Comments	Tracker:	MKWEA	Desian	Codes -	Email fr	rom C.	Ashbv	(15/08/23)

Comments Tracker: MKWEA Design Codes - Email from C. Ashby (15/08/23)		
Comment	Response	Action
Whitehouse Town Centre Design Code Highways have queried the use of community streets and what is provided for pedestrians. As an example the community street that is west of Shetland Drive serves retail and leads also to pub/retail and community uses. These uses and the parking for them are likely to generate footfall between the various areas so footways on both sides of the street would be required for safety reasons. It is assumed that an nitial assessment on parcel size has been carried out that the site is able to accommodate the uses along with the parking and servicing requirements as set out in the adopted parking standards.	a development proposal. Any layouts shown in the Design Code are indicative only to convey how the design principles conveyed in the code could come together to support a layout. This said, the proving work that underpins the layout that has been referred to has been produced using parking and servicing requirements as set out in the adopted parking standards for the coding area.	
Objection – Tree Retention Not Accurately Shown on the plans.	The Design Code has been produced using up to date and accurate topographical and arboricultural survey information including below ground RPAs provided by L&Q Estates who are on site on a daily basis. The information and approach shown in the Design Code has been thoroughly checked and assessed by all of the Design Team including those that operate directly from the site. In this sense, the proposals for tree retention are upheld to be entirely accurate and feasible.	
The existing trees are crucial structuring elements and need to inform the location of streets and open spaces. They must be considered as site constraint landmark features across the masterplan and celebrated as they will help to establish a unique character for the town centre.	The potential for existing trees to be retained as landmarks in public spaces has been fully explored as part of the production of the Design Code. The retention of trees within public realm has been possible at the north of the coding area within the Brook Corridor, however, the alignment and proximity of the already constructed Shetland Drive through the middle of the site means that existing trees within the centre of the site would need to be behind the building line if the requisite uses of the Outline Planning Permission are to be accommodated within the coding area. These trees could be protected (by way of TPO or planning condition) to ensure their retention.	
The placemaking plan in Figure 5 needs to accurately show the category A trees. They need to be retained but currently the Community Street impacts on the root protection areas [RPAs] of the trees to be retained. The trees are a key feature of 'Place' within the layout so this plan needs to accurately show them to demonstrate the layout will not impact on the RPAs. Show the trees as green 'circles' but accurately showing the RPA as the outline of the green circles.	The Design Code has been produced using up to date and accurate topographical and arboricultural survey information including below ground RPAs provided by L&Q Estates who are on site on a daily basis. The information and approach shown in the Design Code has been thoroughly checked and assessed by all of the Design Team including those that operate directly from the site. In this sense, the proposals for tree retention are upheld to be entirely accurate and feasible. We are entirely confident that the principles articulated by the Placemaking Plan would not conflict with the RPAs of existing trees within the coding area. A Placemaking Regulatory Plan is a core requirement of Design Codes as set out by the National Model Design Code (NMDC). The NMDC requires Placemaking strategy and whilst this does not include the need to identify trees or RPAs, we have now shown them accordingly.	Retained trees added to Placemaking Plan
Equally the Illustrative Masterplan needs to accurately show the category A trees using the RPA as the outline of the trees, not 'representative' images. These are site living site constraints and not showing them accurately risks designing unrealistic development proposals. Currently the layout shows a building block impacting on the root protection areas [RPAs] of the trees to be retained.	The Design Code has been produced using up to date and accurate topographical and arboricultural survey information including below ground RPAs provided by L&Q Estates who are on site on a daily basis. The information and approach shown in the Design Code has been thoroughly checked and assessed by all of the Design Team including those that operate directly from the site. In this sense, the proposals for tree retention are upheld to be entirely accurate and feasible. We have reviewed fully and there is no building block impacting on any RPAs.	
Again, Figure 6 [Key Spaces & Frontages] needs to accurately show the category A trees as they are a key feature of 'Place'. The Brook Corridor is shown on plans as a key space, the retained trees will equally		Retained trees added to Key Spaces and Frontages Plan
be an important key feature of the emerging urban landscape. Also, Green Corridors – Illustrative Sketch. These plans are relied upon and need to accurately show the category A trees using the RPA as the outline of the trees, not 'representative' images. This 'sketch' is incorrectly labelled and doesn't label all of the category A trees to be retained. Mandatory Table text should state: Existing trees and hedgerows to be retained for ecological and landscape interest, broken only to facilitate pedestrian routes.	frontages rather than articulating detail but we have reviewed and can add trees as necessary. This illustrative sketch is intended to be an indicative representation of the way in which Design Code principles could be interpreted rather than articulating precise details that will arise through RMAs but we have reviewed and have added retained trees and their respective RPAs as necessary. We have also included text to the Mandatory Requirements table as suggested.	Retained trees and respective RPAs added to Illustrative Sketch. Suggested text added to Mandatory Requirements table.
Objection - NPPF [2021] para 131 requires all new streets to be tree-lined. The current text does not reflect the importance the NPPF places on delivering street trees in new developments and is not robust enough to ensure street trees will be delivered. Therefore, the Mandatory Table for each street type should include a section on Street Trees and as a minimum it should include:	It is important to note that all street typologies are approved by way of the agreed Movement Code 2008. The ditch referred to has already been implemented. We have reviewed fully and added text accordingly.	Suggested text added.
<ul> <li>Under street trees for the city street we would expect the text to include: <ul> <li>Boulevard feel with street trees in 3m central and 2m side verges</li> <li>Street trees should be planted at regular intervals</li> <li>Applicants should work with highways and landscape officers to ensure that street trees in verges with occasional car parking is deliverable</li> </ul> </li> <li>Under street trees for the residential street we would expect the text to include 'Street trees to be provided along the whole route in verges'</li> <li>Under street trees for the community street we would expect the text to include 'Street trees to be planted throughout the street'</li> <li>It would include text on street trees planting palette; for example: <ul> <li>To avoid the potential impacts of species-specific pathogens, single species avenues to be avoided in favour of a palette of trees selected for their form, habitat and seasonal interest</li> <li>Tree species to include flowering varieties The mandatory tables doesn't rigidly follow what was written in the Design Code for Calverton Green. Therefore, amendments are appropriate. Objection – Ditch realignment should not impinge on the root protection area of category A trees / vegetation. Plans should be amended accordingly unless confirmation is provided that this work has already been implemented.</li> </ul> </li> </ul>		References removed.
<ul> <li>Remove reference to and images of 'tree uplights' they are not supported as they impact on nocturnal wildlife such as bats and add to sky-glow from lighting. High quality robust bollard lighting can be included.</li> <li>Examples of high-quality metal bins and seats should be shown as options</li> </ul>		Images added.
The MP doesn't include the location of any play areas so the inclusion of text references to play equipment / play areas and the play images which include large play equipment under street furniture is inappropriate, unless clarified. For example, under public art text states: Public art will be required within the Community Square, but no location is mentioned for the play equipment. Any incidental play features such as in the community square would be more appropriate specified as robust stainless steel not		References removed.
<ul> <li>timber</li> <li>The Brook Corridor built frontage is identified on Figure 6 as a key frontage, but this corridor is then referred to as Green Corridor 'represents an extension of the Brook Corridor that is within the Calverton Green Design Code area'. This is an inconsistency across the proposed design code and reference should just be limited to The Brook Corridor, not Green Corridor which is regarded as a different typology in Policy and in the Calverton</li> </ul>		Reference corrected.
Green DC		

•	The Town Centre Design Code suggests a focus of mixed-uses with active frontages addressing	Noted.		
	the Town Centre City Street which I welcome.			
•	The proposed height should be higher where possible along the High / City Street within the Town Centre. Most of the City Street buildings are 3 storeys in height there is an expectation that the Town Centre would be taller than this being a minimum of 3 storeys in height. In that regard I would encourage residential use above commercial ground floor uses within the Town Centre.	Noted although recent market testing indicates unlikely take-up/delivery of residential above commercial uses. Minimum of 3-storeys supported.	Amended to reflect a minimum of 3-storeys.	
•	It should be noted that whilst this layout doesn't show design details the layout, architecture and hard and soft landscaping in this area needs to be of a high standard as this is the focus for the wider development and therefore considered a key so called 'special and memorable place' in the Master Plan and Highway Design Code. I welcome the increased level of detail in terms of the plans and the proposed illustrative layout which helps understanding of the vision for the area. It is worth being reminded of the previous vision for this area which states that it should be"A memorable place to form the symbolic heart of the new neighbourhoods, whilst providing a place to shop, walk along the park frontage, meet others, and have a coffee or beer." As indicated there needs to be a mix of different uses will be incorporated, with residential accommodation above ground floor commercial uses. This will be reflected in a dynamic balance		Text added.	
•	of both tranquil and bustling open spaces The square will provide a multi-functional space that incorporates open areas for markets. The distribution of uses within the square and surrounding streats will exploit solar potential	commercial uses. Minimum of 3-storeys supported. Agreed.		
•	distribution of uses within the square and surrounding streets will exploit solar potential. The neighbourhood will form central focal point for Area 10 with well defined character and a strong sense of place. It will be a high-quality urban environment.	Agreed.		
•	Soft Landscape - Street tree species will be in accordance with the table on page 26.	Unclear as to what table is referred to.		
•	In the square, rows of ornamental specimen trees will be planted.	Noted.		
•	The central square shared surface will incorporate natural stone paving in key feature areas, reconstituted stone paving slabs, contrasting colours / paving bands.	Noted. Although this will be subject to highway authority approvals.		
•	The east-west corridor that crosses the City Street will have a flush surface, and reconstituted stone sett paving.	Noted. Although this will be subject to highway authority approvals.		
•	The promenade frontage to Lady Margery's Gorse will have a minimum width of 6m and be made up of feature paving.	Dimension to be checked. It is important to note that these elements of the town centre have already been		
•	Street furniture - Contemporary, stylish elements which are distinct to this square sited in response to solar	constructed.		
•	Play provision & Interactive public art element.	No play provision proposed in accordance with the	'Interactive' to be added to Public Art section.	
		comment above. Specific public art provision to be agreed at RM stage however, 'interactive' to be added to the Design Code.		
•	Page 12, Para 3.1 The area wide Whitehouse Design Code should be added to the list of related documents - Milton Keynes - Western Expansion Area - Area 10 Master Plan And Highway Design Code - September 2008.		Reference added.	
•	Page 29, Fig 5 - Parameters Plan. The frontage over the oil pipeline corridor / footpath should be addressed in the Parameters Plan. The oil pipeline corridor should also be shown on this plan. Surveillance of this space should be a mandatory requirement as it follows a footpath and the corridor should be fronted by development to ensure it is both a safe and attractive pedestrian route. (This appears to be indicated on the Illustrative Masterplan, but not shown on the Parameters Plan. Surveillance of the car park from the block south of the community street should be encouraged.	A new edge typology can be created to address this boundary.	New western edge typology created and added to Placemaking Plan.	
•	Page 30, To the west of Shetland Drive the fronts and backs to the proposed community street appear confused as does the layout of the residential block here. Given the need to overlook the footpath to the west of the site, could this area be arranged better?	It is important to note that this is an illustrative sketch to show how the principles of the Design Code could be applied. This said, the need to front Shetland Drive with ground floor residential uses, as well as parkings standards and optimal residential block dimensions are such that front and back arrangements would be challenging.		
•	Page 54, Para 11.1.4 – It is worth noting that the whilst the Masterplan and Highway Design Code allow flexibility in terms of the use and location of Community Streets, The Community Street that links Shetland Drive to Lady Margery's Gorse via the square is already provided and its alignment is therefore fixed. The community street to the west only provides access to an internal area, whilst this is an important access point it doesn't necessarily need to be a public community street as indicated in the illustrative masterplan. The community street providing access to the west of Shetland Drive is required, but its alignment should be flexible as this block could be broken up in several ways, including simply dividing it in to two perimeter blocks. This distinction regarding the flexibility of community street and its flexibility should be reflected in the plans on Fig 8, page 55. I appreciate that this is partially acknowledged on Page 54 Para 11.1.4.	by adding the word 'potential' in front of the Community Street entry on the legend to Figure 8.	'Potential' added to Community Street entry on legend to Figure 8.	
•	Page 50, Key Gateway Buildings – Given the location of the gateway buildings It will be challenging to reflect the opposite buildings scale and form. To the south one of the gateway buildings will be the large food store and the other will probably be residential and to the north one of the gateway buildings will be on a curve. The gateway buildings won't be able to mirror each other in terms of form and to the south the massing is likely to be different, this should be acknowledged in the text as it is to some extent in the illustrations.	reflect flexibility and need for asymmetry where required.	Text added to reflect flexibility and need for asymmetry where required.	
·	Pages 29 -31 – house layouts: some of the diagrams appear to only show one parking space for each unit so these will not be a likely layout once there is the need to comply with parking standards.	These are precisely the same illustrative diagrams shown in the Calverton Green Design Code which MKC approved in 2021. They are not intended to focus on parking arrangements but show how various housing typologies can be arranged.		
•	dwellings front doors leading to potential for neighbour disputes.	These are precisely the same illustrative diagrams shown in the Calverton Green Design Code which MKC approved in 2021. They are not intended to focus on parking arrangements but show how various housing typologies can be arranged.		
	The long edge street is described as "shared private drive"? Refuse vehicles are not able to enter private drives – how will these be serviced and how will low speeds be achieved on long straight sections of road.	All street typologies are all already approved by MKC by way of the adopted Movement Code 2008. Suggest that adopted/private be added to relevant sections/plans to allow for suitable flexibility at RMA stage.		
•	How will the edge street be designed so that it does not result in it being the desire line – it is noted that this has been in the design code previously.	-		<u> </u>
•	Car ports need to be open on two sides but the one shown in page 45 does not appear to be. Highways has noted that there are enforcement issues with these after occupiers enclose them with a garage door or other enclosure. As such these are not a preferred parking solution.	These are precisely the same parking typologies shown in the Calverton Green Design Code which MKC approved in 2021. If necessary, this typology can be amended or removed?		·
•	Parking to the front. Developers will need to give consideration as to how EV points will be provided when in the picture on page 45 could only be provided by charging posts due to a path separating the houses from the parking spaces.	Noted.		
•	In respect of urban design, the following comments have been received; Guidance is missing regarding the City Street, the key spine route through the development. The proposed height should be higher along the City Street. Most of the City Street buildings are 3 storeys in height. The buildings here should be modern in appearance and of a high standard due to the visibility of the location.		City Street principles added.	
•	It should be noted that whilst this layout doesn't show design details the layout, Architecture and hard and soft landscaping in this area needs to be of a modern / high standard along the City Street and as this site is addressing the countryside edge to both the site and the City the design response here needs to be well considered. In places an increased level of detail in terms of the plans and the proposed illustrative layout would help understanding of the vision for the area	principles.	Information reflected in City Street principles.	
•	General – The photos should have text underneath explaining the purpose of the picture and / or the location.	Images are used in a compositional rather than functional way along with the other material rather than intending to show specific details or case studies.		
•	Page 12, Para 2.4.1 The area wide Whitehouse Design Code should be added to the list of related documents - Milton Keynes - Western Expansion Area - Area 10 Master Plan And Highway Design Code - September 2008.	Reference to be added.	Reference added.	

Page 27, Fig 4: States that the Approved Densities are taken From the Adopted MKWEA     Fig.		
Development Framework (2005), but this document shows the higher density area along the city street and doesn't show an isolated high-density cluster in the centre of the development. The Plan should be adjusted to reflect the Development Framework, or a strong rationale should be provided for the change of approach.	igure to be corrected.	Figure corrected
Page 32, Para 8.1.3 The word mandatory is repeated.	ypo to be corrected.	Typo corrected.
Page 33, Fig 5. Key corners should be added to the countryside edge of the green corridor. The norther entrance to the site of the City Street (Could also be a vista termination). There should also be a key building addressing the Parkland Space - Whitehouse South Green.	dditional landmarks to be added.	Additional landmarks added. Update Placemaking Plan
Page 35, Fig 6 The proposed Movement network is consistent with the Area 10 Master Plan and Highway Design Code.	loted.	
<ul> <li>Page 36 (insert Page) – Guidance is missing regarding the City Street, the key spine route City through the development. The proposed height should be higher along the City Street. Most of the City Street buildings are 3 storeys in height. The buildings here should be modern in appearance and of a high standard due to the visibility of the location.</li> </ul>	City Street principles to be added.	City Street principles added.
Page 36 add a bullet point that states that 'On plot parking spaces should be placed behind the building line where possible'.	Bullet to be added.	Bullet added.
Page 37 Mandatory principles – Frontage types - Front boundary treatments must be consistent along streets in terms of height, set back and appearance.	ext to be added.	Text added.
Page 38 add a bullet point that states that 'On plot parking spaces should be placed behind the building line where appropriate / possible'	Bullet to be added.	Bullet added.
Page 39 Mandatory principles – Frontage types - Front boundary treatments must be consistent along streets in terms of height, set back and appearance.	ext to be added.	Text added.
Page 40 add a bullet point that states that 'On plot parking spaces should be placed behind the building line where appropriate / possible'	Bullet to be added.	Bullet added.
Page 41 Mandatory principles – Frontage types - Front boundary treatments must be consistent along streets in terms of height, set back and appearance.	ext to be added.	Text added.
Page 43 Mandatory principles – Frontage types - Front boundary treatments must be consistent along streets in terms of height, set back and appearance.	ext to be added.	Text added.
Page 45 add text to rear parking courts that states one sided 'rear parking' streets should be avoided where possible in some instances apartments above garages could be used to hide parking areas and provide two sides to the street.	ext to be added.	Text added.
<ul> <li>Page 46-49 Whitehouse South Green is a key public space in the centre of the new community. There needs to be a stronger direction in terms of the built form response to the space. Just relying on the guidance for the Residential Street and the Edge Streets isn't appropriate as the built form will address a public space not a street. The space needs to be overlooked with a key frontage and buildings turning the corners.</li> </ul>	Vhitehouse South Green Key Frontage to be added o Section 12.	Whitehouse South Green Key Frontage added to Section 12.
Page 53, 54,56, Fig 8. There should also be a key building / landmark addressing the Parkland Ad Space - Whitehouse South Green	dditional landmark to be added.	Additional landmark added.
• Key corner buildings should be added to the countryside edge of the green corridor. The northern entrance to the site of the City Street (Could also be a vista termination).	dditional landmarks to be added.	Additional landmarks added.
<ul> <li>Page 58, Para 13.1.2 'The Design Code does not seek to address architectural details (such as doors, canopies, eaves), however these will be required to be coordinated into a cohesive solution for each Reserved Matters Application'. Add that there must also be a co-ordinated approach between developers within the same character areas.</li> </ul>	ext to be added.	Text added.
Page 58/59, Section 12, Material Palette – Needs some additional text to ensure some variety in Te the accent materials, should be adjusted throughout document.	ext to be added.	Text added.
Page 61, Section 14, Street Furniture – It is worth mentioning here that the Green Square provides Te an opportunity for a public arts project.	ext to be added.	Text added.