



dynamic development solutions™

For and on behalf of
CMK Town Council

**MK CITY PLAN 2050
LOCAL PLAN REGULATION 18 CONSULTATION
TOWN COUNCIL REPRESENTATIONS**

**Prepared by
DLP Planning Ltd**

September 2024



Prepared by:	Jonathan Leigh Dual BA (Hons) MA Planner
Checked by:	Kirsten Ward BSc (Hons) MA PHD MRTPI Associate Director
Approved by:	Jon Goodall MA (Cantab) MSc MRTPI Director
Date: September 2024	Office: Sheffield

Strategic Planning Research Unit

V1 Velocity Building
Ground Floor
Tenter Street
Sheffield
S1 4BY

Tel: 01142 289190

Broad Quay House (6th Floor)
Prince Street
Bristol
BS1 4DJ

Tel: 01179 058850

4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01234 832740

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

CONTENTS	PAGE
1.0 Introduction.....	5
a) Context of the CMK Business Neighbourhood Plan	5
2.0 National Policy Context.....	6
a) Presumption in Favour of Sustainable Development.....	6
b) Plan-Making.....	6
c) Neighbourhood Plans	7
d) Planning for Housing	7
e) Making Effective Use of Land	8
f) Good Design.....	9
g) Transport.....	9
h) Landscape and Biodiversity	10
i) Historic Environment.....	11
j) Town Centres	11
3.0 Implications of the Upcoming Revised NPPF	12
4.0 Emerging City Plan 2050 – Representations to Proposed Policies and their Relationship To Land Use Priorities for Central Milton Keynes	13
a) Overall Growth Strategy.....	13
Policy GS1 – Our Spatial Strategy	13
Policy GS2 – Strategy for Homes.....	13
Policy GS3 - Strategy for Economic Prosperity	14
Policy GS5 – Our Retail Hierarchy	16
Policy GS10 - Movement and Access	17
Policy GS9 - Supporting Growth with Infrastructure	19
b) Central Milton Keynes.....	21
Policy CMK1 - Central Milton Keynes Placemaking Principles	21
Policy CMK2 - Central Milton Keynes Development Framework Area.....	22
Policy CMK3 - Supporting a thriving CMK.....	25
c) High Quality Homes and Housing Needs of Different Groups	26
Policy HQH1 - Healthy Homes	26
Policy HQH2 - Affordable Housing	26
Policy HQH3 - Supported and Specialist Homes.....	27
Policy HQH4 - Supporting Regeneration and Renewal	28
Policy HQH5 - Homes for Co-living	29



d) Climate and Environmental Action	31
Policy CEA3 - Resilient Design	31
Policy CEA8 - Provision and Protection of Accessible Open Space	31
Policy CEA9 - Biodiversity and Habitats Network.....	33
Policy ECP5 - Heritage	34
5.0 Conclusion	36

1.0 INTRODUCTION

- 1.1 These representations have been prepared on behalf of Central Milton Keynes Town Council (CMKTC) in response to the MK City Plan 2050 Regulation 18 Draft Consultation.
 - 1.2 CMKTC welcomes the opportunity to comment on the MK City Plan 2050 Regulation 18 Draft. We appreciate the ambitious vision for Central Milton Keynes (CMK) as a thriving, sustainable city centre. However, we have significant concerns about several aspects of the plan, particularly regarding the scale and potential impacts of proposed development.
 - 1.3 While we support the principle of growth and intensification in CMK, we believe that this must be balanced with the preservation of CMK's unique character, heritage, and quality of life. These representations focus on key areas where it has been identified elements of the draft Plan need reconsideration or further evidence to justify its proposals.
- a) Context of the CMK Business Neighbourhood Plan**
- 1.4 The CMK Business Neighbourhood Plan (or Central Milton Keynes Alliance Plan 2026 – 'CMKAP'), adopted in 2015, sets out a vision and policies for the development of Central Milton Keynes. On behalf of the Town Council, we are seeking to ensure that the ongoing objectives and aspirations of this plan continue to be reflected in the MK City Plan 2050.
 - 1.5 These representations aim to ensure consistency between the two plans, or otherwise to ensure that the proposals of the emerging City Plan are soundly based and legally compliant ahead of any review of non-strategic policies in the Neighbourhood Plan, and to safeguard the unique character and function of CMK as outlined in the Neighbourhood Plan.
 - 1.6 Note: This representation is based on the version of the National Planning Policy Framework (NPPF) in place at the time of the consultation (December 2023 version). Proposed changes to national planning policy were published for consultation by the current Labour Government with comments to be provided by 24 September 2024. While a material consideration these proposed changes are in draft and not addressed separately within these representations, but potential implications are highlighted.
 - 1.7 It is noted that the potential implications for proposed changes to national policy could impact upon the timescales for preparation and submission of the City Plan 2050, currently proposed before June 2025. This could provide a welcome increase in the opportunities for further engagement with stakeholders including Central Milton Keynes Town Council. To assist this process any revision to the Council's timetable should be communicated to interested parties as soon as possible.

2.0 NATIONAL POLICY CONTEXT

2.1 The National Planning Policy Framework ("the Framework") sets out the Government's planning policies for England and how these are expected to be applied.

2.2 Those policies that are relevant to the plan-making process and these representations in respect of the MK City Plan 2050 Regulation 18 version are summarised below.

a) Presumption in Favour of Sustainable Development

2.3 At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision-taking (paragraph 11). For plan-making, this means:

a. Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan areas; or

ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

b) Plan-Making

2.4 Paragraphs 15 to 37 of the Framework relate specifically to 'plan-making'.

2.5 Paragraph 15 states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

2.6 Paragraph 16 requires that plans are prepared with the objective of contributing to the achievement of sustainable development, and be prepared positively, in a way that is aspirational but deliverable.

2.7 Paragraph 20 requires that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, making sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development; infrastructure; community facilities; and conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

2.8 Paragraph 23 states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.

2.9 Paragraphs 24 to 27 require local planning authorities to cooperate with one another, and with other relevant bodies, to address strategic matters and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. Statements of common ground should be prepared to document progress on addressing cross-boundary matters.

2.10 Paragraph 31 requires that the preparation of policies should be underpinned by relevant, up-to-date, adequate and proportionate evidence.

- 2.11 Paragraph 32 states that local plans should be informed throughout their preparation by a sustainability appraisal that meets legal requirements and demonstrates how the plan has addressed relevant economic, social and environmental objectives. Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).
- 2.12 Paragraph 35 states that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:
- a. Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

c) Neighbourhood Plans

- 2.13 The NPPF provides specific guidance on neighbourhood plans. Paragraph 29 states that neighbourhood plans can shape, direct and help to deliver sustainable development by influencing local planning decisions. Importantly, neighbourhood plans can set out more detailed policies for specific areas, provided these policies do not conflict with the strategic policies in the local plan. This allows for more tailored, locally-specific non-strategic policies.
- 2.14 It's worth noting that paragraph 14 of the NPPF offers protections for neighbourhood plans, but only where they allocate sites to meet a housing requirement figure. To our knowledge, based on the 11,000 figure for CMK, the Town Council has not been given a specific housing requirement figure. Paragraph 23 of the Regulation 18 draft Plan appears to confirm this, indicating that the local planning authority's approach is to recommend a nominal (i.e., one dwelling) but unquantified figure of additional homes to plan for. Therefore, any site allocations in a future CMK neighbourhood plan would be in addition to the local plan requirements, although the prospect of site-specific allocations seems limited given the urban context of CMK.

d) Planning for Housing

- 2.15 Paragraphs 60 to 81 relate specifically to 'delivering a sufficient supply of homes'.
- 2.16 Paragraph 60 requires Local Planning Authorities to ensure that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 2.17 Paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.
- 2.18 Paragraph 67 requires policy-making authorities to establish a housing requirement figure

for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

2.19 Paragraph 69 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a. Specific, deliverable sites for years one to five of the plan period; and
- b. Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

2.20 Paragraph 70 requires local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown that there are strong reasons why this target cannot be achieved.

2.21 Paragraph 74 states that the supply of large numbers of new homes can be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- a. consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
- b. ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
- c. set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;
- d. make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and
- e. consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

2.22 Paragraph 75 states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old.

e) Making Effective Use of Land

2.23 Paragraph 123 states that strategic policies should set out a clear strategy for

accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

- 2.24 Paragraph 124 goes on to state that planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, as well as promoting and supporting the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 2.25 In terms of achieving appropriate densities, paragraph 128 states that planning policies should support development that makes efficient use of land, taking into account: the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting; and the importance of securing well-designed, attractive and healthy places.
- 2.26 Where there is an existing or anticipated shortage of land for meeting identified housing needs, paragraph 129 states that it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances, plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible including through the use of area-based character assessments.
- 2.27 However, paragraph 130 of the NPPF states that significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan.

f) Good Design

- 2.28 Chapter 12 of the December 2023 version of the NPPF makes provision for achieving well-designed and *beautiful* places. Paragraph 132 outlines that plans should *“at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.”*
- 2.29 Paragraphs 133 and 134 provide further detail on the importance of design codes and guides in providing clarity regarding expectations and confirms that these can be prepared at a range of scales. Paragraph 135 explains that the outcome of policies and decisions addressing good design should ensure well-functioning and attractive spaces over the long-term, which respond to local character and establish a strong sense of place. Policies should provide places that are safe, inclusive and accessible in terms of providing for good levels of amenity. Importantly, good design should optimise the potential sites to accommodate and sustain an *appropriate* amount and mix of development.

g) Transport

- 2.30 Paragraphs 108 to 117 refer to 'promoting sustainable transport'.
- 2.31 Paragraph 108 requires that transport issues are assessed from the earliest stages of plan-making and development proposals, so that:

- a. the potential impacts of development on transport networks can be addressed;
 - b. opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
 - c. opportunities to promote walking, cycling and public transport use are identified and pursued;
 - d. the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
 - e. patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
- 2.32 Paragraph 109 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 2.33 Paragraph 110 requires that planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Policies should also be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.
- 2.34 Paragraph 114 states that in assessing sites that may be allocated for development in plans, it should be ensured that:
- a. appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b. safe and suitable access to the site can be achieved for all users;
 - c. the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - d. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 2.35 Paragraph 115 states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- h) Landscape and Biodiversity**
- 2.36 Paragraphs 180 to 194 relate to 'conserving and enhancing the natural environment'.
- 2.37 Paragraph 180 states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). Policies should also recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.
- 2.38 Paragraph 185 identifies the role plans should play in mapping and safeguarding components of local wildlife-rich habitats and wider ecological networks, seeking to

enhancing their connectivity and provide for their restoration, management and the achievement of measurable net gains.

i) Historic Environment

2.39 Paragraphs 195 to 214 relate to 'conserving and enhancing the historic environment'.

2.40 Paragraph 196 states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.

j) Town Centres

2.41 Paragraphs 90 to 95 relate to 'ensuring the vitality of town centres'.

2.42 Paragraph 90 states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.

3.0 IMPLICATIONS OF THE UPCOMING REVISED NPPF

3.1 Based on the expected introduction of the revised NPPF by the end of 2024 and the current progress of the MK City Plan 2050, it is anticipated that the new NPPF will apply if the City Plan is submitted before December 2026.

3.2 This has several important potential implications for the plan. Some of these are summarised below:

- **Housing Supply and Delivery:** The revised NPPF is expected to introduce changes to the way housing land supply is calculated and maintained. This could affect the housing targets and delivery strategies outlined in the MK City Plan 2050 including re-introducing a 5% buffer to the calculation of five year supply. Key changes are associated with providing greater certainty over the ability of plans and proposals to meet housing needs in full, including market and affordable housing needs with a focus on securing the minimum proportion of social rented affordable housing need. While increased support has been identified for mixed-tenure development this is likely to require improvements to the evidence for such schemes e.g., in terms of contributions to delivery rates and the affordability of build-to-rent products.
- **Design and Placemaking:** While there is some reduction in focus on beauty from the overall objectives on strategic policies and requirements to provide safe and accessible places the proposed principles of good design in Chapter 12 of the existing NPPF are essentially proposed to be unchanged. In recognition of making effective use of land it is noted that the proposed changes seek to remove paragraph 130 of this existing NPPF, which states that “*significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area*”. This is likely to reinforce support for intensification in CMK but only insofar as where other objectives such as infrastructure provision can be satisfied.
- **Sustainable Transport and Town Centre Policies:** Given the evolving nature of town centres, the revised NPPF may provide updated guidance on town centre uses and regeneration. This could have implications for the retail and office space strategies proposed for CMK. Proposed changes in relation to sustainable transport seek to support vision-led approaches to managing future modal shift. This is widely viewed as further supporting intensification and limiting the scope for highway capacity as a reason to constrain development.

3.3 Given these potential changes, we recommend that the Council closely monitor the progress of the NPPF revision and be prepared to make necessary adjustments to the MK City Plan 2050 to ensure it aligns with the new national policy framework.

3.4 The exact effect of changes is currently unknown while the changes remain in draft. It is possible that final details of the revised NPPF will impact on the current plan-making timetable in Milton Keynes (proposing further consultation in February 2025 and submission of the emerging City Plan 2050 for Examination in May 2025). Under proposals from the Government the submission of Plans under the current system is likely to be extended to December 2026. It is requested that this provides an opportunity for extended timeframes for engagement with CMK Town Council and other stakeholders.

4.0 EMERGING CITY PLAN 2050 – REPRESENTATIONS TO PROPOSED POLICIES AND THEIR RELATIONSHIP TO LAND USE PRIORITIES FOR CENTRAL MILTON KEYNES

a) Overall Growth Strategy

Policy GS1 – Our Spatial Strategy

- 4.1 We support the recognition of CMK as the highest tier settlement in the Settlement Hierarchy where sustainable development will take place.
- 4.2 However, we object to Policy GS1 as currently worded as it is not consistent with national policy and fails to provide assurance that the infrastructure required to support development will be provided. To ensure consistency with national policy (including NPPF paragraphs 108 and 117), we suggest Policy GS1 is reworded to emphasise the delivery of enhanced services and facilities that will be required to support proposed growth levels.
- 4.3 We also request that the clause related to Tier 1 settlements should reference neighbourhood plans, as the Tier 2 point does, to ensure consistency across the policy and to reflect the current and future role of policies in the CMKAP.

Policy GS2 – Strategy for Homes

- 4.4 CMKTC has serious reservations about the scale and density of housing development proposed for CMK. While we recognise the need for growth, we have serious concerns about the scale of housing development proposed for Central Milton Keynes.
- 4.5 We support the overall spatial strategy focusing growth on CMK and other sustainable locations. However, we have concerns about the scale of growth proposed for CMK and whether it can be achieved without compromising the area's character.
- 4.6 Policy GS2 proposes to provide between 53,256 and 63,000 new homes over the period 2022-2050. While we understand the need for a buffer on the Local Housing Need figure, we are concerned about the upper end of this range and its potential impacts on CMK and in particular the land use and capacity assumptions applied in this location to generate the notional conclusions of the ability to provide this buffer.
- 4.7 The total housing supply of 62,625 homes outlined in Table 1 is very close to the upper end of this range. We are particularly concerned about the allocation of 11,000 homes to Central Milton Keynes and Campbell Park, which represents a significant intensification of development in this area.
- 4.8 We request clarification from the Council on:
- How the 11,000 homes figure for CMK was derived
 - What additional sites beyond the SHLAA/Capacity Study are included
 - How many of the 28,875 completions/commitments are in CMK
 - Whether the 11,000 is in addition to or includes any of those completions/commitments – the indications of the evidence base are that this expressly excludes sites assessed as suitable, available and achievable including any comprising extant planning commitments
- 4.9 We object to the current housing target for CMK in Policy GS2 as it is not justified or effective. The implications of delivering this level of housing growth on CMK's character and infrastructure have not been fully assessed. We request more detailed evidence on how this level of growth can be sustainably accommodated within CMK, particularly in light of NPPF paragraph 123, which states that planning policies should support development that makes efficient use of land, while taking into account the desirability of maintaining an area's

prevailing character and setting.

- 4.10 We question whether this level of intensification can be achieved without severely compromising the unique character and quality of life in CMK. We urge a reconsideration of these targets, suggesting a more modest goal of 7,000-8,000 new homes in CMK by 2050, which would still represent significant growth while maintaining a better balance with the area's existing character.
- 4.11 Policy GS2 includes provision for 3,000 homes on small and brownfield opportunity sites across the whole plan area. While we support the principle of making efficient use of brownfield land, in line with NPPF paragraph 123, we are concerned about the cumulative impact of these developments on CMK's character and infrastructure.
- 4.12 We request more detail on how these windfall developments will be managed and how their impacts will be mitigated. While examples of such sites may be supported in CMK the assumptions for the calculation of 62,825 dwellings in Policy GS2 indicate their contribution would be separate from and additional to the area-based approach to the 11,000 dwellings' capacity in CMK. Without clarity on the assumptions behind small site windfall trends in accordance with NPPF paragraph 72 this indicates substantial scope for double-counting.
- 4.13 Furthermore, with reference to NPPF 2023 paragraph 70 the emerging City Plan 2050 Regulation 18 version does not indicate how it intends to support the contributions towards 10% of the housing requirement from small sites. It does not calculate whether it expects the assumptions for capacity for a further 11,000 dwellings in CMK to count towards delivery on sites under one hectare. This reinforces the potential soundness issues with the capacity-based approach to forecast supply in CMK, which is not underpinned by robust evidence of either windfall trends on small sites or specific sites assessed as suitable, available and achievable.

Policy GS3 - Strategy for Economic Prosperity

- 4.14 CMKTC strongly supports the plan's focus on creating a thriving economic centre in CMK, particularly the emphasis on tech and innovation sectors. We recognise CMK's crucial role as the primary location for office and knowledge-intensive employment in Milton Keynes, as highlighted in the Housing and Economic Development Needs Assessment (HEDNA). However, we have some concerns and suggestions regarding the proposed scale of office development and how it will be achieved:
- 4.15 Firstly, the target of 300,000 sqm of new office floorspace is ambitious but potentially necessary given the current state of CMK's office stock. The HEDNA reveals that about 75% of CMK's office stock was built before 2000 and no longer meets modern requirements. This outdated stock is a major barrier to attracting and retaining businesses. We support the need for increased Grade A office space but request more detail on how this will be achieved, considering the following challenges identified in the HEDNA:
- Low rental levels compared to other areas, making new development financially challenging
 - A risk-averse market where new development usually only occurs with pre-let commitments
 - Fragmented land ownership hindering large-scale redevelopment efforts
- 4.16 The proposal for up to 300,000 sqm of new office space in CMK, primarily in the 'Downtown' business quarter, has the potential to significantly enhance CMK's economic role. However, we request more detailed information on:
- How this quantum of office space will be delivered over time

- How it will be integrated into the existing urban fabric without overwhelming CMK's character
 - What supporting infrastructure and public realm improvements will be needed
 - How it aligns with the proposed reduction in car parking, given that many office workers currently drive to CMK
- 4.17 We request more detail on how 300,000 sqm of new office floorspace will be delivered, considering the challenges identified in the HEDNA such as low rental levels and fragmented land ownership. As the characteristics of demand for office space are likely to continue to evolve over the plan period, and are still settling following the Coronavirus pandemic (e.g., hybrid working and flexible workspace) more detailed land use management criteria may be required to ensure sustainable delivery of schemes.
- 4.18 Secondly, we therefore strongly support the concept of a 'Downtown' business quarter focused on tech and innovation, which aligns with the HEDNA's anticipation that CMK will remain the main location for knowledge-intensive businesses. However, we request more detail on how this will be delivered, including:
- Specific policies or incentives to attract tech and innovation businesses
 - How the area will be designed to meet the needs of these sectors
 - How it will integrate with proposed education facilities, including the potential new university campus
 - Strategies to address the viability challenges for new office development, potentially through well-designed mixed-use schemes
- 4.19 Given the HEDNA's projection that 46% of future office space requirements will be in CMK, we propose the development of a comprehensive masterplan for CMK that can guide this growth in a coherent and sustainable manner. This should leverage the council's ownership of land assets in CMK (including the achievability of those held by MKDP) to shape development strategically.
- 4.20 Thirdly, we strongly support encouragement of redeveloping outdated offices with higher density replacements. However, we request more specific strategies and incentives to facilitate this redevelopment, such as:
- Public-private partnerships for office modernisation
 - Tax incentives for redevelopment
 - Streamlined planning processes for office upgrade projects
- 4.21 We emphasise the need for a diverse range of employment opportunities in CMK, not just office-based jobs. We suggest including targets for different types of employment space, including light industrial, creative, and 'maker' spaces.
- 4.22 We request more specific strategies for incentivising the upgrading of outdated office stock, creating affordable workspace for start-ups and small businesses, and integrating flexible and co-working spaces within new developments.
- 4.23 Fourthly, CMK Town Council strongly supports the policies encouraging the refurbishment of existing buildings and the provision of flexible employment floorspace and business incubator units. However, we request more specific strategies for:
- Incentivising the upgrading of outdated office stock in CMK

- Creating affordable workspace for start-ups and small businesses in the city centre
- Integrating flexible and co-working spaces within new developments

4.24 Finally, we welcome the support for further and higher education institutions but request more detail on:

- How the proposed new university in CMK will be integrated with the 'Downtown' business quarter
- Strategies for creating links between education institutions and local businesses
- A more detailed assessment and policy basis for the provision of student accommodation (and associated land use requirements such as parking and amenity space) and its impact on the housing mix in CMK

4.25 To ensure Policy GS3's deliverability, we suggest:

- Including more detail on mechanisms to deliver the proposed office space in CMK
- Developing a comprehensive economic masterplan for CMK
- Providing more specific strategies for supporting a diverse range of businesses and employment types in the city centre
- Clarifying the integration of education facilities with the wider economic strategy for CMK

4.26 While we support the intensification of development in CMK, we urge careful consideration of how this can be achieved while maintaining the quality of the urban environment and CMK's unique character. The loss of Campbell Park as a potential office development area presents an opportunity to focus on intensifying development in the existing CMK area, but this must be balanced with the preservation of green spaces and other amenities that make CMK attractive.

Policy GS5 – Our Retail Hierarchy

4.27 CMKTC recognises the changing nature of retail and supports the plan's flexible approach to town centre uses. However, concerns have been identified in relation to the proposed scale of new retail development and its achievability in practice and CMKTC thus seek assurances about the protection of CMK's role as a regional shopping destination.

4.28 We note the proposal for up to 66,200 sqm of new comparison retail space in CMK. While we support CMK's role as a regional shopping destination, we have concerns about whether this level of retail expansion is realistic given current trends in the retail sector. We request:

- More evidence to justify this scale of retail growth
- Information on how this will be integrated with existing retail provision
- Assurances that this will not lead to an oversupply of retail space that could result in vacancies

4.29 The target of up to 66,200 sqm of new comparison retail floorspace seems high given trends towards online shopping. We request more evidence to justify this figure and suggest a more conservative target with built-in flexibility to respond to market conditions. While paragraph 56 of the Plan notes that vacant units might be expected to accommodate additional demand in the short-term the assumptions for this are not quantified in policy terms. Further detail is required in terms of what extent of new provision should be considered appropriate as part

of new development and where relevant criteria for those parts of the existing portfolio and primary retail land uses that should be retained as part of any redevelopment.

- 4.30 We note that no additional convenience floorspace is projected for CMK until after 2050. We request clarification on how this aligns with the proposed residential growth in CMK and how local convenience needs will be met given extremely limited provision at present.
- 4.31 We also emphasise the importance of creating a vibrant evening economy in CMK. We suggest specific policies to encourage a diverse mix of restaurants, bars, and cultural venues, while managing potential conflicts with residential uses.
- 4.32 We therefore request more detail on how new retail provision will be integrated with existing retail in CMK. This should include:
- Strategies to improve linkages between the main shopping centre and other retail areas
 - Policies to support independent retailers and create a more diverse retail offer
 - Approaches to manage vacant units and support meanwhile uses
- 4.33 To make Policy GS5 effective, we suggest revising the comparison retail floorspace target for CMK, providing more detail on meeting local convenience needs, and including specific strategies for integrating and managing retail provision in CMK. We request further evidence to justify the 66,196 sqm of new comparison retail floorspace forecast for CMK by 2050. Additionally, we ask for clarification on how local convenience retail needs will be met in CMK given the projected residential growth, despite no additional convenience floorspace being projected until after 2050. Appropriate land use provision should be made for any net additional convenience retail needs identified for CMK in order to provide healthy and accessible communities.

Policy GS10 - Movement and Access

- 4.34 CMKTC broadly supports the plan's aim to create a more sustainable transport system in CMK. However, we have significant concerns and object to the feasibility and potential impacts of some proposals.
- 4.35 The proposed Mass Rapid Transit (MRT) system along Midsummer Boulevard could significantly change movement patterns in CMK. While we support improvements to public transport, we request:
- More detailed plans and timelines for the MRT system
 - Assessment of its impacts on the public realm, particularly the proposed 'Midsummer Boulevard Greenway'
 - Evidence of its integration with wider city transport networks
- 4.36 We support the protection and enhancement of the grid road and redway networks but request more detail on how these will be integrated with the proposed Mass Rapid Transit (MRT) system, particularly in CMK. We suggest:
- A comprehensive plan showing how MRT routes will interact with existing grid roads and redways in CMK
 - Design guidance to ensure MRT infrastructure enhances rather than detracts from CMK's character
- 4.37 We have concerns about the proposed reduction in on-site parking provision in high-density

areas or near public transport nodes. We request the Council's justification for reducing parking in CMK. While we support reduced car dependency long-term, CMK's accessibility for visitors is crucial to its success. We urge:

- A phased approach to parking reduction in CMK, linked to the delivery of alternative transport options
- Regular reviews of parking demand and provision in CMK
- Retention of sufficient short-stay parking in CMK to support retail and leisure uses

4.38 We object to the proposed reduction in on-site parking provision without a clear phased implementation plan. We urge a phased approach to parking reduction in CMK, linked to the delivery of alternative transport options. In accordance with NPPF (2023) paragraphs 111 and 135 in relation to parking standards and good design it is critical that provision for parking standards within development layouts and land use assumptions takes account of housing mix and type and does not undermine the scope to sustainably optimise sites for development. It is unsound to therefore propose any significant reduction in existing provision for parking standards based on the very limited details for housing capacity and future infrastructure delivery associated with the proposals for CMK.

4.39 We strongly support improvements to walking and cycling infrastructure but request more specific commitments for CMK, including:

- A comprehensive network of segregated cycle routes within CMK
- Improved pedestrian crossings in CMK, particularly across the boulevards
- Secure cycle parking throughout CMK, including at key destinations and transport hubs

4.40 We strongly support the HEDNA's emphasis on alternative transport to reduce car dependency. We request more specific commitments to projects and initiatives that will make walking, cycling, and public transport more attractive options in CMK, in line with Policy GS8's aims and in order to provide greater certainty for the collection and spending of planning contributions.

4.41 Delivering the quantum of growth contained in the spatial strategy will require a transformation in modal shift from car to public transport and other more sustainable means of movement. The data, as published on the Council's Transport Policy webpage, shows there has been a continuing decline in bus passenger journeys per head, despite the rapidly increasing population. The number of car journeys is also expected to increase by 35% by 2045 (MRT Outline Business Case). However, there is no comprehensive plan for how the necessary modal shift will be delivered, as there is no Transport Topic Paper and the Council's Local Transport Plan is out of date.

4.42 Additionally, as shown on Figure 1 at paragraph 12 of the Growth Strategy, the emerging MRT routes only cover a limited area of the city. Hence, for the period of the plan, Milton Keynes City Council will remain highly reliant on bus-based public transport to deliver its growth ambitions.

4.43 We welcome the Green and Blue Infrastructure Strategy's support for enhanced walking and cycling infrastructure. We request that the plan include specific commitments to expand and improve CMK's redway network, ensuring it connects seamlessly with the wider city network and provides safe, attractive routes for active travel. This should include green corridors that combine cycling and walking routes with biodiversity enhancements.

4.44 To make Policy GS8 effective, we suggest including more detail on MRT integration in CMK, a phased approach to parking reduction in CMK, and specific active travel commitments for

the city centre. The Local Transport Plan should also be updated or further evidence provided to demonstrate how improvements to public transport and a shift to other sustainable travel modes will be achieved.

Policy GS9 - Supporting Growth with Infrastructure

- 4.45 While we support the "infrastructure before expansion" approach, we have significant concerns about and object to the infrastructure delivery plan proposed to support the growth of CMK.
- 4.46 We request more detail on how education and healthcare provision will be expanded to meet the needs of new residents in CMK. This should cover:
- Specific sites identified for new schools and healthcare facilities within or near CMK
 - Funding mechanisms for delivering this infrastructure in CMK
 - Phasing plans to ensure infrastructure is delivered alongside new housing in CMK
- 4.47 We seek clarification on how utilities capacity, particularly water supply and sewage treatment, will be increased to support the proposed growth in CMK. We note that the earlier Milton Keynes Infrastructure Study and Strategy (May 2024) also records outstanding work to be completed in respect of managing surface water flood risk.
- 4.48 We request a comprehensive assessment of transport infrastructure needs for CMK, including:
- Modelling of traffic impacts from proposed CMK development
 - Identification of necessary improvements to the CMK road network
 - Strategies to encourage modal shift away from private car use in CMK
- 4.49 We strongly support the integration of Linear Parks into strategic urban extensions but request clarification on how this concept will be applied to the intensification of development in CMK.
- 4.50 Together the Milton Keynes Infrastructure Study and Strategy (May 2024) and later Infrastructure Delivery Plan (July 2024) provide little confidence that strategic policies for infrastructure delivery in CMK have been soundly assessed or would be achievable in practice. The IDP (section 7) notes this evidence is still evolving in terms of locations and scales of development. However, pp.58-59 note constraints to existing provision (especially health and education infrastructure).
- 4.51 The May 2024 Study provides a more relevant starting point for further engagement, noting particularly the slow delivery on Plan:MK commitments (only 6%) but the impact of these 6,295 dwellings alone in providing a 300% increase in population but limited reliance on future infrastructure projects (pp. 78-79). Pages 80-84 do not even quantify the population and housing implications for 15,000 dwellings relative to the existing baseline but paint a stark picture of future infrastructure needs (e.g., 10FE of Primary School places against no existing provision).
- 4.52 No projects are identified to secure this provision. Moreover, the solution to any barriers to infrastructure delivery is more likely to be driven by assumptions on housing type and mix (e.g., flatted accommodation). This would reiterate that the emerging strategy is currently entirely unclear in the nature of housing needs that could be sustainably fulfilled in CMK by both existing committed and future planned growth. However, confirmation of assumptions around housing mix and type would impact on the evidence base and achievability of the strategy for CMK as a whole e.g., in terms of viability and relationship with affordable housing

need.

- 4.53 To make Policy GS9 effective, we suggest including more specific commitments to infrastructure delivery in CMK, including education, healthcare, utilities, and transport. We also request clarification on how green infrastructure principles will be applied in the city centre context.

b) Central Milton Keynes

Policy CMK1 - Central Milton Keynes Placemaking Principles

- 4.54 While CMK Town Council broadly supports the placemaking principles for the area, we have object to some critical aspects of the outlined placemaking principles:
- 4.55 **Density and Height:** We strongly object to the proposed density of up to 425 dwellings per hectare in the Central Spine and potential for buildings up to 31 storeys high. The Council has not provided sufficient justification for these figures, which are significantly higher than those recommended in their own Urban Capacity Study (2017) covering CMK. This scale of development risks overshadowing CMK's distinctive boulevards and creating an oppressive street environment. Based on the Urban Capacity Study and the principles outlined in the CMK Business Neighbourhood Plan, we suggest:
- A maximum density of 250 dwellings per hectare in the Central Spine
 - A general height limit of 8-10 storeys, with specific identified locations for landmark buildings up to 15 storeys
- 4.56 These figures are derived from the urban design analysis in the CMKAP and Urban Capacity Study, which suggests that densities above 250 dph and heights exceeding 15 storeys would be out of character with CMK's existing urban form.
- 4.57 While the densities (and associated storey heights) indicated by the evidence base (including Growth Opportunities Study) may be justified in certain circumstances they are unsupported by site-specific assumptions for future growth e.g. in terms of housing mix, site size and plot ratio and mix of uses to be provided. The evidence base for design and area-based capacity assumptions is currently limited in terms of whether it presupposes or accepts constraints such as the relative unsuitability of CMK for family housing and viability constraints as drivers of increased density on individual schemes. However, the starting point for area-based capacity assumptions that reflect existing character and the delivery of a wider mix of housing should reasonably be retained at around a maximum of 250dph unless scheme-specific or site-specific reasons are provided to exceed this and supported by site-specific Design Codes or Design Review Panel findings.
- 4.58 **Mass Rapid Transit:** While we recognise the need for improved public transport to support this level of growth, we have significant concerns about the impacts of the proposed Mass Rapid Transit system on the character and function of Midsummer Boulevard. The IDP and MRT Business Case indicate that this would require major changes to the street layout and public realm. We request much more detail on how this will be integrated sensitively with the existing urban fabric, heritage assets, and public spaces that are crucial to CMK's character. We also seek assurances that the MRT will not reduce the overall amount of green space in CMK.
- 4.59 **Streets and Pavements:** Policy CMK1 Placemaking Principles (at 5c) proposes the stopping up of Witan Gate and Saxon Gate to cars at Midsummer Boulevard. However, Saxon Gate is a city grid road whose function as a district distributor is to serve the transport needs of the City as a whole, not just CMK. Together with the closure of Witan Gate, it is difficult to envisage how north-south cross-city vehicular movement will be accommodated. The next available north-south vehicular route is Grafton Street V6, currently one of the busiest city grid roads. No traffic modelling data is provided to allow robust assessment of this policy objective.
- 4.60 **Parking:** We object to the proposed reduction in surface car parking without clear justification or a phased implementation plan. While we support reduced car dependency long-term, CMK's accessibility for visitors is crucial to its success. We urge:

- A phased approach to parking reduction
- Regular reviews of parking demand and provision
- Retention of sufficient short-stay parking to support retail and leisure uses

4.61 These recommendations are based on the findings of the CMK Parking Strategy, which emphasises the need for a managed transition in parking provision to support economic vitality.

4.62 **Midsummer Boulevard Greenway:** We support the concept of the 'Midsummer Boulevard Greenway' but request:

- More detailed plans for its design and functionality
- Clarification on how it will integrate with the proposed MRT system
- Assurances that it will enhance rather than reduce the overall green space in CMK

4.63 To make Policy CMK1 effective, we suggest the above modifications to density, height limits, and parking provision, along with more detailed plans for MRT integration.

Policy CMK2 - Central Milton Keynes Development Framework Area

4.64 While we support the concept of distinct city quarters, we object to the scale of development proposed:

4.65 **Housing:** The proposed density of up to 425 dwellings per hectare in the Central Spine is far beyond anything previously seen in Milton Keynes, with the potential exception of schemes approved contrary to existing policy on points such as viability, housing mix and with limited provision towards affordable housing need. We believe this risks creating an overly intense urban environment no longer keeping with CMK's spacious, green character.

4.66 The HEDNA suggests a Local Housing Need of 1,902 dwellings per annum across Milton Keynes, but the allocation of 11,000 new homes to CMK by 2050 represents a disproportionate concentration of growth in the city centre.

4.67 The high-density development proposed for CMK risks creating an oversupply of small apartments at the expense of a balanced housing mix. We urge the inclusion of specific policies to ensure a diverse range of housing types in CMK, including confirming the suitability or otherwise of the location to provide for larger family homes and townhouses. This is crucial for creating a sustainable, mixed community in the city centre and avoiding an overconcentration of any single demographic group whilst accepting the constraints to this location in providing for a significant proportion of family housing needs.

4.68 We urge reconsideration of these targets and suggest the following:

- A revised housing target of 7,000-8,000 new homes in CMK by 2050

4.69 Based on our analysis of the Strategic Housing Land Availability Assessment (SHLAA) and the CMK Capacity Study Technical Paper, we believe that a more appropriate and deliverable target for CMK would be 7,000-8,000 new homes by 2050. This figure is derived from: (a) The SHLAA identifies approximately 5,500 potential units in CMK, including sites with planning permission and other suitable sites and (b) The CMK Capacity Study suggests an additional 1,500-2,500 units could be accommodated through intensification and redevelopment of existing sites.

4.70 **Office Space:** While we support the need for increased Grade A office space, we object to the lack of detail on how 300,000 sqm of new office floorspace will be delivered and integrated without overwhelming CMK's character. The Employment Land Study suggests

that this level of office development may be challenging to deliver, given current market conditions and the shift towards flexible working practices. We recommend:

- A phased approach to office development, with regular reviews of demand and uptake
- Exploration of mixed-use developments that combine office, residential, and other uses to create more vibrant and adaptable spaces including for example co-working and flexible workspace
- Specific strategies to attract and retain businesses in the technology and innovation sectors, in line with the Milton Keynes Economic Strategy

4.71 **Retail:** The target of up to 66,200 sqm of new comparison retail floorspace seems high given trends towards online shopping. We request more evidence to justify this figure and suggest a more conservative target with built-in flexibility to respond to market conditions.

4.72 We request more evidence to justify the 66,196 sqm of new comparison retail floorspace projected for CMK by 2050 under Scenario B. We request:

- Clarification on the difference between Scenarios A and B
- Justification for choosing Scenario B
- How the Council has interpreted 'capacity' vs 'need' in line with para 19.9 of the Retail & Leisure Study
- How future retail need has been rationalised based on the capacity figures

4.73 Given the uncertainties in the retail sector highlighted in the Retail and Commercial Leisure Study, we suggest a more conservative target with built-in flexibility. We propose:

- A revised target of 50,000 sqm, with regular review mechanisms
- Flexibility to allow for alternative uses if retail demand does not materialise

4.74 We support the protection of the Primary Shopping Area (Policy CMK2) but request more detail on how this will be achieved in practice, particularly given the increased flexibility for changes of use under recent planning reforms.

4.75 **Design and Development Parameters:** While we broadly support the design and development parameters outlined, we have several objections and requests for clarification:

a) Residential Development Density: We object to the proposed maximum density of 425 dwellings per hectare within the Central Spine (Blocks B1/2, C1/2, D1/2, E1/2). This density is significantly higher than recommended in the CMK Capacity Study and risks overwhelming CMK's character. We suggest:

- A maximum density of 250 dwellings per hectare in the Central Spine
- Justification for the 425 dph figure and explanation of how it aligns with CMK's existing character
- Clarification on how this high density will be achieved while maintaining quality of life and adequate open space and more detailed scheme and site-specific criteria for where it may be supported i.e., in terms of housing mix, relationship with housing need, viability and plot ratio assumptions.

b) Building Lines: While we support the retention of existing building lines on Silbury and Midsummer Boulevards, we have concerns about allowing building lines to extend into existing surface parking areas on the Gates. We request:

- More detail on how the retention of existing street trees will be ensured
- Clarification on the design and implementation of multifunctional sustainable drainage systems parallel to Gate verges
- Assurances that new Redway cycle paths will not compromise pedestrian safety or the overall character of the Gates

c) Underpasses: We seek clarification on the circumstances under which underpasses might be replaced with at-grade crossings. We request:

- A comprehensive strategy for managing the transition from underpasses to at-grade crossings
- Assurances that pedestrian safety will be prioritised in any changes
- Details on how the distinctive character of CMK's pedestrian network will be maintained

d) Development on North and South Row: We have concerns about the potential loss of surface car parking along North and South Row. We request:

- A clearer definition of what constitutes "suitable alternative replacement parking"
- Details on how "lack of demand" for parking will be assessed
- Assurances that any development here will not negatively impact access to CMK for visitors and workers

4.76 To make this Design and Development Parameters effective, we suggest:

- Revising the maximum residential density figures to better align with CMK's existing character and the recommendations of the Capacity Study
- Providing more detailed guidance on the treatment of building lines, particularly along the Gates
- Developing a comprehensive strategy for managing changes to CMK's pedestrian network, including any transitions from underpasses to at-grade crossings
- Clarifying the approach to development along North and South Row, with particular attention to maintaining adequate parking provision

4.77 We request ongoing engagement with the Council as these design and development parameters are refined, to ensure they respect CMK's unique character while allowing for appropriate growth and evolution

4.78 To make Policy CMK2 effective, we propose several key modifications. Firstly, we suggest revising the housing target downwards from 11,000 to 7,000-8,000 new homes in CMK by 2050, based on our analysis of the SHLAA and CMK Capacity Study. This would provide a more balanced and achievable growth target while preserving CMK's character.

4.79 Regarding office space, we recommend providing more detailed strategies for delivering the proposed 300,000 sqm, including a phased approach with regular demand reviews, exploration of mixed-use developments, and specific plans to attract and retain technology and innovation businesses.

4.80 For retail, we urge reconsidering the floorspace target of 66,200 sqm, suggesting a more conservative target of 50,000 sqm with built-in flexibility and regular review mechanisms. We also request clearer justification for the chosen scenario and clarification on the interpretation of 'capacity' versus 'need' including the role for land use management of existing stock to safeguard CMK's primary retail functions.

- 4.81 The design and development parameters should be adjusted to revise the maximum residential density to 250 dwellings per hectare in the Central Spine, provide more detailed guidance on building lines (particularly along the Gates), develop a comprehensive strategy for managing changes to CMK's pedestrian network, and clarify the approach to development along North and South Row, especially regarding parking provision.
- 4.82 Additionally, we stress the importance of including specific policies to ensure a diverse range of housing types, including supporting the achievability of family housing where appropriate, to create a sustainable, mixed community and avoid overconcentration of small apartments. Where the wider evidence base does not indicate the ability of area-based capacity assumptions to support these aims (e.g., due to viability constraints) these elements of the CMK Development Framework should be further revised to safeguard priorities for good design and conserving the character of Central Milton Keynes.
- 4.83 Throughout this process, we request ongoing engagement with the Council to ensure these aspects of Policy CMK2 are refined in a way that respects CMK's unique character while allowing for appropriate growth and evolution.

Policy CMK3 - Supporting a thriving CMK

- 4.84 We support the aim of creating a thriving city centre but have objections about how this will be achieved:
- We seek clarification on what "protect premises" means in criterion 1(a) of this policy.
- 4.85 Further observations on the role for strategic and non-strategic policies to secure these aims are as follows:
- Evening Economy: We suggest specific policies to encourage a diverse mix of restaurants, bars, and cultural venues, while managing potential conflicts with residential uses.
 - University and Tech Quarter: We strongly support these concepts but request more detail on their delivery and integration with the wider city centre.
 - Events Venue: We support the proposal for a multi-use events venue but request more information on its location, capacity, and integration with the wider public realm based on a location to be identified.
- 4.86 To make Policy CMK3 effective, we suggest including more specific policies on evening economy development, providing more detail on the university and tech quarter delivery, and clarifying plans for the events venue.

c) High Quality Homes and Housing Needs of Different Groups

Policy HQH1 - Healthy Homes

- 4.87 We support the overall aim of Policy HQH1 to create healthy homes but note the following comments and objections.
- 4.88 We suggest increasing the requirement for accessible and adaptable homes in CMK beyond the proposed 75% to 90% for M4(2) standards, given the area's importance as a central, accessible location. We request:
- The Council's justification for the 75% M4(2) figure
 - Evidence from the HEDNA or viability assessments supporting this figure
 - Consideration of a higher percentage in CMK
- 4.89 We emphasise the need for a diverse mix of affordable homes, including larger units suitable for families. The Housing Needs Assessment indicates a particular shortage of family-sized affordable homes in CMK.
- 4.90 We support the HEDNA's recommendation for accessible homes but suggest a higher percentage in CMK given the proposed intensification. We propose that 10% of all new homes in CMK should meet M4(3) wheelchair user dwelling standards, rather than the 5% proposed in the plan. We request:
- The Council's justification for the 5% M4(3) figure
 - Evidence supporting this figure
 - Consideration of a higher percentage in CMK
- 4.91 We request more detail on how the policy will be applied to ensure dual aspect homes, particularly in high-density developments in CMK.
- 4.92 To make Policy HQH1 effective, we suggest increasing accessible home requirements in CMK and providing more guidance on achieving dual aspect homes in high-density areas.

Policy HQH2 - Affordable Housing

- 4.93 We object to the inclusion of CMK in Housing Viability Area 3, which requires only 15% of new homes to be provided as affordable homes. Given the high costs in CMK and the need to create a mixed, balanced community, and given the amount of development directed towards Central Milton Keynes, these constraints have a significant effect on the effectiveness of CMK to make sound provision for market and affordable housing needs. The difference between CMK and Housing Viability Area 2 as a minimum, and Housing Viability Area 1 as a preference, which is reflected in testing outcomes showing the 31% target for affordable housing to be significantly more attainable.
- 4.94 The HEDNA identifies a need for 28% affordable housing, which is slightly lower than the current policy target of 31%. However, we believe that maintaining a higher target for CMK is crucial given its importance as a central, accessible location and the need to create a truly mixed community in the heart of Milton Keynes.
- 4.95 We emphasise the need for a diverse mix of affordable homes, including larger units suitable for families. The HEDNA highlights a significant need for 3+ bedroom affordable homes, particularly given the projected increase in older households. We request specific targets for affordable housing mix in CMK, including a minimum percentage of 3+ bedroom homes.
- 4.96 Furthermore, we have concerns about the deliverability of First Homes in CMK given the high property values in the city centre. We request more detail on how affordable home ownership

will be achieved in CMK, including consideration of alternative models such as shared ownership that may be more viable in this area.

- 4.97 A recent appeal decision (APP/Y0435/W/24/3338221) for Bank House, 171 Midsummer Boulevard, has implications for affordable housing provision in CMK. The appeal Inspector found that the provision of 15% affordable housing on this site was appropriate, given the specific viability challenges of the scheme. However, this decision was based on the current policy context and the particular circumstances of that development.
- 4.98 The Decision Letter demonstrates the importance of having robust, up-to-date viability evidence to support affordable housing policies. We urge the Council to commission a new viability study specifically for CMK to inform appropriate affordable housing targets that balance the need for affordable homes with development viability.
- 4.99 Additionally, it is worth noting that the draft NPPF proposes to delete the First Homes requirement. While this may simplify affordable housing delivery, it's not necessarily a benefit for viability. The Council should consider how this change might affect the mix of affordable housing types that can be delivered in CMK and adjust policies accordingly to ensure a range of affordable options are provided including the Labour Government's proposals to prioritise social rent where the Local Plan Viability Study already indicated reduced viability in CMK.
- 4.100 To make Policy HQH2 effective, we suggest:
- Reclassifying CMK into Housing Viability Area 2 at minimum, preferably Area 1, to increase the affordable housing requirement or otherwise fully acknowledge the associated constraints towards meeting housing needs.
 - Maintaining the 31% affordable housing target for CMK, rather than reducing it to 28% as suggested by the HEDNA.
 - Including specific targets for the mix of affordable homes in CMK, with a particular focus on family-sized units (3+ bedrooms) where appropriate and sustainably located.
 - Providing a detailed strategy for delivering affordable home ownership options in CMK, considering alternatives to First Homes that may be more viable in this location.
 - Ensuring that the policy addresses the potential tensions between high-density development and the need for family-sized affordable homes in CMK.
 - Requiring viability assessments for major developments in CMK to be made public, ensuring transparency in the delivery of affordable housing.

- 4.101 We believe these modifications will ensure that Policy HQH2 better reflects the unique challenges and opportunities of providing affordable housing in CMK, contributing to a more balanced and sustainable community in the city centre.

Policy HQH3 - Supported and Specialist Homes

- 4.102 We broadly support the provision of supported and specialist homes, but object to aspects of Policy HQH3 as it is not justified or effective in relation to Central Milton Keynes and state specifically:
- a) We object to the 17.5% requirement for supported and specialist homes in CMK developments as insufficiently evidenced. The Housing and Economic Development Needs Assessment (HEDNA) suggests a higher need in CMK given its central, accessible location. The HEDNA also identifies a substantial increase in the older population, with 41% of overall growth expected to be in the 65+ age group. This demographic shift has significant implications for housing provision in CMK.

4.103 We propose increasing this to 25% of total homes in CMK to better meet identified needs. It should be noted this would likely have significant effects of the existing evidence base in terms of area-based capacity assumptions.

b) The policy lacks detail on integrating these homes into developments to create mixed, inclusive communities. We request specific requirements for:

- Distributing supported/specialist units throughout developments rather than concentrating them
- Ensuring shared amenity spaces and facilities are fully accessible
- Providing a mix of unit sizes and types to cater for different needs

c) The policy does not provide adequate design guidance. We suggest including CMK-specific requirements such as:

- Provision of communal spaces to reduce isolation
- Incorporation of assistive technologies
- Design features to support those with cognitive impairments

d) The policy does not address the need for specialist older persons' housing identified in the HEDNA. We support the HEDNA's recommendation that 5% of new dwellings should be built to M4(3) wheelchair user dwelling standards. However, given the proposed intensification of CMK, we suggest this percentage should be higher in the city centre to ensure adequate provision of accessible homes in this key location. We request a specific target for the provision of extra care housing in CMK.

4.104 To make Policy HQH3 sound, we suggest:

- Increasing the requirement to 25% in CMK based on evidence of need
- Including detailed integration and design requirements as outlined above
- Setting a specific target for extra care housing provision
- Requiring an accessibility strategy for each development

Policy HQH4 - Supporting Regeneration and Renewal

4.105 While we strongly support the principles of regeneration and renewal, we object to aspects of Policy HQH4 as it is not justified or effective, particularly in relation to CMK:

a) The policy lacks specific criteria for assessing impacts on existing communities. We propose including requirements to:

- Assess effects on local character, amenities and social networks
- Evaluate impacts on affordability and potential displacement
- Consider cumulative impacts of multiple regeneration schemes

b) There are insufficient requirements for community engagement. We suggest mandating:

- Early and ongoing consultation throughout the design process
- Establishment of community liaison groups for major schemes
- Publication of community engagement strategies and outcomes

c) The policy provides inadequate guidance on respecting local character. For CMK, we propose requirements to:

- Preserve and enhance the modernist architectural heritage

- Maintain key views and vistas
- Respect the original urban design principles of the city centre

d) The policy does not adequately address how positive contributions to the food environment would be assessed or implemented in city centre regeneration schemes. We request clarification on:

- Metrics for assessing food environment improvements
- Requirements for provision of food-growing spaces
- Expectations for healthy food retail in redevelopment schemes – this is particularly important to support healthy and accessible places and the provision of mix-uses

To make Policy HQH4 sound, we suggest:

- Including specific impact assessment criteria as outlined
- Strengthening community engagement requirements
- Adding detailed guidance on respecting CMK's unique character
- Clarifying expectations around food environment improvements

4.106 These modifications would make the policy more effective in guiding regeneration in CMK while protecting its distinct heritage and community.

Policy HQH5 - Homes for Co-living

4.107 We support the inclusion of co-living as a housing option, but object to aspects of Policy HQH5 as it is not justified or effective for CMK:

a) The policy does not adequately address the potential for student accommodation in CMK, despite the proposed new university. We suggest:

- Designating specific areas within CMK as suitable for purpose-built student accommodation
- Setting targets for student bed spaces linked to university growth projections
- Requiring student housing to be car-free and located close to university facilities

b) There is insufficient detail on management of co-living developments. We propose requirements for:

- On-site management presence 24/7 for larger schemes
- Tenancy agreements that encourage longer-term residency
- Annual reports on occupancy rates and average length of stay

c) The policy lacks CMK-specific design guidance. We suggest including:

- Minimum sizes for private and communal spaces
- Requirements for a mix of unit types, including some larger units suitable for couples or sharers
- Design standards to ensure schemes complement CMK's modernist architecture
- Provision of shared workspaces to support home-working

d) The policy does not address potential impacts on surrounding neighbourhoods. We propose:

- Limits on the number and clustering of co-living developments in any one area

- Requirements for local amenity impact assessments
- Strategies to integrate co-living residents into the wider community

4.108 To make Policy HQH5 sound, we suggest:

- Designating student accommodation areas and setting associated targets
- Including detailed management requirements as outlined
- Adding CMK-specific design guidance
- Addressing potential neighbourhood impacts

4.109 These modifications would ensure co-living developments contribute positively to CMK's housing mix and community while respecting its unique character.

d) Climate and Environmental Action

Policy CEA3 - Resilient Design

4.110 We support the principle of resilient design but object to aspects of Policy CEA3 as it is not sufficiently tailored to CMK's unique context and architectural heritage. To make this policy sound and effective for CMK, we propose the following modifications:

a) Overheating mitigation: We object to the lack of detailed guidance on applying overheating mitigation measures to CMK's modernist architecture. To address this, we request:

- A CMK-specific design guide outlining sensitive external shading solutions compatible with the area's architectural character, such as brise soleil, adjustable louvres, or high-performance glazing that maintains the visual integrity of curtain wall facades.
- Guidance on achieving cross-ventilation in CMK's deep-plan office buildings, including strategies for retrofitting atria, light wells, or innovative double-skin facades.
- A comprehensive strategy for incorporating natural shading in CMK's grid layout and public realm, utilising the existing boulevard structure and proposing new green infrastructure interventions.

b) Indoor air quality: We object to the insufficient consideration given to improving indoor air quality in CMK's existing building stock. We propose:

- Detailed guidance on retrofitting ventilation systems in CMK's modernist buildings, including options for decentralised mechanical ventilation with heat recovery (MVHR) systems that can be integrated without compromising architectural integrity.
- A specific strategy for improving air quality in CMK's covered shopping areas and walkways, incorporating advanced filtration systems, increased natural ventilation, and green walls where appropriate.

c) Climate resilience: We object to the lack of CMK-specific requirements for developments to contribute to overall climate resilience. We suggest:

- Mandatory incorporation of sustainable drainage systems (SuDS) in all new developments and major refurbishments in CMK, with guidance on integrating these systems into the modernist landscape design.
- A comprehensive urban heat island mitigation strategy for CMK, including:
 - Requirements for high-albedo materials in new construction and resurfacing projects
 - Targets for increasing tree canopy cover along boulevards and in public spaces
 - Incentives for green and blue roof installations on new and existing buildings
 - Guidelines for creating "cool corridors" utilising CMK's grid structure

4.111 To make Policy CEA3 sound, we propose that the Council develop a "CMK Resilient Design Supplementary Planning Document" that provides detailed, context-specific guidance on implementing these measures while respecting and enhancing CMK's unique architectural and urban character. This should be developed in close consultation with CMKTC and local heritage experts.

Policy CEA8 - Provision and Protection of Accessible Open Space

4.112 CMKTC strongly supports the emphasis on providing and protecting open spaces in Milton Keynes, but we object to the implementation of this policy in CMK

4.113 While we support the intensification of development in CMK, we urge careful consideration of how this can be achieved while maintaining the quality of the urban environment and CMK's unique character. The loss of Campbell Park as a potential office development area presents an opportunity to focus on intensifying development in the existing CMK area, but this must be balanced with the preservation of green spaces and other amenities that make CMK attractive. The following concerns are therefore identified:

a) We object to the lack of detailed plans for the design and functionality of open spaces within CMK, particularly given the proposed intensification of development. To make this policy sound, we request the inclusion of:

- Specific design principles to ensure new open spaces enhance CMK's unique modernist character and grid structure
- Strategies to integrate new open spaces with the existing public realm, including the proposed Midsummer Boulevard Greenway and Campbell Park
- Detailed plans for how open spaces in CMK will accommodate both recreational uses and support biodiversity, in line with the multifunctional approach outlined in the Green and Blue Infrastructure Strategy

b) We propose specific, evidence-based targets for open space provision in new developments within CMK, recognising the challenges of high-density urban development:

- A minimum of 20% of development site area in CMK should be dedicated to accessible open space. This figure is based on the Open Space Assessment, which indicates CMK currently has higher-than-average provision of civic spaces and formal gardens (1.24 ha per 1000 population). To maintain this high standard as development intensifies, we believe 20% is an appropriate and justified target.
- Innovative approaches to open space provision in CMK, such as roof gardens, green walls, and pocket parks, should be encouraged and count towards open space requirements, provided they are publicly accessible and of high quality

c) We emphasise the critical importance of high-quality, well-maintained public spaces in creating a liveable high-density environment in CMK. To ensure this, we request:

- A comprehensive public realm strategy for CMK, including detailed maintenance and management plans
- Specific design codes for new public spaces in CMK to ensure they meet the highest standards and reflect the area's unique character
- Clear commitments to long-term funding for ongoing maintenance of public spaces in CMK, potentially through developer contributions or a dedicated fund

d) We request that the 710m accessibility standard for key types of open spaces, as outlined in the Open Space Assessment, be strictly applied to all new developments in CMK to ensure equitable access to high-quality open spaces for all residents.

e) To align with the Green and Blue Infrastructure Strategy, we propose that all new and enhanced public spaces in CMK be designed to deliver multiple ecosystem services, including:

- Biodiversity support
- Sustainable drainage systems (SuDS)
- Urban cooling to mitigate the heat island effect
- Health and wellbeing benefits through varied recreational opportunities

f) Given CMK's urban nature and the potential for surface water flooding, we request specific requirements for the integration of SuDS into all new developments and public realm projects in CMK. These should be designed as multifunctional green infrastructure features that provide amenity and biodiversity benefits as well as flood management.

4.114 To make Policy CEA8 sound and effective, we suggest incorporating these detailed requirements for open space provision, design, and management in CMK, setting evidence-based targets for open space in high-density developments, and including clear commitments to long-term maintenance and multifunctionality.

Policy CEA9 - Biodiversity and Habitats Network

4.115 While we welcome the emphasis on biodiversity net gain and the protection of nature, green and blue infrastructure, we object to the policy as currently worded as it does not go far enough in addressing the unique context of CMK. To make this policy sound and effective, we propose the following modifications:

a) We propose specific, ambitious targets for biodiversity net gain in new developments within CMK:

- A minimum 20% biodiversity net gain for all major developments in CMK. This higher target is justified by the need to create significant new habitats in the urban centre to support the city-wide ecological network, as outlined in the Nature, Green and Blue Infrastructure Strategy. While ambitious, we believe this target is achievable through innovative design approaches and justified due to the high population and housing growth that would be generated by the Council's proposed strategy.
- Detailed guidance on how this can be achieved in a high-density urban environment, including:
 - Extensive use of biodiverse green roofs and walls
 - Creation of wildlife-friendly pocket parks and corridors
 - Integration of nesting and roosting features for birds and bats in building design
 - Use of native, pollinator-friendly planting in landscaping schemes

b) We request stronger protection and enhancement measures for CMK's existing green infrastructure:

- A comprehensive audit of existing green spaces and features within CMK, assessing their quality, biodiversity value, and connectivity
- Specific policies to protect and enhance existing green infrastructure in CMK, including protection of mature trees and designation of key areas as Local Wildlife Sites where appropriate
- A detailed strategy to improve connectivity between green spaces in CMK, creating a coherent ecological network that links to the wider city network, including the Linear Parks system

c) We propose more stringent requirements for developments in CMK to contribute to the wider Nature, Green and Blue Infrastructure network:

- Specific guidance on how developments in CMK can contribute to linear parks and other strategic green infrastructure, potentially through off-site contributions or land dedication
- Mandatory requirements for developments to enhance biodiversity corridors through CMK, linking to the wider ecological network

- Detailed strategies to incorporate blue infrastructure into CMK developments, including:
 - Sustainable drainage systems (SuDS) designed for biodiversity benefits
 - Creation or enhancement of water features that support wildlife
 - Measures to improve water quality in existing water bodies

d) To support the delivery of these ambitious targets, we request:

- A dedicated CMK Biodiversity Action Plan, outlining specific species and habitats to be prioritised in the city centre
- Requirements for long-term management plans for all new and enhanced biodiversity features, secured through planning conditions or obligations
- A monitoring and reporting framework to track progress towards biodiversity net gain targets in CMK

e) In light of the Green and Blue Infrastructure Strategy's emphasis on multifunctional spaces, we propose that all biodiversity enhancements in CMK should be designed to deliver multiple benefits, including:

- Climate change mitigation and adaptation
- Air quality improvement
- Noise reduction
- Mental and physical health benefits for residents and visitors

4.116 To make Policy CEA9 sound and effective for CMK, we suggest incorporating these more ambitious targets for biodiversity net gain, stronger protections for existing green infrastructure, and clear, detailed requirements for how CMK developments can contribute significantly to the wider ecological network. These modifications will ensure that biodiversity enhancement is prioritised alongside the intensification of development in the city centre.

Policy ECP5 - Heritage

4.117 While we strongly support the protection of CMK's unique heritage, we object to Policy ECP5 as it does not provide sufficient protection or recognition of CMK's New Town heritage. To make this policy sound and effective, we propose the following modifications:

a) Heritage audit: We object to the lack of a comprehensive understanding of CMK's heritage assets. To address this, we request:

- A commitment to undertake a comprehensive audit of CMK's heritage assets within 12 months of the plan's adoption, including:
 - A detailed inventory of CMK's modernist buildings, public art, and urban design features
 - Assessment of CMK's overall planned layout and infrastructure in relation to its contribution to the setting of relevant heritage assets
 - Identification of key views and vistas within CMK that contribute to its character
- Recognition of non-designated heritage assets through the creation of a "CMK New Town Heritage Local List", informed by the audit and developed in consultation with CMKTC and local heritage experts.

b) New Town heritage protection: We object to the insufficient protection given to CMK's New Town heritage. We propose:

- Development of specific criteria for assessing proposals affecting assets on the MK New Town Heritage Register and the proposed CMK New Town Heritage Local List, including consideration of:
 - Impact on the integrity of CMK's modernist design principles
 - Effects on key views and vistas
 - Contribution to the overall character of CMK as a New Town development
- A requirement for all major development proposals in CMK to demonstrate how they respond positively to and enhance CMK's modernist character, supported by design and heritage impact assessments.
- Detailed guidance on the sensitive adaptation of CMK's modernist buildings for new uses, balancing conservation with the need for functional, energy-efficient spaces and support for appropriate intensification.

c) Heritage interpretation and celebration: We object to the lack of requirements for interpretation and celebration of CMK's heritage. We suggest:

- A policy requiring all major developments in CMK to incorporate heritage interpretation elements, such as information panels, public art, or digital installations that tell the story of CMK's development.
- Development of a CMK Heritage Trail, linking key sites and providing interpretive information about the area's New Town planning and architectural significance.
- A requirement for developers to contribute to a "CMK Heritage Documentation Fund" to support ongoing research, documentation, and archiving of CMK's evolving built environment.

4.118 To make Policy ECP5 sound, we propose that the Council commit to developing a "CMK Heritage Management Plan" within 18 months of the plan's adoption. This document should provide a framework for balancing heritage conservation with the need for growth and adaptation in CMK, including:

- A methodology for assessing the public benefits of development against potential harm to heritage assets, specifically tailored to CMK's context as an evolving New Town.
- Guidance on integrating heritage conservation with other policy objectives, such as sustainability and economic development.
- Strategies for enhancing the contribution of CMK's heritage to its economic vitality and sense of place.

4.119 We believe these modifications will ensure that Policy ECP5 provides robust protection for CMK's unique heritage while allowing for appropriate growth and evolution of the city centre.

5.0 CONCLUSION

- 5.1 Central Milton Keynes Town Council (CMKTC) has carefully reviewed the MK City Plan 2050 in light of the National Planning Policy Framework (NPPF) requirements for plan-making. While on behalf of our client we support the overall vision for a thriving and sustainable CMK we have significant concerns about whether the Plan meets the tests of soundness as set out in paragraph 35 of the NPPF.
- 5.2 Our primary concern is that the Plan fails to meet the 'justified' test of soundness. Paragraph 35(b) of the NPPF requires that plans should be "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence." We contend that for several key aspects of the Plan, particularly regarding CMK, the Council has not provided sufficient evidence to justify its proposed strategy.
- 5.3 Specifically:
- a) The housing target of 11,000 new homes in CMK by 2050 (Policy GS2) is not adequately justified. The evidence provided in the Strategic Housing Land Availability Assessment (SHLAA) and CMK Urban Capacity Study does not support this level of growth. We believe a more appropriate and evidence-based target would be 7,000-8,000 new homes.
 - b) The proposed density of up to 425 dwellings per hectare in the Central Spine (Policy CMK2) lacks justification and is inconsistent with CMK's existing character. The Council has not provided evidence to show how this density can be achieved while maintaining the quality of life and unique urban form of CMK nor how high density development would provide for a range of housing needs.
 - c) The potential for buildings up to 31 storeys high (as implied in the Tall Building Strategy, Figure 5) is of significant concern. This scale of development risks overshadowing CMK's distinctive boulevards and creating an oppressive street environment. The Council has not adequately justified this dramatic change to CMK's skyline or demonstrated how it aligns with the area's existing character of infrastructure needs.
 - d) The retail growth target of 66,200 sqm of new comparison retail floorspace (Policy GS5) appears to be based on an overly optimistic scenario from the Retail and Commercial Leisure Study, without sufficient justification for choosing this high-growth option.
 - e) The proposed reduction in car parking (Policy CMK1) lacks a clear, phased implementation plan and does not adequately consider the potential impacts on CMK's accessibility and economic vitality.
 - f) The required transformation in modal shift from car to public transport and other more sustainable means of travel lacks a comprehensive plan as there is no Transport Topic Paper and the Council's Local Transport Plan is out of date. There is further concern as bus passenger journeys per head have been declining, and Milton Keynes City Council currently remains reliant on bus-based public transport to deliver its growth ambitions.
- 5.4 Furthermore, we are concerned that the Plan may not meet the 'effective' test of soundness as outlined in NPPF paragraph 35(c). The deliverability of some key proposals, such as the Mass Rapid Transit system and the significant office space expansion, has not been adequately demonstrated.
- 5.5 We also question whether the Plan is fully consistent with national policy, as required by paragraph 35(d) of the NPPF. In particular, we believe the proposed scale and intensity of development in CMK, especially regarding building heights, may conflict with NPPF

paragraph 128, which states that planning policies should "support development that makes efficient use of land, taking into account... the desirability of maintaining an area's prevailing character and setting."

5.6 In light of these concerns, we urge Milton Keynes Council to:

- a) Provide more robust evidence to justify the proposed growth targets, development intensities, and building heights, particularly for CMK.
- b) Consider alternative, more moderate growth scenarios that better balance development needs with the preservation of CMK's unique character and skyline.
- c) Develop more detailed, phased implementation plans for key proposals such as transport changes and office space expansion.
- d) Ensure that the Plan more clearly demonstrates how it will deliver sustainable development in line with NPPF paragraph 8, balancing economic, social, and environmental objectives.
- e) Reconsider the proposed building heights and provide a more nuanced approach that respects CMK's existing urban form while allowing for appropriate intensification.
- f) Evaluate the effects upon the total proposed growth strategy for Milton Keynes, including housing land supply and the ability to demonstrate a buffer against local housing need, of reducing the proposed capacity for 11,000 dwellings based on the absence of evidence for the suitability. Availability and achievability of sites

5.7 CMKTC is committed to working constructively with Milton Keynes Council to address these issues. We believe that with appropriate modifications, the MK City Plan 2050 can provide a sound and effective framework for CMK's future development. We request ongoing engagement as the plan develops and offer our local knowledge and expertise to help shape a positive future for CMK that respects its unique heritage and skyline while enabling appropriate growth and evolution.

BEDFORD / SDD / SPRU

4 Abbey Court, Fraser Road
Priory Business Park, Bedford. MK44 3WH
bedford@dlpconsultants.co.uk
01234 832 740

BRISTOL / SDD / SPRU

Broad Quay House (6th Floor)
Prince Street, Bristol. BS1 4DJ
bristol@dlpconsultants.co.uk
01179 058 850

EAST MIDLANDS / SDD

1 East Circus Street, Nottingham
NG1 5AF
nottingham@dlpconsultants.co.uk
01158 966 622

LEEDS

Princes Exchange
Princes Square, Leeds. LS1 4HY
leeds@dlpconsultants.co.uk
01132 805 808

LONDON

107 Clerkenwell Workshops,
31 Clerkenwell Close, London, EC1R 0AT
london@dlpconsultants.co.uk
020 3761 5390

MILTON KEYNES

Midsummer Court, 314 Midsummer Boulevard
Milton Keynes. MK9 2UB
miltonkeynes@dlpconsultants.co.uk
01908 440 015

RUGBY / SDD

18 Regent Place, Rugby, Warwickshire
CV21 2PN
rugby.enquiries@dlpconsultants.co.uk
01788 562 233

SHEFFIELD / SDD / SPRU

Ground Floor, V1 Velocity Village
Tenter Street, Sheffield. S1 4BY
sheffield@dlpconsultants.co.uk
0114 228 9190



IEMA Transforming the world
to sustainability

