



Proposed Submission Plan:MK October 2017: PLAN:MK RESPONSE FORM

The best way to comment on the Proposed Submission Plan:MK October 2017 is online at:

<http://miltonkeynes.objective.co.uk/portal/>

Alternatively, this form is provided to enable you to submit representations on the proposals set out within the Proposed Submission Plan:MK October 2017 either by email or by post.

HOW TO REPLY

This form has two parts. Both parts should be completed:

PART A – Your contact details

PART B – Your response

Forms should be returned to Milton Keynes Council (MKC) **no later than 5pm on 20 December 2017** by:

Email: planmk@milton-keynes.gov.uk

Post: Development Plans Team, Growth, Economy and Culture, Milton Keynes Council, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3EJ.

Further guidance on making representations to the Proposed Submission Plan:MK October 2017 consultation is provided in the following two documents, which are available via MKC's online consultation portal (<http://miltonkeynes.objective.co.uk/portal/>), at the Civic Offices and at public libraries.

- Statement of Representations Procedure
- Guidance Notes for Respondents

If you have any queries about this process please contact the Development Plans team at the address above, via email at planmk@milton-keynes.gov.uk, or by telephone on 01908 252358.



PART A - CONTACT DETAILS

Please note that only your name and organisation name will be published on our online consultation portal. However, we require a full postal address in order to register your comment. We will not accept anonymous responses. If you are an Agent responding on behalf of a third party, please provide full contact details for the third party within Box 1.

BOX 1 RESPONDENT's details

Name: David Lee
Organisation (if applicable): Tinkers Bridge Residents Association
Position (if applicable): Committee member
Address: 45 Old Groveway Simpson Milton keynes
Postcode: MK6 3AA
Telephone: 07736 227 260
Email: TinkersBridge@gmail.com

BOX 2 AGENT's details

Name:
Organisation (if applicable):
Position (if applicable):
On behalf of:
Address:
Postcode:
Telephone:
Email:

PART B – REPRESENTATION

If you are making representations on more than one Chapter, section or Policy of the plan, please fill in a separate ‘Part B’ sheet for each representation.

Your representation should succinctly cover all the information and evidence necessary to justify your representation and/or any suggested modifications, as there will not normally be a subsequent opportunity to make further representations.

Where relevant please submit evidence to support your representation on the soundness and/or legal compliance of the Proposed Submission Plan:MK October 2017. Any supporting evidence can be attached to this form or submitted as a separate document.

If you are proposing modifications to the Proposed Submission Plan:MK October 2017 to address issues of soundness or legal compliance, your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

1. Please state which part of the Proposed Submission Plan:MK October 2017 document this representation relates to. *(If you wish to make representations on more than one part please fill in a separate ‘Part B’ sheet for each representation)*

Paragraph Chapter	7. Homes and Neighbourhoods
Policy	
Policies Map Schedule – Section or Map	
Table	
Figure	
Appendix	



2. Do you consider the Proposed Submission Plan:MK October 2017 to be legally compliant?

Yes | No

If NO, is this because it is NOT:
(Please tick all that you think apply)

- Prepared in accordance with the Local Development Scheme
- Prepared in accordance with the Statement of Community Involvement
- Consistent with the regulatory requirements for consultation
- Compliant with the Duty to Co-operate
- Accompanied by a compliant Sustainability Appraisal

Please give details of why you consider the Proposed Submission Plan:MK October 2017 is not legally compliant. Please be as precise as possible.

We consider that Plan:MK has not been prepared in accordance with the Statement of Community Involvement as it has not provided the opportunity for those residents affected by the YourMK/Mears regeneration programme and the Residents Associations that represent them to influence decisions that will affect them, contrary to the statement in para 1.6 of the SCI.

The weighting given to responses to the draft Plan:MK is unduly in favour of landowners and developers, rather than residents and Residents Associations. Residents Associations are not even specifically listed in SCI Table 2.1 – the Other Consultees section contains just 3 groups – Ward Councillors, Developers, housebuilders, landowners and their agents and Other organisations or individuals who are on our consultation database.

3. Do you consider the Proposed Submission Plan:MK October 2017 to be sound?

Yes | No

If NO, is this because it is NOT:
 (Please tick all that you think apply)

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Please give details of why you consider the Proposed Submission Plan:MK October 2017 is not sound. Please be as precise as possible.

The input from the residents of Milton Keynes has been minimised, with no sign of it having any effect on the plan. This is illustrated by the following points:

1. The input from Tinkers Bridge Residents association to the consultation has been noted as coming from “the public”, not an organisation, giving the impression that it is the view of one person, whereas it represents the joint view of a body of residents
2. There is a list of about 130 organisations who were consulted, of whom only 2 are residents associations (Netherfield and Bletchley Park area), with about 4 local voluntary organisations about 6 government bodies, and over 100 commercial organisations. This weights the plan substantially in favour of commerce, and against the residents of Milton Keynes. Netherfield Residents Association can not recall any active consultation taking place with them, and think they are on the list because they asked to be on an email list concerned with Plan:MK
3. A specific clause which most easily illustrates this is Section A of NH9, which in the version for consultation read

LOSS AND CONVERSION OF RESIDENTIAL

Proposals which result in the loss of one or more dwellings through demolition or conversion should be approved where:

1. There would be a net gain in the overall number of dwellings provided by the proposal; or
2. It can be demonstrated that the existing dwelling is significantly affected by adverse environmental conditions and there is no reasonable prospect that the impacts can be adequately mitigated to create a healthy living environment for existing or future occupants; or
3. The social, economic or environmental benefits of doing so are demonstrated to significantly outweigh the need to minimise net losses to the Borough's housing stock. In particular, significant weight will be attributed to maintaining the provision of wheelchair accessible and adaptable properties.

The consultation responses are in the Consultation Statement, as section 16.98 to 16.103, and reflect the deep unease of Milton Keynes Councillors and the public about this clause. The change to this area is recorded as “Policy HN9: supporting text amended to clarify that this policy does not relate to wider estate regeneration

programmes or for use in wholesale demolition of existing estates.” The supporting text now reads “this purpose of policy HN9 is therefore to protect existing residential properties, rather than to encourage intensification or the large scale demolition of existing estates”. This is a very weak safeguard on an item which generated such strong views.

Given the potential scale of redevelopment that could arise through the YourMK/Mears regeneration programme and the significant effect that this will have on the existing residents on the affected estates, we considered that Plan:MK fails to respond appropriately to this important aspect of the overall Development Strategy. As TBRA suggested in its response to the draft Plan:MK consultation earlier in 2017 (available at http://tinkersbridge.org.uk/tbra/download/minutes/PlanMK_response_Tinkers_Bridge.pdf) we considered that a policy specifically for Regeneration should be included that sets out the key policy requirements that proposals for physical redevelopment and regeneration should meet.

A further illustration relates to the DCLG “First Steps” programme done by TBRA, culminating in the report available at <http://tinkersbridge.org.uk/FirstSteps/Tinkers%20Bridge%20Residents%20Association%20Final%20Action%20Plan.pdf>. As part of this initiative, TBRA surveyed opinions of the residents on Tinkers Bridge, getting a 40% response rate. This data was offered to Plan:MK, but that offer was not accepted.

It is therefore the submission of Tinkers Bridge Residents Association that the voice of the residents has been stifled in creating Plan:MK, and so the plan has not been objectively assessed, and positively prepared. Further, this minimising of the voice of the residents means the plan can not be seen as justified as the most appropriate strategy.

It is very difficult for a voluntary organisation without full time staff to muster the resources to fully review the hundreds of pages of Plan:MK, and so TBRA has concentrated on one small section. Our concern is that the same lack of reflecting the wishes of residents will be present throughout the plan, but we do not have the resources to even test if that is the case.

4. Please set out the changes that you consider are necessary to make the Proposed Submission Plan:MK October 2017 legally compliant and/or sound, including revised wording of any policy or text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible. (Please note that any non-compliance with the Duty to Co-operate cannot be rectified at the examination.)

TBRA, as a Residents Association staffed by volunteers, does not have the necessary expertise and resources to fully propose changes which would meet all the requirements upon Plan:MK. However, we hope that some of the following statements made by Woughton Community Council in their Neighbourhood Plan could be integrated into Plan:MK. We have again confined these comment to housing due to the limitations of our resources.

Policy WN4 Green Grid Squares

The Neighbourhood Plan defines a Green Infrastructure Network of parkland, public open spaces, woodland and Redways, as shown on the Policies Map. Proposals that will enhance the environmental and recreational value and connectivity of the Network will be supported. Proposals that will obstruct or otherwise harm the Network will not be supported.

Policy WN6 Local Green Spaces

Development proposals within a Local Green Space that will harm the permanent open character of the land will only be supported in very exceptional circumstances.

Policy WN7 Trees in the Public Realm

Proposals that will result in the unnecessary loss of an existing mature tree or group of trees in the public realm will be resisted, unless such a loss can be shown to be unavoidable and a replacement tree will be provided in the same locality.

Policy WN9 Housing Design

Proposals for new homes should maintain the distinct residential character of Woughton's Grid Squares within the city by having specific regard to the following design principles: *(9 listed, not all applicable to Plan:MK)*

Policy WN15 Grid Square Local Centres

Proposals to expand an existing Local Centre in a Grid Square, as shown on the Policies Map, to provide for new commercial, office, workspace and live/work units of a local scale, will be supported, provided that provision is made to Milton Keynes standards for off-street car parking.

Proposals that require the redevelopment of an existing Local Centre will only be supported if a new Local Centre is provided in a suitable location in the same Grid Square of an equivalent size and scale.

Policy WN18 Community Facilities

Proposals to improve and extend the existing community facilities... will be supported, provided that provision is made to Milton Keynes Council standards for off-street car parking.

Proposals that require the redevelopment of an existing community facility will only be supported if a new facility is provided in an accessible location in the same Grid Square of an equivalent floorspace.

Policy WN20 Regeneration: Refurbished Housing

Insofar as planning permission is required, proposals for the refurbishment of existing homes on a Grid Square designated for regeneration will be supported, including the reversal of habitable rooms within dwellings to face on to open spaces and to increase south-facing habitable rooms to improve their energy efficiency.

5. If your representation is seeking a change, do you consider it necessary to take part and speak at the examination hearing(s) if invited to do so by the Inspector?

Yes

No

If you wish to take part in the examination hearing(s), please outline why you consider this to be necessary: (Please note the Inspector will determine who will be invited to be heard at the examination hearing(s))

The TBRA, as outlined in our responses above, is concerned that the views of residents and particularly the properly constituted Residents Associations on the seven estates subject to the Your:MK/Mears regeneration programme, have not been properly considered at the earlier stages of the preparation of Plan:MK and at the lack of an adequate policy addressing the regeneration programme. Given the impact that the regeneration programme is having and will continue to have on a significant section of the Milton Keynes population during and beyond the plan period, we would like to have the opportunity to put our concerns that Plan:MK has neither met the legal requirements nor is sound directly to the Inspector.

6. Do you wish to be notified of any of the following?
(Please tick all that apply)

- When Plan:MK 2016-2031 is submitted for independent examination
- When the Inspector's report on Plan:MK 2016-2031 is published
- Adoption by MKC of Plan:MK 2016-2031

X
X
X

Signature



Date

15 December 2017