

TALL BUILDING STRATEGY

CENTRAL MILTON KEYNES

OCTOBER 2025



Corstorphine & Wright

DRAFT

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1.0 PURPOSE OF THE STUDY

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PURPOSE OF THE STUDY

- 1.1 Montagu Evans, in collaboration with Corstorphine & Wright Architects, has been instructed by Milton Keynes Council (MKCC) to produce this Tall Buildings Strategy as part of the Central Milton Keynes (CMK) Growth Opportunity Area Study.
- 1.2 The brief for the study requires recommendations for locations of tall buildings, considering the setting of CMK, the wider landscape and key strategic views (21a of the brief), with a specific output to identify locations where tall buildings should either be particularly encouraged or resisted (25d and 29c of the brief).
- 1.3 It is anticipated that the study will form the basis of recommended policy content for the New City Plan, along with an approach to delivery.
- 1.4 This study is based on good practice methodology developed by the Greater London Authority (GLA) for the Mayor's recent Characterisation and Growth Strategy London Plan Guidance. It also takes account of other similar approaches to tall building studies that have taken place outside of London. This methodology is adapted to the specific context of CMK and its unique townscape.
- 1.5 The approach to the framework output has been based upon:
 - Identifying potential constraints to tall buildings (e.g. heritage assets).
 - Identifying potential opportunities for tall buildings (e.g. existing height clusters, access to open space and public transport).
 - Overlaying the two to identify potential locations for tall buildings.
 - Attendance at workshops with MKCC to seek officer views on potential for additional building heights in CMK.
 - Detailed site visits to CMK and analysis of CMK's existing townscape.
- 1.6 The approach also utilises a qualitative townscape appraisal of CMK to refine the identification of potential locations, along with the identification of views and a review of the height scenarios as they develop, for further discussion with MKCC.



Figure 1.1 Site Plan (Source: Corstorphine and Wright)

- 1.7 Where appropriate, this report refers to the block naming convention illustrated in **Figure 1.3** below.

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Figure 1.2 Aerial View. Source: Google (base map)

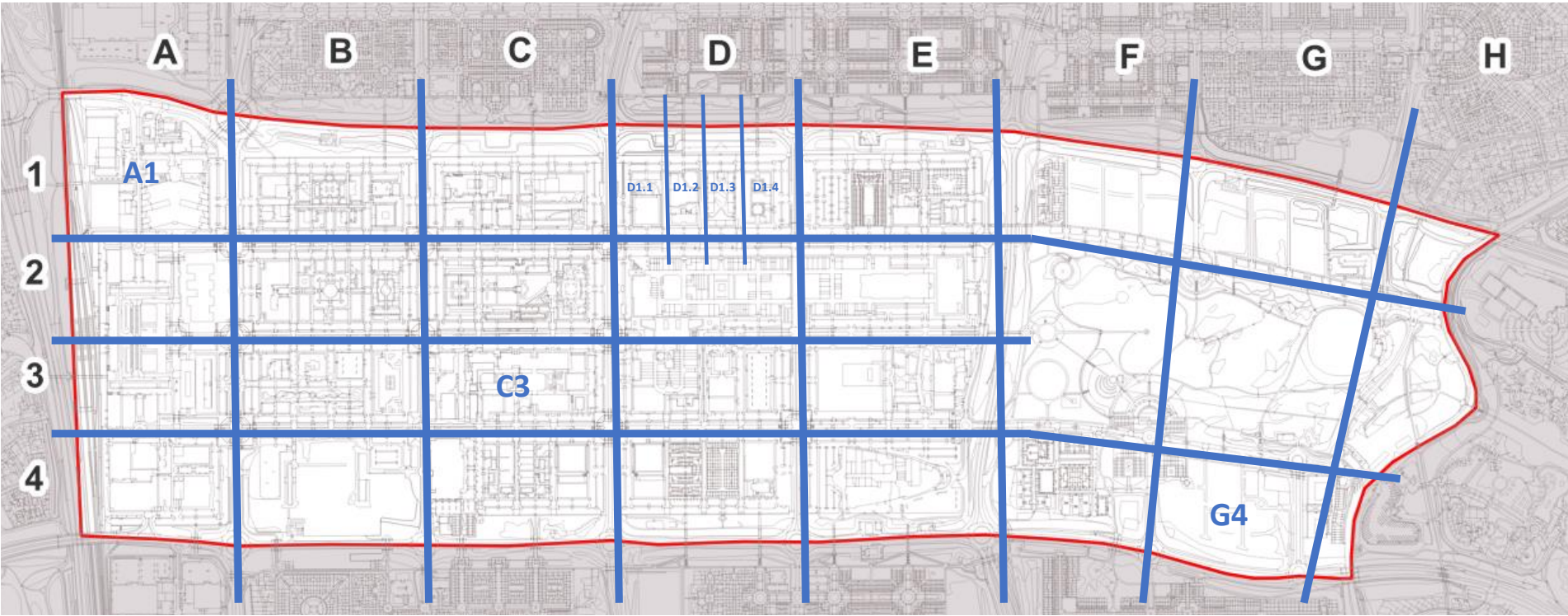


Figure 1.3 CMK Block Naming Convention

PREVIOUS REPORT

1.8 A previous version of this report, issued December 2024, was reviewed by Historic England. The feedback provided following this review has been incorporated into this updated report.

REPORT STRUCTURE

- 1.9 The report is structured as eight sections as follows:
- 1.0 Introduction/Purpose of Study
 - 2.0 Methodology
 - 3.0 Stage 1 – Character Survey: Historic Development
 - 4.0 Stage 1 – Character Survey: Townscape Appraisal
 - 5.0 Stage 1 – Contextual Analysis, including:
 - Prevailing Building Heights
 - Planning Permissions
 - Urban Grain
 - Land use
 - Open space accessibility
 - Public transport accessibility
 - Development Plan allocations
 - Topography
 - Heritage Assets
 - 6.0 Stage 2 – Sieving analysis: Sensitivity vs Suitability map overlays.
 - 7.0 Stage 3 – Identifying tall building zones.

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2.0 METHODOLOGY

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METHODOLOGY

- 2.1
- The methodology underpinning the study follows a similar approach taken to other comparative studies including Watford Tall Buildings Study (2021). In addition, the GLA's Characterisation and Growth Strategy LPG (2023) represents best practice for establishing appropriate locations for optimising capacity, including tall buildings. The GLA's three-stage methodology that informs this is adapted here to suit the CMK context. It consists of:
1.

Baseline analysis focussing on the historic development and townscape characteristics of CMK.
2.

Evaluation and appraisal of the above information to understand and map:

a.

Areas that are sensitive to change (and their degree of sensitivity);

b.

Areas that are potentially suitable for tall buildings (and their degree of suitability).
3.

Layering of sensitivity and suitability factors to identify zone(s) that have the most and least potential to accommodate tall buildings within CMK.
- 2.2
- The tall building strategy may form a basis for further testing of a range of height scenarios within the established tall building zones. This will take account of enabling factors forming part of a future masterplan for CMK. Such factors might include legibility and location of local landmark buildings, accessibility levels to public transport, access to green open space, and ultimately, having regard to shaping the identity of the CMK skyline.

STAGE 1: HISTORIC AND TOWNSCAPE CHARACTER SURVEY AND ANALYSIS

- 2.3
- This stage collates information and evidence relating to the historic development and present-day townscape character of CMK.
- 2.4
- It takes account of Milton Keynes origins as a planned New Town designated in 1967 and developed from the 1970s, and its defining characteristics such as its grid layout, prevalence of large, open areas of public realm, wide boulevards and green network.

STAGE 2: CONTEXTUAL ANALYSIS – ESTABLISHING SUITABILITY AND SENSITIVITY FACTORS

- 2.5
- Findings from the character assessment and evaluation are used to identify a strategy for change using a mapping analysis of factors that are suitable for tall buildings and factors that are sensitive to tall buildings:

FACTORS THAT MAY INDICATE SUITABILITY FOR TALL BUILDINGS

- Prevailing building heights
- Consented development
- Urban grain
- Land use
- Accessibility to green open space
- Public transport accessibility
- Development Plan allocations

FACTORS THAT MAY INDICATE SENSITIVITY TO TALL BUILDINGS

- Historical evolution and heritage assets including listed buildings, conservation areas and non-designated heritage assets (NDHAs), such as those identified on the MKCC New Town Heritage Register (NTHR);
- Local vistas that are sensitive to change;
- Consideration of the effect of topography.

- 2.6
- Identified factors are then collated together to create sensitivity and suitability 'heat' maps to determine areas that are sensitive to tall buildings and those that are suitable for tall buildings within CMK.
- 2.7
- Suitability and sensitivity areas are then combined ('sieved') into a single map to determine areas that are the most suitable for tall buildings, those areas that are more sensitive, and those areas that may be inappropriate for tall buildings.

- 2.8
- The degree of confluence in factors that make a site suitable or sensitive (i.e. if there are overlapping factors of sensitivity or suitability) will assist with a qualitative exercise to determine which locations may be suitable for buildings of different heights:
- Opportunities for mid to high-rise (more than 20 storeys)
 - Opportunities for mid-rise (height threshold of 15 storeys)
 - Opportunities for low to mid-rise buildings (height threshold of eight storeys)
 - Low rise areas with a height threshold of 3 storeys or more.

STAGE 3: IDENTIFYING TALL BUILDING ZONES

- 2.9
- Based on the findings of the mapping exercise of Stage 2, a hierarchy of suitable tall building thresholds is identified. Proposed buildings above the threshold height could constitute tall buildings subject to a tall building policy. This is based on four height categories:
- Red: Height threshold of 20 storeys or more.
 - Amber: Height threshold of fifteen storeys, or more.
 - Yellow: Height threshold of eight storeys or more.
 - Pale Yellow: Height threshold of 3 storeys or more.
- 2.10
- A separate Heritage Impact Assessment has been produced in tandem with this tall building strategy. Its findings have been used to inform these aforesaid building height thresholds.
- 2.11
- The identification of potential height in locations across CMK can also form the basis for a tall building policy that engages in relation to development above certain threshold heights.

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STAGE 1: HISTORIC DEVELOPMENT

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STAGE 1: HISTORIC DEVELOPMENT

- 3.1 This section provides a description of the historical development of Milton Keynes.
- 3.2 Following the Second World War, New Towns in the United Kingdom were planned under the New Towns Act 1946. Milton Keynes was one of the last generation of New Towns and was designated on January 23 1967. The purpose of the development of Milton Keynes was to help alleviate the housing demand that faced London and to provide a commercial centre for Buckinghamshire.
- 3.3 Milton Keynes Development Corporation (MKDC) formed in 1967 and commissioned a masterplan which was approved in 1971. Fred Roche was appointed as the General Manager of MKDC in 1970. The masterplan utilised the contours of the landscape and divided it into 1km by 1km squares to provide flexibility. Of these grid squares, two were designated to be the town centre. The CMK study area in this report also incorporates Campbell Park. The layout is structured with residential, industrial areas and leisure parks all linked together by the grid system of the main roads.
- 3.4 Prior to the development of Milton Keynes, the area was largely farmland and included several pre-existing towns and villages that were incorporated into the urban design of the city. The vision for Milton Keynes was for it to be a low density, car-orientated city with a high level of privacy for its residents.

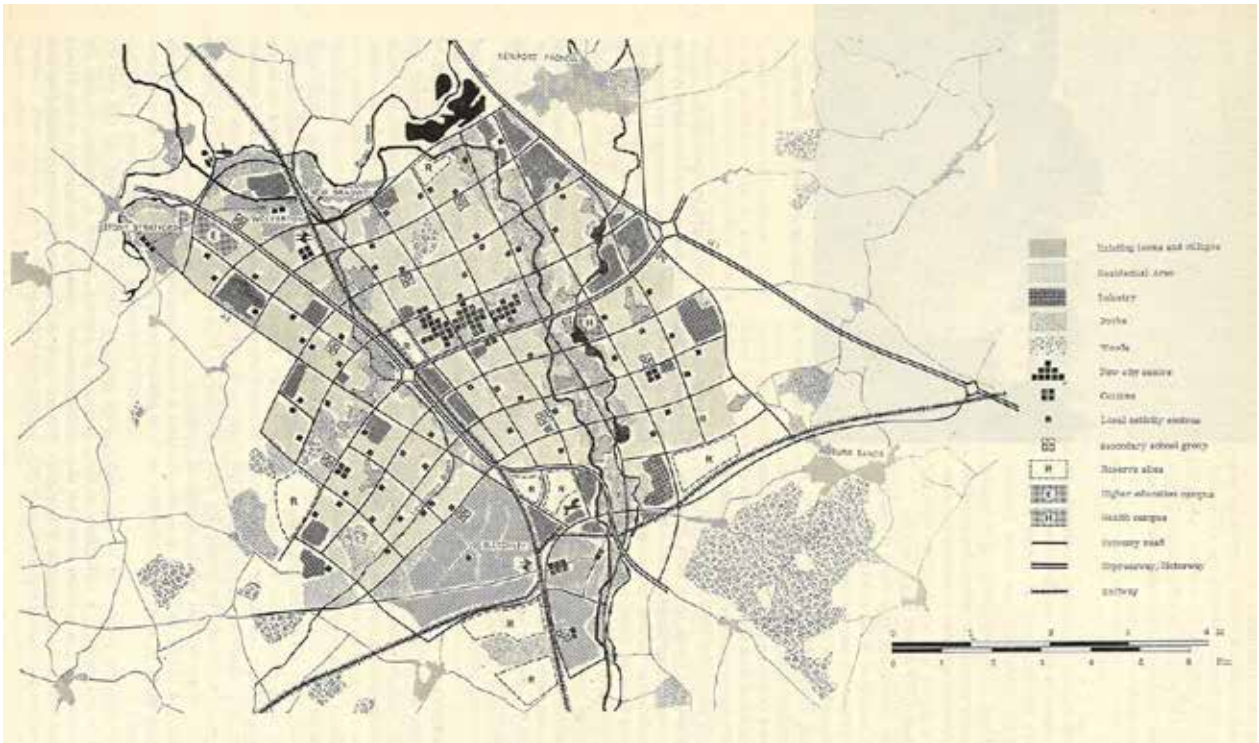


Figure 3.1 The 1967 Central Milton Keynes Masterplan. Source: Milton Keynes Council



Figure 3.2 Satellite image of Milton Keynes 1946. Source: Google Earth

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- 3.5 The elements that defined Milton Keynes included its bold planning, extravagant landscaping and modern architecture. MKDC planned and implemented CMK's infrastructure from the 1970s. CMK's layout comprised a grid pattern specifically within the east-west boulevards and north-south service roads to accommodate for the motor car. The grid regulated traffic flow, with secondary, quieter streets to accommodate areas of surface parking, landscaping, and servicing access to the urban blocks.
- 3.6 Connections were prioritised linking main footpaths with neighbouring squares through underpasses and bridges. The public realm was given definition by a curated selection of modern street furniture (The Infrastructure Pack). The naming of the boulevards 'Midsummer, Avebury and Silbury' symbolised a focus on the heritage of England.
- 3.7 CMK incorporated large areas of open space such as Fred Roche Gardens (1980), Station Square (1982-92) and Campbell Park. Smaller public gardens were included in the MKDC planning manual in 1992 including Grafton Park and Bouverie Square.
- 3.8 Behind Milton Keynes Central Library, excavations discovered evidence of a Saxon meeting place. Following initial excavation in 1977, care was taken not to disturb the rest of the mound, and it is now identified as Scheduled Ancient Monument (the Secklow Hundred Mound).
- 3.9 In terms of arts and culture, Milton Keynes invested in public art as part of the development of the area and there remains a large collection of public sculptures distributed around CMK.

- 3.10 MKDC wound up in March 1992 leaving an approved planning guide for further development. By this time, the population was approximately 183,000. MKDC was replaced by the Commission for New Towns (CNT) and in turn by Milton Keynes Borough Council. In 1997, Milton Keynes Council became a unitary authority and in 1999, CNT became a part of English Partnerships (EP) which was absorbed by the Homes and Communities Agency. Milton Keynes was granted city status in 2022.
- 3.11 The Milton Keynes Development Partnership was established in January 2013 as an independent legal entity, owned by Milton Keynes Council. Its primary role is to use and develop its portfolio of land assets to advance the Council's objectives to develop the city for the future. It focuses on ensuring a high quality of life for its residents and on creating the right conditions to support commercial activities. CMK is now in divided ownership including Milton Keynes Development Partnership, Milton Keynes Council and a variety of private owners and developers.



Figure 3.3 View from the north of the City Centre building site, with Lloyds Court in the foreground. Source: Milton Keynes Development Corporation



Figure 3.4 Image of the A5 under construction. Source: Milton Keynes Development Corporation



Figure 3.5 Satellite image of Milton Keynes 2024. Source: Google Earth

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STAGE 1: TOWNSCAPE APPRAISAL

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STAGE 1: TOWNSCAPE APPRAISAL

4.1 This section provides analysis of the townscape study area and the identified character areas.

TOWNSCAPE ANALYSIS

4.2 The analysis area comprises Central Milton Keynes which forms the central business district of the town, and contains the central retail, residential, office, cultural, leisure and civic uses.

4.3 Central Milton Keynes is laid out in a grid pattern and is formed of east to west boulevards, north to south 'Gates', service roads and internal access streets. Development within the town centre is predominantly setback from the highway, with areas of surface level parking and green space filling the spaces between buildings and highways.

TOWNSCAPE CHARACTER AREAS (TCAS)

4.4 The townscape of CMK may be categorised into seven distinct areas. For the purposes of this analysis the character areas are referred to as:

- Character Area 1: Station Square;
- Character Area 2: Mixed-Use Area;
- Character Area 3: Shopping Building and Civic Quarter;
- Character Area 4: Large Grain Leisure;
- Character Area 5: Campbell Park;
- Character Area 6: Boulevards and Gates; and
- Character Area 7: Residential Sub Areas.

4.5 The broad boundaries of the character areas are identified in **Figure 4.1**. The character and appearance of the character areas is discussed below.

4.6 The townscape baseline assessment describes character areas/types and their characteristics. It defines the distinct and recognisable patterns of elements, or characteristics that make one area different from another, rather than better or worse. Areas are defined and mapped with boundaries that suggest a sharp change from one townscape area to another; however, on site, changes can be more subtle and practically, this often represents a zone of transition.

4.7 The TCAs have been defined on the basis of townscape character and therefore may not be directly comparable with other local plan or land use allocations.

LOCAL AND LONG DISTANCE TOWNSCAPE VIEWS

4.8 Townscape viewpoints have been identified as part of the baseline analysis). They have been selected as being representative of CMK's character and could form the basis for further analysis to help inform and establish appropriate building heights as part of heights scenario testing or at application stage. They are illustrated below in **Figure 4.2** and images of views 1-14 are provided in **Appendix 1.0**.

4.9 The viewpoint selection was informed by consideration of what are the defining vistas that contribute to the character of Milton Keynes. This includes key buildings such as the listed shopping building and former bus station, as well as linear views looking along the boulevards and gates. The views have been identified based on a comprehensive review of the surrounding area, including the following criteria:

- Heritage receptors;
- Townscape character;
- Where the development may be prominent;
- Be visible from concentrations of residential areas;
- Open spaces (parkland, publicly accessible space);
- Accessibility to the public;
- The viewing direction, distance and elevation;
- Townscape and transport nodes

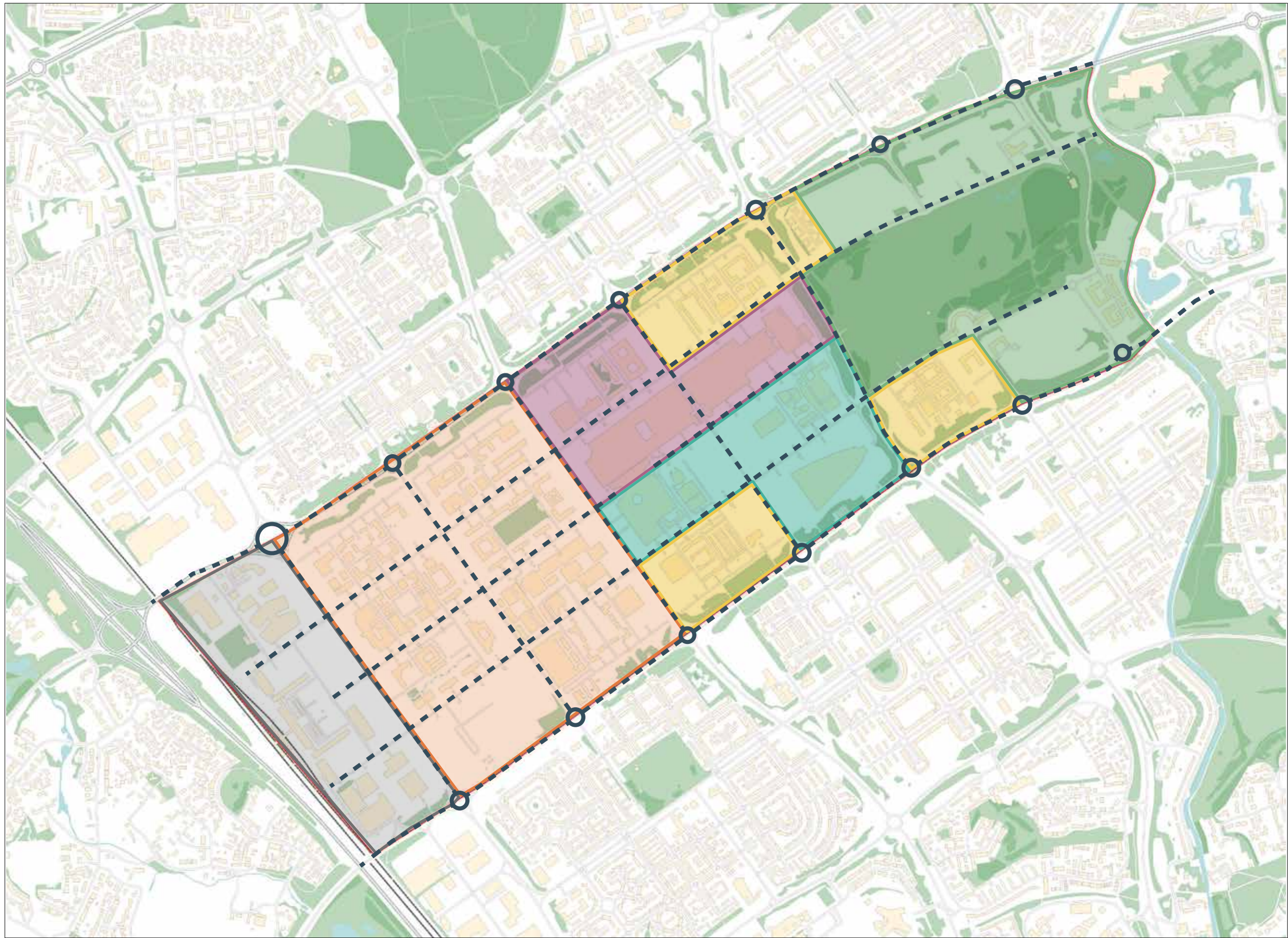
4.10 A selection of mid-range views looking north and southwards from the surrounding residential areas are included to enable consideration for the degree of legibility of primary routes into CMK and the identity of the local skyline.

4.11 Longer range views have been selected to illustrate the potential longer distance effect of tall buildings on the skyline of Milton Keynes when

viewed from a distance and include principal approaches to the city centre. These are shown in **Figure 4.3**.

4.12 The views presented are not intended to be exhaustive of potentially important views which would need to be determined on a case-by-case basis at application stage depending on the nature and location of a proposal.

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TOWNSCAPE CHARACTER AREAS

- Station Square
- Mixed Use Area
- Shopping Building and Civic Quarter
- Large Grain Leisure/Retail
- Campbell Park
- Residential
- Boulevards and Gates

LOCATION:
Central Milton Keynes

DATE:
October 2025

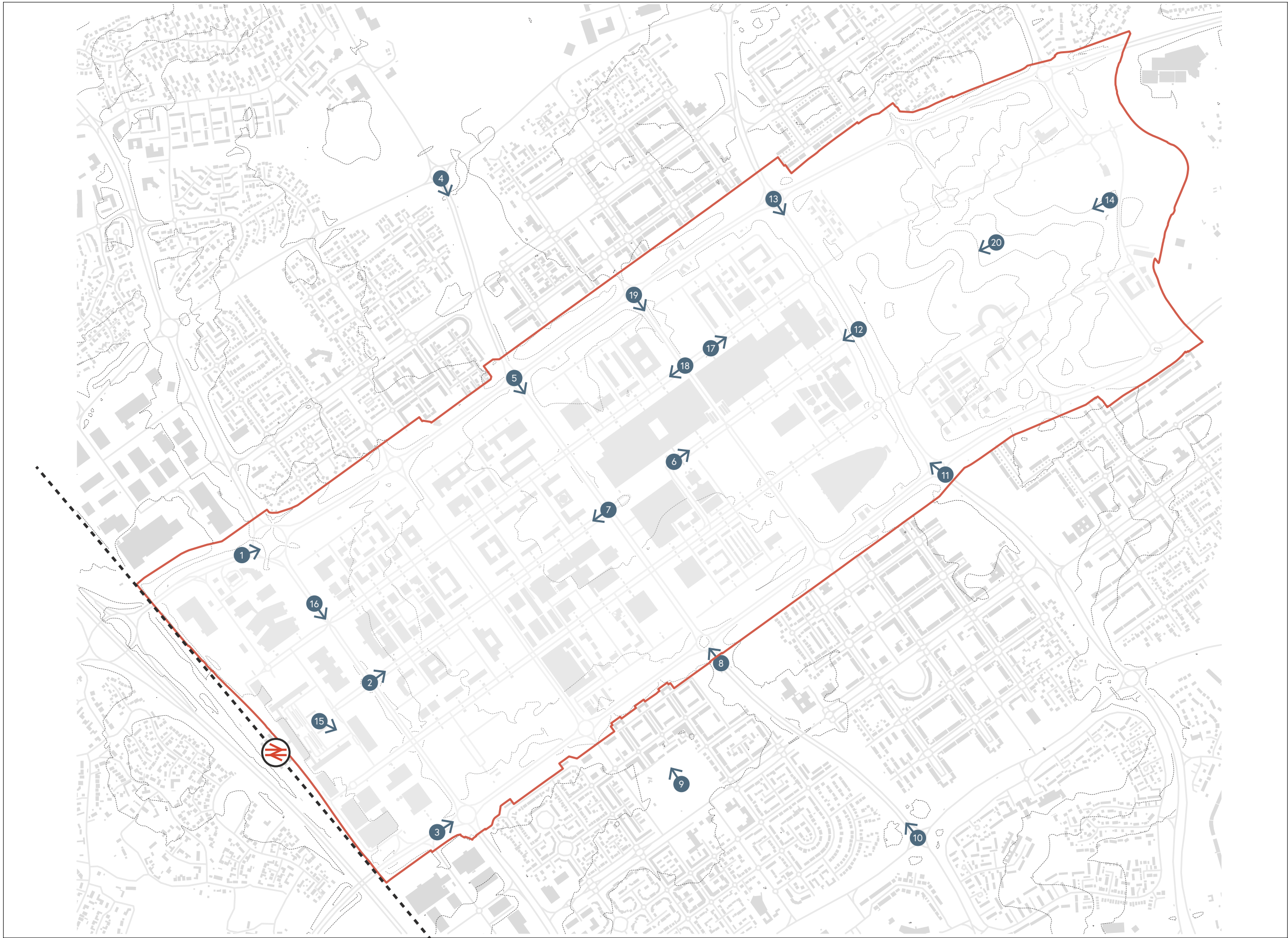
SCALE:
1:12,500 @ A3

FIGURE 4.1 Townscape Character Area Plan
(Source: Corstorphine and Wright)

▲ NORTH

Corstorphine & Wright

London Studio
21-27 Lamb's Conduit Street, Holborn, London, WC1N 3NL
020 7842 0820
corstorphine-wright.com



LOCAL VIEWS

- Study Area
- Identified Townscape local view

LOCATION:
Central Milton Keynes

DATE:
October 2025

SCALE:
1:12,500 @ A3

FIGURE 4.2 Views Location Plan (Source:
Corstorphine and Wright)

▲ NORTH



WIDER VIEWS

-  Study Area
-  Identified views

LOCATION:
Central Milton Keynes

DATE:
October 2025

SCALE:
NTS

FIGURE 4.3 Longer Distance skyline views
(Source: Corstorphine and Wright)

 **NORTH**

Corstorphine & Wright

London Studio
21-27 Lamb's Conduit Street, Holborn, London, WC1N 3NL
020 7842 0820
corstorphine-wright.com

CHARACTER AREA 1: STATION SQUARE

- 4.13 Character Area 1 is characterised by large areas of hardstanding, generally used for vehicular parking, and the infrastructure associated with the train station to the southwest of Central Milton Keynes.
- 4.14 Milton Keynes Central railway station is located at the western end of the character area and is served by intercity train services between London, the north of England, and Scotland, as well as by regional train services. A bus interchange is located within the train station forecourt and provides local, district, and long-distance bus services.
- 4.15 The station building is formed of a five-storey wide block which is flanked on either side by office blocks. The blocks frame the Station Square and provide long views along Midsummer Boulevard. Although the station building (Station house) and adjacent office blocks (Phoenix House and Elder House) are not located on the NTHR, they should be considered NDHAs. Their modernist form create a distinctive townscape and definition to the edges of Station Square. The station building was issued a Certificate of Immunity from Listing in August 2020.
- 4.16 The large areas of hardstanding and concrete paving are evident across the whole of Central Milton Keynes – most evident within Character Area 1, providing hardstanding for the commercial and train station uses. They are characterised by hard, concrete surfaces which form a strong sense of openness, lack of enclosure commensurate in scale to the open space and a consistency of ground surface character. This offers a flexibility in terms of how these spaces are used and occupied by people.
- 4.17 The North of the TCA is strongly mixed use in character and defined by its large grain. Within it are a retail park, football pitch, small grain drive through and retail and the large grain modern Quadrant:MK office complex. The south of the TCA is similarly mixed comprised of large grain retail and adjoining car parks, a modern office block and an ice rink.

- 4.18 The most important building in the TCA is the grade II listed former bus station designed by Milton Keynes Development Corporation in 1982. It has a strong modern appearance, reminiscent of Miesian architecture, resulting from the clarity of its roofline which extends beyond the core of the building and supported by a series of piloti. The building forms part of a wider ensemble of transport infrastructure fronting Station Square.
- 4.19 Key views that have been identified within the TCA include:
- 1 – Looking east from the north-west roundabout looking towards CMK.
 - 2 – Looking north-east up Midsummer Boulevard
 - 3 – Looking north-east from the south-west roundabout.
 - 15 – Looking south-east from station square towards the former bus station.
 - 16 – Looking south south-east from the intersection of Silbury Boulevard and Grafton Street down Grafton Street.
- 4.20 These views are representative of the TCA as they look towards key views of CMK when arriving from the A5 or from Milton Keynes Station. Other views include axial views of the main boulevards and views of listed buildings.



Figure 4.4 Station Square



Figure 4.5 Former bus station (looking south)



Figure 4.6 Former bus station (looking towards Station Square)

CHARACTER AREA 2: MIXED USE AREA

- 4.21 Character Area 2 is defined by mixed-use developments, mainly comprising commercial, office, hotel, and residential uses as well as some religious buildings. It is located within the central blocks of Central Milton Keynes. The pedestrian environment is clearly defined and separate from vehicular movement, with public realm linked together through a series of under passes and porte cocheres. These physical elements are principal features of the character areas and CMK's identity as a whole.
- 4.22 The significant width of Boulevards and Gates which criss-cross the character area means there is space to accommodate generous footway widths, channels of tree planting and zones of surface car parking, see **Figure 4.7**. The latter typically surround the edges of urban blocks, often creating physical separation between pedestrian routes and building frontages. It should be noted that the public realm itself, including 'boulevards, gates, streets and rows and those structures / features within them', while not included in the New Town Heritage Register, should be considered a NDHA.



Figure 4.7 Pedestrian Walkway

- 4.23 The central blocks within Central Milton Keynes become more commercial towards the west comprising hotels, offices and retail areas. The commercial areas to the west of the TCA, near the train station, reflect the uses of the area and is largely made up of large coarse-grain retail units and offices. The buildings are constructed from a range of materials, with the majority being either built from steel frame and faced with brick. Externally, many of the commercial units in this area have been externally clad. A range of roof types is evident within the character areas, including that of flat, hipped, and multi-gabled roofs. The buildings are generally utilitarian in appearance, serving as part of the commercial development. These areas are set within large areas of hardstanding, often used for vehicular parking.
- 4.24 Buildings within the commercial areas vary in quality, architectural styles and functions. Buildings are formed of medium to large urban blocks which vary in scale and massing. There are a number of instances where public access routes are included, allowing connections between main the Boulevards. Development is predominantly formed of mid-rise buildings between four and seven storeys. There is evidence of taller contemporary development along Midsummer Boulevard and Witan Gate, where buildings vary between ten and fourteen storeys. There is a particular concentration of taller buildings (up to 14 storeys) evident around 'The Hub' and at the junction of Witan Gate and Midsummer Boulevard.
- 4.25 To the north of the primary commercial area, lies a grouping of municipal buildings, including a large police station complex, the post-modern Milton Keynes Magistrates' Court and modernist County Court. The latter two are included in the NTHR. To the north-east of this municipal grouping lies a commercial grouping which comprises of hotels and offices. This includes the Norfolk and Ashton House which are identified on the NTHR. These are built in a Miesian modernist style of reflective glass and concrete as seen elsewhere across CMK.
- 4.26 In general terms, the significant width of the primary Boulevards and Gates means that taller buildings bear a limited visual impact when perceived from ground level in the public realm. The grid formation of CMK also limits the visibility of taller buildings in long range views when moving along the primary streets. Their presence is most perceptible at close range and at mid-range in oblique views which lessens their visual prominence generally.
- 4.27 There are few residential developments within the town centre / central blocks of Central Milton Keynes (Character Area 2) as this is largely a commercial area. There are some examples of former commercial buildings which have changed use to accommodate residential units, along with some upward extensions. The purpose-built residential developments within the central blocks date from approximately the mid-2000s to the present and are high density comprising up to 18 storeys (residential apartment complex bound by Avebury Boulevard to the south and South Fifth Street to the east). The grouping of recent taller buildings of the 'Hub' close to Witan Gate are also residential. Block B1.4 has recently been developed up to 13 storeys
- 4.28 There are a handful of mixed-use developments within Character Area 2. These are typically characterised by formal landscaping within a central courtyard, retail and leisure uses on the ground floor, and residential units above, comprising between five and ten storeys.
- 4.29 The residential developments within Character Area 2 are contemporary in character, featuring cladding and large panelled glazing. These developments are surrounded by commercial development areas, complementing the residential areas and contributing to good access to amenities.
- 4.30 In the centre of Character Area 2 there are buildings and a park included in the NTHR. These include Fred Roche Gardens public gardens at the centre of commercial development, see **Figure 4.8**, and Regency Court to the south-west of the park, a modernist mid-terraced self-contained office block built in brownish concrete block and glass with a central open space. Lastly, Grafton Park is a public open space located to the southwest of the analysis area and is also flanked by commercial development. Although Grafton Park is not located on the NTHR it should be considered a NDHA.



Figure 4.8 Fred Roche Gardens

- 4.31 In contrast to the areas of planned public green space, there are also areas of unused and unstructured green space towards the southwest. This is partly due to the long term status of land earmarked for redevelopment, such as the large area of land to the southeast of the railway station (Block B4) which is allocated in the current development plan for Further Higher Education use. This area detracts from the more established and intact parts of the character area.
- 4.32 There are smaller patches of green space throughout Character Area 2, comprising public and semi-public / private open spaces – usually associated with residential, mixed-use development, or office development. These areas are characterised by formal landscaping including mature trees and paved paths.
- 4.33 The religious buildings within this Character Area comprise a church and a mosque. The Church of Christ the Cornerstone is located within one of the central blocks, surrounded by commercial character areas and facing Fred Roche Gardens to the west. The church is a large domed, symmetrical building set among associated landscaping and hardstanding for vehicular parking. It lies in the centre of the block, bound by two symmetrical L shaped slab buildings, Northgate and Southgate Houses, which contribute to an overall positive visual townscape composition. The Church, adjoining buildings and landscaping are identified on the NTHR.
- 4.34 The Al-Rawdha Mosque is located within the Milton Keynes Islamic and Cultural Association building and lies to the south of the character area on South Row, overlooking open green space beyond. The Mosque is not culturally expressive and appears to be located in a former office / commercial unit dating, approximately, from the 1990s. It is also set within an area of hardstanding, and to the south of a larger area of hardstanding for vehicular parking.
- 4.35 Overall, Character Area 2 comprises a variety of uses and is well served by commercial units and green space which makes a positive contribution to the overall appreciation of the Character Area and CMK's identity as a whole.
- 4.36 Surface parking lines the Boulevards and Gates within the character area, often creating a strong sense of physical separation from public walkways and building frontages.

- 4.37 Key views that have been identified within the TCA include:
- 2 – Looking north-east up Midsummer Boulevard from the roundabout to the front of Station Square.
 - 5 – Looking south south-east from the Saxon Gate roundabout as one approaches CMK from the north.
 - 7 – Looking south-west on Midsummer Boulevard towards Milton Keynes Station.
 - 8 – Looking north-west from the Witan Gate Roundabout.
- 4.38 These views are representative of the TCA as they are representative of the main approaches to centre of the TCA and of the approach to and from the railway station.
- CHARACTER AREA 3: SHOPPING BUILDING AND CIVIC QUARTER**
- 4.39 The grid form of the analysis area allows for structured grouping of many of the commercial spaces, including the shopping centre 'Centre:MK' which lies to the immediate southwest of Campbell Park, comprising the central core of Character Area 3. The Character Area includes central retail, business, and civic uses.
- 4.40 There are some listed buildings and a scheduled monument within Character Area 3. These are the Central:MK Shopping Building (Grade II, **Figure 4.10**) Milton Keynes Central Library (Grade II, **Figure 4.9**), and the Secklow Hundred Mound (Scheduled Monument).
- 4.41 Lloyds Court, the Black Horse Statue (outside Lloyds Court), and the Civic Offices on Silbury Boulevard are all identified on the NTHR.
- 4.42 This area therefore represents a focus of heritage interest, reflecting the origins of Milton Keynes as a New Town and the innovative approach to the architecture of the Shopping Building.



Figure 4.9 Milton Keynes Library



Figure 4.10 Milton Keynes Shopping Centre

- 4.43 The Centre: MK shopping centre was built between 1975–79 by the MKDC’s architects department. It has a modern, clean-lined appearance synonymous with the character of CMK and comprised of consistent horizontal and reflective fenestration and a sequence of piloti defining its edges at ground level. Retail spaces are provided at the perimeter of the building, with service areas and delivery facilities running above and reached by a raised road over the development. The Shopping Building consists of a 650m long block, which is arranged along two parallel arcades built to accommodate 130 shops and six department stores. The design of the shopping centre was influenced by the modernist architect Mies van de Rohe. The structure is formed of a standard steel frame in regular bays, with the materials including steel, glass and travertine marble.
- 4.44 The Civic Centre and Central Library are set within large areas of hardstanding for vehicular parking. These civic buildings share an austere and monumental character and low-rise ranging from two to four storeys.
- 4.45 The Milton Keynes Central Library is Grade II listed. Gaining approval in 1978, the public library was built between 1979–81 and designed by Buckinghamshire County Council’s architects’ department. The two-storey building is clad in brown brick. The principal elevation along Silbury Boulevard is broken down into 17 bays and is articulated through brick pillars, which alternate between full height and first floor levels.
- 4.46 Building heights are generally lower within this character area, with the shopping centre taking up more built footprint as a proportion of overall external public realm. The focus of retail activity and severance of vehicular movement on Midsummer Boulevard mean that pedestrian activity is more prevalent relative to other parts of CMK. Areas of surface parking, often flanking primary streets and in some cases taking up whole urban blocks are dominant features of the townscape.

- 4.47 Key views that have been identified within the TCA include:
- 6 – Looking north-east along Midsummer Boulevard towards Campbell Park.
 - 12 – Looking south-west along Midsummer Boulevard towards the Midsummer Place/Milton Keynes Shopping Centre connector.
 - 17 – Looking north-east along Silbury Boulevard looking along the north façade of the MK Shopping Centre.
 - 18 – Looking south-west along Silbury Boulevard.
 - 19 – Looking south-east along Secklow Gate towards Milton Keynes shopping centre.
- 4.48 These views are representative of the TCA as they show key approaches to the TCA as well as showing key interactions between boulevards and Milton Keynes shopping centre.
- CHARACTER AREA 4: LARGE GRAIN LEISURE/RETAIL**
- 4.49 Character Area 4 comprises three large grain leisure/retail areas surrounded by considerable parking space and some limited open green space. They occupy three of the main blocks in the east of CMK. The key features of the area are large-grain buildings and adjoining carparks, which take up the majority of the space available. Buildings are noted for their medium to large scale, and large footprints. The result is that the area feels expansive rather than densely developed.
- 4.50 Like the other character areas the area has distinct spaces for pedestrians and motorists, reflecting the formal organisation of movement as a key feature of the area and of CMK as a whole. Pedestrians can utilise underpasses and distinct crossing areas marked by porte cocheres for access between areas. The generous and carefully designed roads allow for the steady flow of traffic.
- 4.51 Large boulevards lined with rows of trees are a main feature of the road system, with adjoining parking space. Wide open space exists between buildings , with very little sense of enclosure. The lower level of density creates a sense that one is moving away from the main downtown area, with an eastern approach taking one towards Campbell Park and away from the denser CMK urban area. In this way the character of the area is more aligned with an out-of-town leisure/retail centre morphology rather than a traditional town centre

- 4.52 Three main leisure offerings are within this area, all within large, architecturally distinct buildings/districts. These include the large shopping centre extension Midsummer Place, Milton Keynes Theatre district and Xscape Milton Keynes, a multiplex indoor entertainments centre with an indoor ski slope.
- 4.53 Midsummer Place is a large, shopping centre built in 2000 of concrete, metal, cladding and glass. It has a rooftop carparking area. It is directly beside, but not connected to, the Grade II listed late-1970s shopping centre. It does not continue the built form of the older building. Midsummer Place has a large footprint, with large, flat and unengaging frontages which do not contribute to the reception of the area. The main entrance is an exception to this, which has a more welcoming glass façade and courtyard.



Figure 4.11 Midsummer Place Shopping Centre

- 4.54 Sitting to the east of Midsummer Place are smaller scale buildings with an adjoining carpark. This area is open and of a lower density. The area includes a three-storey with roof carpark and a disused cinema. Of more note is the 'The Point MK', a former cinema complex built in 1985 of reflective glass and steel in a 'ziggurat' form. It is included in the New Town Heritage Register, but a Certificate of Immunity from Listing was given

to the building by Historic England in March 2021. A planning application, rejected but allowed at appeal, proposes the demolition of 'The Point' to be replaced with a residential scheme of up to 21 storeys. Overall, the area is defined by large footprint buildings of low architectural merit, with a very limited provision of public spaces. Most open space is utilised by car parking, though a significant amount of tree planting throughout continues the leafy and verdant quality experienced throughout CMK.

- 4.55 Milton Keynes' Theatre area comprises a number of buildings providing a selection of bars and restaurants, a hotel, post-office and a large modern theatre building. These buildings vary in height from between 4 to 6/7 storeys high. The theatre itself was built in 1999 in a modernist style, built around its steep internal auditorium, with a waveform roof.
- 4.56 The adjoining theatre district is built with a consistent form, scale and materials with obvious attention paid to creating a coherent grouping of buildings. The buildings are formally organised around pedestrian walkways and a small public plaza, creating a pedestrian friendly public realm amongst the buildings with a high degree of enclosure.



Figure 4.12 The Point

- 4.57 The theatre entrance itself is wide, open and forum-like, with large columns and flanking buildings ushering people into the space. This large concrete and metal entrance activates the main boulevard, which alongside public space lining the north-west frontages of the theatre district creates a small activated public area along one of CMKs main boulevards.
- 4.58 The indoor ski centre, Xscape Milton Keynes, is Europe's largest indoor skiing centre. It is the second largest building in Milton Keynes and one of the most prominent, with its sloped metal form standing out from the lower scale and often rectangular forms of Milton Keynes downtown area. It opened in July 2000. The area between the building and the road network is infilled almost entirely by car parking space. The exception to this is in the south-east where there is landscaping and footpaths to pedestrian overpasses to residential areas. The large building defines the experience of this part of the TCA, with its expansive frontage overarching approaches from the south-west, and its sloping metal arch being visible as one heads towards Campbell Park. The visual impact of the metal and steel building is mitigated by the extensive tree planting that softens the area.



Figure 4.13 Xscape Milton Keynes

- 4.59 Key views that have been identified within the TCA include:
- 6 – Looking east north-east along Midsummer Boulevard towards Campbell Park.
 - 11 – Looking north-west from the V8 Malbrough Street roundabout towards Xscape Milton Keyne and Milton Keynes Theatre.
 - 12 – Looking south-east along Midsummer Boulevard towards Milton Keynes Shopping Centre, with Milton Keynes Theatre to your right.

4.60 These views are representative of the TCA as they show key approaches to the TCA and interactions between boulevards and buildings.

CHARACTER AREA 5: CAMPBELL PARK

- 4.61 Character Area 5 comprises areas of open green space within and surrounding Campbell Park. There are other areas of smaller green space interspersed through the analysis area, however the predominant area is to the northeast comprising Campbell Park and its immediate setting.
- 4.62 It comprises a public open space featuring picturesque landscaping, a cricket ground, an amphitheatre, event space, and public art installations set within a large buffer of mature vegetation and trees.



Figure 4.14 Campbell Park

- 4.63 Surrounding Campbell Park and within the Character Area are large areas of undeveloped land to the northwest and southwest of the park which are interspersed with a gridded road network. Campbell Wharf is a recent residential-led development located at the eastern end of the TCA, fronting onto the Grand Union Canal.
- 4.64 The Character Area is largely made up of landscaped, open green space which contributes to residential and social amenity value. Formal green spaces within the landscape make a positive visual contribution to the character and appearance of Central Milton Keynes.
- 4.65 Key views that have been identified within the TCA include:
- 14 – Wide view looking west across Campbell Park from Overgate.
 - 20 – Wide view looking west across Campbell Park towards the Light Pyramid.

4.66 These views are representative of the TCA as they show wide views of the topography and planting of the park and the landmark Light Pyramid.

CHARACTER AREA 6: BOULEVARDS AND GATES

- 4.67 Key to CMK's structure are the grid roads, made up of 'Boulevards' running east-west and 'Gates' running north-south, along with 'slow streets' The latter also act as service roads and connect with smaller access roads.
- 4.68 The significant width and regimented grid formation created by the Boulevards and Gates is central to the overarching character of CMK. The consistent building lines, and openness enables long, linear views. In many cases these are interrupted by prevalence of mature tree planting and street furniture and related structures such as crossing points, porte cocheres and underpasses.
- 4.69 The focus on vehicular movement is evident, and in many instances creates long impenetrable urban blocks with a lack of permeability for pedestrians. The clear delineation between pedestrians and vehicles and separation between these zones through tree planting and urban greening, creates a comfortable pedestrian environment from a road safety perspective but an inactive pedestrian environment, with a general lack of natural surveillance.
- 4.70 There is a cycle way network in CMK, with a north to south route, but no clear delineated cycle route allowing segregated east-west access.

4.71 Boulevards and Gates are very generously sized, with some instances of distances between facing buildings of up to 100m on Saxon Gate for example. Midsummer Boulevard has face to face distances of c.70m. This allows for generous widths of footways, clear separation from roads and relatively large areas of surface car parking running along building frontages. Consistent channels of mature planting and soft landscaping form a larger green grid which extends beyond CMK, connecting with the suburban areas of the wider city.



Figure 4.15 Midsummer Boulevard

CHARACTER AREA 7: RESIDENTIAL

- 4.72
- Character Area 7 is comprised of three isolated areas with a strongly residential character. This contrasts the rest of CMK which is predominantly mixed-use in character. The buildings found within these sub-areas low and mid-rise residential units of between two to seven storeys. There are offices within this sub-area but they do not strongly impact its overarching residential character.
- 4.73
- Alongside residential buildings there are large amounts of hardstanding and parking space which is typical of CMK. Buildings are often arranged around communal green spaces, while some have gardens to the rear.
- 4.74
- Located in the TCA, block D4 is mainly comprised of small-scale terraced housing built in the early 1980s. These buildings are two to three storeys in height and are more typical of houses outside CMK. They are built in light brown brick in standard bond, with saltbox roofs. The grouping of terraces found between South Ninth and South Tenth Street have been added to the New Town Heritage Register. This area also includes the large footprint Saxon Court which is included in the NTHR. A recently approved planning application (21/02246/FULEIS) will extend the building by three storeys and include a residential scheme of up to thirty four storeys shall be built on the site. A large scale new residential scheme up to 11 storeys has been completed within this area more and has a scale more reflective of the other recent residential developments in CMK.
- 4.75
- Within block E1 there is a range of residential present, including terrace houses arranged around North 11th Street Community Garden which is similar to that found in block D4. To the east of the block the recently built Solstice Apartments can be found, which rises to seven storeys. This area therefore shows the changing character of residential development within CMK, becoming larger and more dense.



Figure 4.16 Residential Block D.4

- 4.76
- Buildings within the within block F4 vary in typology with terraces, flats, and detached and semi-detached properties being evident. Dwellings are generally low rise and vary between two and five storeys in height. Buildings are built from brick, and have a range of roof types. Residential development is based on a grid, cul-de-sac or a more curvilinear configuration. Development is set amongst a series of residential streets, which are subject to light traffic, notwithstanding the area has a calm residential character.



Figure 4.17 Residential Block F.4

- 4.77
- A small group of residential properties can be found at block F.1.1. These are formally organised, arranged cul-de-sacs with parking space. There are three connected groupings of houses, as well as detached houses and apartment blocks built in brown and red brick with hipped roofs. Architecturally they are fairly typical of late 20th century residential design, with some light modernist flourishes. There is fairly extensive planting here creating more of a verdant quality, helped by its location very close to Campbell Park and its adjoining open space.

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5.0

STAGE 1: CONTEXTUAL ANALYSIS

CENTRAL MILTON KEYNES

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STAGE 1: CONTEXTUAL ANALYSIS

5.1 A high-level contextual analysis has been undertaken to establish a baseline condition for CMK, categorised into locational factors that would be suitable for tall buildings and those that would be potentially sensitive to the introduction of tall buildings.

SUITABILITY FACTORS

PREVAILING BUILDING HEIGHTS

- 5.2 Existing building height can be an indicator of suitability for tall buildings. Conversely, taller buildings may not be suitable in areas characterised by shorter buildings.
- 5.3 Central Milton Keynes is characterised by a general uniformity of building heights, typically of 6–10 storeys (interspersed with sporadic taller elements, with some limited clustering of height at key intersections). The perception of scale when experienced from the public realm is limited by the relative width of boulevards and gates. The nature of the grid layout limits direct terminating views of taller blocks. There are few instances where buildings form a strong sense of enclosure to the street.
- 5.4 The two most notable exceptions to the prevailing height are where there is a grouping of taller buildings surrounding ‘The Hub’ (**Figure 5.2**) at the junction of Midsummer Boulevard/Witan Gate and the Hotel La Tour (14 storeys) (**Figure 5.3**) which marks the main entrance to Campbell Park from CMK.
- 5.5 The Hub’s central square is contained on all sides by tall buildings up to 14 storeys, creating a strong sense of enclosure, in contrast with the relative openness of the majority of CMK.

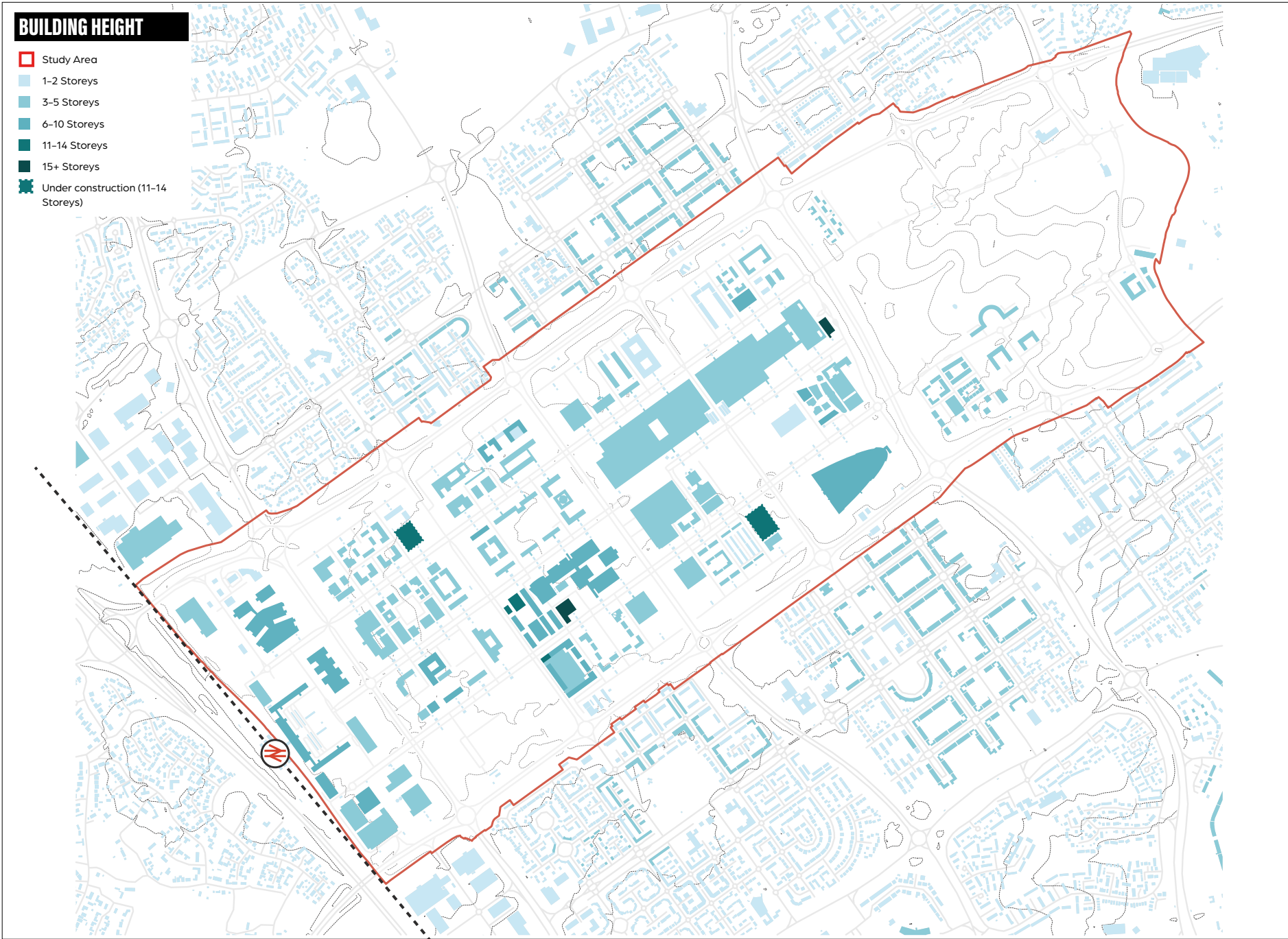


Figure 5.1 Prevailing building heights (Source: Corstorphine and Wright)

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Figure 5.2 The Hub



Figure 5.3 Hotel La Tour

CONSENTED DEVELOPMENT

5.6 Permitted development for taller buildings may reinforce existing height patterns across and urban area.

5.7 **Figure 5.4** identifies a number of planning applications within the CMK area. Higer higher education development is allocated on a large, open, undeveloped site to the southeast of the train station. The Shopping Building and its urban block are subject to upgrades and modest development. To the north and south of Campbell Park, there are a grouping of sites allocated for housing.

5.8 At the time of writing, the most significant applications in terms of height are:

- Planning permission now implemented for a 14 storey residential scheme at Bowback House, 21 N Fourth St, (20/00185/FUL);
- Planning permission following appeal, for a 14–20 storey residential scheme at Bank House, 171 Midsummer Boulevard (AP-3621);
- A refused application for a 33-storey residential tower at Jaipur Restaurant, 599 Grafton Gate, which was subsequently allowed at appeal ((APP/Y0435/W/24/3344711);
- A live application for a 8–9 storey residential scheme at Westminster House, 500 Avebury Boulevard, (24/01299/FUL);
- Planning permission for a 34-storey residential tower at Saxon Court, 1 Saxon Gate, (21/02246/FULEIS),
- A refused application for a 21-storey tower at The Point, 602 Midsummer Boulevard, which was subsequently allowed at appeal (APP/Y0435/W/24/3350378);
- Planning permission implemented for a residential scheme of 3–12 storeys known as site D4.4 on Avebury Boulevard and South Tenth Street), (18/01591/FUL);
- Planning permission for a 5–13 residential scheme, at the former Food Centre on Midsummer Boulevard, (19/02804/OUT);
- Planning permission for a 16–25 storey residential scheme at the Theatre Car Park, (24/00036/FUL).

5.9 As indicated in the plan in **Fig. 5.4**, there is a relatively even distribution of sites subject to planning applications for tall buildings, with Saxon Court being the most significant in height terms.

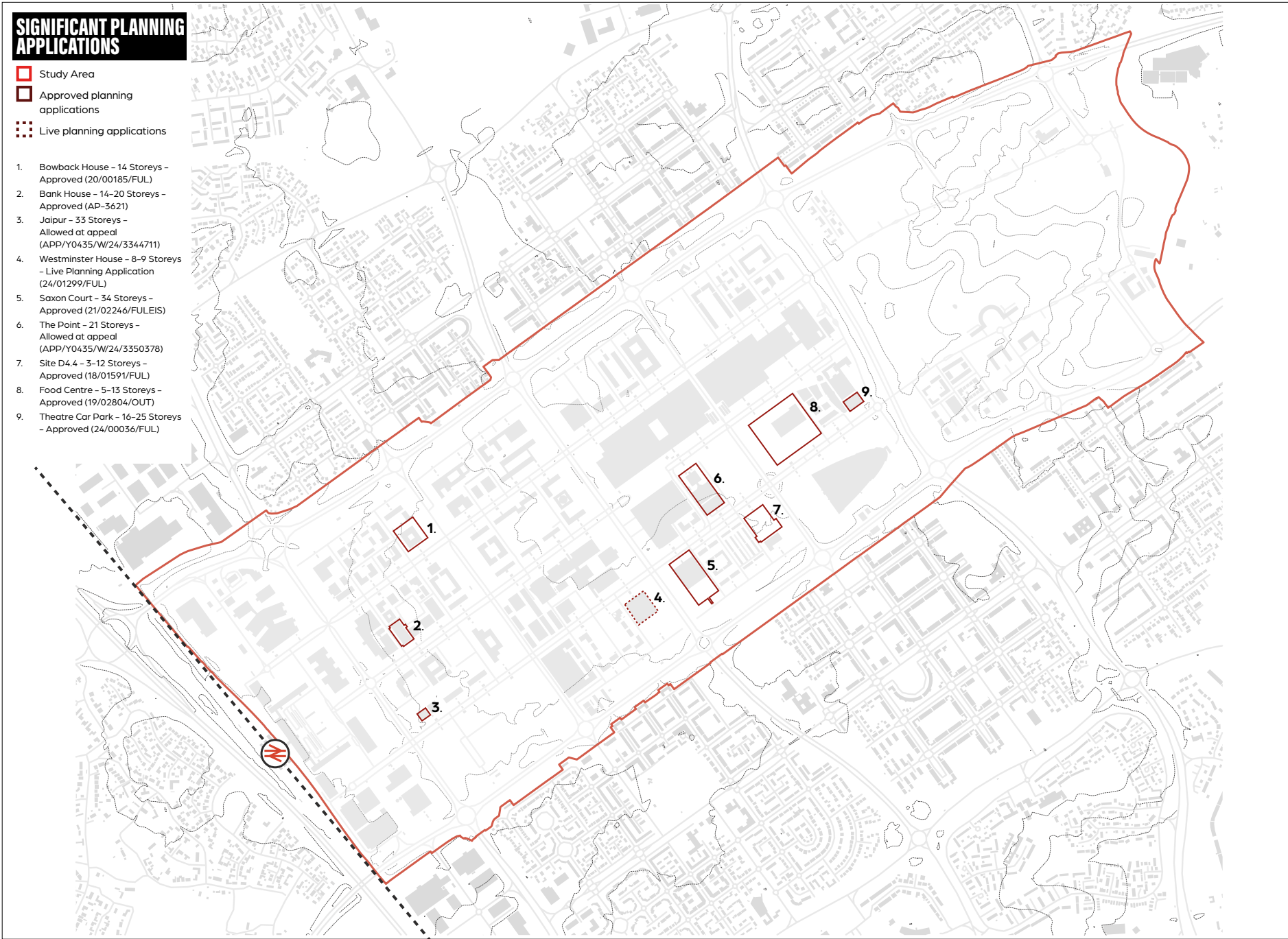


Figure 5.4 Significant planning applications (Source: Corstorphine and Wright)

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URBAN GRAIN

- 5.10 Taller buildings may be suitable in areas which are characterised in areas of larger grain blocks which can support higher density development. Conversely, footprint to accommodate taller buildings may be limited in areas formed of a smaller prevailing urban grain.
- 5.11 The Nolli plan illustrates a regimented series of urban blocks arranged in a grid formation within the CMK area. There is consistent grain of building footprint evident in the central part of CMK, between the train station and Saxon Gate.
- 5.12 Further to the east, the larger grain footprint of the Shopping Building is dominant, occupying two city blocks.
- 5.13 The openness of Campbell Park to the east, including the streets and public realm surrounding it, is of a similar coverage to approximately two thirds of the built-up area of CMK.
- 5.14 Public open spaces as a proportion of the whole CMK area, noting the significant width of Boulevards (running east to west) and Gates (running north to south), are significant relative to the built footprint of urban blocks.
- 5.15 The Shopping Centre and Xscape are notable as large, singular structures within the eastern portion of central CMK. The remaining urban grain of CMK is relatively consistent including continuous street frontages and semi-private and private open space within the urban blocks.



Figure 5.5 Nolli plan (pattern of existing development) (Source: Corstorphine and Wright)

LAND USE

- 5.16 The existing land use in CMK is strongly mixed use, with a wide range of offices, leisure, commercial, retail, residential and civic buildings present. This mixed-use character is apparent in most areas, but single uses dominate in certain blocks.
- 5.17 The land within blocks A1–A4, centred around the train station, demonstrates this mixed-use quality well. Present are a range of offices and retail, with leisure and mixed-use buildings such as the station itself.
- 5.18 The land between Grafton Gate and Saxon Gate is primarily made up of office and residential, however there are civic buildings such as the courts and church, hotels and some retail interspersed throughout.
- 5.19 The land to the east of the Central Business District (CBD) past Saxon Gate, retail and leisure are the primary land uses centred around Midsummer Boulevard. The large-grain Milton Keynes Shopping Centre and Xscape MK south-west of it have the largest footprints in CMK. The larger-grain theatre district is more mixed-use in character, but the theatre itself predominates.
- 5.20 North of the shopping centre, the area is primarily residential, with the civic uses of the library and town hall and a retail block. Block D4, south of the shopping centre stands out for its low-rise residential character more akin to uses outside of CMK.
- 5.21 Within the CMK there are three separate and distinct sub-areas comprising low and medium-rise residential buildings with a suburban character. These are found at blocks D4, E1 and E4 and contrast the denser, mixed-use character found elsewhere in CMK.
- 5.22 Campbell Park itself is an expansive public park that occupies a large part of the east extent of CMK, with extensive landscaping, tree planting and paths.

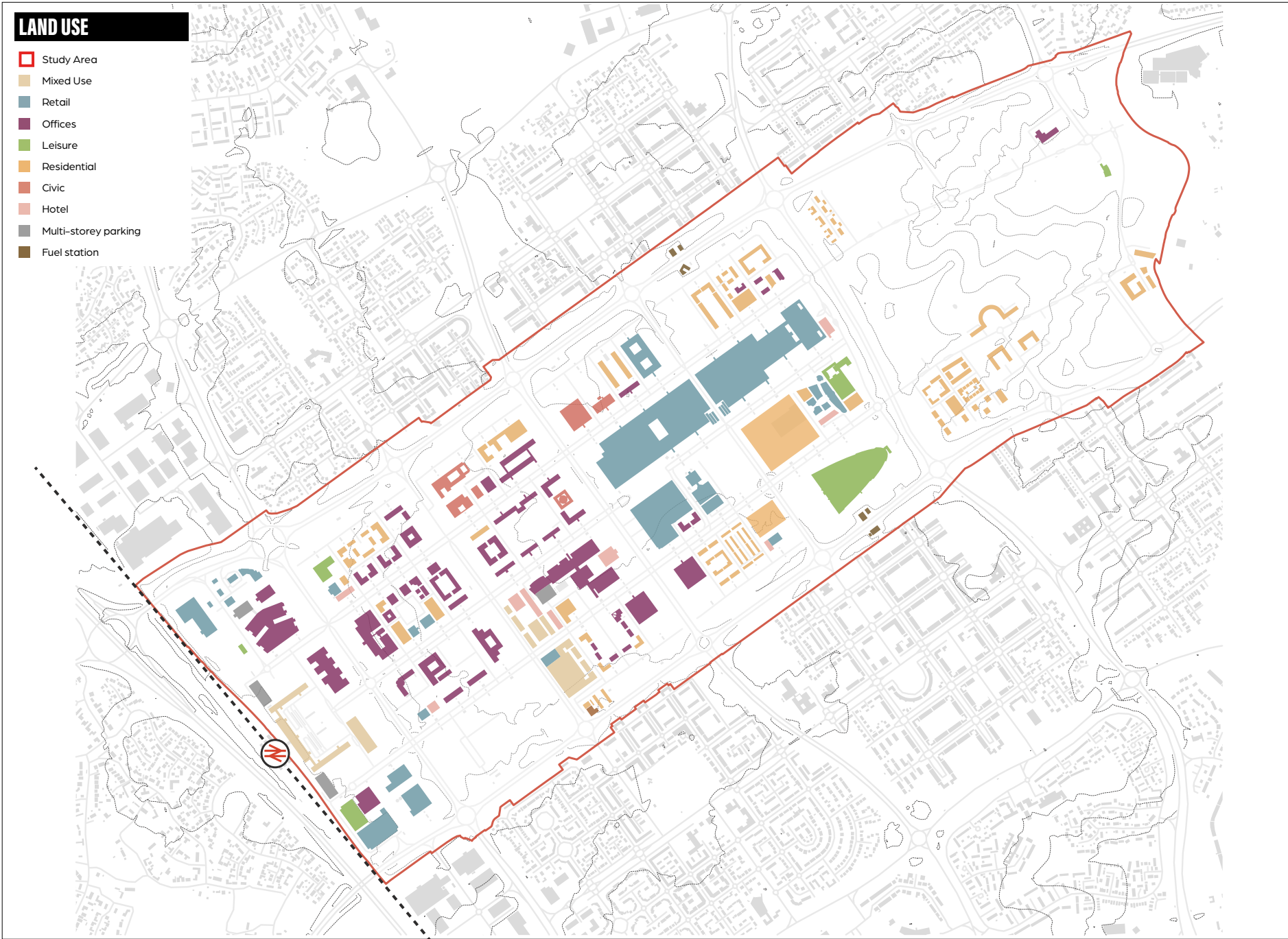


Figure 5.6 Land use (Source: Corstorphine and Wright)

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ACCESSIBILITY TO GREEN OPEN SPACE

- 5.23 Access to green open space is an important factor in supporting amenity for residents and workers across CMK. In particular, those who live and work in high density development.
- 5.24 There is a notable deficiency of open green space within CMK, with the 46-hectare Campbell Park forming the primary open space for the city and wider region at the eastern end of CMK.
- 5.25 The three 'Gates' running north to south through CMK are defined as 'wildlife corridors' and form linkages between the urban character of CMK and the greener, suburban and rural setting of the wider context

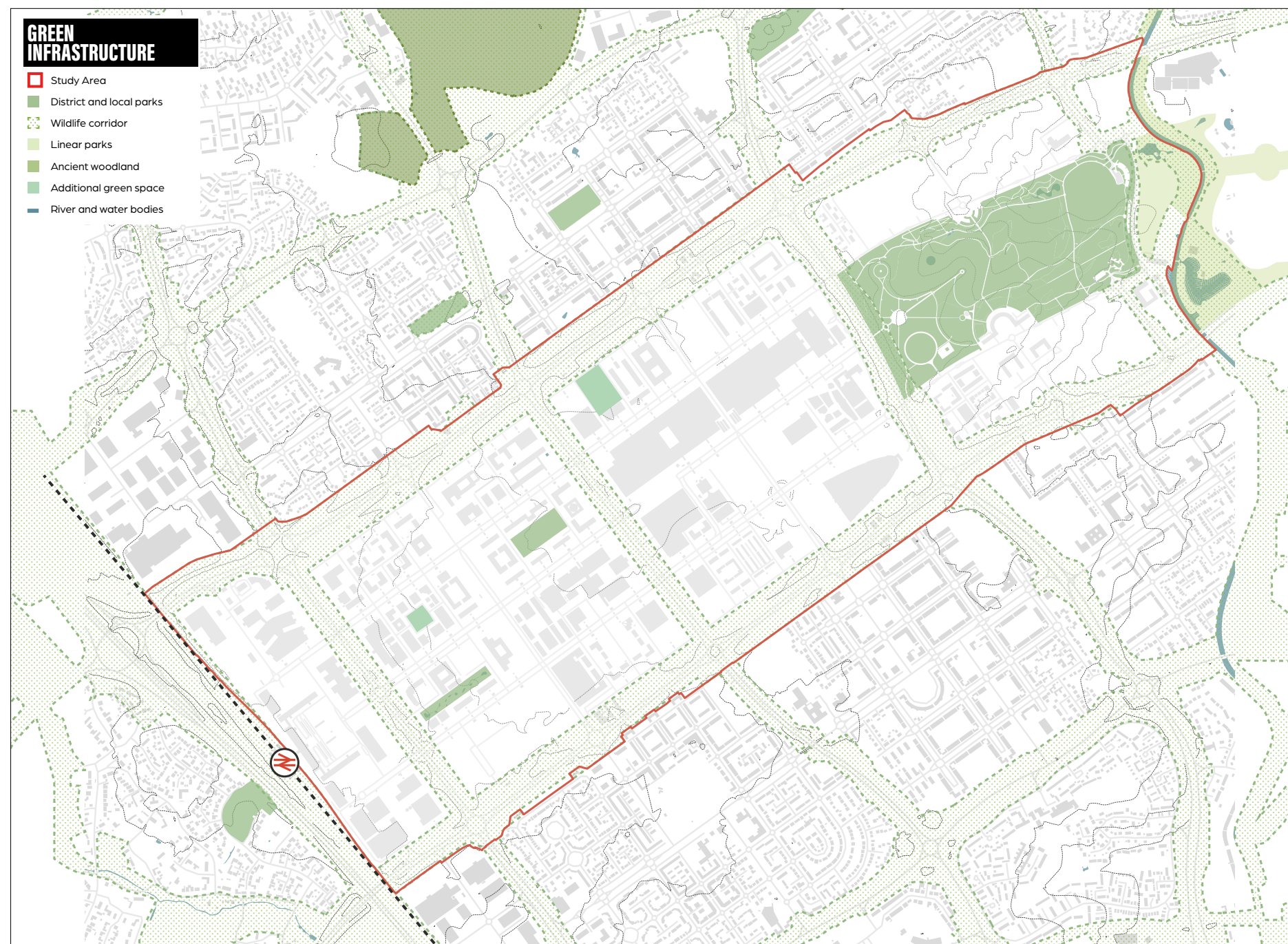


Figure 5.7 Green infrastructure (Source: Corstorphine and Wright)

PUBLIC TRANSPORT ACCESSIBILITY

- 5.26 Public transport accessibility is a key criterion in helping to determine appropriate locations for tall and/or high-density development.
- 5.27 Milton Keynes Central station is the primary interchange, serving CMK and the wider region. There is a bus network running from the station square along the central spine of Midsummer Boulevard and towards Campbell Park.
- 5.28 The relatively compact area of CMK and its series of walkways, underpasses and cycle paths means the majority of its area is accessible. The grid layout and arrangement of boulevards and gates creates good legibility with clear definition of street frontages.
- 5.29 The draft Milton Keynes City Plan 2050 contains proposals to identify a new Mass Rapid Transit (MRT) with potential to accommodate growth in and around new MRT stops or hubs within the existing built up areas of the city, referred to as Transport Hubs.
- 5.30 In Central Milton Keynes, the emerging focus is on a route along Midsummer Boulevard via interchanges at Station Square and the shopping centre and re-routing bus routes along Silbury and Avebury Boulevards.

DEVELOPMENT PLAN STRATEGY

- 5.31 This section sets out the currently adopted and emerging policy context for CMK, to outline the strategic development aspirations for the future growth and development of CMK, including locations which may be the focus of future development.

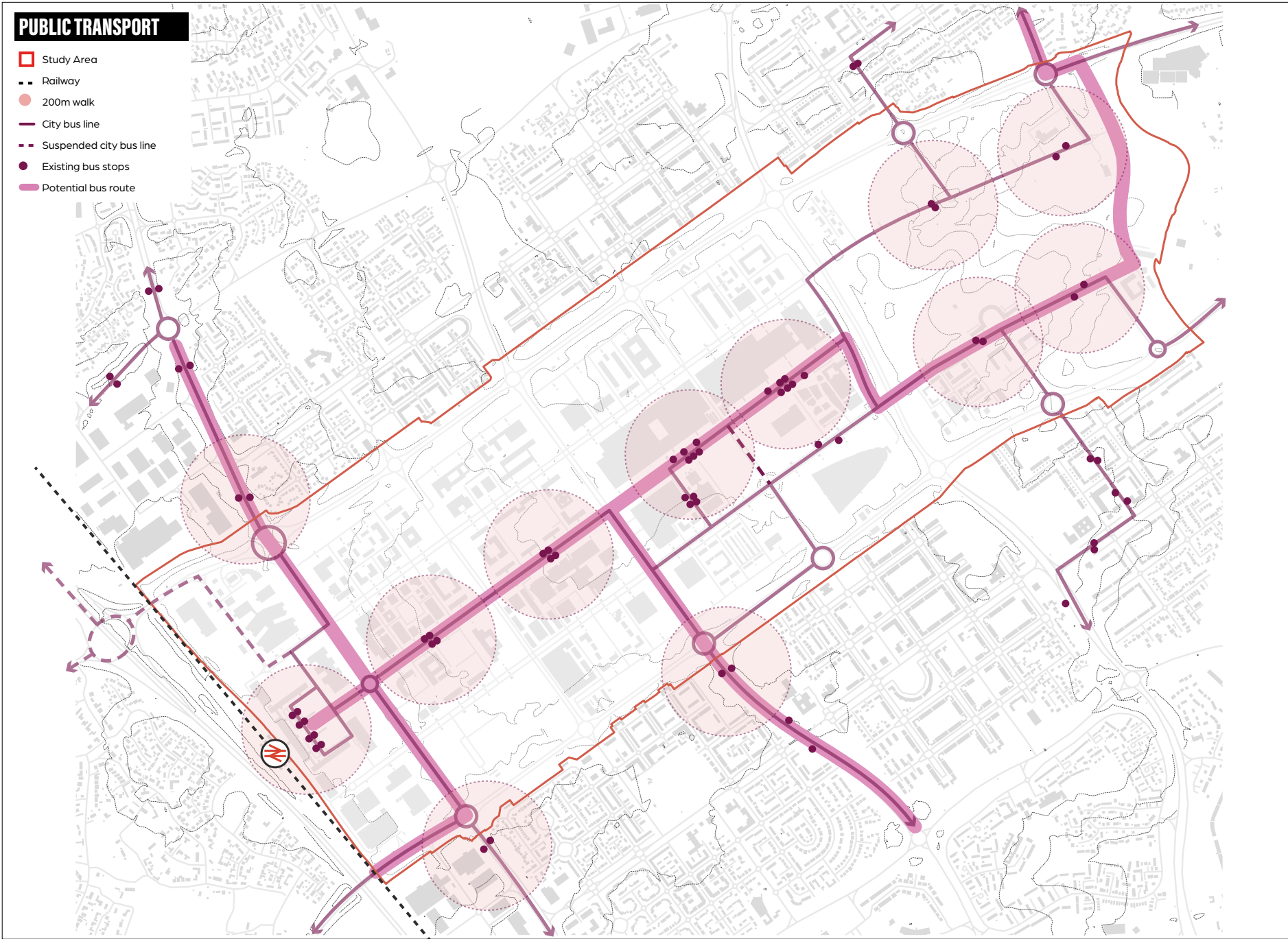


Figure 5.8 Public transport network (Source: Corstorphine and Wright)

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ADOPTED POLICY

- 5.32
- The currently adopted Local Plan comprises the Local Plan for Milton Keynes, Plan:MK adopted in March 2019 along with the CMK Alliance Neighbourhood Plan, adopted in 2015.
- 5.33
- As set out in Policy SD2 of the Plan:MK, CMK is envisaged to continue to be promoted as a focal area for a mix of uses including retail, office, residential, cultural and leisure. It highlights how new development should make a positive contribution to improving the vitality of the town centre.
- 5.34
- It identifies the retail core of CMK as being centred on the shopping centre where opportunities for enhancing its environment are encouraged. Smaller scale convenience retail is promoted as part of mixed-use development across the whole of CMK, as well as high quality residential development.
- 5.35
- The role of CMK as a major financial and employment hub is also championed. Policy DS3 identifies the area between the railway station of V7 Saxon Street, H5 Portway and H6 Childs Way as a CBD suitable for major mixed-use office-led development focussed around Milton Keynes Central Railway Station. The policy encourages the expansion of existing employment premises.
- 5.36
- Policy SD3 envisages specific growth levels for each of the uses and activities identified in SD2 within CMK . They include:
 - 3,535 additional new homes.
 - 110,000m2 of office floorspace (12) .
 - Up to 33,490m2 of comparison retail floorspace in the primary shopping area of CMK.
 - The site requirements of existing and potential further and higher education institutions, which may include an element of student accommodation.
 - Additional food and drink and hotel floorspace.
 - Support services for people with specific needs.
 - Green infrastructure for the wellbeing of CMK residents and the attractiveness of CMK for visitors in line with Policy NE4. 8. Conserve biodiversity and provide for the natural environment in line with Policies NE2 and NE3. B.

- 5.37
- The policy states:

This new growth will be accommodated using a combination of the redevelopment of vacant, underdeveloped and under-performing sites including the development of Block B4 for further and higher education. Blocks F1.2–F1.4, G1.1–G1.3, G1.4N and H1.1 on the northern side of Campbell Park will be developed for largely residential purposes together with other mixed uses appropriate to a residential area. On the southern side of Campbell Park, Blocks F4.3. G4.1–G4.3 and G3.3 will be developed for largely residential purposes with other mixed uses appropriate to a residential area. The role of Campbell Park as the main city centre park will be maintained and links to the park will be improved where opportunities arise. The impact of development proposals on the setting of the park will be considered in the determination of planning applications for those proposals. C. Supplementary Planning Documents and Development Briefs will be prepared to guide change and the development of CMK sites.
- 5.38
- The plan identifies various site allocations across the CMK area for:
 - Proposed Further Education (Block B4).
 - Housing allocations interspersed throughout the town centre.
 - Allocations for housing in blocks F1 and F4 either side of Campbell Park.
- 5.39
- These site allocations are also identified in the CMK Alliance Plan 2026.
- EMERGING POLICY
- 5.40
- The Council consulted on the draft Milton Keynes City Plan 2050 at Regulation 18 stage between July 2024 and October 2024.
- 5.41
- Policy GS identifies a need for around 300,000 sq m of office, education or research and development uses within Central Milton Keynes, in particular in the 'Downtown' business quarter consisting of Blocks A1–4 and B1–4.
- 5.42
- Policy CMK1 identifies the potential for 'gateway' higher buildings at key locations which are identified as Midsummer Boulevard, Station Square and Campbell Park.
- 5.43
- Policy CMK2 provides for 11,000 new homes in the CMK area, 300,000 sq m of office space and up to 66,200 sq m of comparison goods shopping space.

- 5.44
- As set out above, the emerging policy identifies the Downtown Quarter as the focus for office and higher education space. Development will be supported in the 'Midtown Quarter' (Blocks C1–4, D1 and D4) for a mix of uses including residential-led mixed use development. A Central Spine is identified for high density residential development of up to 425 dwellings per hectare which runs rom B2/3 to E2/E3.
- 5.45
- Development Proposals in the 'Uptown' leisure quarter (Blocks D2, D3 and E2–E4) will be supported where they are retail, cultural and leisure-led. The 'Parkside Quarter' (blocks E1, F1 and F4, G1 and G4, H1 and H4) will be supported for residential led development.

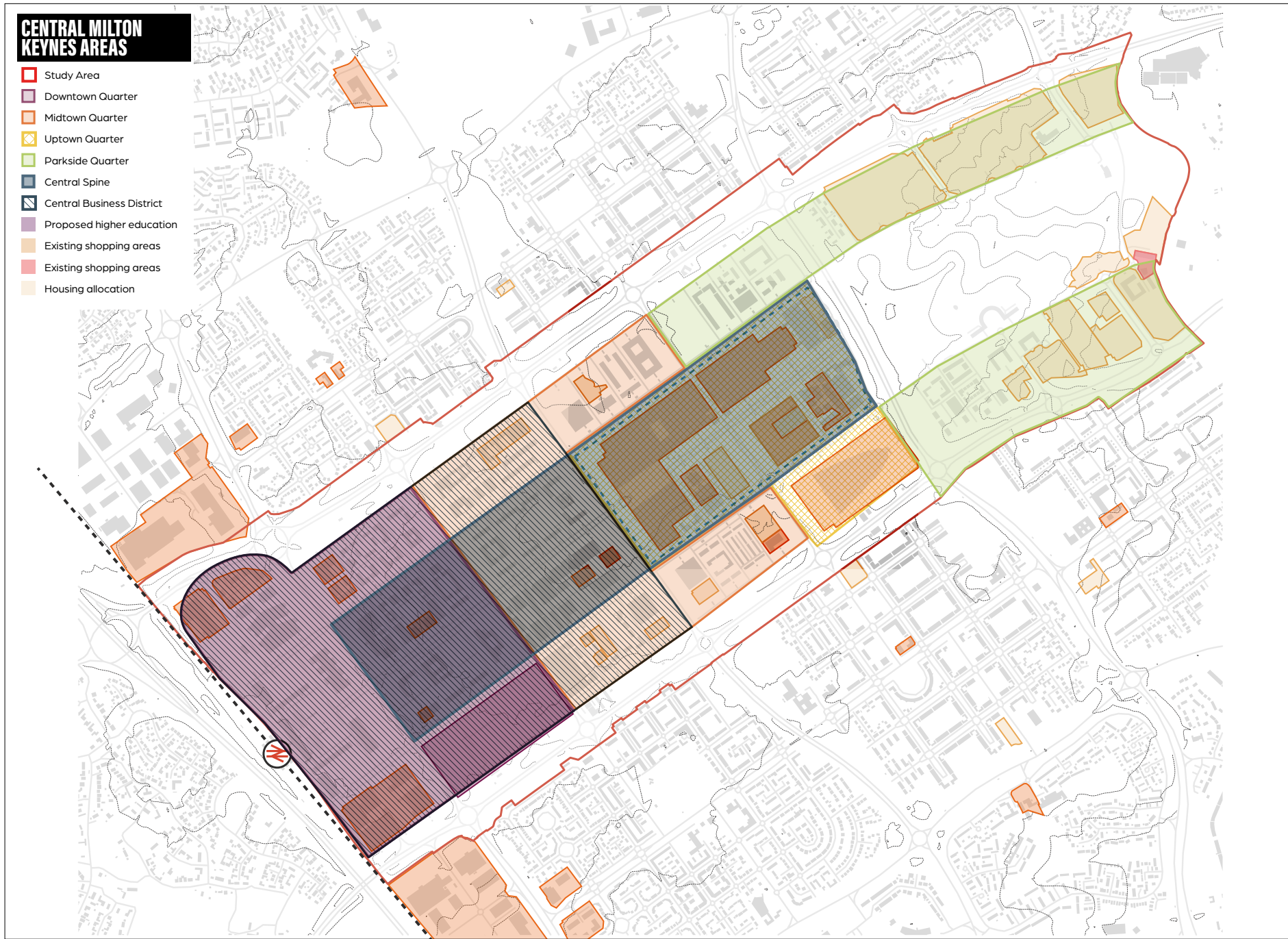


Figure 5.9 Policy map (Source: Corstorphine and Wright)

SENSITIVITY FACTORS

HERITAGE ASSETS

- 5.46 There are a limited number of designated heritage assets within CMK. This includes the grade II listed former bus station , grade II listed Shopping Building and Grade II listed Central Library.
- 5.47 Campbell Park is a Grade II Listed registered park and garden.
- 5.48 There are no conservation areas within the CMK area.
- 5.49 There are a number of buildings that are identified as forming part of the historic character of CMK as a New Town. These buildings are identified in the MK New Town Heritage Register and are considered to be locally listed Non-Designated Heritage Assets. They are:
1. Magistrates Court
 2. South County Court
 3. Norfolk and Ashton House
 4. Regency Court
 5. Fred Roche Gardens
 6. Church Of Christ The Cornerstone
 7. Northgate and Southgate Houses
 8. Sentry House and Saxon Court
 9. Lloyd's Court
 10. The Point
 11. Housing (South Ninth and Tenth Street)
 12. Civic Offices
 13. Housing (North Eleventh and Twelfth Street)
 14. Eaton Mews
 15. Black Horse Statue

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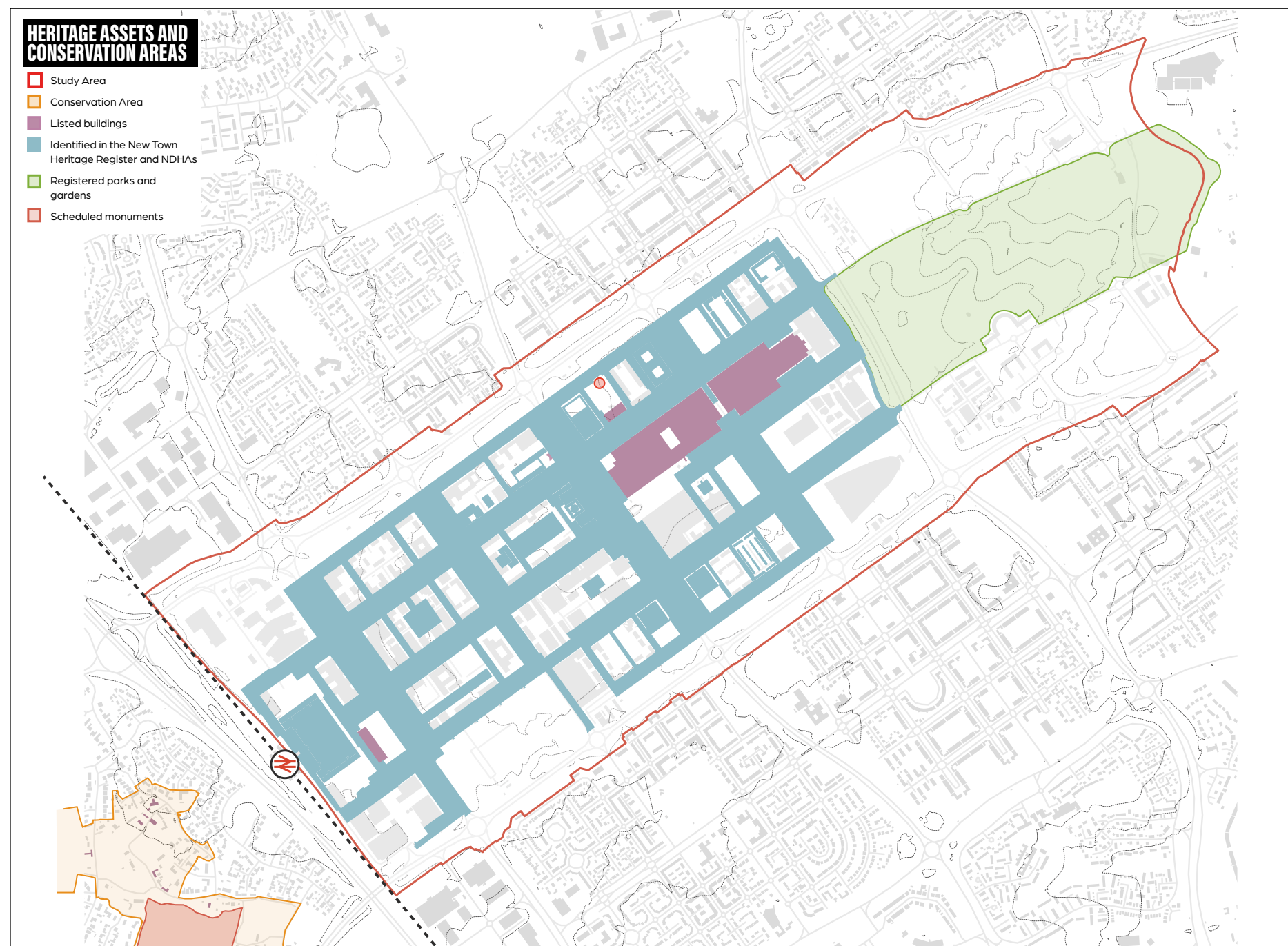


Figure 5.10 Heritage assets and conservation areas (Source: Corstorphine and Wright)

TOPOGRAPHY

- 5.50 Topography is identified as a sensitive factor in general terms as locating taller buildings on higher ground can increase the prominence and extent of visibility in long range views. In the context of CMK, there is a relatively even topography which slopes gently upwards from Milton Keynes Central to the west towards a 'plateau' within the central part of CMK. The land falls away gradually from a raised ridge line at the western edge of Campbell Park.
- 5.51 In the wider context, CMK lies at the central part of a raised area of land which falls away gradually to the west and east.
- 5.52 On this basis and given the limited impact the topography is likely to have on the location and acceptability of taller buildings in CMK, the topography of the immediate and wider surrounds is included for context only and is not identified as a sensitivity factor as part of the mapping exercise that follows.



Figure 5.11 Topography (local context) (Source: Corstorphine and Wright)

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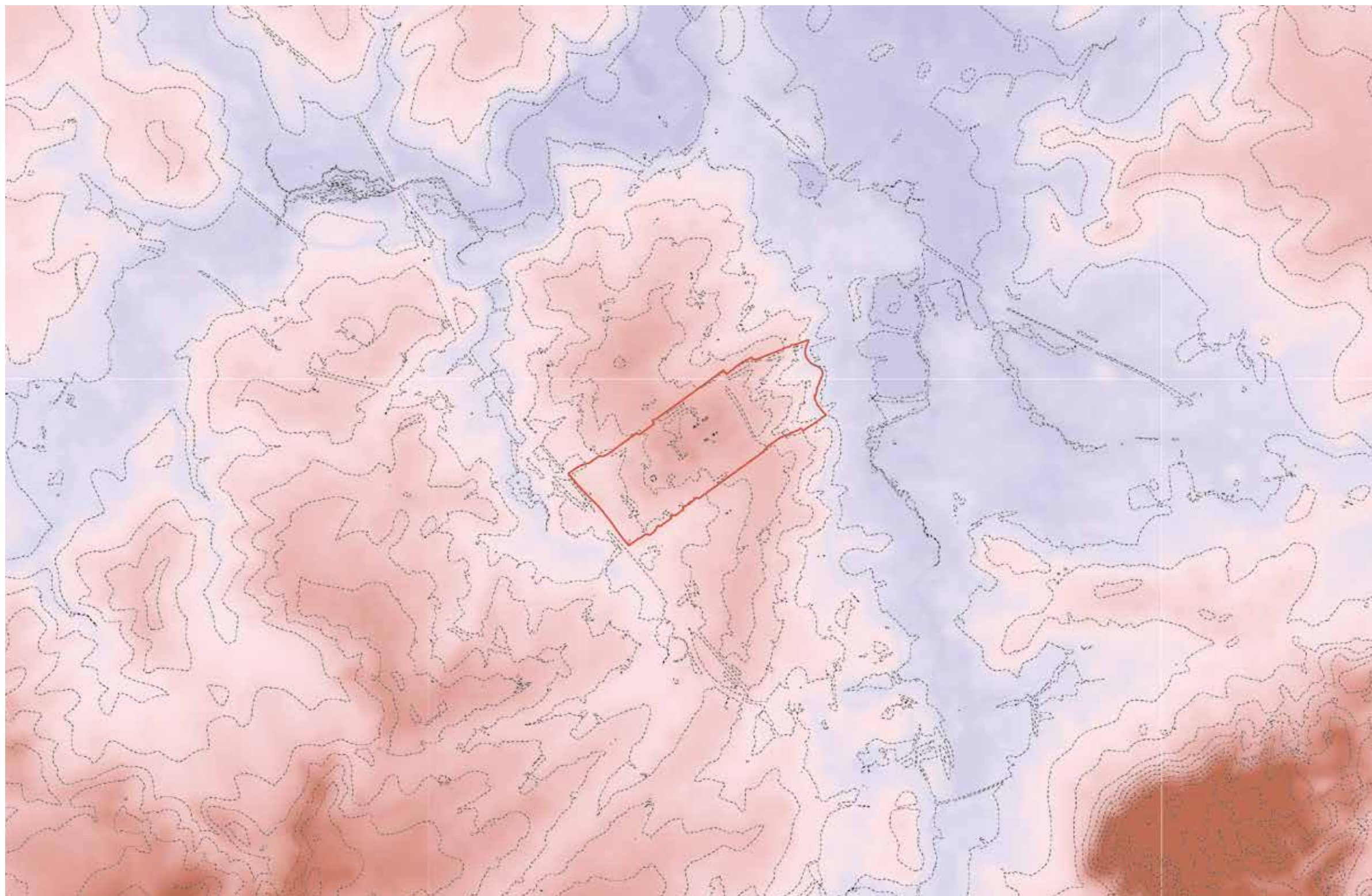


Figure 5.12 Topography (wider context) (Source: Corstorphine and Wright)

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6.0

STAGE 2: SENSITIVITY AND SUITABILITY MAPPING

CENTRAL MILTON KEYNES

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STAGE 2: SENSITIVITY AND SUITABILITY MAPPING

6.1 This Tall Building Study follows a context-led approach focusing on two sets of factors based on their suitable or sensitivity to tall buildings. The darkest colour tones on the sensitivity and suitability plans (see **Figures 6.1 and 6.2**) denote locations where multiple factors overlap. These are the most sensitive or suitable locations.

SENSITIVITY

6.2 As presented in **Sections 3.0 and 4.0**, the overarching character of Milton Keynes, defined by its homogenous townscape, and significant street widths means that it is a place that is generally conducive to intensification in townscape terms. On this basis, the primary factor that is identified as being sensitive to tall buildings is:

- Heritage assets and conservation areas
- Open spaces
- Low prevailing building heights
- Small prevailing urban grain

6.3 This includes Designated Heritage Assets (listed buildings, a registered park and a scheduled ancient monument) and also NDHAs, including those recognised through the NTHR. In addition, the overarching character of CMK’s origins as a New Town, while not being recognised as a heritage asset as a whole, means that the potential for introducing taller buildings should be balanced against preserving or enhancing this character (recognised through a combination of the designated heritage assets and the NDHAs).

6.4 The effect of individual proposals in the significance of heritage assets by virtue of developing within the setting of a heritage asset would need to be assessed on a case-by-case basis.

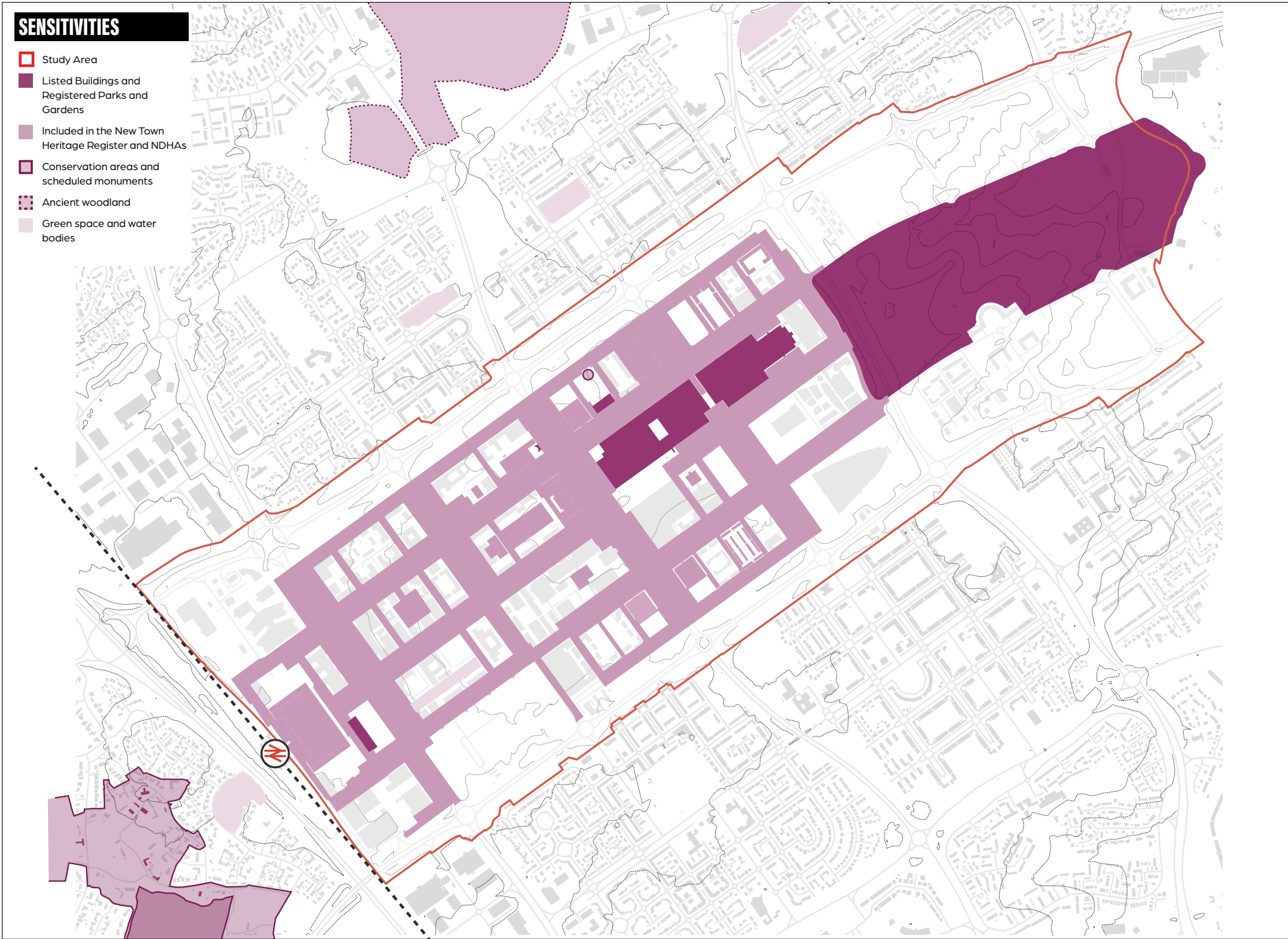


Figure 6.1 Sensitivity plan (Source: Corstorphine and Wright)

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- 6.5 This would entail an applicant identifying the significance of each potentially affected asset and the contribution made to that significance by its setting, with an assessment of how the significance of that asset is impacted.
- 6.6 The effect of individual proposals on the significance of listed buildings is a matter of great weight as enshrined within Section 66 of the Town and Country Planning Act (Listed Buildings and Conservation Areas) 1990.
- 6.7 We therefore recommend that any policy related to the assessment of tall buildings should specifically require an assessment of the effect of a proposal on the significance of heritage assets. Where the significance of designated heritage assets is harmed, then that should be balanced against the public benefits arising from the proposal in accordance with the guidance set out in the National Planning Policy Framework.
- 6.8 Where the significance of non-designated heritage assets is harmed, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset in accordance with the guidance contained within the NPPF.
- 6.9 The local views identified in **Figure 4.2** are included to provide a representation of CMK's character, focusing primarily on vistas along the main boulevards and gates. They are intended to be used as points of reference in assessing the effect of tall buildings on the character and appearance of Central Milton Keynes.

SUITABILITY

- 6.10 The baseline factors identified as being suitable for supporting taller buildings are:
- Higher prevailing building heights
 - Consented development
 - Larger urban grain
 - Land use
 - Accessibility to green open space
 - Public transport accessibility
 - Development Plan Strategy
- 6.11 The overlay of areas identified as being suitable for tall buildings highlights locations along the central parts of Milton Keynes. These locations are accessible, are identified as a future focus of development and already contains 'clusters' of taller buildings.

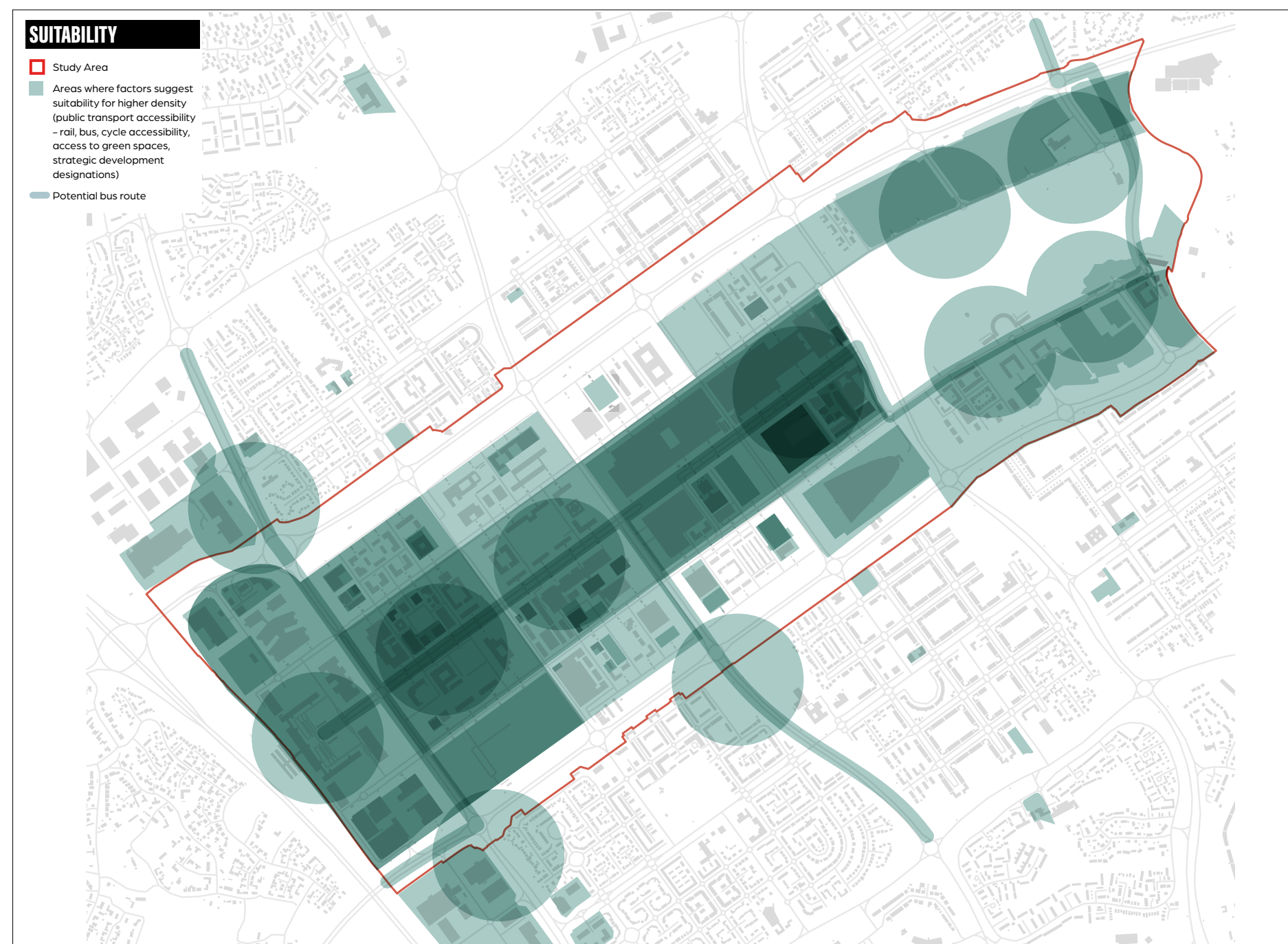


Figure 6.2 Suitability Plan (Source: Corstorphine and Wright)

SENSITIVITY VS SUITABILITY

- 6.12 **Figure 6.3** overlays the plans showing the suitable and sensitive areas within the study area, identified through the contextual analysis.
- 6.13 A significant portion of CMK is identified as being suitable for the introduction of taller buildings. Blocks that accommodate designated heritage assets, open space, low rise residential and Campbell Park are the most notable areas where taller buildings are deemed unsuitable to avoid affecting the character and significance of these locations.
- 6.14 Given that these identified sensitivity factors are matters of particular weight, **Figure 6.4** removes those areas from consideration.
- 6.15 **Figure 6.4** illustrates with darker tones of green the locations where taller buildings may be suitable. These include around Station Square (without impacting on one’s ability to appreciate the architectural form of the former bus station), and on Midsummer Boulevard between the station and shopping centre, where there is good access to public transport nodes. There are several site allocations for housing in this part of CMK; while the development plan strategy envisages office-led development within the area identified as the adopted CBD and emerging downtown and midtown quarters.

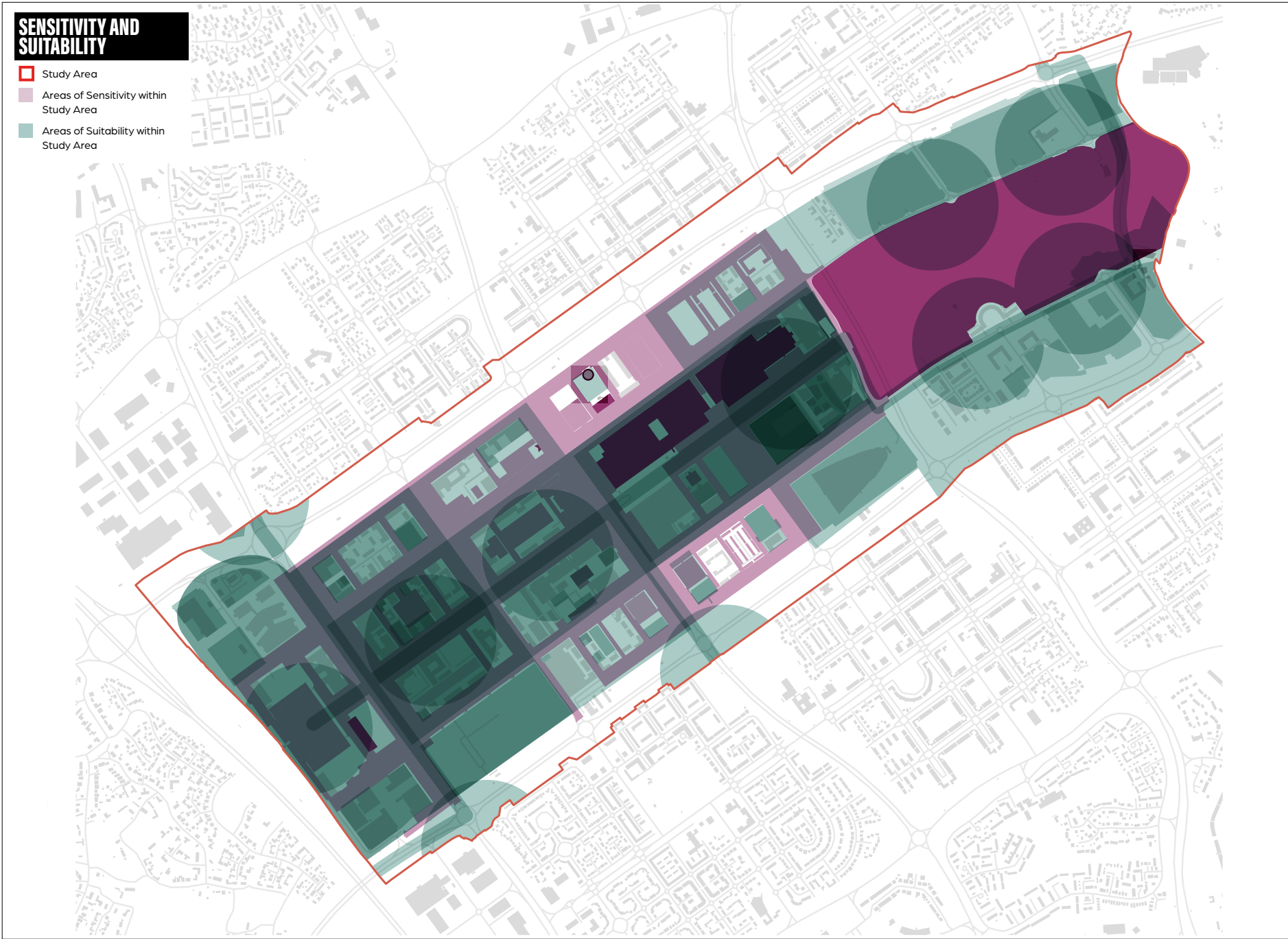


Figure 6.3 Sensitivity vs Suitability overlay (Source: Corstorphine and Wright)

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Figure 6.4 Suitability with Sensitivity Removed (Source: Corstorphine and Wright)

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7.0

STAGE 3: IDENTIFYING TALL BUILDING ZONES

CENTRAL MILTON KEYNES

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STAGE 3: IDENTIFYING TALL BUILDING ZONES

- 7.1
- This final stage establishes where there is potential for taller buildings in spatial terms. This uses the Sensitivity vs Suitability overlay plan (**Figure 6.3**) taking account of the corresponding darker areas and areas of overlap to determine areas that may be particularly suitable for tall buildings.
- 7.2
- CMK’s largely homogenous character, its wide and open streets and spaces and dominance of vehicular infrastructure (car parks and roads) means that it is naturally conducive to intensification and tall buildings can play a role in achieving this. The grid layout of Milton Keynes and specific townscape context means that there are limited terminating views for tall buildings.
- 7.3
- In contrast, some areas are less suitable for taller buildings, where they accommodate listed buildings or open space for example. As discussed above, consideration should be given to their individual significance and relationship with their setting on a case-by-case basis.

HERITAGE IMPACT ASSESSMENT

- 7.4
- As noted in **Section 2.0**, a separate Heritage Impact Assessment (HIA) has been produced in tandem with this tall building strategy. This followed feedback from Historic England that a HIA of the development proposed for CMK should be prepared with its recommendations reflected in local plan policy.
- 7.5
- The HIA includes:
 - An overview of the statutory provision and framework for assessment;
 - Identification of heritage assets within CMK, particularly the contribution made to the significance of the heritage assets from their settings;

- A summary of previous decisions on tall buildings within Central Milton Keynes reached by the City Council or the Planning Inspectorate;
- A commentary on the proposed tall building threshold heights.

- 7.6
- Having regard to potential heritage impacts, recommendations are made in the HIA in and have been used to inform the building height thresholds and potential policy approach.

BUILDING HEIGHT THRESHOLDS

- 7.7
- Figure 7.1** shows the total area that may be suitable for scenarios testing for taller buildings, based on the analysis within this report. It is subdivided into four zones of building threshold heights to respond to the areas of overlap between suitability and sensitivity factors in **Figure 6.3**. The four zones are:
 - Red: Height threshold of 20 storeys or more.
 - Amber: Height threshold of fifteen storeys, or more.
 - Yellow: Height threshold of eight storeys or more.
 - Pale Yellow: Height threshold of 3 storeys or more.
- 7.8
- Appendix 2.0** of this report provides a block-by-block explanation of the proposed threshold heights having regard to the recommendations of the HIA and other pertinent considerations.
- 7.9
- The red zone is focussed on the most accessible area, centred on Midsummer Boulevard between the station and shopping centre. It has good access to existing and proposed public transport nodes and includes areas of existing clusters of taller development, such as the ‘Hub’ on Witan Gate.
- 7.10
- The amber zones reflect accessible locations and emerging building heights. The western edge of the study area is included in this category to take account of longer views of CMK from the Loughton Conservation Area (identified in the HIA).
- 7.11
- The yellow zones are identified to ensure a stepping down in scale is maintained towards the surrounding suburban character and to take into account the setting and significance of designated heritage assets, for example to the north and south of Campbell Park.
- 7.12
- A pale yellow 3-storey threshold height has been identified around early CMK buildings such as Lloyd’s Court and the Civic Centre, reflecting the heritage significance of these NDHAs and their group value with the listed Shopping Building, Central Library, and the Octo Sculpture to the west.

POTENTIAL POLICY APPROACH

- 7.13
- In addition to general design policies, a building heights policy could be devised that requires assessment against a range of townscape related criteria when certain building heights are exceeded by a proposal. Proposals that exceed identified height thresholds could be identified as ‘tall buildings’. The threshold for assessment under the tall building policy could be informed by the height thresholds set out in **Figure 7.1**.
- 7.14
- Policy criteria could include:
 - Assessment of the visual impact of the building from a range of distances;
 - The effect of the proposal on the long-range skyline composition of Milton Keynes;
 - The effect on the spatial hierarchy of the locality, including legibility and wayfinding;
 - A general requirement for tall buildings to be of an exemplary architectural standard (informed by review by a Design Review Panel);
 - Avoiding harm to the significance of heritage assets, and where harm does arise, that this is demonstrably outweighed by planning benefits in accordance with the approach set out in the National Planning Policy Framework;
 - An assessment of glare;
 - An assessment of overshadowing, particularly with regard to public open spaces;
 - An assessment of the ground level effect of the proposals, including the interaction with public realm and site access and servicing access;
 - An assessment of the cumulative visual effect of proposed and consented tall buildings.
- 7.15
- Such an approach would encourage tall buildings within particular locations in CMK, promote excellence in design without setting rigid upper height limits, ensure that the effect on heritage assets is adequately addressed and allow the Council to consider the effect of buildings
- 7.16
- The above approach would also allow flexibility in the approach to all buildings without being overly prescriptive as to location of buildings of a particular height, especially where there may be particular planning benefits that arise from particular proposals.



Figure 7.1 Threshold Heights for Tall Building Strategy (Source: Corstorphine and Wright)

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APPENDIX 1: VIEWS

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View Location Plan highlighting locations of updated views.



0 50 100 150 200 300 500m

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KEY	
	Study area
	Identified townscape local view

Client	
Milton Keynes City Council	
Project	
Milton Keynes Growth Strategy	
Drawing Title	
Identified local townscape views	
Drawing No.	
23090 - 02	
Drawing Status	
PRELIMINARY	

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Date			28.09.23

VIEW 1
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VIEWS

VIEW 2

EXISTING



VIEW 3
EXISTING



VIEWS

VIEW 4

EXISTING



VIEW 5
EXISTING



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VIEWS

VIEW 6

EXISTING



VIEW 7
EXISTING



VIEW 8

EXISTING



VIEW 9
EXISTING





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VIEW 11
EXISTING





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VIEW 13
EXISTING



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VIEW 14

EXISTING



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VIEW 15
EXISTING



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VIEWS

VIEW 16

EXISTING



APPENDIX 2: BUILDING THRESHOLD HEIGHTS RATIONALE

CENTRAL MILTON KEYNES

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CITY BLOCK REFERENCE	A	B	C	D	E	F	G	H
1	• Accessible location • Contains City Centre Shopping Areas • Emerging Policy Promotes Downtown Quarter as location for higher density office development • Larger blocks prevailing building grain • Height Threshold of 15 storeys enables detailed appraisal of potential effect on Loughton Conservation Area	• Accessible Location • Contains permitted 14 storey building (Bowback House). • Emerging Policy Promotes Downtown Quarter as location for higher density office development • Contains existing town centre use. • Site Threshold set at 8/15 storeys to reflect higher density development towards Silbury Boulevard and stepping down towards lower density development to north	• Accessible location • Falls within emerging midtown quarter promoted for residential led mixed use development • Site Threshold set at 8/15 storeys to reflect higher density development towards Silbury Boulevard and stepping down towards lower density development to north. Three storey threshold height set at eastern end of block to enable detailed appraisal of potential effect on setting of listed building (Octo and Central Library) and Scheduled Ancient Monument (Secklow Hundred).	• Three storey height threshold will enable detailed assessment against setting of heritage assets within block.	• Lower levels of accessibility than elsewhere in CMK. • Emerging Parkside Quarter supported generally for residential development. • Prevailing existing townscape character is low-rise residential up to three storeys in northern portion of the block, also non-designated heritage assets. • Southern part of the block occupied by seven storey Solstice Apartments. • 15 storey threshold height stepping down to 8 storeys at boundary of CMK area allows for transition from listed shopping building to lower density heights beyond CMK boundary.	• Accessible location • Emerging Parkside Quarter supported generally for residential development. • Acknowledged development sites for residential purposes • Site Threshold Set at 8 storeys to assess the effect of development on Campbell Park (Grade II RPG) consistent with the Council decision in relation to the refusal of Campbell Park Northside		
2	• Highly accessible location • Emerging Policy Promotes Downtown Quarter as location for higher density office development • Larger blocks prevailing building grain – Station Square presents opportunity. • Height Threshold of 15 storeys enables detailed appraisal of potential effect on Loughton Conservation Area	• Highly accessible location • Contains permitted 14–20 storey building (Bank House). • Emerging Policy Promotes Downtown Quarter as location for higher density office development and higher density residential development in Central Spine • Accessible Open Space • Site Threshold set at 20 storeys	• Highly accessible location • Falls within emerging midtown quarter promoted for residential led mixed use development and higher density residential development in Central Spine • Accessible Open Space • Site Threshold Set at 20 storeys. • Steps down to 15 storeys to provide transition to lower density development to north and to reflect public transport accessibility levels. 8 storey threshold at eastern end to reflect proximity to listed Shopping Building and Open Space	• Not suitable for Tall Building – listed Shopping Building	• Much of the block is not suitable for Tall Building due to the existence of the listed Shopping Building • Threshold set at 20/15 storeys at eastern end of block to reflect existing Hotel La Tour tall building and opportunity of gateway location.	• Grade II RPG Campbell Park – Not Suitable for Tall Building		
3	• Highly Accessible Location • Potential setting effects on listed bus station, including views from Station Square. • Emerging Policy Promotes Downtown Quarter as location for higher density office development • Larger blocks prevailing building grain – Station Square presents opportunity. • Height Threshold of 15 storeys enables detailed appraisal of potential effect on Loughton Conservation Area, and 8 storeys to east of bus station to assess potential setting effects on bus station.	• Highly accessible location • Emerging Policy Promotes Downtown Quarter as location for higher density office development, and higher density residential development in Central Spine • Accessible Open Space • Appeal allowed for 33 storey building (Jaipur). • Site Threshold set at 20 storeys	• Highly accessible location • Existing cluster of taller buildings 11–15 storeys • Falls within emerging midtown quarter promoted for residential led mixed use development and higher density residential development in Central Spine • Site threshold set at 20 storeys	• Highly Accessible location • Falls within emerging Uptown Quarter for town centre uses and higher density residential development in Central Spine • Contains permitted development at 21 storeys (the Point). • Site Threshold set at 15 storeys to enable detailed assessment of impact of tall buildings on listed Shopping Building.	• Highly Accessible location • Falls within emerging Uptown Quarter for town centre uses and higher density residential development in Central Spine • Site Threshold set at 15 storeys to enable detailed assessment of impact of tall buildings on listed Shopping Building. Existing tall building (Hotel Le Tour) represents opportunity for higher threshold on Marlborough Gate (20 storeys)			
4	• Accessible Location • Contains City Centre Shopping Areas • Emerging Policy Promotes Downtown Quarter as location for higher density office development • Larger blocks prevailing building grain Height Threshold of 15 storeys enables detailed appraisal of potential effect on Loughton Conservation Area	• Accessible location • Emerging Policy Promotes Downtown Quarter as location for higher density office development, and also proposed higher education site. • Potential gateway location at Avebury Boulevard and Grafton Street reflected in 20 storey height threshold • Site Threshold set at 15/8 storeys stepping up towards central spine and down towards lower density development to south	• Accessible Location • Falls within emerging Midtown quarter promoted for residential led mixed use development. • Site Threshold set at 15/8 storeys stepping up towards central spine and down towards lower density development to south	• Accessible Location. • Falls within emerging Midtown quarter promoted for residential led mixed use development. • Completion of 12 storey building (Site D4.4) • Site Threshold set at 15/8 storeys stepping up towards central spine and down towards lower density development to south	• Emerging Uptown Quarter supports retail, cultural and leisure led development. • Block accommodates large scale leisure development • Site Threshold set at 8 storeys stepping up towards Block E3 (15 storeys) and down towards lower density development to south	• Accessible location • Acknowledged development sites for residential purposes • Emerging Parkside Quarter supported generally for residential development. • Site Threshold Set at 8 storeys to assess the effect of development on Campbell Park (Grade II RPG) • Site threshold set at 8 storeys to enable detailed assessment of the effect of development on Campbell Park, consistent with the proposed approach for Campbell Park Northside.		

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