regard they should be recessed or cantilevered (rather than be supported by an external frame). 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.

4.11.40 Setbacks at top floor, particularly suitable for flat roofs, can make the elevation more interesting and help create an identity for an area. Notwithstanding other urban design considerations, the location of balconies should take account of the prevailing wind direction.



External framed balconies over clutter the elevation



Balconies should be of a usable size and preferably integrated into the building design



Integrated balconies

Other Elements

4.11.41 The quality of the building can be spoilt by poor attention to detail.

4.11.42 The building elements which require careful detail attention in detailed design include:

- Doors;
- Porches;
- Chimney / chimney pots;
- Flues and ventilation;
- Gutters, pipes and other rainwater details;
- Garage doors;
- Ironmongery and decorative features;
- Flashings.

4.12 Internal Layout for Passive Solar Capture

4.12.1 The following guidance is applicable for passive solar houses (i.e. those that face within 30 degrees of south).

4.12.2 The most heated and frequently used rooms should be placed on the south side of the dwelling (for south-facing houses this implies fronting the street while for north facing it means being located at the back of the house facing the rear garden).

4.12.3 Rooms that benefit little from sunlight such as hallways, utility rooms, and bathrooms are placed on the north side of the dwelling and have smaller windows.

4.13 Outside Spaces

Family Housing

- 4.13.1 In accordance with guidance in PPS3 'Housing', provision should be made for private gardens where family housing is proposed. Gardens for family housing should be a minimum of 10 metres in depth, although they can be shorter (say 7-8 metres) for wide frontage units. In determining the appropriate garden size, consideration should be given to the need to ensure that the privacy of the dwelling is not compromised through overlooking or overshadowing from adjoining properties. Where gardens include existing mature trees, gardens will need to be larger to provide space for trees.
- 4.13.2 Developments should provide a mix of different garden sizes for family houses. Wide frontage houses provide the opportunity to create larger and better shaped garden spaces.
- 4.13.3 Gardens should be designed to ensure that they receive afternoon sun. Consequently, north-facing gardens may need to be longer than south-facing gardens. Rear gardens should have usable space with some privacy and therefore should not be awkwardly shaped or very narrow.
- 4.13.4 Consideration should be given to locating dwellings that have small or no private gardens close to public open spaces, in particular play areas.

Apartments

- 4.13.5 Within flatted developments, each apartment must have access to private open space. This can be provided in the form of private gardens for ground floor flats, balconies, roof gardens or terraces, or private shared gardens.
- 4.13.6 Where possible, ground floor apartments should have their own small private rear garden.
- 4.13.7 A balcony for an apartment should be large enough to accommodate a small table and two chairs to allow residents to sit out comfortably.
- 4.13.8 Balconies should be attached to living rooms rather than bedrooms. 'Juliet' style balconies will not be acceptable as the primary provision for apartments.
- 4.13.9 Ground floor balconies should be designed to ensure that they are secure from external access.
- 4.13.10 All apartments should provide space to dry clothes either within the apartment or within a communal facility.

Private Communal Amenity Space

- 4.13.11 The minimum area for usable communal space is 50 square metres, plus 5 square metres per additional unit over five units.
- 4.13.12 Communal gardens should be enclosed by walls or buildings with no public access. They should be of sufficient size to be useable, and should incorporate seating and play areas with a combination of hard and soft landscape features, including trees.
- 4.13.13 The layout and design of the communal garden should offer privacy for dwellings adjoining the space.
- 4.13.14 Where significant 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.

4.14 Services

Bin Storage

- 4.14.1 The location and positioning of waste and recycling bins must be considered at the outset of the design of the layout and housing. Discussions should be held with the Council's Waste Operations Manager prior to submission of any application.
- 4.14.2 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/.
- 4.14.3 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.
- 4.14.4 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 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).
- 4.14.5 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.

4.14.6 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.

4.14.7 Further details on requirements in relation to refuse collection and recycling can be obtained from the Council’s Waste Strategy Manager.

Utility Boxes

4.14.8 Utilities enclosures for meters should be discreetly located so they do not provide a dominant element on principal elevations within the street scene. Such boxes should be placed where they enable meter reading without the need to access the dwelling. Low screen walls or porch reveals can be used to make utilities boxes less obvious.

Letter Boxes

4.14.9 In apartment blocks, all flats should have separate externally accessed letter boxes.

4.14.10 For houses, letter boxes must be located at a convenient height for ease of use by postmen.

Electricity sub-stations

4.14.11 Substations must be designed to form part of the street scene. They should be of a material to match the prevailing construction materials used for dwellings in the vicinity.

4.14.12 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, equipment should be designed sympathetically in order to minimise the negative impact on the public realm.

Electric Vehicle Charging Points

4.14.13 The Council’s requirements with regard to electric vehicle charging points are:

- Where practicable, dwellings should be designed to enable the installation of a domestic EVCP to approved industry standards at a later date.

Superfast Broadband Infrastructure

4.14.14 The Council’s requirements with regard to superfast broadband infrastructure are:

- Ducting for fibre connectivity to each dwelling or, if appropriate in terms of flats and apartments, aggregated connectivity.

Chapter 5 – Design Quality Assurance

5.1 Introduction

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.

5.2 Design Checklist

The following points are set out to help applicants ensure that their designs cover the main points in this design guide.

Appreciating the Context

- Has the CONTEXT of the site and surrounding area been appraised considered?
- Has Table C1 (the site context) been considered and completed?
- Has Table C2 (the surrounding area context) been considered and completed?
- Has a SWOT analysis been undertaken for the site?
- Within the development has the street been used as the unit of 'character' which implies a uniform character for a particular street?

Vision and Concept Formulation

- Has the above site appraisal together with the development requirements informed a vision and concept for the site with guiding design objectives?

Building the Place

- Does the overall layout respond to the concept developed within the previous Vision and Concept Formulation stage?
- Does the layout demonstrate a coherent/ legible structure with non-residential uses such as schools, facilities shops and public transport stops located in the most accessible places?
- Has the landscaping and public realm been carefully considered and established as part of the overall layout to help establish an identity for the development?
- Has the process of achieving a high quality landscape as outlined in the Design guide been adhered to?
- Is SLOAP (Space Left Over After Planning) been avoided?
- Do pedestrian routes follow pedestrian desire lines?
- In the main, do streets occur to the front of houses thereby providing frontage access?
- Have redways been carefully considered particularly with respect to how they feel for users?

- Is the layout based on a perimeter block structure with a clear public/private interface?
- Has the layout taken account of solar gain capture?
- If culs-de-sac are included, do they occur within a connected movement network?
- Are vehicle speeds controlled by built form and layout?
- Are densities appropriate to the context?
- Have the appropriate housing typologies been included so that an optimum balance of allocated and on street parking, street frontage, setbacks and continuity of built form been achieved?
- Has parking been provided in accordance with the Council's adopted parking standards?
- Is parking well integrated into the development, surveilled and convenient?
- Has the development attempted to provide all parking on plot and on street before other options are considered?
- Have landmarks, and focal points been identified and responded to appropriately?

Detailing the Place

- Have elements including setbacks, continuity of frontage, boundary treatments, privacy distances and the requirement for buildings to turn corners been considered?
- Has the detailed design appearance particularly regarding materials, windows and roofs been carefully considered with respect to the context?
- Does the detailed design appearance help contribute to the character and identity for the development?
- Has the need for energy efficient buildings helped to drive the design and appearance of the building?
- Has the requirement for the provision of services such as bin storage been integrated into the layout?

5.3 Pre-application Consultation

5.3.1 Applicants are strongly encouraged to undertake pre-application consultation with both the local authority and other interested and affected parties such as the local community.

5.3.2 Applicants should use the Design and Access Statement as the basis or format for pre-application consultation. A SWOT analysis of the site and surrounds which informs a concept for the site should be the starting point for consultation rather than consulting on completed designs produced in CAD or similar.

Consultation

5.3.3 The appraisal and concept stages of the design process should be developed through a process of consultation with the local community. The nature of the consultation will depend on the size of the development and the extent to which it is likely to affect an existing neighbourhood.

5.3.4 At a basic level, consultation might consist of a discussion of proposals with immediate neighbours prior to an application. On the larger projects, it may involve a “planning for real” event/s. Time taken to involve people in the decision making at this stage should be considered an investment which might well represent time saved compared to a poorly researched scheme with little regard for local conditions, which has to be totally redesigned after public consultation, following a planning application. Sensitive and genuine public consultation helps to anchor a development into its social context.

5.4 Design and Access Statements

5.4.1 DCLG Circular 01/2006 (updated in March 2010) makes it mandatory for design and access statements to be provided with outline and full planning applications.

5.4.2 The Council has produced a Guidance Note on how to prepare Design and Access Statements and what they should cover. A copy is included in Appendix D. All Design and Access Statements should follow this format.

5.4.3 It is believed that by following the three steps outlined in the Guidance Note in the development of design, that overall quality will be raised.

5.5 Design Codes

5.5.1 Design Codes can help deliver good quality places and the Council strongly encourages the use of them when appropriate, particularly for larger and complex sites.

5.5.2 The key features of Design Codes (from Preparing Design Codes: A Practice Manual, DCLG, 2006) are:

- They are based on and help deliver a design vision such as a masterplan or other form of design framework for a site or area;
- They are a set of graphic and written rules that are technical in nature;

- They establish with precision the design considerations of a development or area;
- They are 3-dimensional in scope and focus primarily on urban design consideration
- They focus on and establish clearly the essential and mandatory design elements and characteristics of a particular development;
- They can also include provisions which are advisory or optional.

5.5.3 The Council endorses these features and expects all Design Codes to be based around them.

5.6 Design Competitions

5.6.1 The Council will strongly encourage the use of competitions to promote design quality and innovation.

5.7 Design Personnel

5.7.1 The Council strongly believes that if a step change in design quality is to be achieved, it is essential that developers use qualified architects, urban designers and landscape architects.

5.8 Building for Life

5.8.1 “Building for Life” is a partnership between several national agencies, including Design Council CABE, the Homes and Communities Agency (HCA) and Home Builders Federation. “Building for Life” is the national standard for well-designed homes and neighbourhoods, and is based on criteria which are used to evaluate the quality of new housing developments. A “Building for Life” assessment scores the design quality of planned or completed housing developments against the 20 Building for life criteria. Further details of the Building for Life criteria can be obtained from www.buildingforlife.org.

5.8.2 The Council supports “Building for Life” and recommends that for residential planning applications, the mandatory Design and Access Statement is geared to answer the Building for Life questions (Appendix E outlines the relationship between the two documents). The Council furthermore has Building for Life accredited assessors who would be happy to provide a Building for Life Assessment of individual schemes at planning and completed stages.

5.9 Building Process

- 5.9.1 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 and landscape) being as close to post-adoption levels as possible.

Glossary

Accessibility	The ability of people to move round an area and to reach places and facilities, including elderly and disabled people, those with young children and those encumbered with luggage or shopping.
Active frontages	Street elevations that are enlivened by visible activity either within or outside the building.
Adaptability	The capacity of a building or space to be changed so as to respond to changing social, technological and economic conditions.
Broken frontage	A building frontage or line with large gaps between buildings (occurs along a street with detached buildings).
Building elements	Doors, windows, cornices and other features which contribute to the overall design of a building.
Building line	The line formed by the frontages of buildings along a street.
Context	The setting of a site or area, including factors such as traffic, activities and land uses as well as landscape and built form.
Continuity of frontage	How continuous a building frontage or line is. The larger the gap between buildings the less the continuity of frontage (and vice versa).
Density	The floorspace of a building or buildings or some other unit measure in relation to a given area of land. Built density is expressed as number of units per hectare for residential development. (see also Net Dwelling Density)
Design codes	A design code is a set of illustrated design rules and requirements which instruct and may advise on the physical development of a site or area. The graphic and written components of the code are detailed and precise, and build upon a design vision such as a masterplan or other design framework for a site or area.
Design principle	An expression of one of the basic design ideas at the heart of an urban design framework, design guide, development brief or a development.
Design and access statement	Submitted with a planning application, the statement sets out the design principles that the planning applicant has adopted in relation to the site and its wider context, as required by PPS1.
Desire line	An imaginary line linking facilities or places which represents the most convenient (shortest) route for pedestrians to take. The desire line may develop into an informal path that pedestrians prefer to take to get from one location to another rather than using a sidewalk or other official route. The street network of a development should generally be arranged to reinforce pedestrian desire lines.
Development brief	A document, prepared by a local planning authority, a developer, or jointly, providing guidance on how a site of significant size or sensitivity should be developed. Site specific briefs are sometimes known as planning briefs, design briefs and development frameworks.
Elevation	The facade of a building, or the drawing of a facade.
Enclosure	The use of buildings to create a sense of defined space.
Form	The layout (structure and urban grain), density, scale (height and massing), appearance (materials and details) and landscape of development.
Landmark	A building or structure that stands out from its background by virtue of height, size or some other aspect of design.
Landscape	The character and appearance of land, including its shape, form, ecology, natural features, colours and elements and the way these components combine. In towns 'townscape' describes the same concept.

Layout	The way buildings, routes and open spaces are placed in relation to each other.
Legibility	The degree to which a place can be easily understood and traversed, i.e. how easy it is to find your way around.
Local distinctiveness	The positive features of a place and its communities which contribute to its special character and sense of place.
Massing	The combined effect of the height, bulk and silhouette of a building or group of buildings.
Mixed uses	A mix of uses within a building, on a site or within a particular area. 'Horizontal' mixed uses are side by side, usually in different buildings. 'Vertical' mixed uses are on different floors of the same building.
Movement	People and vehicles going to and passing through buildings, places and spaces.
Natural surveillance	The discouragement to wrong-doing by the presence of passers-by or the ability of people to be seen out of surrounding windows. Also known as passive surveillance (or supervision).
Net dwelling density	Net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided.
Pepper-potting	The dispersal of affordable housing units within residential developments to promote mixed communities and minimise social exclusion.
Perimeter block	Arrangement of buildings with their fronts facing the street and their backs facing the backs of other buildings.
Permeability	The degree to which an area has a variety of pleasant, convenient and safe routes through it.
Planning Policy Statements	(PPSs) Documents embodying Government guidance on general and specific aspects of planning policy to be taken into account in formulating development plan policies and in making planning decisions.
Public/private interface	The point at which public areas and buildings meet private ones.
Public realm	The parts of a village, town or city (whether publicly or privately owned) that are available, without charge, for everyone to use or see, including streets, squares and parks.
Redway	Dedicated cycle and pedestrian footpaths that run through most areas of Milton Keynes. They are physically separate from the road network.
Scale	The impression of a building when seen in relation to its surroundings, or the size of parts of a building or its details, particularly as experienced in relation to the size of a person.
Sense of place	Local characteristics which give a place identity.
Setbacks	The distance from the edge of the street to the front of the building, also known as private defensible space.
Street furniture	Structures in and adjacent to the highway which contribute to the street scene, such as bus shelters, litter bins, seating, lighting, railings and signs.
Sunspace	Highly glazed south facing amenity areas or porches incorporated into the dwelling layout to enhance passive solar gain and reduce heat loss.
Urban design	The art of making places. Urban design involves the design of buildings, groups of buildings, spaces and landscapes, in villages, towns and cities, and the establishment of frameworks and processes which facilitate successful development.

Vernacular	The way in which ordinary buildings were built in a particular place, making use of local styles, techniques and materials and responding to local economic and social conditions.
View	What is visible from a particular point. Compare 'Vista'.
Vista	An enclosed view, usually a long and narrow one.
Zero carbon	Zero net carbon emissions from new developments.

Appendix A

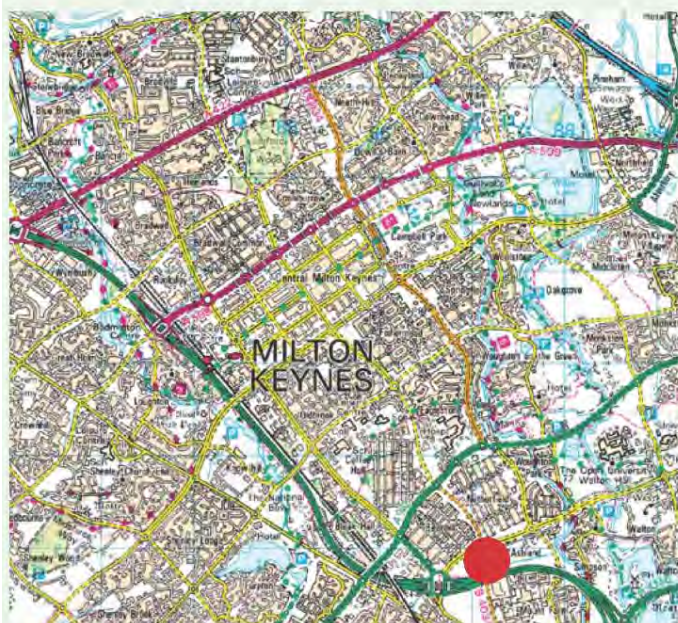
Case Studies

Ashland

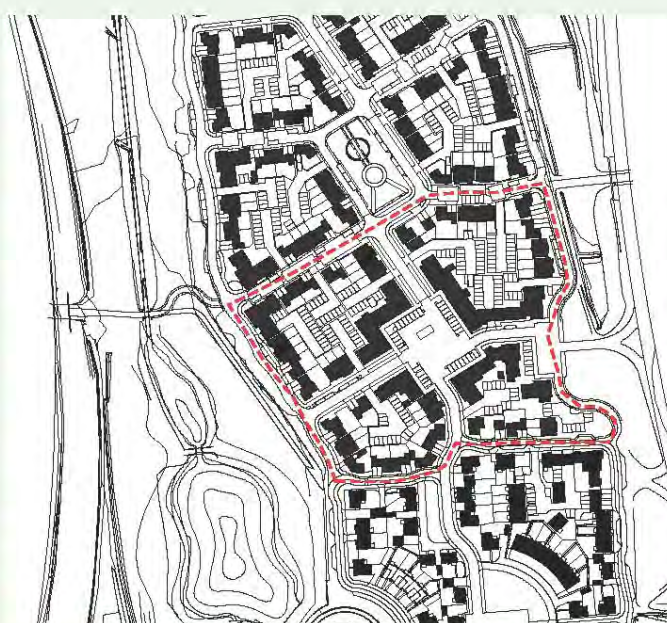
Overview

Ashland is located in the south of Milton Keynes. Currently being built, its layout is characterised by a perimeter block structure.

The area of detailed analysis consists of four blocks, with a mixed use public square at its centre.



● The site



--- Area of detailed analysis



Evaluation

The case study demonstrates the successful application of a number of urban design principles:

- Buildings front streets.
- Clear block structure provides a legible movement framework.
- Limited palette of materials helps create distinctive character.
- Buildings turn the corner with active frontages.
- Development is characterised by continuous frontages.

The development is less successful in terms of:

- Large rear parking courts.



Buildings turn corners with active frontages



Buildings provide strong sense of enclosure to public square



Limited palette of materials helps create distinctive character



Development characterised by continuous frontages

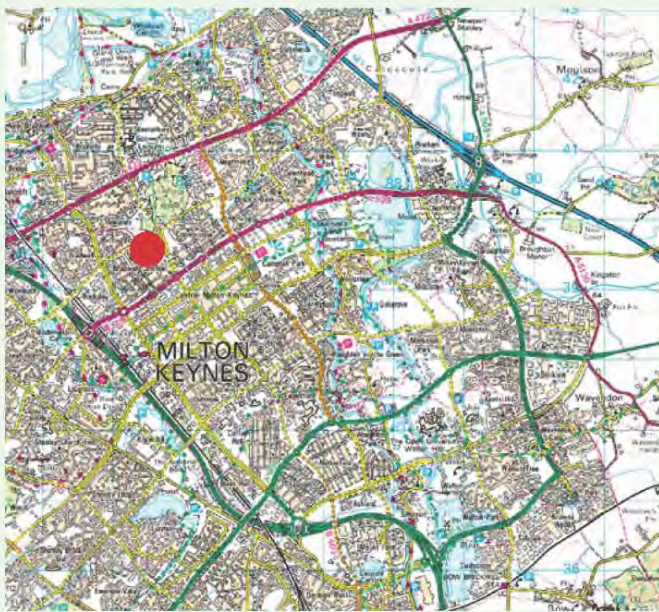
Analysis of built form components within the area of detailed analysis	
Area of detailed analysis	2.49 ha
Number of dwellings	138
Dwelling mix	Apartments; detached
Density	
Dwellings per hectare	55
Car Parking	
Location	Mainly rear courts, some on-plot
Layout	
Setbacks	metres
Plot sizes	metres
Building Form	
Building height	3 and 4 storeys
Roof form	Flat and mono-pitched


Bradwell Common

Overview


Bradwell Common is one of the “doughnut estates” that ring Central Milton Keynes. Built in the 1980s, its layout is based on a rectilinear grid.

The area of detailed analysis consists of a number of regular blocks bounded by straight streets.



 The site



 Area of detailed analysis



Evaluation

The development demonstrates the successful application of a number of urban design principles:

- Buildings front streets.
- Block structure provides a legible movement framework.
- The estate is based on a connected movement structure.
- Short culs-de-sacs have been designed as courtyards. As a result, they are not dominated by a conventional hammerhead layout and have a strong sense of enclosure.
- The green character of the area is accentuated with trees planted in small roundabouts which close vistas and help to reduce traffic speeds.
- Cars are parked on plot, usually in front of the building line. Hedges are used to reduce the impact of parked cars and to reinforce the green character of the area.

- Block paving is used to create a sense of place and a more pedestrian-friendly environment.
- The use of a limited palette of building materials reinforces the identity of the estate.

The development is less successful in terms of:

- Footpaths emerging from the end of cul-de-sacs are narrow and not surveilled.
- Rear gardens back onto open space.



Short cul-de-sac designed as courtyard.



Block paving creates a sense of place and a more pedestrian-friendly environment



Green character accentuated with trees planted in small roundabouts to close vistas



Hedges are used to reduce the impact of parked cars and to reinforce the green character of the area



Limited palette of materials helps to reinforce identity of estate

Analysis of built form components within the area of detailed analysis	
Area of detailed analysis	6.2 ha
Number of dwellings	157
Dwelling mix	Predominantly detached, & semi-detached; some terraced
Density	
Dwellings per hectare	25
Car Parking	
Location	On-plot
Layout	
Setbacks	5-10 metres
Plot sizes	7.5-8 x 25-30 metres; 12-13 x 25 metres
Building Form	
Building height	2 storeys
Roof form	Pitched



Cars are parked on-plot to the front of the dwelling

Monkston

Overview

Monkston is located in the east of Milton Keynes. Built in the 1990s, its layout is characterised by a large circular area of public open space at the centre of the grid square.

The area of detailed analysis consists of two concentric blocks with both straight and curved streets.



● The site



--- Area of detailed analysis



Evaluation

The case study demonstrates the successful application of a number of urban design principles:

- Buildings front open space.
- Buildings front streets.
- Clear block structure provides a legible movement framework.
- More important streets have wide verges planted with trees. Local streets are narrower, with no trees.
- Cars are parked on plot, in front of the building line. Hedging is used to reduce impact of parked vehicles.
- Block paving is used on the park edge street to create a sense of place and a more pedestrian-friendly environment.
- Mix of house types.
- Secure fronts and backs.

The development is less successful in terms of:

- Houses do not turn the corner with active frontages.



Green "feel" provided by street trees, verges and planting. Importance of street emphasised by street trees and width.



Buildings front open space.



Hedges and front garden planting reduce impact of parked cars



Cars are parked on-plot to the front of the dwelling



Mix of dwelling types, including terraced housing

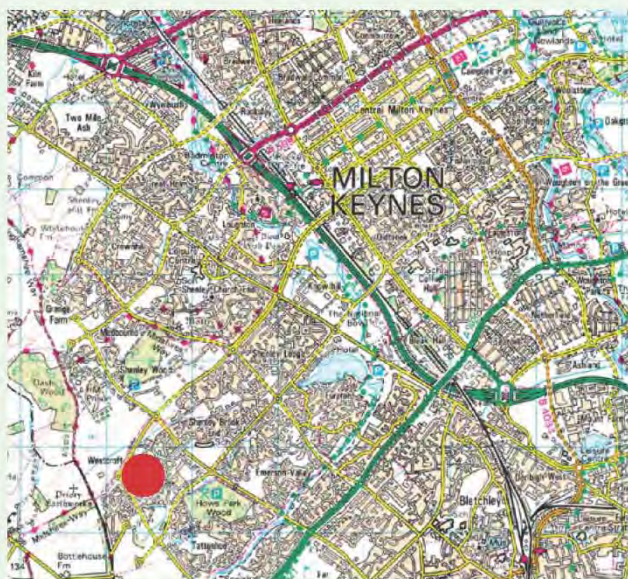
Analysis of built form components within the area of detailed analysis	
Area of detailed analysis	2 ha
Number of dwellings	61
Dwelling mix	Predominantly detached; some semi-detached and terraced
Density	
Dwellings per hectare	30
Car Parking	
Location	On-plot
Layout	
Setbacks	5-6 metres
Plot sizes	11 x 25 metres
Building Form	
Building height	2-3 storeys
Roof form	Pitched

Westcroft

Overview

Westcroft is located in the west of Milton Keynes. Built in the 2000s, its layout is characterised by a large circular area of public open space at the centre of the grid square.

The area of detailed analysis is made up of two concentric blocks with both straight and curved streets.



● The site



--- Area of detailed analysis



Evaluation

The development demonstrates the successful application of a number of urban design principles:

- Buildings front streets, and the block structure provides a legible movement framework.
- More important streets have wide verges. Local streets are narrower, with stronger sense of enclosure.
- Development is characterised by continuous frontages.
- Cars are parked on plot, usually set back behind the building line.
- Although culs-de-sac are incorporated, they are included within the context of a connected movement network

The development is less successful in terms of:

- Although the main streets have strong active frontages, there are some areas which suffer from blank elevations and long lengths of brick wall



Focal building at end of vista aids legibility



Buildings which "turn" the corner



Continuous frontage provides strong built edge to public open space



Ground cover planting provides clear distinction between public and private space



Parking provided on-plot in "drive-throughs"

Analysis of built form components within the area of detailed analysis	
Area of detailed analysis	2.1 ha
Number of dwellings	59
Dwelling mix	Predominantly detached, & semi-detached; some terraced
Density	
Dwellings per hectare	28
Car Parking	
Location	On-plot
Layout	
Setbacks	2 metres
Plot sizes	9-12 x 18-25 metres
Building Form	
Building height	2/3 storeys
Roof form	Pitched

Wolverton

Overview

Wolverton is located in the north west of Milton Keynes. The town developed around the railway works during the late nineteenth and early twentieth century.

The area of detailed analysis is located within the Victorian suburbs of Wolverton, developed in a grid pattern. It is made up of a rectangular block bounded by straight streets.



● The site



--- Area of detailed analysis



Evaluation

The development demonstrates the successful application of a number of urban design principles:

- Buildings front streets, and the block structure provides a legible movement framework
- Active frontages, with frequent doors and windows, add vitality to public realm
- Hierarchy of streets with varied character
- Development is characterised by continuous frontages, and strong sense of enclosure
- Cars are parked on street and on plot to the rear accessed from back lanes

The development is less successful in terms of:

- Accommodating on-street parking with space for two-way traffic movement
- Back lanes make rear boundaries of properties insecure



Buildings which "turn" the corner



On-street echelon parking



Back lanes provide vehicular access to rear of properties



Active frontages to the street



Street with strong sense of enclosure

Analysis of built form components within the area of detailed analysis

Area of detailed analysis	3.0 ha
Number of dwellings	147
Dwelling mix	Predominantly terraced
Density	
Dwellings per hectare	49
Car Parking	
Location	On-street, on-plot
Layout	
Setbacks	0-2.5 metres
Plot sizes	4.5-5.7 x 30 metres
Building Form	
Building height	2 storeys
Roof form	Pitched

Woolstone

Overview

Woolstone is located in the of Milton Keynes. Its layout is characterised by a linear form of development.

The area of detailed analysis consists of a single square block, broken up with a number of courts and cul-de-sacs.



● The site



--- Area of detailed analysis



Evaluation

The case study demonstrates the successful application of a number of urban design principles:

- Buildings front streets.
- Limited palette of materials and strong landscaping structure helps create distinctive character.
- Buildings turn the corner with active frontages.
- Short culs-de-sacs have been designed as courtyards. As a result, they are not dominated by a conventional hammerhead layout and have a strong sense of enclosure.
- Although most houses are set in large plots, there is a mix of house types.

The development is less successful in terms of:

- Rear gardens back onto open space, providing limited surveillance of play area.



Short cul-de-sac designed as courtyard.



Landscaping provides strong sense of identity.



Hedges are used to reduce the impact of parked cars and to reinforce the green character of the area.



Limited palette of materials helps create distinctive character.

Analysis of built form components within the area of detailed analysis	
Area of detailed analysis	4 ha
Number of dwellings	71
Dwelling mix	Detached
Density	
Dwellings per hectare	18
Car Parking	
Location	On-plot
Layout	
Setbacks	Varies 5+metres
Plot sizes	Varies typically 5-9 x 24-28 metres
Building Form	
Building height	2 storeys
Roof form	Pitched

Appendix B

Planning Policy

Submission Core Strategy

Policy CS 10 (Housing) states: The Council will work with Milton Keynes Partnership (or any successor bodies), developers and registered social landlords to meet the Council's housing requirement, as set out in Policy CS 2 'Housing Land Supply'.

New and refurbished housing should meet the needs and aspirations of the existing population and of the future residents by the provision of an appropriate range of sizes, values, styles, tenures and densities. Infill development should respect the style and scale of buildings and the mix of dwelling types on the surrounding area.

Housing should meet the Council's adopted standards of energy efficiency, renewable energy generation, carbon neutrality, safety and 'lifetime homes'. Some dwellings should support 'home-based working' and all homes should have high quality ICT connectivity.

Residential neighbourhood design should encourage access by walking, cycling and other forms of non-car travel within the neighbourhood and across the city. Car parking standards should meet the projected levels of car ownership (in addition to visitor parking).

The Council will plan to meet specific housing needs across the Borough including the following: affordable housing, multiple occupancy, elderly persons, special needs, single people, religious, ethnic or lifestyle groups. These requirements will be covered in further planning and housing management guidance.

Policy CS 11 (A Well Connected Milton Keynes) states (inter alia): The Council will work with neighbouring local authorities and transport providers to meet the demand for: increased movement of people and goods, improved accessibility across the Borough, improved safety and quality of life and a reduction in the Borough's carbon footprint. Over the Core Strategy period, the measures used will include:

1. Maintaining and future-proofing the city's grid road network and extending it into new development areas whilst safeguarding the corridors for possible mass transit schemes.
2. A step change in improvements to public transport including a core public transport network, with Central Milton Keynes at its hub, serving key trip generators and to cater for specific areas and types of public transport need. New bus services will be provided to major new areas of development when sufficient buildings are occupied.
3. More sustainable transport choices for car owners and information and measures to encourage them to use non-car modes for more journeys.
4. Encouraging greater movement within the Borough by cycling and walking through improvements to the existing Redway network and other paths including more direct routes, enhanced facilities and signage, better integration with transport interchange hubs, and improved surveillance; and by extending the Redways network throughout major new development areas (including the creation of routes that are shorter than the equivalent road journey).
5. Planning the development of large housing and employment areas, health, education, leisure, sports, emergency services and other key facilities so that it is well served by public transport and easily accessible by walking and cycling. This applies particularly to Central Milton Keynes, town and district centres elsewhere in the Borough, the Eastern and Western Expansion Areas, the four Strategic Reserve Areas (SR1, SR2, SR3 and SR4), and Key Settlements in the rural area.

Policy CS 12 (Developing Successful Neighbourhoods) states: New developments and major redevelopments must be designed to support sustainable lifestyles for all. This will include:

1. Creating walkable neighbourhoods and extensions of the existing walking, cycling and key public transport networks
2. Siting key day-to-day facilities, including schools, shops, leisure and employment in locations easily accessible on foot, by bike and by public transport
3. Creating high quality open spaces in line with the MK Open Space Strategy and private amenity space for houses

4. Appropriately locating development to maintain and improve current flood risk and air quality standards
5. Separating housing from noisy/24 hour working employment uses (B2 and B8)
6. Encouraging home working
7. Achieving the highest standards of design in terms of safety and security
8. Creating diverse and flexible neighbourhoods that can respond to change overtime, allowing communities to form and grow effectively
9. Ensuring flood water management is planned at the largest appropriate scale of new development and, wherever possible, designed as public open space
10. Not precluding further expansion other than where the proposals include a permanent long-term boundary for the City

Policy CS 13 (Ensuring High Quality, Well Designed Places) states:

Character of Place

All new development must be of high design quality in terms of layout, form and appearance, and make a positive contribution to the character of the area in which it is located.

All new development must be based on a thorough site appraisal and be sensitive to its context. New housing should be of an appropriate density for the area in which it is located.

Where there is no clear character on the site or surrounding area, new development must be designed to create a distinctive sense of place by using existing site features, the layout of the development, and the appearance of buildings.

Design of Place

To ensure high design quality, all new developments should:

1. Comply with best practice urban design principles in By Design, Manual for Streets and Safer Places, or future best practice guidance
2. Champion new approaches to sustainable urban form and structure, which build on the concept of the grid, so that everyone lives within walking distance of a viable bus route, local shops and other day-to-day facilities
3. Provide a choice of contemporary, innovative, exemplar architecture that reflects Milton Keynes' reputation as an ambitious, forward-thinking, innovative 21st Century city
4. Integrate energy efficiency and solar performance in the layout and orientation of buildings and neighbourhoods
5. Provide sustainable and strategic surface water drainage as part of a network of multi-purpose open spaces
6. Provide visual landmarks to help with orientation, particularly from the grid road and redway networks
7. Provide a range of housing densities with more high density in Central Milton Keynes and close to good public transport nodes, with lower densities elsewhere, to contribute towards variety in visual appearance and create diverse, sustainable neighbourhoods
8. Effectively integrate the Council's car parking standards into the layout of new developments
9. Redways (another unique element of MK) should be built within the landscape corridor of all new grid roads, as well as elsewhere within new developments
10. Continue the green character of the city through appropriate use of planting on streets and in public open spaces, and respecting the existing landscaped grid road corridors

Waste Development Plan

Policy WCS3 (Sustainable design, construction and demolition) states: New built development should facilitate the efficient use of resources. A waste management plan should be provided with all planning applications and should consider:

- a) Designs and layouts that allow the effective sorting, recycling and composting of waste;
- b) Ensuring the development can be served by appropriate waste collection methods to support recycling systems;
- c) Design principles and construction methods that minimise primary aggregate use and encourage the use of high quality building materials made from recycled and secondary sources;
- d) Construction and demolition methods that minimise waste production and re-use/recycle materials, as far as practicable onsite;
- e) Construction which reduces inert landfill disposal; and
- f) Accommodating an appropriate proportion for waste management facilities for recycling, composting, recovery and treatment.

Local Plan Policies

Policy D1 (Impact of Development Proposals on Locality) states: Planning permission will be refused for development that would be harmful for any of the following reasons:

- (i) Additional traffic generation which would overload the existing road network or cause undue disturbance, noise or fumes
- (ii) Inadequate drainage, which would adversely affect surface water disposal, including flood control, or overload the existing foul drainage system
- (iii) An unacceptable visual intrusion or loss of privacy, sunlight and daylight
- (iv) Unacceptable pollution by noise, smell, light or other emission to air, water or land
- (v) Physical damage to the site and neighbouring property including statutorily protected and other important built and natural features and wildlife habitats
- (vi) Inadequate access to, and vehicle movement within, the site

Policy D2a (Urban Design Aspects of New Development), states: Development proposals will be refused unless they meet the following objectives:

- (i) Character in townscape and landscape by identifying and reinforcing better quality and locally distinctive design elements
- (ii) Continuity of street frontage and enclosure of space by clearly defining public and private areas and locating main building entrances on the street.
- (iii) Quality public realm consisting of spaces and streets that are accessible, attractive, well related to and overlooked by buildings providing natural surveillance, with active ground floor uses along main streets and with parked vehicles not being visually dominant
- (iv) Ease of movement by creating places that are permeable and well connected with safe, attractive, convenient routes along streets giving priority to walking, cycling and public transport
- (v) Legibility by providing recognisable streets, junctions and landmarks to help people to find their way around
- (vi) Adaptability of buildings and spaces, capable to use by a range of activities in response to changing conditions
- (vii) Variety of layout, building form, use and tenure through the site

Policy D2 (Design of Buildings) states: Development proposals for buildings will be refused unless they:

- (i) Are in scale with other buildings in the immediate vicinity in terms of their height and massing, except where a greater scale is necessary to reflect the development's function and importance
- (ii) Relate well to and enhance the surrounding environment
- (iii) Provide access for those with impaired mobility
- (iv) Allows for visual interest through the careful use of detailing, where this is appropriate to the character of the area
- (v) Include landscaping and boundary treatments that integrate with those of the surrounding area
- (vi) Have regard to the need to design layout and screening in the interests of the prevention of crime and the surveillance of the public realm

The extension of existing buildings will only be permitted providing the scale of the proposed extension does not detract from the character of the original building.

Policy D4 (Sustainable Construction) states: All new development exceeding 5 dwellings (in the case of residential development) or incorporating gross floorspace in excess of 1000 sq m (in the case of other development) will be required to include the following:

- (i) Energy efficiency by siting, design, layout and buildings' orientation to maximize sunlighting and daylighting, avoidance of overshadowing, passive ventilation;
- (ii) Grouped building forms in order to minimize the external wall surface extent and exposure;
- (iii) Landscape or planting design to optimise screening and individual buildings' thermal performance;
- (iv) Renewable energy production e.g. external solar collectors, wind turbines or photovoltaic devices;
- (v) Sustainable urban drainage systems, including rainwater and waste water collection and recycling;
- (vi) Significant use of building materials that are renewable or recycled;
- (vii) Waste reduction and recycling measures;
- (viii) Carbon neutrality or financial contributions to a carbon offset fund to enable carbon emissions to be offset elsewhere.

Policy H8 (Housing Density) states: "The density of new housing development should be well related to the character and appearance of development in the surrounding area.

The Council will seek the average net densities set out below for development within each zone as defined on the accompanying plan:

Zone 1	CMK (including Campbell Park)	100 dws/ha
Zone 2	Adjoining grid squares north and south of CMK, Bletchley, Kingston, Stony Stratford, Westcroft and Wolverton	40 dws/ha
Zone 3	The rest of the City, City Expansion Areas, Newport Pagnell, Olney and Woburn Sands	35 dws/ha
Zone 4	The rest of the Borough	30 dws/ha

Policy H9 (Housing Mix) states: Development proposals that include 5 or more dwellings should incorporate a range of house sizes and types and all dwellings will be encouraged to meet the "Lifetime Homes" standards.

Policy L3 (Standards of Provision) states: New housing development will be required to provide new or improved recreational facilities in accordance with the Council's adopted standards in Appendix L3.

Appendix L3 – Standards for Recreation and Leisure Facilities

FACILITY	MINIMUM SIZE	CATCHMENT AREA OR STANDARD	CHARACTERISTICS
Local Play Areas	0.2 hectares ¹ or 0.35 if surrounded by housing	300 metres	<ul style="list-style-type: none"> • Mainly for children up to age 8 • For unsupervised play close to home • Located at 500 metre intervals • Active zone² should be at least 20 metres from residential property boundaries and 30 metres from roads • Approximately 5¹ items of play equipment and small games area

FACILITY	MINIMUM SIZE	CATCHMENT AREA OR STANDARD	CHARACTERISTICS
Neighbourhood Play Areas	0.6 hectares ¹	600 metres	<ul style="list-style-type: none"> For all children, but emphasis on 8+ For unsupervised play Located at 1,000 metre intervals Active zone² should be at least 40 metres from residential property boundaries and 30 metres from roads Approximately 8¹ items of play equipment and ball games area, goal wall, cycle area; larger more adventurous equipment The inclusion of youth shelters, wheeled sports facilities and multi-games walls for teenagers is essential
Local Parks	1-2 hectares	600 metres 0.6 hectares per 1,000 population	<ul style="list-style-type: none"> For visitors on foot, including nearby workers Providing children's play, sitting out areas, landscaped environment, community events area, kickabout area and playing fields if the park is large enough At least 0.4 hectares per 1,000 population for casual, informal playspace if not provided elsewhere
District Parks	20 hectares	1.2 kilometres	<ul style="list-style-type: none"> For weekend and occasional visits on foot Containing playing fields, but at least 12 hectares for other pursuits (as in Local Parks) and some car parking
Linear Parks	60 hectares	3.2 kilometres or more where the Park is appreciably larger than 60 hectares	<ul style="list-style-type: none"> For weekend and occasional visits by car or public transport Either semi-natural environment, commons, woodland etc, or formal parks providing for both active and possible recreation – e.g. boating, entertainment, etc Containing playing fields but at least 40 hectares for other pursuits Adequate car parking essential
Playing fields		1 hectares (net) per 1,000 population, 1.5 hectares (gross) per 1,000 population	<ul style="list-style-type: none"> Gross size includes ancillary facilities such as pavilions, car parking and spectator areas
Allotments		0.25 hectares per 1,000 population	<ul style="list-style-type: none"> Should have water supply and car parking Preferably within 600 metres walking distance
Areas of wildlife interest	0.5 hectares	0.5 hectares at 1 kilometre intervals Optimum 10 hectares at 1 kilometre intervals	<ul style="list-style-type: none"> Accessible semi-natural greenspace Normally within or adjoining built-up areas

Notes:

¹These quantities will need to be greater in areas of high density family housing

²Active Zone: area for play equipment and other items

Policy NE1 (Nature Conservation Sites) states:

- (i) Development will not be permitted if it is likely to harm the nature conservation value of an international site (RAMSAR sites, SACs and SPAs)
- (ii) Proposals for development likely to affect a National Nature Reserve or Site of Specific Scientific Interest will only be permitted if they can be subject to conditions that will prevent damaging impacts on biodiversity interests, or if other material considerations are sufficient to override nature conservation interests.
- (iii) Development which would be likely to harm the biodiversity or geological conservation value of a site county-wide (RIGS, MK Wildlife sites) or local importance (Local Nature Reserves, Wildlife Corridors, local wildlife sites) will only be permitted if the importance of the development outweighs the local value of the site.

Policy NE2 (Protected Species) states: Planning permission will be refused for development if it would be likely to adversely affect animal or plant species, or their habitat, specifically protected by law.

Where necessary, planning conditions will be attached to permissions to require the developer to take steps to secure the protection of species or habitat affected by development.

Policy NE3 (Biodiversity and Geological Enhancement) states: All new development exceeding 5 dwellings (in the case of residential development) or incorporating gross floorspace in excess of 1000 sq m (in the case of other development) will be required to incorporate proposals to enhance biodiversity and geological features which are appropriate to, and where possible compensate for, impacts on the immediate area and the site characteristics.

Measures may include use of native species in landscaping schemes, or the improvement or creation of wildlife habitats or features of geological interest.

Priority will be given to woodland planting and other habitats and species identified by local Biodiversity Action Plan. Where enhancement is not possible on the site, appropriate enhancements will be sought on other land.

Policy T1 (The Transport User Hierarchy) states: Development proposals should meet the needs of transport users in the following order of priority:

- (i) Pedestrians and those with impaired mobility
- (ii) Cyclists
- (iii) Users of public transport and taxis, and motorcyclists
- (iv) Others

Policy T2 (Access for those with Impaired Mobility) states: Development proposals must be designed to meet the needs of those with impaired mobility. In particular:

- (i) Specifically identified and convenient parking spaces should be provided
- (ii) The layout of the external environment, including links to adjoining areas, must provide convenient, direct and safe access.

Policy T3 (Pedestrians and Cyclists) states: Development proposals must be designed to meet the needs of pedestrians and cyclists. In particular:

- (i) The layout of the external environment, including links to adjoining areas should provide convenient, direct, safe, secure, and understandable pedestrian and cycle routes that are not isolated from other transport routes;
- (ii) The needs of cyclists should be taken into account in traffic calming schemes;
- (iii) Locations that are a deterrent to pedestrians and cyclists should be improved, including crossing points at roads;
- (iv) The existing redway, footway and right of way network should be retained, improved and extended;
- (v) Cycle parking should be provided that is conveniently sited, secure and sufficient to meet the Council's parking standards, together with showers and changing facilities.

Policy T5 (Public Transport) states: Development proposals must be designed to meet the needs of public transport operators and users. In particular:

- (i) Road layouts must include direct, convenient and safe bus routes
- (ii) Bus priority measures must be implemented, where appropriate
- (iii) All houses and most other development must be no more than 400m from a bus stop
- (iv) Bus stops must have suitable shelters, good pedestrian access and be open to public supervision
- (v) Specific consideration must be given to the provision of public transport services in planning new development.

Policy T15 (Parking Provision) states: Development proposals should meet the following vehicle parking requirements:

- (i) Car parking provision must not exceed the Council's maximum standards
- (ii) On-site parking should not be reduced below the maximum standard if it would be likely to result in off-site parking causing problems that cannot be resolved by on-street parking controls.
- (iii) Parking areas should be well designed in terms of safety, circulation and appearance and assist access by pedestrians and cyclists.

Policy T17 (Traffic Calming) states: Development proposals should include traffic calming measures to provide a safe environment for pedestrians, those with impaired mobility and cyclists. In new development areas traffic calming should be achieved as an integral part of the street design.

The design of such measures must take into account the need for efficient and convenient public transport operation.

The Council may seek financial contributions from developers towards the implementation of traffic calming measures.

Appendix C

Appraisal Templates

TABLE C1: SITE CONTEXT APPRAISAL TEMPLATE

WHAT IS THE SITE CONTEXT?	
NATURAL ENVIRONMENT	
Topography	Which way does the site slope?
Drainage	Is the site liable to flooding?
Trees/hedges	What trees and hedgerows are to be found on the site?
Biodiversity	Are there any wildlife habitats within the site?
Watercourses	Are there any watercourses crossing the site?
BUILT ENVIRONMENT	
Easements	Are there any easements for services that cannot be built on?
Buildings	Are there any buildings/structures within the site that should be retained?
Listed Buildings	Are there any listed buildings within or adjoining the site?
Contamination	Is the site contaminated?
Archaeology	Are there any archaeological remains on the site?
Adjoining Buildings	Are there any buildings adjoining the site? What is the form, scale and layout of these buildings?
LAND USES	
Local facilities	What local facilities are there within walking distance of the site?
Surrounding Land Use	What is the use of land adjoining the site, either existing or proposed?
Existing Land Use	What is the existing land use of the site?
MOVEMENT	
Rights of Way	Are there any existing rights of way across the site?
Movement Framework	How does the site relate to the existing movement framework?
Public Transport	Where are the nearest bus routes and bus stops?
Access	What are the access points to the site?
Desire lines	What are the desire lines to local facilities?
LEGIBILITY	
Views	Are there any important views from the site or of the site from off-site?
Landmarks	Are there any important landmarks on or off site?
AMENITY	
Neighbouring Properties	What is the relationship of neighbouring buildings to the site? Do neighbouring properties overlook the site?
Adjoining Uses	Will there be any impacts such as noise from neighbouring uses?

TABLE C2: AREA CHARACTER APPRAISAL TEMPLATE

WHAT IS THE CHARACTER OF THE SURROUNDING AREA?		
LAYOUT		
Block structure/size	<p>What size and shape are the blocks?</p> <p>Are the blocks rectilinear or irregular in shape?</p>	Does this element make a positive contribution to the character of the area?
Street types	Is there a recognisable street hierarchy - e.g. mews, residential streets, park edges etc.?	Does this element make a positive contribution to the character of the area?
Street layout	<p>Is there a connected street network?</p> <p>Are street layouts straight or irregular?</p>	Does this element make a positive contribution to the character of the area?
Plot sizes	What size and shape are the residential plots?	Does this element make a positive contribution to the character of the area?
Relationship of building to street	<p>Do buildings front the street?</p> <p>Are the buildings gable end on to the street?</p>	Does this element make a positive contribution to the character of the area?
Continuity of frontage	Do the streets have a continuous frontage or are there gaps in the built frontage?	Does this element make a positive contribution to the character of the area?
Setbacks/building line	How far are the buildings set back from the highway?	Does this element make a positive contribution to the character of the area?
Car parking	Is parking provided on plot, on street, in front parking courts or in rear parking courts?	Does this element make a positive contribution to the character of the area?
Front boundaries	What form of front boundary treatment is there - hedges, walls, soft landscaping etc?	Does this element make a positive contribution to the character of the area?
OPEN SPACE/LANDSCAPE		
Public space	Is the street layout characterised by areas of public space - e.g. public squares, circuses, SUDs?	Does this element make a positive contribution to the character of the area?

Garden sizes	What size and shape are the gardens?	Does this element make a positive contribution to the character of the area?
Street trees/hedges	Are the streets characterised by tree planting and/or existing hedges?	Does this element make a positive contribution to the character of the area?
BUILDING FORM		
Building height	What is the height of the buildings?	Does this element make a positive contribution to the character of the area?
Building type	Are buildings flatted, detached, semi-detached or terraced? Are buildings square, rectangular or L-shaped? Are buildings narrow or wide-frontage?	Does this element make a positive contribution to the character of the area?
STYLE		
Roof form	What is the roof type - flat,ridge,hipped etc.? What is the degree of slope? Are there dormer windows?	Does this element make a positive contribution to the character of the area?
Materials	What materials are used - brick, stone, tile, slate etc.? What is the typical colour?	Does this element make a positive contribution to the character of the area?
Windows	What type are they - sash, bays? How many are there and what are their size and shape? What proportion of the facade do they take up? - solid to void ratio What colour is the frame of the window?	Does this element make a positive contribution to the character of the area?

Appendix D

Rear Parking Courts

- D1. It is not just Milton Keynes Council that does not support the inclusion of rear parking courts. Both Manual for Streets and the Parking Guide “Car Parking: What Works Where” (prepared by the former EP) state that rear court parking is recommended only after parking to the front and on street have been fully considered. Rear courtyards should support on-street parking, not replace it.
- D2. Where rear parking courts are included it is essential that on street parking is carefully managed. If it is not allowed then this should be suitably enforced through for example double yellow lines. If it is allowed, parking should be carefully designed into the streetscape so as to avoid indiscriminate parking on verges, pavements or indeed in the carriageway such that it prevents safe through movement of large vehicles.

D3 Rear parking courts must be made to feel as private and secure as possible. This can be achieved through:

- well designed ‘bridges’ between houses;
- electronic lockable gates (operated by key code so that in case of emergency, the code may be passed to emergency responders;
- as narrow an entrance as possible while still meeting highway requirements;
- accesses into rear parking courts should be located opposite to the fronts of dwellings in order to provide overlooking of the access;
- there should only be one entrance into a parking court, to be used by both vehicles and pedestrians;
- parking courts must be well lit and achieve appropriate BS standards. Ground level lighting should be provided;
- in order to aid surveillance, the boundaries of houses that abut parking courts should be a maximum 1.5 metres high with an additional 300 mm visually permeable trellis on top.



Secure rear parking court

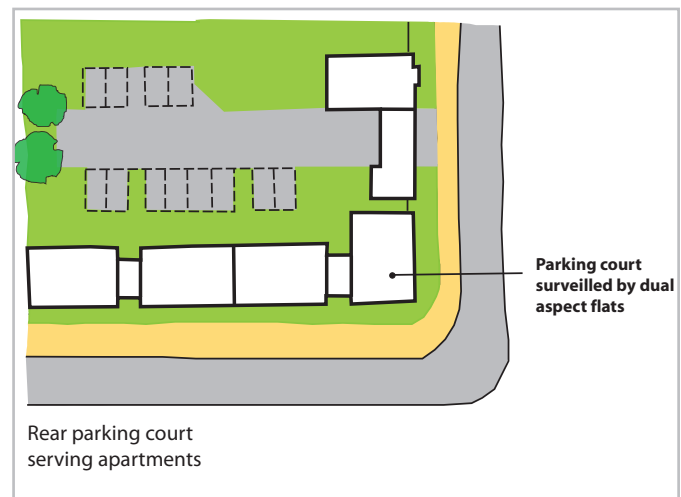
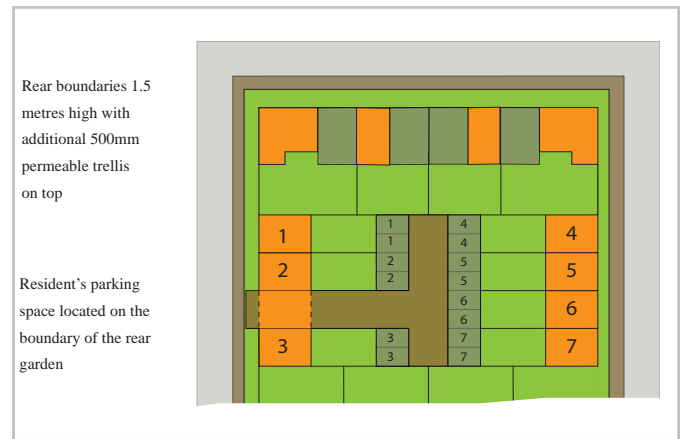


Rear parking courts must be secure and not “leaky”



Only one entrance for vehicles/pedestrians is permitted. Unlocked alleyways will not be permitted

- D4. Rear parking courts must be designed so that the resident's parking space is located on the boundary of the rear garden. In this way residents are more likely to use the parking court, rather than parking in inappropriate locations (e.g. on verges and pavements).
- D5. 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 (i.e. dual frontages are created). In these cases, these parking courts are acceptable. For apartments, there is no requirement for a permeable upper 300 mm to the boundary treatment.
- D6. All homes must be accessible from the rear through lockable gates that can be opened by means of a key from both sides. Footpaths need to be provided within rear gardens from the rear gate to rear door of the house to enable ease of access through garden when it is wet.
- D7. Parking courts should generally be within the range of 6-12 spaces. Larger courts may be appropriate for apartments. Tandem parking will not be allowed, as vehicles tend to dominate the court and the amount of vehicle manoeuvring is increased.
- D8. Rear parking courts should remain private and therefore visitor parking is not allowed within parking courts unless the parking court is un gated and under the control of some form of management company.



- D9. Garges and car ports should be avoided within parking courts as they block surveillance of vehicles.
- D10. Parking courts should be softened with limited landscaping (limited because too much will merely increase the size of the rear parking court). Appropriate tree species should be used to ensure that views into the court are not obstructed.
- D11. Where there are two rear parking courts adjoining each other, they must have a 1.8 metres solid structure (preferably brick wall) separating them.



"Bridge over unit" makes a clearer definition that the rear court is private

Rear Parking Courts with Houses

- D11. The Council and MKP have dealt with numerous planning applications where developers have located one or two houses within a rear parking court. This has largely been to provide some surveillance of the parking court.
- D12. The problem with this design solution is that it undermines the privacy of a rear parking court, blurring the required clear distinction between public and private space. For this reason housing will not be permitted within rear parking courts. Surveillance of the parking courts can be achieved through other means.

Rear Parking Courts with Flats over Parking (FOPs)

- D13. FOPs have often been included in rear parking courts to help with surveillance of the latter. They do however compromise the privacy, security and public-private interface of the parking court and are therefore not permitted.
- D14. Where FOPs can be used is to screen and protect rear parking courts. They must form part of the street frontage with the FOP needing to have its front door facing the street.



Plan showing FOPs used to screen and protect rear parking courts

Appendix E

Design and Access Statement Guidance Note

Preparing Design & Access Statements

A Guide for Applicants and Agents



www.milton-keynes.gov.uk/urban-design

Both Central Government and Milton Keynes Council are committed to raising the standard of design in the city. It is now widely recognised that good urban design not only adds value by increasing the economic viability of development, but also contributes to social and environmental regeneration.

High quality design is not a luxury, it is expected. We therefore need your help in delivering good design by the submission of a Design and Access Statement in support of your planning application.

The government has legislated that most outline applications and full planning applications require an accompanying Design and Access Statement. Key exemptions include householder extensions (except those in conservation areas), changes of use and engineering or mining operations. Other exemptions can be found in the DCLG Guidance on Information Requirements and Validation (March 2010).

Design and access statements help to ensure development proposals are based on a thoughtful design process and a sustainable approach to access; they allow the applicant to explain and justify their proposals; and they help all those assessing the application to understand the design and access rationale that underpins them. Statements should improve the quality of proposals.



Milton Keynes Council will not register applications that do not include a statement at all or one that does not address the headings in Steps 1 - 3 of this Guidance Note.

What is a Design and Access Statement?

It is a report accompanying and supporting a planning application to illustrate the process that has led to the development proposal. It should explain how design decisions have been reached and justify the proposal in a structured way.

The purpose of the statement is to improve the layout of the development and the design of the exterior of new buildings and public spaces.

You should start your statement when you start your scheme, and use it to help influence the design. It should explain how the design has evolved, and be site specific (not copied from another scheme). It should not be an afterthought merely to justify a pre-determined solution nor simply a description of the proposed scheme.

Level of Detail and Presenting the Information

The level of detail required in a design and access statement will depend on the scale and complexity of the application, and the length of the statement will vary accordingly. The Design and Access Statement should use plans and illustrative materials to explain the various issues which have influenced the scheme design.



Illustration showing clear movement network

For larger or more challenging sites, the statement will probably include plans and elevations, photographs of the site and its surrounds; and any other relevant illustrations. Photographs should be included to illustrate a point and not purely as wallpaper. Consequently, they should be accompanied with a caption.

These illustrative materials must not be used as a substitute for adequate drawings submitted with the planning application. Crucially, regardless of the complexity of the planning application, the document must effectively cover all the design and access issues for the proposed development.



Understanding the context is the key to good design

Pre-application Discussions and Negotiations

PPS1 advises that pre-application discussions are critically important. Applicants, particularly for major applications, will be expected to use statements as an aid to pre-application discussions. In this way local authority officers (and other interested and affected parties) will better understand what underpins proposals and this should facilitate decision-making.

What Do I Need to Do ?

The Components of a Design and Access Statement

A design and access statement should appraise the context and explain the design principles and concepts that have been applied to particular aspects of the proposal – these are the amount, use, layout, scale, landscaping, appearance and access of the development. These can be encompassed in the following three recommended steps which will form the content of the statement:

1. Appraising the context
2. Assess development objectives
3. Working up design solutions

It should also set out the principles and concepts that will be used when the proposal is developed in the future. In particular, for outline applications applicants should demonstrate how relevant parts of the statement will be adhered to in the drawing up of future details.

Building for Life

The Council supports the use of “Building for Life” to assess housing developments (see Core Strategy ‘Critical Success Factors and Monitoring Factors’ objective 11, page 99 & ‘Risks Actions and Contingencies’ objective 11, page 136). “Building for Life” is a national standard for well-designed homes and neighbourhoods, which assesses schemes against 20 criteria (see page opposite). It is recommended that for residential planning applications, the Design and Access Statement is geared to answer the “Building for Life” questions.

The answers to the “Building for Life” questions should be grouped under the headings in the DCLG Guidance on Information Requirements and Validation (see table below).

Design and Access Statement Headings	Relevant Building for Life Criteria
Use	1,2,3
Amount	1,2,3
Layout	6,7,8,9,10,11,12,15,16,17
Scale	6,8,17
Landscape	6,7,8,16
Appearance	6,8,17
Access	4,13,14

Some of the “Building for Life” criteria (questions 18-20) do not fit obviously into any of the Design and Access Statement headings and so should be included under other headings as appropriate.

Building for Life Questions

Environment & Community

1. Does the development provide (or is it close to) community facilities, such as a school, parks, play areas, shops, pubs or cafes?
2. Is there an accommodation mix that reflects the needs and aspirations of the local community?
3. Is there a tenure mix that reflects the needs of the local community?
4. Does the development have easy access to public transport?
5. Does the development have any features that reduce its environmental impact?

Character

6. Is the design specific to the scheme?
7. Does the scheme exploit existing buildings, landscape or topography?
8. Does the scheme feel like a place with distinctive character?
9. Do the buildings and layout make it easy to find your way around?
10. Are streets defined by a well-structured building layout?

Streets, Parking & Pedestrianisation

11. Does the building layout take priority over the streets and car parking, so that the highways do not dominate?
12. Is the car parking well integrated and situated so it supports the street scene?
13. Are the streets pedestrian, cycle and vehicle friendly?
14. Does the scheme integrate with existing streets, paths and surrounding development?
15. Are public spaces and pedestrian routes overlooked and do they feel safe?

Design & Construction

16. Is public space well designed and does it have suitable management arrangements in place?
17. Do the buildings exhibit architectural quality?
18. Do internal spaces and layout allow for adaptation, conversion or extension?
19. Has the scheme made use of advances in construction or technology that enhance its performance, quality and attractiveness?
20. Do buildings or spaces outperform statutory minima, such as building regulations?



Public spaces are well overlooked



Parking well integrated into street scene

Step 1: Appraising the context (Opportunities and Constraints)

Understanding the site is the first step in the process of good design.

“No two places are identical and there is no such thing as a blueprint for good design. Good design always arises from a thorough and caring understanding of place and context” (By Design – Urban Design in the Planning System: towards better practice)

A site analysis should not be a standard exercise. It is a factual account using writing, drawings (to scale) and/or photographs to explain the character and features of the specific site and the surrounding locality. You will need to visit the site to do this; it cannot be done as a desktop exercise. The scope of a site analysis should be tailored to the location of the site, scale of development and requirements of the planning controls.



Key landscape features to inform proposal

At its most extensive, a site analysis would document the site in terms of land uses, contours and existing vegetation, buildings (any of which could be retained), views to and from the site, access and connection points, drainage and services, orientation, microclimate and noise sources, possible contamination and other notable features.

With respect to the surrounding locality, it is particularly important to understand existing access points, and land uses as well as built form, layout, heights and styles.

The site analysis identifies which particular features of the setting affect the design and why.

The character and features of the site and its setting should lead to an opportunities and constraints plan for the site, which are the key influences on the design, together with an understanding of the future character of an area.



A thorough site analysis is vital

Step 2 :

Assess development objectives

As the applicant you will have certain development objectives, most notably pertaining to amount of development and proposed land uses. They should be assessed and justified against the opportunities and constraints identified in Step 1. Certain commercial and personal objectives, for example, may be at odds with the important features and character identified in the site analysis.

An effective assessment explains how any apparent conflict may be resolved and high quality design achieved. The Planning Authority will consider these aspects in fine detail.

Step 3 :

Working up design solutions

The statement is not simply a justification of a pre-determined design solution. It is likely that there will be several design options which may be investigated, but whichever is worked up, it must address the assessment of development objectives from Step 2 (which in turn incorporates the Context Appraisal from Step 1) and the principles of good design expressed in government guidance, that include among others:

- By Design – Urban Design in the Planning System: towards better practice;
- By Design – Better Places to Live: a companion guide to PPG3;
- Urban Design Compendium.

We would strongly advise that involvement with the local community and other professionals is undertaken when the size or complexity of the scheme justifies this. The statement should indicate and explain how the findings of any consultation have influenced the design options (and preferred options).

The following components are expected to appear in Step 3. Applicants are advised to read "Guidance on Information Requirements and Validation", in order to understand the difference in level of detail required between an outline planning application and full planning application.

Use - the use or mix of uses proposed for land and buildings. Use cannot be reserved within an outline application. Statements should explain the proposed use(s), their distribution across the site, and relationship to uses surrounding the site.

Amount - the amount of development proposed, either in terms of units (for residential) or floor space (for all other uses). Amount cannot be reserved within an outline application. Statements should explain the amount of development for each proposed use, how this is distributed across the site, and its relationship to the site's surroundings.

Layout – the way in which buildings, routes and open spaces are provided, placed and orientated in relation to each other and buildings and spaces surrounding the development. Statements must demonstrate how crime prevention measures have been considered in the design of the proposal

and how the design reflects the attributes of safe, sustainable places as set out in Safer Places – the Planning System and Crime Prevention (ODPM/Home Office, 2003).

Scale – the height, width and length of a building buildings in relation to its surroundings. The maximum and minimum sizes will need to be included in outline applications.

Landscaping – the treatment of private and public spaces to enhance or protect the amenities of the site and the area in which it is situated through hard and soft landscaping measures.

Applications must be supported with a landscape master plan / strategy drawing, considering landscape context, character and visual impact of the proposed development. All existing trees and hedges must be clearly and accurately shown. A full ecological report may be required.

Appearance – the aspect of a place or building that determines the visual impression it makes, including the external built form of the development, its architecture, materials, decoration, lighting colour and texture.



Landscaping needs to be integrated into overall design

Access – applicants should explain how the site will be linked to surrounding routes and facilities. Access arrangements will ensure that all users will have equal and convenient access to buildings, spaces and the public transport network. Applicants should include an explanation of disabled access.

Listed Buildings

Design and access statements are also required for listed building consent. They will be similar to design and access statements for planning applications, although there will be some differences because of the differing nature of the application. Where there is a planning application submitted in parallel with an application for listed building consent, a single combined statement will suffice.

Further information on design and access statements in relation to listed buildings can be obtained from the Council's Conservation and Archaeology team.

Further Information

Further information can be found at the following:

'Guidance on Information Requirements and Validation' - DCLG March 2010

- Design and Access Statements –

'How to write, read and use them' - CABE 2006, see <http://www.cabe.org.uk/publications/design-and-access-statements>

- Disability Rights Commission (DRC)

'Guidance for Access Statements', see www.drc-gb.org

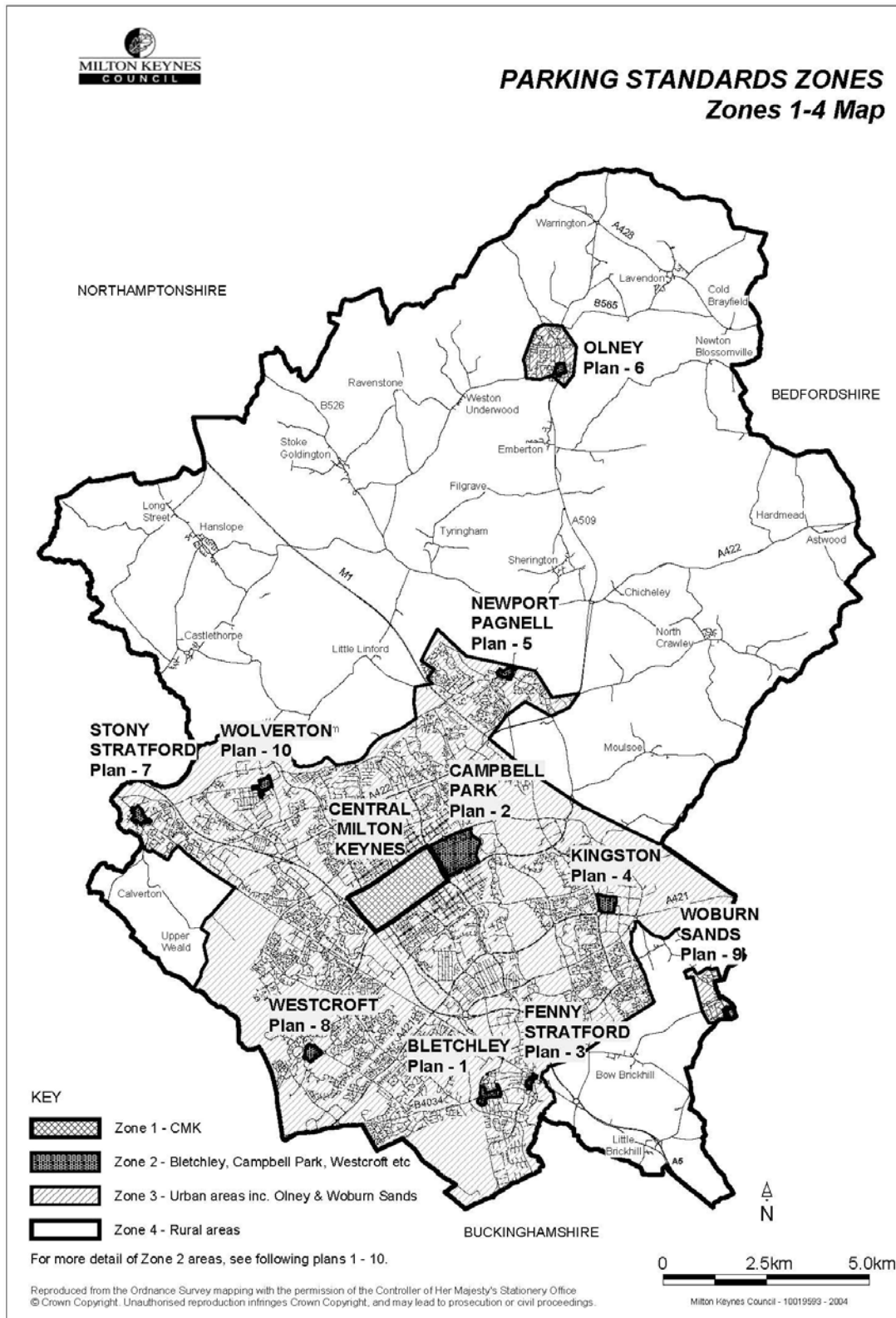
Appendix F

Residential Parking Standards

(Extract from Parking Standards Addendum 2009)

The Council's car parking standards for all dwellings are included in the "Addendum to Parking Standards", adopted in 2009.

The Council's car parking standards are currently being reviewed.



2. Changes to Standards for Dwellings

Following the review of car ownership and the review of the 2005 standards, changes to the residential car parking standards are shown in the tables below. The new standards for allocated and unallocated parking are shown in Table 1 and 2 below.

These standards supersede those shown in Table 3 in section 7 of the 2005 document. Notes 2-5 in that table, which relate to C3 accommodation, are also superseded by the new standards. However, Note 1 continues to apply; Garages are not counted as a parking space.

NB. These standards show the minimum requirement for parking provision. Parking provision in excess of the minimum will be considered on a site-by-site basis.

The figures in Table 1 show the minimum level of allocated parking required per dwelling. Allocated parking is defined as privately owned spaces that are designated for the sole use of an individual dwelling. Such spaces will normally be located on-plot, but for some developments, such as flats, they may be located in a shared parking area.

Table 1 – Standards for Allocated Parking (spaces per dwelling)

Dwelling Size (bedrooms)	Accessibility Zone			
	1	2	3	4
1	1	1	1	1
2 (flat)	1	1	1	2
2 (house)	1	1	2	2
3	2	2	2	2
4+	2	2	2	3

In addition to the allocated parking shown in Table 1, provision should be made for unallocated parking. Unallocated parking is defined as spaces that are for shared use by any visitors or resident. These spaces must be provided in publicly accessible locations, normally as part of the public highway.

Table 2 – Unallocated Parking Requirement (spaces per dwelling)

Dwelling Size (bedrooms)	Accessibility Zone			
	1	2	3	4
1-bed	0	0	0.25	0.25
2-bed (flat)	0	0	0.50	0.25
2-bed (house)	0	0	0.25	0.25
3-bed	0	0	0.50	0.50
4 or more	0	0	0.50	0.50

The requirement for unallocated parking can also be expressed as follows:

0.25 spaces per dwelling = 1 space per 4 dwellings

0.50 spaces per dwelling = 1 space per 2 dwellings

Where this requirement results in a partial space (0.25, 0.5 or 0.75), the provision should be rounded up to the next whole number of spaces. For small infill plots and similar applications in existing streets, where the total unallocated requirement is 1 space or less, the provision will be determined on a site-by-site basis.

Urban Design & Landscape Architecture

Milton Keynes Council
Civic Offices
1 Saxon Gate East
Milton Keynes MK9 3EJ

T +44 (0) 1908 252708

F +44 (0) 1908 252329

E urban.design@Milton-keynes.gov.uk



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</p> <p>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</p> <p>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.’</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> <p>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>

2.3		<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>
	<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>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) 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>

		<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>	
2.14		<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>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>
2.15		<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>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. 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> <p>Amend ordering of principles.</p>
3.12		3.3.2 first six items are relevant not 5.	<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>	
3.13		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>No change (will however provide guidance on the relationship between buildings and underpasses).</p>
3.14		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>No change.</p>

3.15		inevitable, but don't actively encourage it! 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"	Is this the case?	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.'
3.16		3.4.6 last bullet make it "Larger play areas for older children and related..."	Agree	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.'
3.17		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	Already covered by 3.4.7 2 nd sentence not relevant to 3.4.7	No change.

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> <p>Routes should be straight and as short as possible;</p> <p>There should be enough distance allowed for so that the entire underpass can remain as a straight/direct alignment</p> <p>Underpasses should be of sufficient width to allow good visibility into and from the underpass;</p> <p>Housing should be located facing the underpass to provide natural surveillance into the underpass;</p> <p>Where they cross dual carriageways, provision should be made to allow daylight from the central reservation area;</p> <p>High quality robust lighting should be</p>
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3.24				<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>
		<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				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		3.6.26 maybe it should say tree and shrub species – last time I looked, most of those listed were bushes. 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.	List of appropriate species is wrong. On Highways advice will be deleting last sentence.	Para 3.6.26 - Include revised list of 'tree' species. 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> <p>a. The garden is enclosed from the rear parking area</p> <p>b. Good highway grade access is provided to all front doors</p> <p>c. a flat over the drive thru access provides surveillance to the rear</p> <p>d. the number of dwellings using the drive thru is no more than 4-5</p>	<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.

		may be a little excessively tight.	is too prescriptive.	
3.63		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!	Noted.	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.'
3.64		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.	Both diagrams have been criticised by other respondents.	Delete convex and concave diagrams on page 92.
3.65		4.11.1 Insert "minimum" before "objective" and "with privacy measures" after 13.7m. It's pretty tight.	Unnecessary	No change.
3.66		4.12.15 You can't come up with a more interesting good glazing bar example can you? The examples given are pretty boring!	Subjective view	No change.
3.67		4.12.18 Our tradition is the local stone and local brickworks! Reword as Although the traditional	Unnecessary.	No change.

		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>

3.75		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.	The council have no powers to insist on specific requirements	equipment should be designed sympathetically in order to minimise the negative impact on the public realm.'
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>	No change.
4.1	Cllr Edith Bald	I like the Guide and the way it is written which makes it intelligible for ordinary people.	Noted.	No change.
4.2		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	Yes, the Design Guide does provide new guidance (or guidance that never previously existed) for many of the issues you refer too. Some standards for parking, road widths have changed. Some of the standards are mandatory and others are advisory and the letters implementation depends on a variety of circumstances.	No change.

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>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>	No change.
4.5			<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>

		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?	rationale for this drawing and supporting text no longer exists.	
5.4		Page 27, second bullet point - this bullet point needs to include cyclists (or a separate bullet point included).	Accepted.	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.'
5.5		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	Accepted.	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.'
5.6		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?	Accepted.	Delete plan on page 39.
5.7		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.	Accepted.	Amend para 3.6.7 first sentence to read: 'The street network must be designed so that, wherever possible, direct access

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	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.	Accepted.	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).'
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.</p> <p>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>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>

6.6		<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	the carriageway. Also the word "pavement" should be replaced with "footway" (the carriageway is also a 'pavement').	does not agree that the tree should be positioned at the back of the footway. Accepted.	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.'
6.11	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.	Accepted.	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.'
6.12	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).	Accepted.	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.'
6.13	3.6.40 3 rd bullet in the box should say "serving" too many houses, not "served by" too many.	Accepted.	Amend para 3.6.40 3 rd bullet point to read: 'too much traffic because

6.14		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.	Accepted in part. Non-vehicular strips are no longer to be included.	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;
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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

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.	required at each end of the parking to ensure that the speed restraint effect remains when the car is absent. 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>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>meadows; (5) bat or bird boxes and crevices." 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). Amend green box page 32 first bullet point to include sentence at the end to state: 'Non-native species,</p>
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		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".		where used, should be selected for known wildlife value.'
10.4		Minor points/tips The document bears evidence of different contributors and needs proof-reading e.g. the reprint of Local Plan Appendix L3. 5.8.1: CABE is now defunct.	Document will be proof read before final publication. CABE is now part of the Design Council.	Amend para 5.8.1 to read: "Building For Life " is a partnership between several national agencies, including Design Council CABE, ...'
11.1	Landscape Adoptions Officer	Landscape Adoption Process/Requirements (p34) To para. 2 add: "...and in consultation with colleagues in landscape architecture, arboriculture, ecology, etc." 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.	Accepted.	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.'
12.1	Mark Haynes Senior Landscape Officer (Development Management)	Plant list on page 47 (para 3.6.26) lists low shrubs rather than street trees and should be amended.	Accepted.	Amend green box para 3.6.26 to read: Avenue/boulevard <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'. 				

12.2				<p>Field Maple species.</p> <ul style="list-style-type: none"> • Prunus x schmittii. • Cherry species. • Sorbus aucuparia 'Sheerwater Seedling'. <p>Mountain Ash species</p> <ul style="list-style-type: none"> • Crataegus x laveallei <p>Hawthorn species.</p> <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	Louise Izod (Public Arts Projects Officer)	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.		include additional text stating: 'Where gardens include existing mature trees, gardens will need to be larger to provide space for trees.'
13.2		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. 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.	Noted.	No change.
13.3		3.4.3 <i>Landscape quality and management of public</i>	Accepted.	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.'
		Developers should consider		See above.

		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: 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>	Accepted on the whole. However, it is not considered necessary for the Design Guide to provide the level of detail suggested.	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 ’
15.2		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	Accepted.	Amend para 4.15.3 to read: Residents are required to bring their refuse and

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		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?	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.
18.3		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.	Point regarding rear parking courts is noted. Basements are not generally considered to be a viable option.	No change.
18.4		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.	Noted. Whilst this may be a sensible idea, it is not something which the Design Guide needs to be prescriptive on.	No change.
18.5		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	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	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 aerals 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>'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>	Accepted.	Delete paras 3.5.8-3.5.10, and illustration on page 39.

		<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>
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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

30.4		<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>
		<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>

31.9		Shouldn't we be promoting more sustainable forms of transport and making our residential developments well connected and serviced?		<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> <p>No change.</p>
		<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>	It is accepted that tandem parking may be appropriate in certain circumstances.	
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>	It is accepted that tandem parking may be appropriate in certain circumstances.	<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	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.	Not accepted. Section 3.6 deals with important urban design principles. This section is about more than just technical highway requirements.	No change.
33.10	3.6.18 It is not clear if the Council prefers crossroads or staggered junctions. Clarify this point in 3.6.18.	Accepted.	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.'
33.11	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> "	Not convinced that the proposed wording adds anything to what the Guide already says.	No change.
33.12	3.6.35's accompanying plan The plan needs to avoid car opening over roadway as per requirements for Brooklands.	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	As above. Delete this paragraph. 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.	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 Accepted.	Delete drawing on page 73.
33.20	3.10.3 3rd bullet point Repetition of bullet point. Delete 3rd bullet point.	Accepted.	Amend green box 3.10.3 to delete second bullet point.
33.21	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.	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.	Amend first bullet point para 4.2.4 to read: 'buildings designed to provide additional future floor space through conversion or extension.'
33.22	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> "	The wording says 'should' not 'must' which suggests that recessed or cantilevered are preferred.	Add sentence after second sentence para 4.12.39: 'Where external frames are used care needs to be taken that they

33.23		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.	This was only guidance, however it is accepted that the level of detail included in this section is unnecessary.	complement the overall elevation design and are not seen as a 'bolt-on' that clutters the elevation.' Delete para 4.13.4.
33.24		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	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.	Amend para 4.15.9: 'For houses, letter boxes must be located at a convenient height for ease of use by postmen.'
33.25		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	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	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

		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>

		the Council. This is a Design Guide and should be a document to be <u>considered</u> in the determination of planning applications.			
35.6		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.	This is semantics.	No change.	
35.7		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.	Accepted.	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.’	
35.8		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.	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	See response to comment 35.1	
35.9		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.	Accepted.	Delete para 1.2.4.	

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>	Accepted.	Amend Table 2 Page 25 to include: 'Street furniture and lighting'.
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>	Accepted.	<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		3.3.3: The last sentence of this paragraph states:	The Council is currently	Delete para 3.3.3.

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>	
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 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> <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"> • Acer platanoides 'Emerald Queen'. Norway Maple species. • 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.
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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

35.43		<p><u>in specific points</u> they can be narrowed further.</p> <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>read, "In specific points they can be narrowed down further to accommodate redway or other dedicated pedestrian crossing points"</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>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>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 Governments 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 Throughs’: 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		Pg. 76 'example diagrams': Both plan examples result in a car dominated development and an inefficient use of the land.	gardens result. Not accepted. Both examples provide efficient means of accommodating parking and accord with principles of Manual for Streets.	No change.
35.70		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.	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)?	No change.
35.71		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.	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.	No change.
35.72		Pg. 80 Point 4.2.5: The comment: 'CLG are currently reviewing Lifetime Homes.' is incorrect. This was revised in July 2010.	CLG are reviewing all residential design standards. However, reference to any review should not be included in the final version of the Design Guide.	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>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. Delete paras 4.5.25-4.5.38.
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.</p> <p>Para 4.12.6 accepts that well-designed traditional houses are appropriate.</p> <p>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>
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>	<p>No change.</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.		This is really a matter for the Housing Strategy.	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>

Parish Council Presentation

Room 2, Civic Offices, 18 January 2012

Neil Sainsbury (NS) (Head of Urban Design and Landscape Architecture) gave a presentation explaining the main topics covered by the Draft New Residential Development Design Guide.

A Question & Answer session followed. The main issues raised were:

- The Design Guide should require that developers use qualified architects/landscape architects/urban designers.
- Sometimes qualified architects are just as bad.
- Chapter 5 – design quality assurance – should be strengthened. Section on Building for Life (BfL) too weak. Are we going to require accredited BfL assessor? Stronger pre-application procedure required. Is the Council going to use a local design review panel (NS – stated that the Council still looking into it).
- Is there a mechanism for parishes to identify what they value in their local area? (Suggestions from around the table included Village Design Statement, neighbourhood plan, appraisal using Design Guide template C2)
- Conflict between permeability and safety of footpaths from culs-de-sac. Too much emphasis on overlooking from dwellings – after dark curtains are drawn. Space around footpaths makes them feel safer. (NS – important that desire lines are along connected streets, not culs-de-sacs).
- Problem for cyclists of having to continually stop where driveways cross redways (p41 of Design Guide). (NS – stated that experienced cyclists will use road, less experienced cyclists will not be so worried about having to stop).
- Desire lines are from houses to facilities not between facilities. Grid squares should have more than one focal point – to encourage residents to visit different parts of the estate.
- Local centres provide a focus for a community. Design Guide should give more emphasis to local centres, through e.g. including a diagram. Local centres may need to serve more than one area, across a grid road.
- Need for allotments and edible plants within public spaces (e.g. fruit trees instead of ornamental species). Reference made to initiatives elsewhere e.g. Todmorden (<http://www.incredible-edible-todmorden.co.uk/home>)
- Complaint that the Council do not take account of parishes comments on planning applications.

- Concern that the Residential Design Guide and the Highways Design Guide were being divorced from one another. (NS – stated that Transport officers had been involved in the preparation of the Residential Design guide and that the Highway Design Guide was being consulted on late February.)
- Guide has nothing on street furniture, and on TV aerials/satellite dishes. Need to get rid of street clutter, as has been done in Upton.
- Guidelines needed for house extensions and householder developments to ensure that original design concept is not lost (NS – referred to the existing guidance note on householder developments: http://www.miltonkeynes.gov.uk/development-control/documents/Design_Guide_Final_V2.pdf). It was also noted that many of these changes are permitted development.
- Developers should be required to discuss proposals with parishes/town councils.
- Entrances from grid roads not mentioned in design guide. Guidance required relating to first stretch of estate road where there is a transition from vehicle speeds of grid road to residential roads.
- Should consider issues where existing villages are incorporated in new development areas.
- Is there a minimum level of provision of facilities (particularly, community centre/meeting hall) for each grid square or per population. (The Council has adopted Supplementary Planning Guidance on S106 contributions for leisure, recreation and sports facilities: http://www.milton-keynes.gov.uk/planning-policy/documents/Leisure_recreation_and_sports_facilities_SPG.pdf)
- No provision has been made for a meeting hall in Ashland. (Suggestions from around the table included use dwelling as community house, or use an empty shop).

Members' Workshop Monday 12 March

Additional Issues Raised by Members at Workshop

Images	Agreed to remove photos on page 95, and top photos on page 96 & 103.
Garages	Agreed to include following text: "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."
Speed Limits	Members understood that there is a Council Policy which states that residential roads should be designed to 20mph. It was agreed to check with the Council's Transport Department. They have responded as follows: "There is no policy, but as a principle we try to achieve 20mph on most residential roads, particularly those directly serving dwellings. The 25mph design speed for type 6 and 7 is just that – a design speed. It recognises the need for wider carriageways, larger junction radii, increased forward visibility etc. etc. to accommodate higher traffic flows and higher frequencies of larger vehicles. It doesn't mean that you can't have a 20mph limit on them."
Parking for flats	Agreed to include text to read: 'Parking for flats should be clearly and suitably signed from all approaches.'
Bullet points	Agreed that bullet points should not continue over to next page.
Appendix A	Agreed that case studies should be arranged so that whole of case study can be viewed on opposite pages.
Appendix B	Agreed to include statement to state that guidance is correct at time of adoption of Design Guide. Policies may subsequently be superseded by more recent policies.
Juliet Balconies	Members proposed that Juliet balconies should be discouraged. Juliet balconies are required as a safety measure where full length windows are included. It is therefore not considered reasonable for the Design Guide to discourage Juliet balconies.
Photovoltaic Panels	Agreed to include reference to orientating roofs to maximise opportunities to fit photovoltaic panels. Amend para 3.5.4 to read: 'Orientating as many houses as possible so that the elevation with the most glazing faces within 30 degrees of south will maximise solar gain, as well as the opportunity to fit photovoltaic panels to roofs.'
Parking for leisure uses in linear parks and other open spaces	Agreed to include wording in Section 3.9 as follows: '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.'

Wards Affected:

All Wards

ITEM 4

DELEGATED DECISION

10 APRIL 2012

**PRIMARY AND SECONDARY SCHOOL ADMISSIONS ARRANGEMENTS:
SEPTEMBER 2012 AND 2013**

Author: Marilyn Barby, School Admissions and Transport Manager.

Tel: (01908) 253242

Purpose:

To report on the consultation on school admissions arrangements for primary and secondary transfers at age 7 and 11 and for children starting school for the first time in September 2013.

To report on the consultation on arrangements for admission outside the normal transfer round from September 2012.

Background:

Admissions authorities are required to consult on their admissions arrangements. This is in accordance with the School Standards and Framework Act 1998 as recently amended by the Education Act 2011 and the School Admissions Code issued February 2012.

The Local Authority (LA), as the admissions authority for community and voluntary controlled schools, is required to consult annually on its admissions arrangements, including the LA's co-ordinated schemes for all primary and secondary admissions, which are national requirements.

1. Recommendation(s)

- 1.1 That the administrative boundary of Milton Keynes be reconfirmed as the relevant area for school admissions.
- 1.2 That the primary and secondary co-ordinated scheme for admission for intakes in September 2013, which applies to all admissions authorities including academies in Milton Keynes, be confirmed (attached as **Annex A**).
- 1.3 That the in year primary and secondary co-ordinated scheme for admission outside the normal rounds from September 2012 onwards, which applies to all admissions authorities including academies in Milton Keynes, be confirmed (attached as **Annex B**).
- 1.4 That the oversubscription criteria for admission to community and voluntary controlled primary schools from September 2013, which includes statutory changes and a proposal to change the method of measuring distance from shortest available route to straight-line, be confirmed (attached as **Annex C**).

- 1.5 That the proposed published admissions numbers for September 2013 intakes for all community and voluntary controlled primary schools, which includes some proposed changes detailed at **2.9**, be confirmed (attached as **Annex D**).
- 1.6 That the primary and secondary in year admissions guidance incorporating the Fair Access protocol, which applies to primary and secondary schools and academies in Milton Keynes, be confirmed (attached as **Annex E**).

2. Issues

- 2.1 Between January and March 2012 the LA consulted with headteachers, governing bodies, other admissions authorities (foundation, voluntary aided and academy schools), other local education authorities, diocesan authorities and the secretaries of the professional teacher associations.
- 2.2 The LA took account of legislation on the admissions arrangements included in the Education Act 2011, which came into force in February 2012, and the School Admissions Code issued at that time.
- 2.3 The consultation (attached as **Annex F**) invited comments on:
- The relevant administrative area for admissions purposes;
 - The proposed primary and secondary co-ordinated scheme for admissions for intakes in September 2013, which applies to all admissions authorities including academies in Milton Keynes;
 - The proposed in year primary and secondary admissions co-ordinated scheme for admission outside the normal rounds from September 2012 onwards, which applies to all admissions authorities including academies in Milton Keynes;
 - The proposed oversubscription criteria for community and voluntary controlled primary schools for intakes in September 2013 and beyond;
 - The proposed published admissions numbers for September 2013 intakes for all primary community and voluntary controlled schools in Milton Keynes;
 - The primary and secondary in year admissions guidance incorporating the Fair Access Protocol, which applies to primary and secondary schools and academies in Milton Keynes;

2.4 Consultation

The consultation was made available on the council's website including contact details for those wishing to obtain hard copies and where to send responses.

There were no responses to this consultation. The response to consultation in previous years has been low. In 2011 there were 5 responses; 2 from parents and 3 from primary schools. In 2010 there were also 5 responses; 2 from parents, 2 from primary schools and 1 from a secondary school.

2.5 **Relevant Area**

The relevant area is the whole of Milton Keynes including the villages to the north sited within the council's boundary. It is proposed that this area should be confirmed as the relevant area.

2.6 **The proposed primary and secondary co-ordinated scheme for admissions in September 2013 which applies to all admissions authorities including academies in Milton Keynes.**

The LA is required to formulate a co-ordinated scheme (or schemes) for primary and secondary admissions and transfers and to consult.

There are no changes to the co-ordination arrangements for primary and secondary admissions.

2.7 **The proposed in year primary and secondary co-ordinated scheme for admission outside the normal round from September 2012 onwards**

The local authority is required to formulate an in year primary and secondary co-ordination scheme for admissions outside the normal round. There are no changes proposed.

2.8 **The proposed oversubscription criteria for admission to primary community and voluntary controlled schools**

There are two changes to the admissions criteria for primary community and voluntary controlled schools, in line with the draft School Admissions Code which came into effect from 1 February 2012. These are:

- Widening the oversubscription criteria for children in care to include children, previously in care, who immediately after being in care became subject to an adoption, or residence or special guardianship order within the last year.
- Allowing admissions authorities to admit above the infant class size limit for twins and children from multiple births when one of the siblings is the 30th child to be admitted.

In addition we propose to change the criterion used for measuring distance from home to school which is the tie-breaker if there are more applications than places available under a particular criterion.

It is proposed to move from a shortest available route measurement to straight line measurement.

A number of "Own Admissions Authorities" in Milton Keynes use straight line measurement to rank admissions applications, 3 primary and 9 secondary.

A neighbouring authority, Buckinghamshire County Council consulted last year and agreed to move to straight line measurement which will be introduced for the 2013 intakes.

The current arrangement of using shortest available route appears to leave us open to challenge on the route actually used and the mileage. Straight line measurement is less open to challenge. Whichever method is used there will always be some children who have an advantage over others.

2.9 **Proposed Published Admissions Numbers (PANs) for September 2013 intakes**

The schedule attached as **Annex D** lists all primary community and voluntary controlled primary schools with the proposed Published Admission Number for September 2013.

Changes are proposed for:

Falconhurst School – increase by 10 from 50 to 60.
Langland Community School - increase by 10 from 50 to 60.

The proposal to increase the number of available places at these two schools is in line with the Council's duty to ensure that there is sufficient capacity in schools for local children. Targeted input and support is assisting these schools to improve. Additional children will provide the school with increased revenue funding which is also advantageous to schools in these situations.

Middleton Primary School – increase from 60 to 90.
Meadfurlong and Penwith Schools amalgamate from 1 September 2012. The proposed PAN for the new school for September 2013 is 60 at 4+ and 50 at 7+.

The governing bodies of all schools identified above have been consulted with and are in agreement with these proposed changes.

2.10 **Proposed primary and secondary in year admissions incorporating the Fair Access Protocol**

The general guidance document reflects the current arrangements for managing in year admissions incorporating the Fair Access Protocol. There are no proposed changes.

3. **Alternative Options**

- 3.1 The LA is legally required to co-ordinate school admissions arrangements. If the proposals are not agreed the LA would not be able to meet its statutory obligations regarding school admissions arrangements.

4. **Implications**

4.1 Policy

No additional comments.

4.2 Resources and Risk

No additional comments.

N	Capital	N	Revenue	N	Accommodation
N	IT	N	Medium Term Plan	N	Asset Management

4.3 Carbon and Energy Management

No additional comments.

4.4 Legal

The LA is required to determine admissions arrangements in line with the School Standards and Framework Act 1998 as amended by the Education Act 2011 and in line with the School Admissions Code, both of which came into effect in February 2012.

4.5 Other Implications

No additional comments.

N	Equalities / Diversity	N	Sustainability	N	Human Rights
N	E-Government	N	Stakeholders	N	Crime and Disorder

Background Papers:

LA consultation document issued January 2012

Consultation responses - none

Education Act 2011

DfE School Admissions Code of Practice issued February 2012

MILTON KEYNES COUNCIL

CO-ORDINATED SCHEME FOR PRIMARY AND SECONDARY SCHOOL ADMISSIONS – SEPTEMBER 2013

This document outlines the scheme to formulate admissions to primary and secondary schools in Milton Keynes for admission at the main points of entry from September 2013.

This scheme relates to the following admission authorities:-

Milton Keynes Council as the admissions authority for all primary community and voluntary controlled schools.

All foundation, trust and voluntary aided schools and academies which are “Own Admissions Authorities” shown below.

PRIMARY SCHOOLS & ACADEMIES

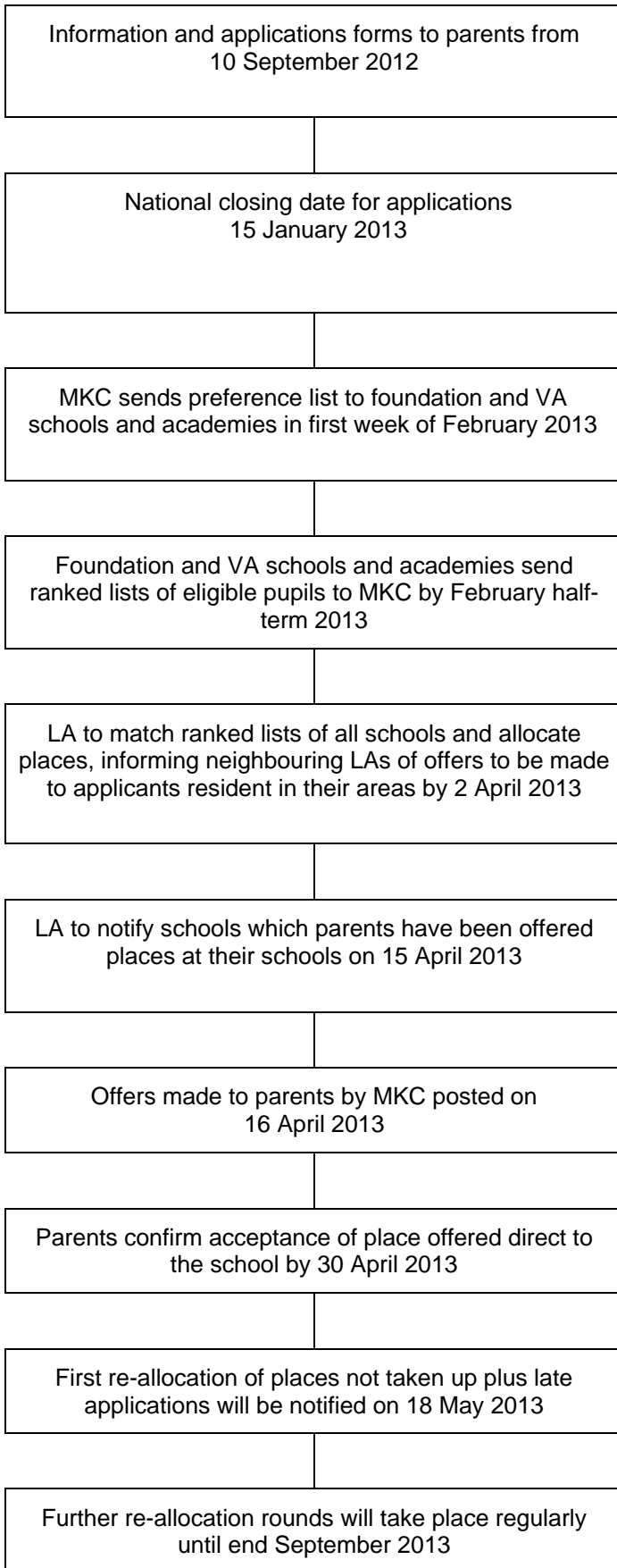
Bishop Parker Catholic School
 Bow Brickhill CE Primary School
 Christ the Sower Ecumenical Primary School
 St Bernadette’s Catholic Primary School
 St Mary Magdalene Catholic Primary School
 St Mary & St Giles CE Aided Junior School
 St Monica’s Catholic Primary School
 St Thomas Aquinas Catholic Primary School
 Brooksward School
 Germander Park School
 Glastonbury Thorn School
 Green Park School
 Loughton School
 New Bradwell School
 Olney Infant Academy
 Oxley Park Academy
 Portfields School
 Southwood School
 Stanton School
 Tickford Park Primary School
 The Premier Academy
 Two Mile Ash School

SECONDARY SCHOOLS & ACADEMIES

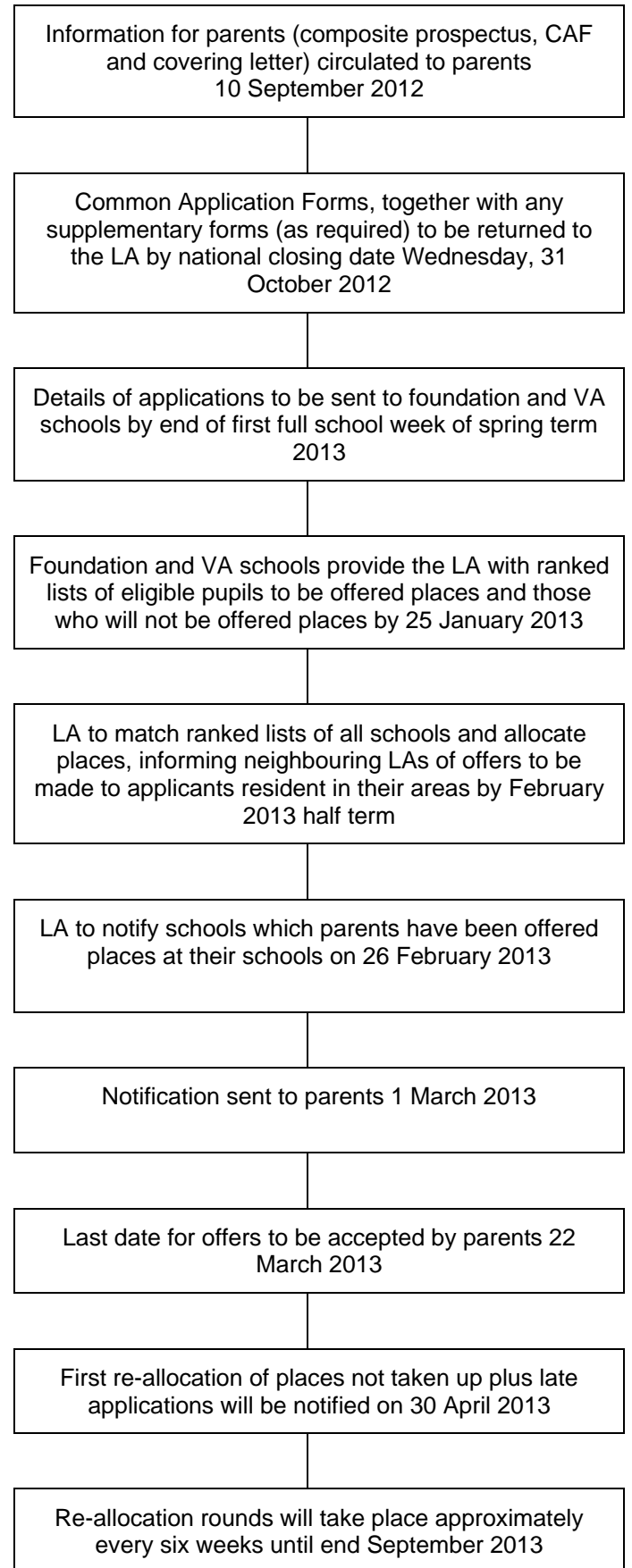
Denbigh School
 Leon School & Sports College
 Lord Grey School
 Oakgrove School
 Ousedale School
 Shenley Brook End School
 St Paul’s Catholic School
 Stantonbury Campus
 The Milton Keynes Academy
 The Hazeley Academy
 The Radcliffe School
 Walton High

MILTON KEYNES COUNCIL

Timeline for transfer at 7+ and starting school for the first time for September 2013



Timeline for secondary admission for September 2013



Section 2 Elements of the Scheme

2.1 Information for Parents

The 'Admission to Primary Schools in Milton Keynes Information for Parents' and the 'Admission to Secondary Schools in Milton Keynes Information for Parents' booklets will be available at infant, junior and primary schools in Milton Keynes for distribution during the second week of September 2012 to the parents of children starting school for the first time, transferring to junior school at the end of Year 2 and transferring to secondary school in September 2013. The booklets contain information about:

- o Primary or secondary schools
- o Prospective parents' evenings or other opportunities to visit schools
- o How to express preferences
- o How allocations will be made
- o Schools' admissions criteria
- o Where a supplementary form is required by the school
- o Deadlines for applications and allocation
- o Transfers for pupils with a special educational need
- o Home-to-school transport policy
- o Where to access further information
- o Late applications
- o How to apply on line
- o The in-year fair access protocol

Parents will be able to express preferences for schools in Milton Keynes as well as any preferred schools outside the council boundaries in other local authorities (LAs).

2.2 The Common Application Form

Parents will be encouraged to apply online using the Common Application Form and viewing the admissions booklet. Parents will be provided with a paper copy on request. The form has a common format.

Parents will be required to:

- o Express up to three preferences
- o Rank order their preferences
- o Give details of siblings who will remain at the school in September 2013
- o Give details of the child (address, date of birth, any relevant medical information)
- o Indicate if the child has a statement of special educational needs
- o Indicate if the child is in care
- o Give any reasons for their preferences
- o Name current school
- o Give their details (name, address, relationship to the child, contact details)
- o Provide proof of their and their child's address (for secondary school transfer only)

If additional information is required by governing bodies of foundation or voluntary aided schools or academies in order to apply their admissions criteria, this will be detailed in the specific section about that school in the booklet and on the Common Application Form. Contact details for each school are included so parents can obtain any supplementary information forms required from the schools directly.

Parents will be required to apply online or return the completed Common Application Form to their child's infant, junior or primary school by the national closing date, 31 October 2012 for secondary school transfer or 15 January 2013 for children starting school for the first time or transferring from infant schools at the end of Year 2. Supplementary forms must be returned to the individual secondary or primary school.

All schools and academies must ensure that all applications are dispatched straight away to the School Admissions Team.

If secondary schools receive applications directly from parents in error, they should inform the School Admissions Team and send the application to the team straight away.

2.3 Applications for voluntary aided and foundation schools and academies

Milton Keynes Council's School Admissions Team will ensure that all parents' preferences are logged on the CAPITA ONE admissions system. The School Admissions Team will send all applications in an electronic data file. Any supplementary information received will be forwarded to foundation and voluntary aided schools and academies.

The application list will be sent to these schools during the first full school week in the spring term, January 2013, for secondary school transfers and by the end of the first week of February 2013 for all primary admissions.

2.4 Applications for schools in other LA's and applications for Milton Keynes schools from families living in other LA areas.

Similar to the process described in 2.3, applications for schools in other LAs will be logged on the CAPITA ONE system. The School Admission Team will send an electronic data file to the other LAs. Any supplementary information received will be forwarded to the relevant maintaining LA.

Milton Keynes Council School Admissions Team will receive applications from neighbouring LA's. These will be recorded and passed to foundation or voluntary aided schools and academies included in the electronic data entry file.

2.5 How a single offer will be determined from those eligible for places

Foundation and voluntary aided schools and academies should consider applications, apply admissions criteria and determine an eligibility list. If the school or academy has more applications than places available a rank order of eligibility beyond the published admission number should also be determined.

If a child is eligible for a place at more than one of the parents' preferred schools a place will be offered at the highest ranked school on the application form. This releases places which can be allocated through the reiteration process and ensures that as many applicants as possible are offered a place at one of their preferred schools.

Eligibility lists should be returned via electronic data transfer to Milton Keynes Council School Admissions Team by 25 January 2013 for secondary transfers and February half-term 2013 for primary admissions.

If a pupil is deemed to be eligible for places in more than one school, the allocation will be determined by considering which school is ranked highest in the parents' preferences.

If none of the parents' preferences can be met, a place will be allocated at the nearest school with places available.

A single place will be identified for each child by the end of this process. Wherever possible, when schools have more eligible applications than places available, places will only be allocated up to the limit of the published admissions number. The admission number will only be exceeded in **exceptional circumstances**. Where further capacity is required to provide every child with a school place, a discussion will be held with schools to agree an acceptable solution.

2.6 Protocol for children with statements of special educational needs

The Inclusion Team will work with parents of children with statements and schools during the summer term of year 5 and autumn term of year 6 to agree, following transfer review, which school to be allocated for September 2013.

The Inclusion Team will inform parents of the school allocated for their child by 15 February 2013.

Any allocations for children with statements of special educational needs will count against the Published Admission Number for September 2013.

2.7 Notification of offers to all schools or other LAs

For secondary school transfers other LAs will be informed by 15 February 2013 of the offers of a school place that Milton Keynes Council will be making to their applicants. This listing will include the child's name, date of birth, address and current junior or primary school. All schools, including own admission authority schools, will be informed of the final offers, which may include offers made to pupils living in other LAs, by 24 February 2013. Schools should not communicate with parents until after the offer letter from Milton Keynes Council has been sent.

For primary admissions other LAs will be informed by February half-term 2013 of the offers of a school place that Milton Keynes Council will be making to their applicants. This listing will include the child's name, date of birth, address and current junior or primary school. All schools, including own admission authority schools, will be informed of the final offers, which may include offers made to pupils living in other LAs, by 2 April 2013. Schools should not communicate with parents until after the offer letter from Milton Keynes Council has been sent.

2.8 Offers of a school place to parents by Milton Keynes Council

The council will write to all parents who live in Milton Keynes giving a single offer of a school place and informing them of their entitlement to appeal, should they not be satisfied with the offer. The School Admissions Team will post letters with details of the allocation of places by second class post on Monday 1 March 2013 for secondary transfers. This is the national notification date.

Offers for primary school admissions will be sent out on 15 April 2013 by second class post. This is the national notification date.

Parents who applied online will receive an email notification on 1 March or 15 April 2013 followed up by a letter.

2.9 Admission appeals

Milton Keynes Council and other admission authorities will establish independent appeal panels in the period April – July 2013, to hear appeals lodged by parents who have not been successful in their applications to preferred schools. The appeal panels are independent of the admission authorities. Their decisions are binding upon parents and admission authorities.

2.10 Late applications

Every effort will be made to encourage parents to complete application forms by the closing date of 31 October 2012 for secondary transfers and 15 January 2013 for children starting school for the first time or transferring from infant schools at the end of Year 2. If an application form is not received by the relevant closing date it may not be possible to consider it until all the other applications have been processed. Requests for a change of preference(s) after the closing date will only be considered in exceptional circumstance. No other changes to preferences will be considered before the national notification date.

Applications received between the closing date and the start of the autumn term 2013 will be treated as late. Late applications will be considered in the next allocation round. Consideration will be given to parents' preferences. However if all preferred schools are full parents will be advised of their right of appeal and a place will generally be offered at the nearest school with places available.

2.11 Waiting lists

Parents who have been unsuccessful in being offered a place for their child at their preferred school/s, either following allocations, after appeals or following late applications will have their child's name placed on the waiting list. If a place becomes available, the school's admissions criteria will be applied to determine who from the waiting list should be allocated the vacant place. The School Admissions Team will co-ordinate this process until the end of the autumn term 2013. No offers of places that become available should be made by any school during this period.

Waiting lists will be held for primary and secondary schools and academies until the end of the autumn term 2013.

From 1 September 2013, for new applications, parents will be asked to complete an in-year application form and return it to the School Admissions Team who co-ordinate in-year admissions for primary community and voluntary controlled schools.

Applications will be processed in line with the co-ordinated scheme for admission outside of normal transfer round (in-year admissions).

ADMISSIONS IN FUTURE YEARS FROM SEPTEMBER 2014 ONWARDS

Under the Admissions Code there is a duty to consult where the proposed scheme is substantially different or where the scheme has not been consulted on in the last 7 years. There are no changes to the current (2012) scheme and save for an opportunity for interested parties to comment for 2013 it is not planned to consult on the scheme in forthcoming years. The timeline will require adjustment each year and in each case where the date is not a working day the next working day will apply.

**MILTON KEYNES COUNCIL
PROPOSED
CO-ORDINATED SCHEME FOR ADMISSIONS OUTSIDE OF NORMAL TRANSFER
ROUND FROM SEPTEMBER 2012 (AND 2013)
(In-Year admissions)**

SECTION 1

Timetable from September 2012

Applications available throughout the academic year to parents/carers via web page www.milton-keynes.gov.uk/schooladmissions or paper application form available from the School Admissions Team

Application received by Milton Keynes Council direct. Date stamped if via post and system dated if online application.

Direct approaches to all schools and academies from parents **must** be forwarded to Milton Keynes Council School Admissions Team. Schools **must** ask parents to apply using the application process as set out on the webpage. Paper forms available from the School Admissions Team.

Milton Keynes Council School Admissions Team enter all details of the application on database (ONE) within 5 school days of receipt. Within that timescale School Admissions Team to have passed details of applicant to Academy, Foundation, Voluntary Aided Schools and where appropriate other local authorities.

Academy, Trust, Foundation and Voluntary Aided schools process application, using their own oversubscription admission criteria if applicable. Response **must** be received within 5 school days (see paragraph 2.5). Place on waiting list where one is held if not able to offer and inform local authority.

MKC School Admissions Team to make offers of **all** placements for **all** admissions authorities including academies, stating parent's right to appeal in letter, copy to own admission authority.

If first preference school is unable to provide a place the local authority will coordinate with second and third preference schools until a place can be offered either at one of the preferences or at the nearest alternative school to applicant's home address with places available.

Interpretation

Home local authority: The local authority in which the child is resident.

Local authority (LA): Your local council, which has responsibility for schools and education.

Maintaining local authority: The local authority in which the school is situated.

ONE: Database programme used by Milton Keynes Council to record and maintain student information.

Own Admission Authority: Any school which is responsible for its own admission arrangements. This includes Academy, Trust, Foundation and Voluntary Aided schools.

MKC: Milton Keynes Council

Parent: Refers to both individual parents as well as those with parental responsibility for the child, eg carers.

SECTION 2 - Elements of the Scheme

2.1 Regulations

This scheme is formulated in line with the School Admissions Code 2011 which can be viewed at <http://www.education.gov.uk/sacocode>.

2.2 Applying for a school place outside of the normal transfer times

From September 2012 Milton Keynes Council (MKC) will coordinate **all** applications for school places for **all** schools, academies, trust, foundation, voluntary aided, voluntary controlled and community schools, for children resident in Milton Keynes.

Parents with children of statutory school age who move into or within Milton Keynes and require a school place outside of the normal transfer times should apply for a school place using the in year primary or secondary application form available on the council's website at www.milton-keynes.gov.uk/schooladmissions also available contact the School Admissions Team for a paper in year application form. The completed form should be submitted with any additional supplementary papers including proof of residence documents for the parent and child before their application can be considered.

School places cannot be allocated on the basis of intended future changes of address unless house moves have been confirmed through the exchange of contracts or the signing of formal lease agreement (Crown/Forces personnel are exempt).

We are unable to consider applications for schools whereby the date that the place is required from is more than two months from the date of the application. (eg applying in January but not requiring a place until May; we will only consider an application from March). Children **must** be resident within the country before an application can be considered. Service and Crown Personnel are exempt from the above.

Documentary evidence in the form of a solicitor's letter to confirm exchange of contracts or a rental agreement will be required. Proof of residence for the child/young person

will also be required by providing a copy of the child benefit statement or working tax credit. Parents resident in Milton Keynes who are requesting a change of school must provide proof of their home address and provide a copy of their latest council tax statement. Please see the cover sheet provided with the application for details of all documents required. This is also explained in the online guidance. For further details see www.milton-keynes.gov.uk/schooladmissions.

The council reserves the right to seek further documentary evidence to support a claim to residence.

2.3 Application forms

Parents **must** apply to their local authority regardless of the school they are applying for. The online or paper application form allows parents to apply for any school (excluding independent schools) and to give reasons for their preferences. If parents apply direct to a school the governing body should inform the home local authority who will co-ordinate across borders with neighbouring local authorities.

The in year primary or secondary application form is available to download from the council's website at www.milton-keynes.gov.uk/schooladmissions. A paper in year application form is also available from the School Admissions Team.

The application form will ask the parent for the following information:

- To express up to three preferences
- List their preferences in rank order
- Give details of siblings who currently attend the preferred school
- Give details of the child for whom the application is being made (address, date of birth, any relevant medical information or special social circumstances)
- Indicate if the child has a statement of special educational needs
- Confirm whether the child is in care to a local authority.
- Give any reasons for their preferences
- Name the child's current school
- Give details about the person completing the application (name, address, relationship to the child, contact details)

If additional information is required by the governing body of a foundation, voluntary aided school or academy in order to apply its oversubscription criteria, parents will need to complete a supplementary form. A list of schools that require the completion of supplementary forms is available on the Milton Keynes Council – School Admissions website. Supplementary forms for voluntary aided church schools are available on the Milton Keynes Council School Admissions website or direct from the school(s). Applications may not be considered until these forms have been received. Supplementary forms need to be returned along with the application form to the School Admissions Team.

Parents applying to a faith school on faith grounds may need to complete an additional form available from the school or provide any necessary proof from their minister or parish priest to confirm their faith commitment. This information should be returned direct to the preferred school.

Parents are required to return the completed paper application form, with any appropriate supplementary information/evidence, to the School Admissions Team at

Milton Keynes Council, Saxon Court, 502 Avebury Boulevard, Central Milton Keynes, MK9 3HS.

The School Admissions Team will ensure that all parents' preferences are logged on the CAPITA ONE admissions database within five school days of receipt of application.

2.4 Applications for community or voluntary controlled Schools

Applications for a community or voluntary controlled school will be processed by the School Admissions Team within a further ten school days for a child without a school place (requiring school place immediately, eg child has no current school).

If there are more applications than places available the School Admissions Team will apply the oversubscription criteria.

If the local authority is unable to meet any of the preferences requested by the parents, a place will be allocated at the school nearest to the child's home address that has a place available unless the child already has a school place within close proximity to their home address. In this case no alternative offer will be made unless requested by the parent.

The School Admissions Team will inform parents in writing of the outcome of their application.

2.5 Applications for foundation, voluntary aided schools and academies

The School Admissions Team will send details of all applications received, including any supplementary information, to the relevant foundation, voluntary aided schools and academies within five school days of receipt.

Foundation, voluntary aided schools and academies should consider all applications within 5 days. The school or academy should admit the child if there is a space available (unless exempt under 3.32 of the School Admissions Code). If there are more applications than places available the school or academy is required to apply its oversubscription criteria and advise the local authority within five school days if a place can be offered.

If the school is oversubscribed they should place the child on the waiting list, if the school holds one (over and above the statutory time limit of December for children in the academic year of admission) and refer back to the local authority. To maintain public confidence and to ensure transparency the local authority will periodically, in agreement with schools, check school waiting lists to ensure correct application of the oversubscription criteria.

It may be that some children, determined to be eligible for admission, will be allocated places at alternative schools for which they are also eligible and which have been placed higher in the rank order of parental preference.

Schools and academies in Milton Keynes that are their own admission authority should forward applications made directly to them onto the School Admissions Team and inform the parent of the application process as detailed on the School Admissions webpage. Own admission authority schools and academies are required to advise parents that they need to apply for a school place through the local authority and for safeguarding purposes take details of the pupil(s) forwarding this to the School Admissions Team.

2.6 Applications for schools in other local authorities (LAs)

Parents resident in Milton Keynes who wish to apply for a place at a school maintained by another local authority should apply to the local authority in which they live. The home local authority will then co-ordinate the application and contact the authority which maintains the school to advise of the application. Timescales in this situation may be extended from those above. However; the home local authority will endeavour to keep in contact with the family to communicate progress.

The offer of a school place will be made by the home local authority following confirmation from the maintaining local authority that a place is available for the child.

A maintaining local authority should exchange information on applications made directly to them for children resident in Milton Keynes and **must** inform the home local authority if a place is available at one of its schools for the pupil. The home authority will issue the offer of a school place letter.

Children moving house into a different local authority to which they currently live should consider the local authority that they are moving into as their home authority for the purpose of their application for a school place.

2.7 Children with statements of special educational needs

Children with a current statement of special educational needs will be referred to their local Special Educational Needs (SEN) Team. The SEN Team will work with the School Admissions Team and parents of the child to secure a place at a school where the specific needs of the child can be met.

2.8 School placement offers

The council will inform parents in writing of the outcome of their application. Offer letters will be sent out by the local authority for all schools for in year applications. These will be done in conjunction with information supplied by schools and academies that are their own admission authority once the School Admissions Team has received written or email confirmation from the school.

The School Admissions Team will post out a letter to the child's home address to inform them of the outcome of their application and the right to appeal if applicable.

2.9 Information for parents

The 'Admission to Secondary Schools in Milton Keynes' and 'Admission to Primary Schools in Milton Keynes' booklets will be available in PDF format on the Milton Keynes Council website – school admissions. They contain the following information:

- A list of schools by local area
- The published admission number for each school
- Each schools oversubscription criteria
- Information relating to children with special educational needs
- Home-to-school transport information
- Details on where to access further information
- Details regarding in-year applications (those received outside of the normal transfer period)

- Information and important dates for applying for school places during the normal transfer round, eg applying for a primary school place, applying to transfer from primary to secondary school etc
- Contact details for the Milton Keynes Council School Admissions Team

Paper application forms and copies of the 'Admission to Schools' booklets can be obtained by request from:

School Admissions Team
Milton Keynes Council
Saxon Court
502 Avebury Boulevard
Central Milton Keynes
MK9 3HS

Email schooladmissions@milton-keynes.gov.uk

Reference copies will also be available within all libraries and schools across Milton Keynes.

IN YEAR COORDINATION FROM September 2013

The Draft School Admissions Code states that local authorities will no longer be required to carry out in year admissions for admissions outside the normal round from September 2013.

It is proposed to continue to provide in year coordination for all community and voluntary controlled primary schools and to engage with schools and academies which are their "Own Admissions Authorities" to discuss options during the spring term 2012.

Following these discussions the 2012 in year coordination scheme shown above will be amended for 2013 onwards as necessary.

OVERSUBSCRIPTION CRITERIA FOR MILTON KEYNES COMMUNITY AND VOLUNTARY CONTROLLED PRIMARY SCHOOLS FOR SEPTEMBER 2013 INTAKES

Places are allocated at community and voluntary controlled primary schools in line with Milton Keynes Council's admissions criteria shown below, subject to parents applying online or completing and returning an application form. These arrangements must take into account the class size limits for pupils aged 5, 6 or 7 at Key Stage 1. The criteria apply to admissions of children who are:

- a) starting school for the first time
- b) transferring at 7+
- c) requesting admission during the year, eg newly moved into the area

Children who have a Statement of Special Educational Needs will be given priority for admission within the normal admission round at 7+ or for children starting school for the first time.

Where there is oversubscription the following criteria will be used to allocate places.

- 1) Children who are in care, including those who were previously in care, who immediately after being in care became subject to an adoption, or residence or special guardianship order within the last year.
- 2) Children who live in the defined area and have a sibling on roll at the time of admission. Proof of residence may be required.
- 3) Children who live in the defined area served by the school. Proof of residence may be required.
- 4) Denominational preference for a Church of England school, supported by evidence that a parent has been for the last year a regular worshipper (on average at least twice per month) at the relevant local church. Parents should attach a form available from the C of E school, which must be completed by the priest or minister confirming church commitment.
- 5) Children who live outside the defined area and have a sibling on roll at the time of admission.
- 6) Children who live outside the defined area of the school.

In the event of there being more applicants meeting any of the criteria above than available places, places will be allocated in distance order using the distance between the child's normal home address and the school's main entrance as measured in a straight line using the Local Authority's computerised measuring system with those living closest to the school receiving the higher priority.

Sibling and Multiple Birth definitions for Primary School Admissions

Sibling criteria

A sibling is a brother or sister, which for admission purposes means brothers and sisters of whole or half blood or any other child (including an adopted child) who permanently resides at the same address and for whom the parent also has parental responsibility.

Multiple births

In cases where there is one remaining place available and the next child on the waiting list is one of a twin, triplet or other multiple birth groups both twins would be admitted (or all siblings in the case of multiple births) even if this goes above the admission number for the school or takes any class above the threshold of 30 in line with Infant Class Size legislation.

COMMUNITY AND VOLUNTARY CONTROLLED SCHOOLS			
Published Admission Number (or Admission Number)			
This is the number of school places that the Local Authority, as the admissions authority for community and voluntary controlled schools, must offer up to in each relevant year group before any application can be refused.			
The proposed planned admission number for each school is shown below.			
School	Published Admission Number 2013	School	Published Admission Number 2013
Abbeys Primary	45	Russell Street	60
Ashbrook	60	Shepherdswell	45
Barleyhurst Park Primary	30	Sherington CofE	15
Bradwell Village	90	Simpson	30
Brooklands Farm Primary	60	St Andrews CE First	15
Broughton Fields Primary	60	St Mary's Wavendon CofE Primary	15
Bushfield	90	Stoke Goldington CofE First	15
Caroline Haslett Primary	60	Summerfield Combined	50
Castlethorpe First	15	The Willows School & Early Years Centre	30
Cedars Combined	45	Water Hall Primary	45
Chestnuts Primary	45	Wavendon Gate	60
Cold Harbour CofE	45	Willen Primary	50
Downs Barn First	30	Wood End First	30
Drayton Park	45	Wyvern	90
Emberton	12		
Emerson Valley	120		
Falconhurst	60		
Giffard Park Primary	60		
Giles Brook Primary	60		
Great Linford Combined	45/15		
Greenleys First	60		
Greenleys Junior	60		
Hanslope	30/15		
Haversham Village	25		
Heelands	30		
Heronsgate	120		
Heronshaw	60		
Holmwood	60		
Holne Chase Primary	45		
Howe Park	60		
Kents Hill	60		
Knowles Primary	60		
Langland Community	60		
Lavendon	15		
Long Meadow	60		
Loughton Manor First	60		
Meadfurlong	45/45		
Merebrook Infant	60		
Middleton Primary	90		
Monkston Primary	60		
Moorland Infant	30		
New Chapter	45/15		
Newton Blossomville CE	8		
North Crawley CE First	15		
Oldbrook First	60		
Olney Middle	90		
Orchard	75		
Pepper Hill	45		
Priory Common First	60		
Priory Rise	30		
Queen Eleanor Primary	30		
Rickley Park Primary	60		

Proposed changes for September 2013:
 Falconhurst - increase from 50 to 60
 Langland - increase from 50 to 60
 Meadfurlong/Penwith amalgamation - change to 45 at 4+ and 45 at 7+
 Middleton - increase from 60 to 90
 Oldbrook - increase from 45 to 60 *(agreed for 2012)

Primary and secondary in year admissions incorporating the Fair Access Protocol

Guidance

1. The School Admissions Code requires local authorities to ensure children have access to a suitable school or education provision.
2. Children starting school for the first time, or transferring at 7 and 11 are admitted to schools in line with the primary or secondary schemes co-ordinated by Milton Keynes Council in partnership with community, voluntary controlled, voluntary aided and foundation schools and academies. All local authorities have a statutory responsibility as follows:
 - 2.1 From September 2010 to co-ordinate admissions to primary and secondary schools outside the normal admissions round (known as 'in year').
 - 2.2 To have a Fair Access Protocol in place, which all schools must agree to work within, to ensure that vulnerable and hard to place children are provided with a school place within a reasonable time.
3. This document sets out the arrangements agreed for primary and secondary age children, including the council's Fair Access Protocol for vulnerable groups.

In year admission to primary and secondary schools, including academies

4. The Milton Keynes Council co-ordinated scheme for admissions outside the normal transfer round came into effect from September 2010. The scheme sets out the arrangements for children living in Milton Keynes or who are moving to the area.
5. All applications will be processed by the School Admissions and Transport Team working in partnership with schools and other local authorities.
6. Parents and carers who are moving to Milton Keynes from an address in England and want to apply for a school place in Milton Keynes before they move will be advised to apply through their current local authority who will then liaise with Milton Keynes Council.
7. Parents and carers moving to or who have arrived in Milton Keynes from outside England will be advised to apply to the council direct, which can be done before any move. The following documentation prior to processing any application:
 - 7.1 Confirmation that the house purchase is legally binding (in other words, they have already exchanged and completed and are living in their new home) or a formal lease agreement

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7.2 Council tax bill for new property.

8. Proof that parent/s and child/ren are allowed to live in the UK will be required so the School Admissions and Transport Team will need to see passports/visas and the child/ren's birth certificate/s.
9. Parents and carers moving within Milton Keynes are required to inform Milton Keynes Council of their anticipated new address and proposed date of move. Confirmation of their new address (as set out in paragraph 7) will be required prior to processing any application.
10. Parents applying for a place for their child at a secondary school also need to provide a copy of their child benefit statement as proof that their child is resident at the address on the application form.
11. Where children are already attending a school in Milton Keynes and the reason for changing schools is not as a result of an address move, parents and carers will be required to provide the reasons for this request. If this is due to difficulties at the child's current school it is expected that parents and carers will have tried to resolve these difficulties with the school and the council will seek reassurance from the school that all attempts to resolve any difficulties have been exhausted.
12. The council aims to offer a school place within 15 working days, not including school holiday and training days, following receipt of an in year application form. This may be delayed in line with any anticipated move date. The furthest ahead a place will be offered is one half term. It is unlikely that a place would be offered to children not resident in the UK.
13. Where a first preference school is not over subscribed the council would process the application immediately and send an offer letter. Second or third preferences will not ordinarily be processed in these circumstances.
14. Where the first preference school is over subscribed but the second or third preference school has a place available the application will be processed as above. The council will still process the application for the higher preference school(s) to ensure the child is appropriately placed on any waiting list (where one exists). However this should not delay the offer of a place.
15. Where the first, second and third preference schools are oversubscribed the council will ask all three admissions authorities to apply their oversubscription criteria and state their priority order should places become available. In order to best manage the workflow the council may process applications in batches.
16. If it is not possible to offer a place at the first, second or third preference school parents and carers will then be offered a place at an alternative school. Parents and carers also have the right to appeal against any decision not to offer a place at any of their preferences.

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17. In many cases community, voluntary aided, foundation schools and academies will also contact families direct when an allocation has been made. Alternatively parents will be given the contact numbers for the allocated school
18. The Admissions Code makes it clear schools are responsible for informing the local authority of the number of children on roll and number of places available in each year group together with waiting list details, where one exists.
19. A regular report will be made available providing information on the numbers of in year applications and the outcomes of these applications.

Fair Access Protocol

20. The council's Fair Access Protocol covers three areas:
 - 18.1 Managed moves
 - 18.2 Arrangements for permanently excluded children
 - 18.3 Admission arrangements for vulnerable or hard to place children
21. Children with statements of special educational needs would not normally be considered within these arrangements.
22. The principles underpinning the Milton Keynes Fair Access Protocol are:
 - 20.1 Every child has the right to be educated
 - 20.2 Children should be placed in school quickly
 - 20.3 Schools have a shared responsibility for all children
 - 20.4 Schools must agree, fully participate and work within the protocol
 - 20.5 Vulnerable or hard to place children should be given priority for admission over others on a waiting list or awaiting an appeal
 - 20.6 Schools should work together and support each other in ensuring a fair distribution of hard to place children
 - 20.7 No school should be full to a permanently excluded or hard to place child where that school is the designated school based on the protocols
 - 20.8 Schools cannot cite oversubscription as a reason for not admitting a child under the Fair Access Protocol
 - 20.9 Schools should not insist on an appeal being heard before admitting a child under the protocol

Managed moves

23. A managed move is an agreed arrangement between the child, parents and two schools. A managed move will be agreed for some children who are at risk of permanent exclusion and for whom the school believe that all support mechanisms to improve behaviour have been exhausted.
24. There may be reasons other than a child's poor behaviour which mean that a managed move has been requested, for example a pupil experiencing problems as a

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result of bullying. It must be demonstrated that the proposed move is in the best interests of the pupil.

25. For secondary school aged children managed moves will be co-ordinated by secondary schools and the academy. They will be monitored and evaluated by the Milton Keynes Behaviour Partnership reporting to the Milton Keynes Secondary Headteachers Group in order to inform the policy and procedures including criteria.
26. Managed moves may also be arranged for primary aged children.

Permanently excluded children

27. For secondary aged children the Milton Keynes Behaviour Partnership aims to reduce the number of permanent exclusions from secondary schools. The managed moves policy contributes to achieving this aim by providing a positive opportunity for children at risk of exclusion.
28. If, following a managed move, the child's behaviour does not improve then another managed move is unlikely to be appropriate. Any permanent exclusion would be viewed as final. In other circumstances a child may be permanently excluded without recourse to the managed move protocol as a result of a significant incident.
29. It is possible for a permanently excluded child to transfer immediately to another school. In most cases the excluding school would complete a referral to the Milton Keynes Behaviour Partnership who will ensure that the child is provided with education six days after their exclusion in line with statutory requirements.
30. Secondary aged permanently excluded children are usually educated at a Personal Education Centre. The child's action plan will set out the arrangements including, where appropriate, for reintegration to another secondary school.
31. For primary aged pupils the local authority will make provision using the Primary Pupil Referral Unit (PRU) based at Romans Field School, PRU tuition or by admission directly into another mainstream school. As part of the child's plan, a school will be identified where a reintegration programme can begin. The child will remain on the roll of the alternative provider until he or she starts full-time at his or her new school.
32. If a child has been permanently excluded from two schools there is no automatic right to a mainstream school place.

Vulnerable or hard to place children

33. There are a number of children at any given time who are unable to gain admission to school and who are classified as vulnerable or hard to place.
34. Local authorities must in partnership with schools ensure education is provided for these children as soon as possible.
35. Children who fall into one or more of the following categories can be considered under the Fair Access Protocol:

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- 33.1 Children attending PRUs who need to be reintegrated back into mainstream education
- 33.2 Children who have been out of education for longer than one school term
- 33.3 Children whose parents have been unable to find them a place after moving to the area because of a shortage of places
- 33.4 Children withdrawn from schools by their family following fixed term exclusions and unable to find another place
- 33.5 Children of refugees and asylum seekers
- 33.6 Homeless children
- 33.7 Children with unsupportive family backgrounds where a place has not been sought
- 33.8 Children known to the police or other agencies
- 33.9 Children without a school place and with a history of serious attendance problems
- 33.10 Traveller children
- 33.11 Children who are carers
- 33.12 Children with special education needs (but without a statement)
- 33.13 Children with disabilities or medical conditions
- 33.14 Children returning from the criminal justice
- 33.15 Children of UK service personnel and other Crown Servants

Considering children under the Fair Access Protocol

- 36. Parents should complete the council's primary or secondary in year application form and provide any documents which may be requested.
- 37. The council will process the application. If it is not possible to provide a place under that process then additional information may be sought from the parent or previous school to determine whether the applicant should be considered as hard to place.
- 38. If it is agreed that the criteria is met and the application should be considered under the Fair Access Protocol then the council will consult with the parent or carer of the child and the governing body of the school where a place is being requested. If governors refuse this request then a formal notice of the local authority's intention to direct the school to admit may be issued to the school.
- 39. The school then has 15 days to agree the request or refer the matter to the Schools Adjudicator who is independent of the council. The direction would be issued at the end of that period or once any referral to the Schools Adjudicator has been considered.
- 40. If an academy refuses to admit a child under the Fair Access Protocol a similar process would be followed. The local authority would refer the matter to the Secretary of State for consideration.
- 41. Following the decision, either made through consultation or by direction, that the child has a school place he or she should be admitted within 10 school days. The admission date should be notified to the council.

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Review of the Fair Access Protocol

42. The Council will review the operation of the Fair Access Protocol annually.
43. The Milton Keynes Behaviour Partnership is invited to review the Fair Access Protocol, making any recommendations to the Local Authority.

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CONSULTATION ON ADMISSIONS ARRANGEMENTS FOR PRIMARY AND SECONDARY ADMISSIONS AND TRANSFERS INCLUDING IN YEAR ADMISSIONS FOR SEPTEMBER 2012 and 2013

Introduction

This document covers key areas that the local authority wishes to consult on in relation to proposed arrangements for primary and secondary admissions and transfers for the September 2013 and beyond.

The consultation covers:

1. Determining the relevant area for school admissions.
2. The proposed primary and secondary co-ordinated scheme for September 2013 intake which applies to all admissions authorities including academies in Milton Keynes.
3. The proposed in year primary and secondary co-ordinated scheme for admission outside the normal admission rounds from September 2012 (and 2013 onwards).
4. The Fair Access Protocol, which applies to all primary and secondary schools and academies.
5. The oversubscription criteria for admission to community and voluntary controlled primary schools.
6. Proposed Published Admissions Numbers for September 2013 intakes for all community and voluntary controlled schools in Milton Keynes.

You are invited to comment on items 1 to 6 above. Before returning the consultation response document please read the background notes on the following pages and the accompanying documents. Responses should be sent in by **Thursday, 1 March 2012**.

Marilyn Barby
Schools Admissions & Transport Manager
Milton Keynes Council
Saxon Court
502 Avebury Boulevard
Milton Keynes
MK9 3HS

Telephone: (01908) 253242
Fax: (01908) 252938
Email: marilyn.barby@milton-keynes.gov.uk

1. Relevant Area

The council is required to determine its “relevant area” within which local consultation takes place. It may be more or less than the LA area or may include part of a neighbouring LA area or an LA may decide after consultation that its own administrative area should be the relevant area.

It is proposed that the relevant area should be the whole of Milton Keynes including the villages to the north sited within the Council’s boundary.

Consultees will include all neighbouring LAs and maintained schools situated beyond the council’s boundary but within a five-mile limit.

2. The proposed primary and secondary co-ordinated scheme for September 2013 intakes which applies to all admissions authorities including academies in Milton Keynes

Under the Admissions Code there is a duty to consult where the proposed scheme is substantially different or where the scheme has not been consulted on in the last 7 years.

There are no changes to the current (2012) scheme and save for an opportunity for interested parties to comment for 2013 it is not planned to consult on the scheme in forthcoming years. The timeline will require adjustment each year and in each case where the date is not a working day the next working day will apply.

3. Proposed in year primary and secondary co-ordinated scheme for admission outside the normal round from September 2012 (and 2013)

Under the Admissions Code the local authority is not required to formulate an in year primary and secondary co-ordination scheme for admissions outside the normal round. This comes into effect for in year admissions from September 2013

There are no significant changes to the current (2011) scheme, although this provides an opportunity for interested parties to comment on the 2012 scheme.

It is proposed to continue to provide in year co-ordination for all community and voluntary primary schools and to engage with schools and academies which are “Own Admissions Authorities” to discuss possible options during the spring term 2012.

Following these discussions the 2012 in year coordination scheme will be amended for 2013 onwards as necessary.

4. Proposed Fair Access Protocol

The general guidance document attached reflects the current arrangements for managing in year admissions incorporating the Fair Access Protocol. There are no proposed changes although the document has been updated following the Department for Education decision which means that local authorities are not required to set up School Admissions Forums

5. Oversubscription criteria for admission to primary community and voluntary controlled schools

The criteria are attached for information. There are two changes to the admissions criteria for primary community and voluntary controlled schools, in line with the draft School Admissions Code which are likely to come into effect from 1 February 2012. These are:

- Widening the oversubscription criteria for children in care to include children, previously in care, who immediately after being in care became subject to an adoption, or residence or special guardianship order within the last year.
- Allowing admissions authorities to admit above the infant class size limit for twins and children from multiple births when one of the siblings is the 30th child to be admitted.

In addition we propose to change the criterion used for measuring distance from home to school which is the tie-breaker if there are more applications than places available under a particular criterion. It is proposed to move from a shortest available route measurement to straight line measurement.

A number of “Own Admissions Authorities” in Milton Keynes use straight line measurement to rank admissions applications, 3 primary and 9 secondary. A neighbouring authority, Buckinghamshire County Council consulted last year and agreed to move to straight line measurement which will be introduced for the 2013 intakes.

The current arrangement of using shortest available route appears to leave us open to challenge on the route actually used and the mileage. Straight line measurement is less open to challenge. Whichever method is used there will always be some children who have an advantage over others

6. PAN – Proposed Published Admissions Numbers for September 2013 intakes

A schedule is attached which lists all community and voluntary controlled primary schools with the proposed Published Admission Number for September 2013.

There are some proposed changes on the schedule.

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Your comments are invited on the proposed admissions arrangements detailed in 1 to 6 above for 2013 intakes, transfers and in-year admissions. A consultation response form is available