



Anna Holloway
Milton Keynes Council
Development Management
Civic Offices
1 Saxon Gate East
Milton Keynes MK9 3EJ

11 July 2012

Dear Anna Holloway

Phoenix House, 202 - 300 Elder Gate, Central Milton Keynes, Milton Keynes MK9 1BE

Your ref 12/01194/FUL

Our ref 12 07 07

The Society wishes to comment on the above planning application proposing: *flexible use for any use within Class A1, Class A2, Class A3, Class A4, Class A5, B1a (Offices) and D1; ground floor extension and alterations*. The Society strongly **objects** to the proposed ground floor extension. The principal reasons for our position are given below.

CMK history

As you are of course aware, Phoenix House is the central of three buildings around Station Square. It is therefore a key part of the design of Central Milton Keynes, a world-renowned modern town planning example. Closely linked to the opening of the MK railway station, the building has played a key role in making the new town viable in economic terms as it allowed it to become a regional employment centre.

CMK architectural language and legibility

Virtually on axis with the Shopping Building, which lies at the far end of the principal grid, the two developments were instrumental in setting out the realisation of CMK. In addition to its important siting in the CMK grid and its relation to the Shopping Building, the architectural expression of Phoenix House is also particularly important as regards the legibility of CMK as a coherent town centre: the use of mirrored glass is a readily recognisable element shared by both developments and so is the use of covered colonnades. Contrary to the applicants' claims, the proposed in-filling of the ground floor recession will not 'enhance the surrounding environment'. It will, instead, detract from well-thought architectural cross-references between a number of original buildings in CMK. It will also have a detrimental impact on the design of the existing building as it will alter the way the building relates to the ground – a fundamental relationship in all architectural design – and it will affect the way in which the ground floor advocates its permeability and invites pedestrian use.

CMK amenity and NPPF

The use of colonnades in Phoenix House, and in numerous other buildings in CMK, is particularly important in making CMK a place friendly to its inhabitants or visitors as these offer protection from the elements. The colonnades work together with the distinctive *porte-cochères* and both these elements are essential towards retaining a good standard of amenity in CMK. This requirement has been firmly re-asserted as absolutely fundamental in all planning: the recently published *National*

Planning Policy Framework identifies the aim 'to secure a good standard of amenity for all existing and future occupants of land and buildings' as one of the 12 core planning principles (NPPF, paragraph 17).

Level access

We understand 'level access' is being brought in as an argument for the proposed alterations. Proposing the addition of 439m² of floorspace is clearly a totally disproportionate way of dealing with any access requirements, especially so for an application concerning ground floor spaces. Therefore we believe this argument is of no relevance to the determination of this application.

It is for all these reasons that the Society strongly **objects** to the proposed in-filling of the ground floor of Phoenix House.

We hope our comments will be of help and taken into consideration. Should you require some clarification on any of the above, do not hesitate to contact me. I would also greatly appreciate if you could keep us informed of any further developments on this case.

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

Yours sincerely


Dr Christina Malathouni
Senior Conservation Adviser

cc Simon Peart, Conservation Officer, Milton Keynes Council