Milton Keynes Retail & Commercial Leisure Study

2025 Update

ON BEHALF OF MILTON KEYNES CITY COUNCIL

June 2025

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1. Introduction

Background

1.1 Nexus finalised Milton Keynes City Council's ('the Council') Retail and Commercial Leisure Study ('RCLS') in early 2024. In the near 18-months since, two key events mean that the Council is now seeking an update to some of the content of the RCLS.

1.2 The first event is driven by changes to the Government's Standard Housing Method, as well as the crystallisation of likely housing delivery on some of the Council's largest housing sites. The combination of these factors means that there is now greater certainty around the quantum and location of housing delivery in the City to 2050. Under the RCLS, Nexus was asked to project forward capacity for additional retail and commercial leisure floorspace under two different scenarios in keeping with the Housing and Economic Development Needs Assessment ('HEDNA'). Scenario A considered average housing growth of 1,902 dwellings per annum, whilst Scenario B assumed growth of 2,265 dwellings per annum. Although the Scenario B figure remains unchanged, the Scenario A figure has now been lowered to 1,799 dwellings per annum.

1.3 Moreover, there is now greater certainty around where major areas of housing development will be located, including 16,000 additional dwellings in Central Milton Keynes and Campbell Park, and 7,500 dwellings (before 2050) in the Eastern Strategic City Extension. The full list of projected housing delivery sites is set out in Section 3 of this report. This allows greater specificity about where associated retail and leisure facilities might come forwards than was the case at the time of the RCLS.

1.4 The second significant event is that the Council progressed its Plan to a Regulation 18 consultation between 17th July and 9th October 2024. The Council is currently sifting through the 7,000 responses received, including those to a range of policies which have implications for the retail and commercial leisure elements of the RCLS. Nexus is therefore asked to comment on those representations and advise what, if any, suggested changes there should be to the policies and related explanatory text set out in the draft Regulation 18 consultation Plan.

1.5 This Retail and Commercial Leisure Study Update ('RCLSU') does not replace the RCLS. It should be read alongside that document. It does though provide updates in the areas highlighted above.

Our Brief

1.6 The Council seeks reporting on these matters in order to inform the preparation of its Regulation 19 Milton Keynes City Plan 2050, which is scheduled to go out on consultation in September 2025. Specifically, this RCLSU reports on the following factors, which include some new considerations arising since the time of the previous report:

1) Convenience and comparison goods retail and food and beverage (restaurant, pubs, bars and cafes) **floorspace projections** for the period 2026-2050, under both Scenario A and B;

2) Whether the added clarity over **strategic housing designations** would result in any different suggested balance of floorspace projections either within CMK, or in the rest of the Borough;

3) Whether the RCLS's previous 'rule of thumb' assessment for **supporting retail and service facilities** can be associated more closely with each of the proposed strategic housing sites;

4) What impact new proposals for a **Universal Destinations & Experiences Theme Park** in Bedford Borough might have for retail and hotel sectors within the Borough;

5) Whether current Policy CB1 proposals for **Central Bletchley** are likely to be viable, or whether a more flexible approach might be advisable; and

6) More generally, whether the **Regulation 18 responses** to Policies GS5, ECP2, ECP3, ECP4, PFHP3, CMK2 and CM3 warrant any other recommended changes to the suite of policies to be put forward under the Regulation 19 Plan.

1.7 For clarity, the RCLSU does not update on other matters which were included within the original RCLS. These include:

- Capacity projections for commercial leisure facilities or hotel[1] facilities.
- Analysis of the national policy context or trends.
- Health-check assessment for any of the Borough's centres.
- A Healthy Town Centres Assessment.
- Benchmarking exercises.
- A review of Services Provision.

[1] Though we do carry out a high-level assessment of the likely impact of the Universal development on the MK hotel sector.

2. Updated Floorspace Projections

Introduction

2.1 This chapter of the report provides an updated position on floorspace capacity projections for the authority area over the period to 2050, which was covered in Chapter 4 of the original RCLS. The original RCLS projected floorspace capacity for convenience goods, comparison goods, food and beverage, and other commercial leisure uses such as cinemas and bowling alleys. In line with the brief, this update covers only convenience, comparison and food and beverage capacities.

2.2 Since the production of the original RCLS, there have been certain changes which are expected to influence the capacity projected by 2050, including the scale and location of new housing development, expenditure forecasts and floorspace densities. This chapter will be updated in reflection of these changes.

2.3 We follow the same methodology that was used in the RCLS which we do not set out in detail here, and therefore it is recommended that this chapter is read alongside the original chapter.

Population and Housing Updates

2.4 The household survey underpinning the original RCLS was based on a Study Area of 14 defined Zones, each composed of postal sectors, which are detailed at Figure 2.4.1. The population and expenditure forecasts used throughout our capacity assessment are provided by Experian on the basis of these Zones. For this RCLSU, we use the same Study Area, but update the population and expenditure forecasts in light of the most recent updates from Experian.

Figure 2.4.1 **Study Area Postal Sectors and Number of Interviews**

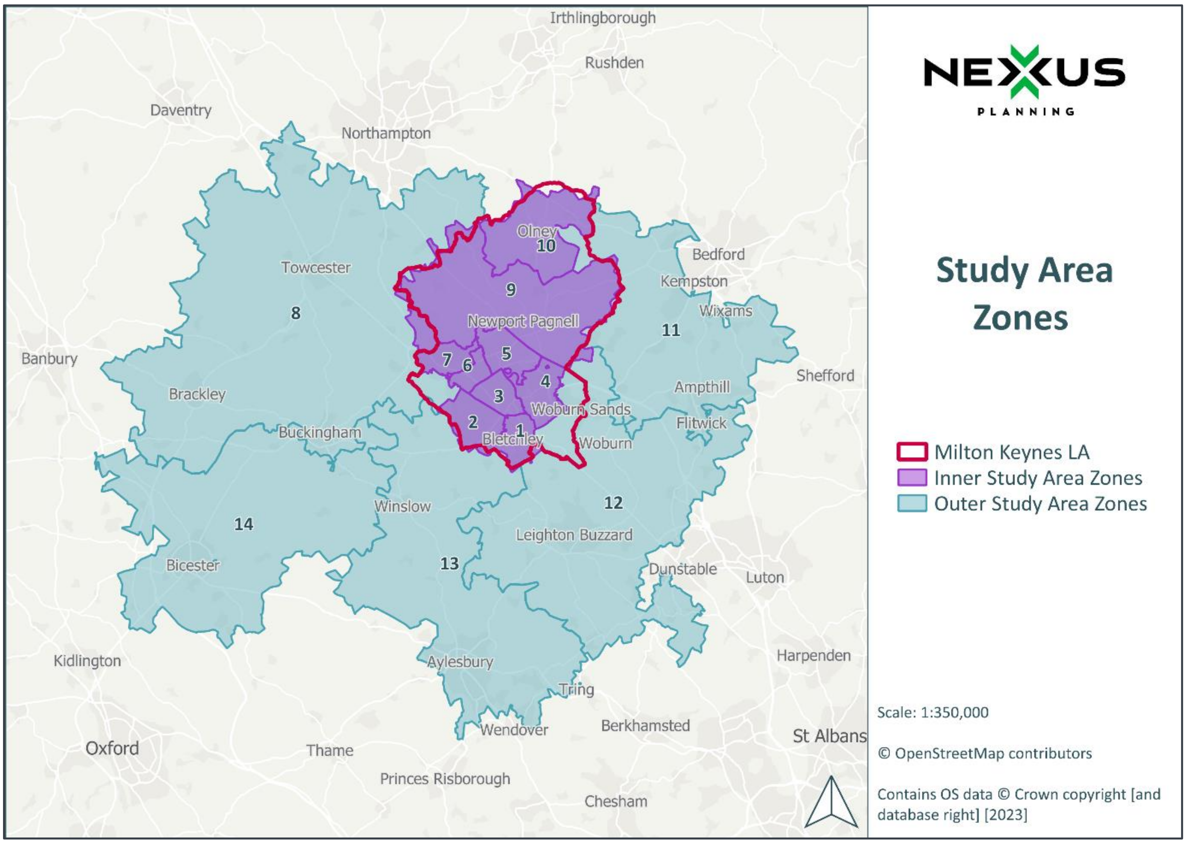
Zone	Postal Sectors	Household Survey Interviews
1	MK1 1, MK2 2, MK2 3, MK3 5, MK3 6	103
2	MK3 7, MK4 1, MK4 2, MK4 3, MK4 4, MK5 6, MK5 7, MK8 0	101
3	MK5 8, MK6 1, MK6 2, MK6 4, MK6 5, MK9 1, MK9 2, MK9 3	100
4	MK6 3, MK7 6, MK7 7, MK7 8, MK10 0, MK10 7, MK10 9	100
5	MK9 4, MK14 5, MK14 6, MK14 7, MK15 0, MK15 8, MK15 9	100
6	MK8 8, MK8 9, MK13 7, MK13 8, MK13 9	100
7	MK11 1, MK11 2, MK11 3, MK12 5, MK12 6, MK13 0	100
8	MK8 1, MK11 4, MK18 1, MK18 5, MK18 6, MK18 7, MK19 6, NN7 2, NN7 3, NN12 6, NN12 7, NN12 8, NN13 5, NN13 6, NN13 7	104
9	MK16 0, MK16 8, MK16 9, MK19 7	101
10	MK46 4, MK46 5	100
11	MK43 0, MK43 1, MK43.2, MK43 8, MK43 9, MK45 1, MK45 2, MK45 3	100
12	LU5 6, LU6 2, LU7 0, LU7 1, LU7 2, LU7 3, LU7 4, LU7 9, MK17 7, MK17 8, MK17 9, MK45 5	100
13	HP19 0, HP19 7, HP19 8, HP19 9, HP20 1, HP20 2, HP21 7, HP21 8, HP21 9, HP22 0, HP22 4, HP22 5, HP22 7, HP23 4, MK17 0, MK18 3	100
14	MK18 2, MK18 4, OX25 1, OX25 2, OX25 3, OX26 1, OX26 2, OX26 3, OX26 4, OX26 5, OX26 6, OX27 0, OX27 7, OX27 8, OX27 9	100

Zone	Postal Sectors	Household Survey Interviews
Study Area Total		**1,409**

Source: Appendix A

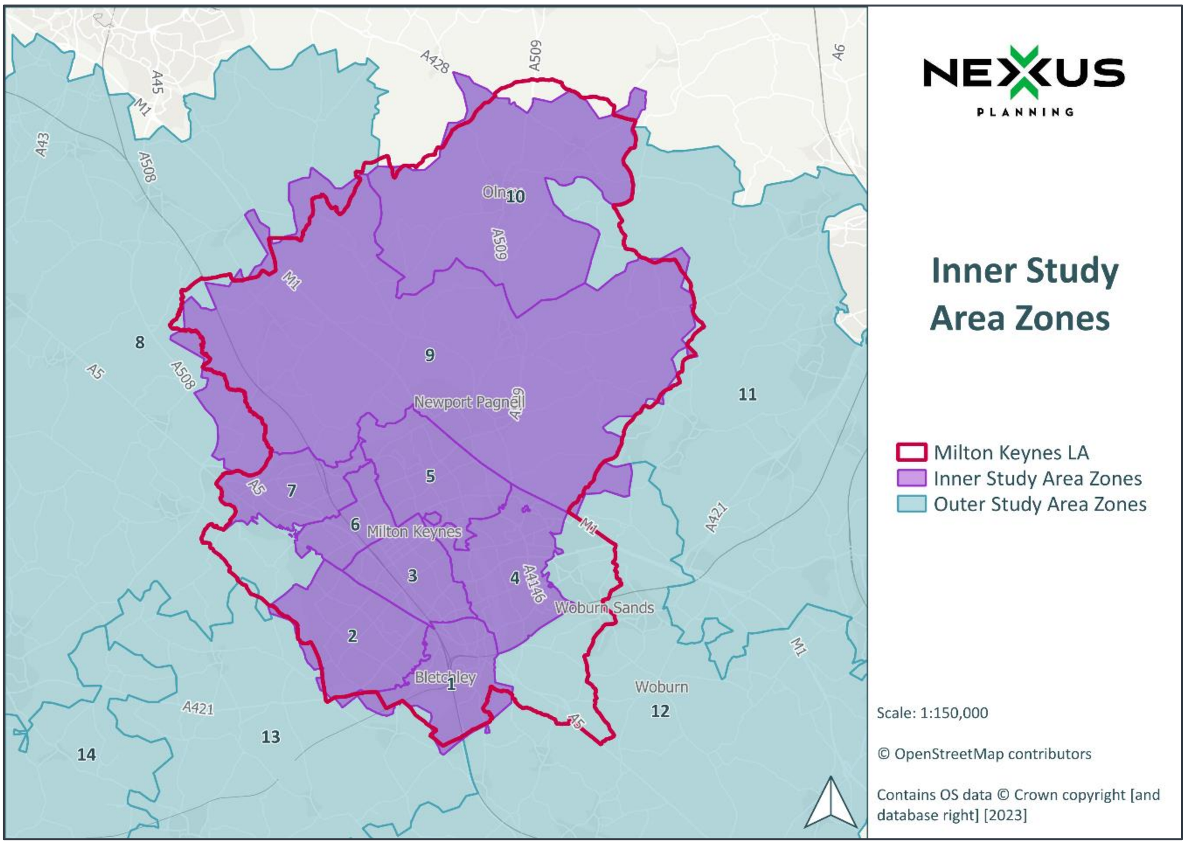
2.5 Our results consider both an Inner Study Area, composed of Zones which broadly align with the Council area (Zones 1-7, and 9-10), and the Outer Study Area (Zones 8, and 11-14). These areas are produced on the figures below.

Figure 2.5.1 **Study Area Map**



Source: Appendix A

Figure 2.5.2 **Inner Study Area Map**



Source: Appendix A

2.6 The RCLS results were produced on the basis of two separate scenarios, Scenario A and Scenario B.

2.7 Scenario A was previously based on the assumption of 1,902 dwellings per year. In this RCLSU, we instead adjust this figure to 1,799 dwellings, which is the new minimum figure for the Council area, calculated using the changes to the Government's standard method. Our approach to Scenario A is otherwise the same as in the original RCLS. For the Inner Study Area Zones (Zone 1-7, and 9-10), we have sourced 2026 population projections using Experian App Library data (2025 report). Based on an annual growth of 1,799 dwellings, we have attributed population growth to each of the Zones based on the current population split between each Zone in the Inner Study Area. The population of each Zone has then been projected until 2050. For the Outer Study Area Zones (Zone 8, and 11-14), we have reverted to Experian population projections up to 2040, where projections end. For the period 2040-2050, we have assumed population growth based on demographic trends in the previous 10-year period.

2.8 The resulting population figures for Scenario A can be seen in the table below:

Figure 2.8.1 **Population Projections – Scenario A**

Zone	Population					Population Growth
Zone	**2026**	**2031**	**2036**	**2041**	**2050**	**2026-2050**
Zone 1	35,407	38,172	40,937	43,702	48,679	37.5%
Zone 2	52,237	56,316	60,396	64,475	71,818	37.5%
Zone 3	31,085	33,513	35,940	38,368	42,737	37.5%

Zone	Population					Population Growth
Zone 4	45,304	48,842	52,380	55,918	62,286	37.5%
Zone 5	29,003	31,268	33,533	35,798	39,875	37.5%
Zone 6	20,956	22,593	24,229	25,866	28,811	37.5%
Zone 7	27,526	29,676	31,825	33,975	37,844	37.5%
Zone 8	103,405	106,904	109,827	112,628	117,765	13.9%
Zone 9	24,814	26,752	28,690	30,627	34,115	37.5%
Zone 10	10,108	10,897	11,687	12,476	13,897	37.5%
Zone 11	73,194	75,280	76,982	78,587	82,066	12.1%
Zone 12	107,051	109,844	111,802	113,622	118,378	10.6%
Zone 13	130,018	134,498	138,072	141,502	147,995	13.8%
Zone 14	66,951	68,976	70,762	72,608	75,960	13.5%
Inner Study Area (Zones 1-7, 9-10)	**276,440**	**298,028**	**319,616**	**341,204**	**380,062**	**37.5%**
Total Study Area	**757,059**	**793,530**	**827,061**	**860,151**	**922,226**	**21.8%**

Table 1a, Appendix A

2.9 The resultant population at 2050 is slightly lower than what was projected in the RCLS, which is to be expected given the reduction in annual dwelling completions. The RCLS projected an Inner Study Area population of 393,438, which has now decreased slightly to 380,062.

2.10 We also update the population projections for Scenario B. In the RCLS, Scenario B was based on a figure of 2,265 dwellings per year over the plan period, and allocated these to the Inner Study Area zones according to their current population split. In this RCLSU we still use this figure, however, with the publication of the HEDNA, there is now greater certainty surrounding where housing growth is likely to be directed. We therefore update Scenario B to reflect these geographies, and expect that the results will more accurately represent the distribution of housing growth and, subsequently, where expenditure will grow the most.

2.11 The updated population figures for Scenario B are presented in the table below:

Figure 2.11.1 **Population Projections – Scenario B**

Zone	Population					Population Growth
Zone	**2026**	**2031**	**2036**	**2041**	**2050**	**2026-2050**
Zone 1	36,517	38,791	41,743	44,366	47,461	30.0%
Zone 2	53,442	55,712	57,417	59,222	61,926	15.9%
Zone 3	33,453	39,545	44,488	49,531	59,628	78.2%
Zone 4	46,773	50,917	57,895	62,619	70,148	50.0%
Zone 5	29,757	31,021	35,308	39,313	47,321	59.0%
Zone 6	22,307	26,153	29,790	30,251	30,897	38.5%
Zone 7	28,055	29,091	30,040	30,850	31,630	12.7%
Zone 8	103,405	106,904	109,827	112,628	117,765	13.9%

Zone	Population					Population Growth
Zone 9	25,307	29,600	39,157	46,480	60,765	140.1%
Zone 10	10,308	10,411	10,515	10,619	10,826	5.0%
Zone 11	73,194	75,280	76,982	78,587	82,066	12.1%
Zone 12	107,051	109,844	111,802	113,622	118,378	10.6%
Zone 13	130,018	134,498	138,072	141,502	147,995	13.8%
Zone 14	66,951	68,976	70,762	72,608	75,960	13.5%
Inner Study Area (Zones 1-7, 9-10)	**285,919**	**311,242**	**346,352**	**373,249**	**420,602**	**47.1%**
Total Study Area	**766,538**	**806,744**	**853,797**	**892,196**	**962,766**	**25.6%**

Table 1a, Appendix B

2.12 The projected population of the Inner Study Area at 2050 is 420,602, which is slightly higher than the 416,960 which was forecast in the RCLS. Additionally, the distribution of this growth is different than previously projected. For the Inner Study Area zones, the population growth over the period 2026-2050 ranges from 5.0% in Zone 10, where little growth is allocated, to 140.1% in Zone 9, which is the location of major strategic housing growth.

Expenditure Updates

2.13 As with population forecasts, we also update expenditure forecasts using the most recent data available from Experian.

2.14 Experian App Library (2025 report) provides updated expenditure per capita data in 2023 prices. As with the RCLS, we then project these expenditure figures forwards to the base year (2026) and subsequent assessment years using the growth rates presented in the Experian Retail Planner Briefing Note 22 (March 2025), which have been updated since the publication of the original RCLS.

2.15 Growth rate forecasts for both convenience and comparison goods are generally less optimistic than what was forecast in the RCLS. Whereas previous forecasts projected initial negative growth for convenience goods, before a slight increase year on year, the latest forecasts project negative growth until 2040. Likewise, previous forecasts projected initial negative growth for comparison goods before increasing annually. The latest forecasts also project negative growth initially and then annual positive growth from 2026 onwards, although annual growth is more conservative than previous forecasts. The table below sets out in detail how expenditure is expected to grow over the period to 2040, as outlined in the latest Experian Retail Planner Briefing Note.

Figure 2.15.1 **'Adjusted' Special Forms of Trading Market Share Forecasts**

Year	Convenience Goods	Convenience Goods 'Adjusted SFT'	Comparison Goods	Comparison Goods 'Adjusted SFT'
2023	-2.9	-3.3	-2.7	-2.2
2024	-1.1	-1.9	-0.3	-1.7
2025	-0.2	-0.9	0.7	-0.4
2026	-0.2	-0.7	1.8	0.9
2027	-0.1	-0.6	2.2	1.3
2028	-0.1	-0.4	2.7	2.0
2029	-0.1	-0.4	2.8	2.2

Year	Convenience Goods	Convenience Goods 'Adjusted SFT'	Comparison Goods	Comparison Goods 'Adjusted SFT'
2030	-0.1	-0.4	2.8	2.2
2031	-0.1	-0.4	2.8	2.2
2032	-0.1	-0.3	2.8	2.2
2033	-0.1	-0.3	2.8	2.2
2034	0.0	-0.3	2.7	2.1
2035	0.0	-0.3	2.7	2.1
2036	0.0	-0.3	2.7	2.1
2037	0.0	-0.3	2.7	2.1
2038	0.0	-0.3	2.8	2.1
2039	0.0	-0.3	2.8	2.1
2040	0.0	-0.3	2.8	2.0

Source: Figure 7, Experian Retail Planner Briefing Note 22, March 2025

2.16 As seen in the table above, Experian forecasts only go up to 2040. Given that both convenience and comparison growth rates over the previous period are relatively consistent (at -0.3% and 2.0%, respectively), we have assumed that convenience and comparison will continue to grow at these rates over the period 2040-2050.

2.17 The expenditure per capita figures are then multiplied by the population of each zone at each of the assessment years. The figures below set out the resultant outcome of the total 'brick and mortar' comparison and convenience expenditure in the Study Area at the base and assessment years.

Figure 2.17.1 **Retail Expenditure Forecasts in the Study Area (£m) – Scenario A**

	2026	2031	2036	2041	2050	Growth 2026-2050
Convenience	£2,154.0	£2,207.2	£2,264.8	£2,318.9	£2,417.8	**12.2%**
Comparison	£3,217.4	£3,714.6	£4,297.8	£4,942.8	£6,320.5	**96.4%**

Source: Tables 1b & 8b, Appendix A

Figure 2.17.2 **Retail Expenditure Forecasts in the Study Area (£m) – Scenario B**

	2026	2031	2036	2041	2050	Growth 2026-2050
Convenience	£2,179.6	£2,241.7	£2,335.7	£2,403.3	£2,523.1	**15.8%**
Comparison	£3,253.4	£3,769.4	£4,427.0	£5,116.4	£6,588.5	**102.5%**

Source: Tables 1b & 8b, Appendix B

2.18 As seen, convenience growth is relatively marginal over this period whereas comparison spend is expected to double. In terms of convenience spend, the overall expenditure available is expected to be larger at 2050 across both scenarios than was forecast in the RCLS. Although per capita spending is forecast to decline, overall expenditure available is expected to increase as a result of population growth. In comparison spend, however, the overall spend available at 2050 has decreased from previous forecasts. This is due to a combination of lower per capita spend, and less optimistic growth rates.

Retail Floorspace Projections

2.19 When calculating floorspace projections for convenience and comparison goods, we employ the same method as in the RCLS.

2.20 A key element of floorspace projections is a market share analysis which identifies where residents of different zones carry out their shopping. As the results of the RCLSU use the same household survey results as the RCLS, we do not seek to replicate the market share findings here, which can be seen in the RCLS.

2.21 The original RCLS used national company trading averages for benchmarking purposes to understand the relative under- or over-performance of certain stores. We have updated these results in light of the latest sales densities from GlobalData, which can be seen in full at Appendix A and Appendix B. We present summary tables below:

Figure 2.21.1 **Convenience Benchmarking (Scenario A)**

Destination	Benchmark Turnover (£m)	Survey Turnover (With 1% Inflow from Beyond Study Area (£m)	Trading Position against Benchmark (£m)	Trading Position against Benchmark (%)
Within Milton Keynes City Council Area	£858.9	£977.6	£118.8	13.8%
In-Centre	£588.7	£623.0	£34.4	5.8%
Out of Centre	£270.2	£354.6	£84.4	31.2%

Source: Table 5, Appendix A

Figure 2.21.2 **Convenience Benchmarking (Scenario B)**

Destination	Benchmark Turnover (£m)	Survey Turnover (With 1% Inflow from Beyond Study Area (£m)	Trading Position against Benchmark (£m)	Trading Position against Benchmark (%)
Within Milton Keynes City Council Area	£862.5	£1,002.2	£139.6	16.2%
In-Centre	£591.0	£639.5	£48.5	8.2%
Out of Centre	£271.5	£362.7	£91.2	33.6%

Source: Table 5, Appendix B

2.22 From our market share analysis, we are then able to assess the capacity for additional convenience floorspace over the Local Plan period. To do this we follow the same methodology as set out in paragraphs 4.40 to 4.57 of the RCLS. We have made necessary updates in relation to population, expenditure and the latest floorspace densities as set out in RPBN 22. We have also updated our list of commitments to reflect new approvals, and where national operators have since been identified, we have replaced their estimated sales density to align with the company-specific figure.

2.23 Our full assessment can be seen at Tables 6 and 7 of Appendix A and Appendix B. The tables below summarise the capacity available under Scenarios A and B, at both an authority-wide level, and looking at CMK specifically.

Figure 2.23.1 **Net quantitative capacity for new convenience goods in the Council area (inclusive of CMK) – Scenario A**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£57.1m	4,341	to	5,563
2036	£83.2m	6,351	to	8,139
2041	£116.7m	8,949	to	11,468
2050	£169.6m	13,126	to	16,821

Figure 2.23.2 **Net quantitative capacity for new convenience goods in CMK – Scenario A**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	-£19.3m	-1,465	to	-1,877
2036	-£15.5m	-1,185	to	-1,519
2041	-£10.5m	-803	to	-1,029
2050	-£2.6m	-204	to	-262

Figure 2.23.3 **Net quantitative capacity for new convenience goods in the rest of the Council area (exclusive of CMK) – Scenario A**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£76.4m	5,806	to	7,440
2036	£98.8m	7,536	to	9,658
2041	£127.2m	9,751	to	12,497
2050	£172.3	13,330	to	17,083

Figure 2.23.4 **Net quantitative capacity for new convenience goods in the Council area (inclusive of CMK) – Scenario B**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£82.4m	6,265	to	8,028
2036	£125.7m	9,589	to	12,288

2041	£165.6m	12,703	To	16,280
2050	£228.8m	17,706	To	22,690

Figure 2.23.5 **Net quantitative capacity for new convenience goods in CMK – Scenario B**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	-£13.9m	-1,056	to	-1,354
2036	-£7.7m	-584	to	-748
2041	-£1.6m	-123	to	-158
2050	£7.8m	600	to	769

Figure 2.23.6 **Net quantitative capacity for new convenience goods in the rest of the Council area (exclusive of CMK) – Scenario B**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£96.3m	7,321	to	9,382
2036	£133.3m	10,172	to	13,036
2041	£167.3m	12,826	to	16,438
2050	£221.0m	17,105	to	21,921

2.24 The range of capacity presented suggests the minimum and maximum likely capacity. The minimum capacity is what could be consumed if new floorspace was to be taken up by retailers with a higher sales density (in line with the average sales densities of the 'big 4 retailers'), whereas the maximum capacity represents what floorspace could be supported by new floorspace was taken up by retailers with a lower sales capacity (in line with the average sales densities of discount retailers).

2.25 Under Scenario A, we project capacity of between 4,341 sqm and 5,563 sqm at 2031 for the Council area as a whole. As available surplus expenditure increases, this capacity grows to between 6,351 sqm and 8,139 sqm in 2036, between 8,949 sqm and 11,468 sqm in 2041 and between 13,126 sqm and 16,821 sqm at 2050. This is slightly lower than what was projected in the RCLS.

2.26 Figures 2.23.2 and 2.23.3 break down the overall results to look at the capacity available within CMK specifically, and the remainder of the Council area (excluding CMK). This shows that although there is considerable capacity available within the rest of the Council area at 2050, of between 13,330 and 17,083 sqm, there is actually a slight negative capacity within CMK, of between -204 and -262 sqm at 2050. The RCLS also projected a negative capacity within CMK, although in this update the negative capacity we project is slightly narrower.

2.27 Under Scenario B, we project capacity of between 6,262 sqm and 8,028 sqm at 2031 for the Council area as a whole. As available surplus expenditure increases, this capacity grows to between 9,589 sqm and 12,288 sqm in 2036, between 12,703 sqm and 16,280 sqm in 2041 and between 17,706 sqm and 22,690 sqm at 2050. This is marginally higher than what was projected in the RCLS.

2.28 Figures 2.23.5 and 2.23.6 break down the overall results to look at the capacity available within CMK specifically, and the remainder of the Council area (excluding CMK). As in Scenario A, the capacity available within the remainder of the Council area is significantly higher than the capacity within CMK. In this update we project a positive capacity in CMK at 2050 of between 600 sqm and 769sqm, a change from the RCLS where we projected a slight negative capacity within CMK.

2.29 Following the same methodology as used for convenience floorspace, and again in reflection of updated population, expenditure, floorspace densities and commitments, we also forecast the capacity for additional comparison floorspace over the Local Plan period, both in the Council area and within CMK specifically. Our full assessment can be seen in Tables 18 and 19 of Appendix A and Appendix B, the results of which we summarise in the tables below.

Figure 2.29.1 **Net quantitative capacity for new comparison goods in the Council area (inclusive of CMK) – Scenario A**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£44.4m	7,210	to	11,331
2036	£131.6m	19,062	to	29,954
2041	£224.2	28,986	to	45,549
2050	£428.8m	45,176	to	70,990

Figure 2.29.2 **Net quantitative capacity for new comparison goods in CMK – Scenario A**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£21.4m	3,477	to	5,465
2036	£60.5m	8,757	to	13,762
2041	£101.9m	13,179	to	20,709
2050	£193.6m	20,392	to	32,044

Figure 2.29.3 **Net quantitative capacity for new comparison goods in the rest of the Council area (exclusive of CMK) – Scenario A**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£23.0m	3,733	to	5,866
2036	£71.1m	10,304	to	16,192

2041	£122.3m	15,807	to	24,839
2050	£235.3m	24,784	to	38,946

Figure 2.29.4 **Net quantitative capacity for new comparison goods in the Council area (inclusive of CMK) – Scenario B**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£53.6m	8,700	to	13,671
2036	£183.5m	26,574	to	41,759
2041	£300.2m	38,811	To	60,989
2050	£556.3m	58,607	To	92,097

Figure 2.29.5 **Net quantitative capacity for new comparison goods in CMK – Scenario B**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£25.5m	4,133	to	6,495
2036	£83.4m	12,085	to	18,991
2041	£135.6m	17,529	to	27,546
2050	£250.0m	26,336	to	41,385

Figure 2.29.6 **Net quantitative capacity for new comparison goods in the rest of the Council area (exclusive of CMK) – Scenario B**

Year	Surplus Expenditure (£m)	Total Capacity in the Council (sqm net)		
2031	£28.1m	4,566	to	7,176
2036	£100.0m	14,489	to	22,768
2041	£164.6m	21,282	to	33,443
2050	£306.3m	32,271	to	50,712

2.30 Under Scenario A, we project capacity of between 7,210 sqm and 11,331 sqm at 2031 for the Council area as a whole. As available surplus expenditure increases, this capacity grows to between 19,062 sqm and 29,954 sqm in 2036, between 28,986 sqm and 45,549 sqm in 2041 and between 45,176 sqm and 70,990 sqm at 2050. This is lower than what was previously projected in the RCLS, in large part because the surplus expenditure available after accounting for commitments is approximately half of what was projected in the RCLS. This is a result of lower per capita spend and less optimistic growth rates.

2.31 Figures 2.29.2 and 2.29.3 break down the overall results to look at the capacity available within CMK specifically, and the remainder of the Council area (excluding CMK). This shows that the capacity available within the Council area as a whole is roughly equally split between CMK and the rest of the Council area.

2.32 Under Scenario B, we project capacity of between 8,700 sqm and 13,671 sqm at 2031 for the Council area as a whole. As available surplus expenditure increases, this capacity grows to between 26,574 sqm and 41,759 sqm in 2036, between 38,811 sqm and 60,989 sqm in 2041 and between 58,607 sqm and 92,097 sqm at 2050. Again, the capacity we project here is slightly lower than what was projected in the RCLS.

2.33 Figures 2.29.5 and 2.29.6 break down the overall results to look at the capacity available within CMK specifically, and the remainder of the Council area (excluding CMK). As with Scenario A, there is a broadly similar level of capacity available within both areas.

Food and Beverage Projections

2.34 The brief for the RCLSU also requires us to provide an update of the capacity for additional food and beverage floorspace. As with the RCLS, we have undertaken this assessment by utilising current market shares as identified through the Household Survey, population and spending growth rates and benchmarking against current levels of provision.

2.35 Experian provides localised data on spending on restaurants and cafés per capita, which includes spending on alcoholic drinks (away from home) and take-away meals. In 2024, this spending was projected to be £1,207 per person per annum for residents in the Inner Study Area (2023 prices).

2.36 Taking into account updated population growth figures, and the latest anticipated leisure spending growth rates (Experian Retail Planner 22, Figure 1a), we calculate the projected total spend across the Plan period in both Scenarios A and B. Under Scenario A, total spend is projected to grow to £523.7m by 2050, whereas total spend is projected to grow to £584.1m under Scenario B over the same time period. This is a slight increase on the available expenditure in the RCLS, under both scenarios.

Figure 2.36.1 Total food and beverage expenditure in the Inner Study Area

	2026	2031	2036	2041	2050
Scenario A	£323.8m	£359.7m	£399.5m	£441.6m	£523.7m
Scenario B	£334.5m	£375.0m	£433.7m	£484.9m	£584.1m

2.37 Applying the same retention rate adopted in the RCLS (93.6%) and growing the benchmark turnover of existing floorspace on the basis of changing leisure floorspace densities (using the latest figures from RPBN 22), we find a total food and beverage spending surplus by 2050 of £182.9m under Scenario A and of £229.2m under Scenario B. This surplus expenditure is then translated into floorspace using the latest leisure sales densities from RPBN 22.

2.38 A summary of our results can be seen in the tables overleaf.

Figure 2.38.1 **Restaurant, Pubs, Bars and Café Capacity – Scenario A**

Year	Surplus Expenditure (£m)	Sales Density	Floorspace Capacity (sqm)
2031	£33.6m	£5,025	6,686
2036	£69.6m	£5,050	13,781
2041	£107.5m	£5,076	21,180
2050	£182.9m	£5,121	35,710

Figure 2.38.2 **Restaurant, Pubs, Bars and Café Capacity – Scenario B**

Year	Surplus Expenditure (£m)	Sales Density	Floorspace Capacity (sqm)
2031	£37.9m	£5,025	7,534
2036	£91.6m	£5,050	18,132
2041	£137.9m	£5,076	27,172
2050	£229.2m	£5,121	44,755

2.39 The RCLS projected a capacity for 38,013 sqm food and beverage floorspace under Scenario A, and 43,336 sqm under Scenario B. Our projections in this update are broadly similar, although in Scenario A we are projecting slightly less capacity, and under Scenario B we are projecting slightly more capacity than was previously forecast.

Summary

2.40 This section has provided an update on the projected floorspace capacities for convenience floorspace, comparison floorspace and food and beverage floorspace over the Local Plan period to 2050, under Scenarios A and B.

2.41 As with the RCLS, our capacity modelling is based on population projections. The population figures for Scenario A have been updated to reflect the latest projections from Experian, and adjusted using the updated minimum housing numbers. Scenario B has also been updated to reflect the latest projections, and adjusted to match the distribution of housing across the Council area, as set out in the latest HEDNA. The result of this is that projected population growth under Scenario A is slightly lower, and growth under Scenario B is slightly higher, than what was previously projected.

2.42 Our projections of retail floorspace capacities have been updated in light of new expenditure per capita figures, expenditure growth rates, sales density projections and existing retail commitments. In terms of convenience and food and beverage floorspace, we are projecting broadly similar capacities to what was projected in the RCLS. For comparison floorspace, however, we are projecting less capacity under both scenarios, largely due to lower per capita spend and less optimistic growth rates.

2.43 A full comparison of the differences in floorspace capacity projections between the RCLS and this update for the Council area as a whole can be seen in the tables below.

Figure 2.43.1 **Comparison of floorspace capacities (sqm) in the RCLS and RCLSU for the Council area at 2050 (Scenario A)**

<table>
<tr><th></th><th colspan="3">RCLS</th><th colspan="3">RCLSU</th></tr>
<tr><td>Convenience floorspace capacity (sqm)</td><td>13,602</td><td>to</td><td>18,620</td><td>13,126</td><td>to</td><td>16,821</td></tr>
<tr><td>Comparison floorspace capacity (sqm)</td><td>79,675</td><td>to</td><td>125,047</td><td>45,176</td><td>to</td><td>70,990</td></tr>
<tr><td>Food and beverage floorspace capacity (sqm)</td><td colspan="3">38,013</td><td colspan="3">35,710</td></tr>
</table>

Figure 2.43.2 **Comparison of floorspace capacities (sqm) in the RCLS and RCLSU for the Council area at 2050 (Scenario B)**

	RCLS			RCLSU		
Convenience floorspace capacity (sqm)	15,479	to	21,190	17,706	to	22,690
Comparison floorspace capacity (sqm)	90,207	to	141,754	58,607	to	92,097
Food and beverage floorspace capacity (sqm)	43,336			44,755		

2.44 It should be noted that the capacities we outline in this section include all projected housing growth and are therefore inclusive of any capacity directly generated by strategic housing sites, which we go on to consider in Section 3.

3. Strategic Housing Sites

Introduction

3.1 Paragraphs 19.47 to 19.50 of the RCLS considered, at a high-level, how to assess the retail and leisure floorspace supported by large greenfield developments. As the HEDNA has now established the strategic housing designations coming forward over the Local Plan period, and an estimation of the number of dwellings at each, this chapter builds on the original RCLS to set out in more detail the retail and leisure floorspace supported by these housing sites.

Supporting Facilities

3.2 The strategic housing sites are set out in the table below. In keeping with the wider capacity assessment for the area as a whole, we have focused on their delivery to the end of the Plan period at 2050. Whilst the developments (and associated population changes) are anticipated to come forward at different times, it is assumed that each will have been completed by that point.

3.3 In line with our earlier capacity exercise, we calculate the estimated population of each site by applying the national average household size of 2.4 persons per dwelling. The results are presented in the table below.

Figure 3.3.1 **Potential population of each strategic housing site**

Site	Proposed Dwellings @ 2050	Proposed Population @ 2050
Completions and Commitments 2022-2050	22,705	54,492
Central Milton Keynes including Campbell Park	16,000	38,400
Central Bletchley	1,184	2,842
MRT Transport Hubs	2,900	6,960
Open University Walton Campus Strategic Brownfield site	400	960
Wolverton Works Strategic Brownfield site	400	960
Eastern Strategic City Extension	7500	18,000
East of Wavendon Strategic City Extension	2250	5,400
South of Bow Brickhill Strategic City Extension	1,300	3,120
Levante Gate Strategic City Extension	1,250	3,000
Shenley Dens Strategic City Extension	1,000	2,400
Other small and brownfield sites	2,990	7,176

3.4 It is therefore assumed that the strategic housing sites will have a total population of around 144,000 people by 2050.

3.5 Based on this projected population, we now consider the amount of retail and leisure floorspace supported by each site.

Convenience Goods Capacity

3.6 An average per capita convenience goods expenditure for residents within the Inner Study Area has been sourced from Experian App Library, and projected forwards using per capita growth forecasts derived from Figure 7 of the RPBN (March 2025). At 2050, the projected average per capita convenience goods expenditure is £2,576. We then multiply this figure by the estimated population at each housing site to identify the total convenience expenditure available, which is £370.2m.

3.7 In the main, we would consider it appropriate for main food shopping needs arising from these sites to be directed towards existing centres and food superstores (although there may be exceptions). Accordingly, we make an adjustment to focus on the top-up shopping spend which would most appropriately be directed towards district or local centres. As in our earlier capacity modelling, we make an assumption of a 75:25 split between main food shopping and top-up shopping[2]. 25% of the total convenience expenditure available is £92.5m.

3.8 We then make a further adjustment to reflect the retention of top-up spend. From our knowledge of how households shop and their natural inclination to use facilities close to home to undertake much of their 'top up' shopping, we consider that appropriately located convenience facilities accessible to all of the planned sites will generally have the potential to attract around 75% of all such expenditure.

3.9 Additionally, we recognise that some spending from outside of the local area is likely to occur at local centres. Individuals residing outside the housing sites will likely visit these developments for various reasons (visiting friends, school, work etc), and we have therefore assumed that an added 20% of the turnover of all 'top up' stores within the sites will be 'inflow' from outside the sites themselves.

3.10 Adjusted for expenditure leakage and inflow, we estimate that the strategic sites will collectively support £83.3m of convenience expenditure.

3.11 The final step in our methodology is to convert the identified 'top up' expenditure into a floorspace estimate. In undertaking this exercise, we deploy an average sales density which is more accented towards the known sales density of traders likely to occupy smaller convenience stores (e.g. Budgens Co-op, Londis etc), potentially discount foodstores (Lidl or Aldi), or one of the 'main four' foodstore operators who might open a smaller format store. Using this approach, we adopt the lower sales density average used in our capacity modelling, which projected forwards to 2050 is £10,084. The results are set out in the table below.

Figure 3.11.1 **Estimated Convenience Floorspace Capacity at 2050**

Site	Total Convenience Expenditure @ 2050	Top-Up Expenditure @ 2050	Expenditure Available @ 2050 with 75% retention	Expenditure Available @ 2050 with 20% inflow	Floorspace Capacity (sqm) @ 2050
Completions and Commitments 2022-2050	£140.4m	£35.1m	£26.3m	£31.6m	3,132
Central Milton Keynes including Campbell Park	£98.9m	£24.7m	£18.5m	£22.3m	2,207
Central Bletchley	£7.3m	£1.8m	£1.4m	£1.6m	163
MRT Transport Hubs	£17.9m	£4.5m	£3.4m	£4.0m	400
Open University Walton Campus Strategic Brownfield site	£2.5m	£0.6m	£0.5m	£0.6m	55
Wolverton Works Strategic Brownfield site	£2.5m	£0.6m	£0.5m	£0.6m	55
Eastern Strategic City Extension	£46.4m	£11.6m	£8.7m	£10.4m	1,035
East of Wavendon Strategic City Extension	£13.9m	£3.5m	£2.6m	£3.1m	310

[2] This is reflective of the household survey results, which indicated the split between main food and top-up shopping was approximately 75:25.

Site	Total Convenience Expenditure @ 2050	Top-Up Expenditure @ 2050	Expenditure Available @ 2050 with 75% retention	Expenditure Available @ 2050 with 20% inflow	Floorspace Capacity (sqm) @ 2050
South of Bow Brickhill Strategic City Extension	£8.0m	£2.0m	£1.5m	£1.8m	179
Levante Gate Strategic City Extension	£7.7m	£1.9m	£1.4m	£1.7m	172
Shenley Dens Strategic City Extension	£6.2m	£1.5m	£1.2m	£1.4m	138
Other small and brownfield sites	£18.5m	£4.6m	£3.5m	£4.2m	412
Total	**£370.2m**	**£92.5m**	**£69.4m**	**£83.3m**	**8,260**

3.12 The results show that there is a total of £85.2m convenience expenditure supported by the housing sites at 2050. Translating this into floorspace, we project there to be a total capacity for 8,260 sqm of convenience floorspace. This may be met either through small to medium size foodstores, or smaller local centre type shopping.

Comparison Goods Capacity

3.13 We now carry out a near identical assessment of housing site capacity to support comparison goods floorspace in the section below.

3.14 We begin with the same estimated population of each site as outlined in Figure 3.3.1. We then apply the average per capita comparison expenditure of residents in the Inner Study Area. At 2050, this is projected to be £6,483. This figure multiplied by the estimated population results in a total available comparison expenditure of £931.7m.

3.15 As with convenience goods, we then make an adjustment for expenditure retention and inflow. In terms of the former, we assume a far lower retention rate of 5%. This is because we would expect the vast majority of comparison spending to be carried out in higher order town centres. A similar assumption is made that an additional 10% of inflow would be generated from individuals visiting the site from outside. This results in an available expenditure of £51.2m.

3.16 To convert this into floorspace we then use the projected sales density of comparison floorspace at 2050, which is £6,041/sqm.

3.17 The results of this exercise can be seen in the table below, which shows that by 2050, the housing sites are expected to cumulatively support 8,483 sqm of comparison floorspace.

Figure 3.17.1 **Estimated Comparison Floorspace Capacity at 2050**

Site	Total Comparison Expenditure @ 2050	Expenditure Available @ 2050 with 5% retention	Expenditure Available @ 2050 with 10% inflow	Floorspace Capacity (sqm) @ 2050
Completions and Commitments 2022-2050	£353.3m	£17.7m	£19.4m	3,217
Central Milton Keynes including Campbell Park	£249.0m	£12.4m	£13.7m	2,267
Central Bletchley	£18.4m	£0.9m	£1.0m	168
MRT Transport Hubs	£45.1m	£2.3m	£2.5m	411
Open University Walton Campus Strategic Brownfield site	£6.2m	£0.3m	£0.3m	57

Site	Total Comparison Expenditure @ 2050	Expenditure Available @ 2050 with 5% retention	Expenditure Available @ 2050 with 10% inflow	Floorspace Capacity (sqm) @ 2050
Wolverton Works Strategic Brownfield site	£6.2m	£0.3m	£0.3m	57
Eastern Strategic City Extension	£116.7m	£5.8m	£6.4m	1,063
East of Wavendon Strategic City Extension	£35.0m	£1.8m	£1.9m	319
South of Bow Brickhill Strategic City Extension	£20.2m	£1.0m	£1.1m	184
Levante Gate Strategic City Extension	£19.5m	£1.0m	£1.1m	177
Shenley Dens Strategic City Extension	£15.6m	£0.8m	£0.9m	142
Other small and brownfield sites	£46.5m	£2.3m	£2.6m	424
Total	**£931.7m**	**£46.6m**	**£51.2m**	**8,483**

Food and Beverage

3.18 To calculate the food and beverage floorspace supported by the housing sites, again we begin with the same estimated population of each site as outlined in Figure 3.3.1. We then apply the average per capita food and beverage expenditure of residents in the Inner Study Area. At 2050, this is projected to be £1,424. This figure multiplied by the estimated population results in a total available food and beverage expenditure of £204.6m.

3.19 Again, we then account for retention and inflow. Household survey results indicate that approximately 15% of spending on food and beverage in the Inner Study Area is spent in Local and Village Centres. We assume these spending patterns would continue and as such adjust the amount of food and beverage expenditure which is likely to be directed to Local and Village Centres. We also make a small adjustment of 10% inflow to account for any spending from people outside of the Inner Study Area. Following this, we estimate that by 2050 the housing sites will support £33.8m of food and beverage expenditure.

3.20 We project food and beverage sales densities forward using the growth rates outlined in the RPBN 22 (March 2025), which results in a sales density of £5,121/sqm by 2050. Applying this density to the expenditure available, we forecast that the housing sites could support a total of 6,593 sqm of food and beverage floorspace at 2050.

Figure 3.20.1 **Estimated Food and Beverage Floorspace Capacity at 2050**

Site	Total Food and Beverage Expenditure @ 2050	Expenditure Available @ 2050 with 15% retention	Expenditure Available @ 2050 with 10% inflow	Floorspace Capacity (sqm) @ 2050
Completions and Commitments 2022-2050	£77.6m	£11.6m	£12.8m	2,500
Central Milton Keynes including Campbell Park	£54.7m	£8.2m	£9.0m	1,762
Central Bletchley	£4.0m	£0.6m	£0.7m	130
MRT Transport Hubs	£9.9m	£1.5m	£1.6m	319
Open University Walton Campus Strategic Brownfield site	£1.4m	£0.2m	£0.2m	44

Site	Total Food and Beverage Expenditure @ 2050	Expenditure Available @ 2050 with 15% retention	Expenditure Available @ 2050 with 10% inflow	Floorspace Capacity (sqm) @ 2050
Wolverton Works Strategic Brownfield site	£1.4m	£0.2m	£0.2m	44
Eastern Strategic City Extension	£25.6m	£3.8m	£4.2m	826
East of Wavendon Strategic City Extension	£7.7m	£1.2m	£1.3m	248
South of Bow Brickhill Strategic City Extension	£4.4m	£0.7m	£0.7m	143
Levante Gate Strategic City Extension	£4.3m	£0.6m	£0.7m	138
Shenley Dens Strategic City Extension	£3.4m	£0.5m	£0.6m	110
Other small and brownfield sites	£10.2m	£1.5m	£1.7m	329
Total	**£204.6m**	**£30.7m**	**£33.8m**	**6,593**

Retail Services

3.21 In addition to convenience, comparison and food and beverage floorspace, it would also be normal to bring forward a number of units in service retail use. These are typically classified as being in retail services (e.g. hairdressers, nail bars, dry cleaners etc), leisure services (excluding food and beverage which we have already accounted for) and financial and business services (e.g. estate agents, banks etc). These services are less easy to estimate expenditure capacity for, though Experian Goad estimate that such uses account for 7.4%, 10.8% and 6.1% of floorspace in UK centres respectively. This totals 24.3% of all floorspace across the UK. We have factored in that the proposed Local and District Centres supporting the housing sites are likely to be smaller than the UK average surveyed by Goad and might be expected to have a slightly higher proportion of service goods. We have therefore upwards adjusted the UK figure to 30% of all floorspace in the centres. This is equivalent to approximately 10,235 sqm of services floorspace.

Summary

3.22 The table below summarises the total convenience, comparison, food and beverage, and services floorspace likely to be supported by the residents of the housing sites. Across all retail uses, we estimate the sites to support a total of 33,338 sqm of retail floorspace.

3.23 These results align with the findings of Section 2 which show capacity for additional floorspace across all retail uses. Our capacity findings in Section 2 are inclusive of the results set out in the table below, which provide guidance in terms of the geographical locations where new retail floorspace should be directed to.

Figure 3.23.1 **Estimated Floorspace Capacity at 2050**

Site	Estimated Convenience Floorspace Capacity (sqm)	Estimated Comparison Floorspace Capacity (sqm)	Estimated Food and Beverage Floorspace Capacity (sqm)	Estimated Services Floorspace Capacity (sqm)	Total Floorspace Capacity (sqm)
Completions and Commitments 2022-2050	3,132	3,217	2,500	2,655	11,504
Central Milton Keynes including Campbell Park	2,207	2,267	1,762	1,871	8,106
Central Bletchley	163	168	130	138	600

Site	Estimated Convenience Floorspace Capacity (sqm)	Estimated Comparison Floorspace Capacity (sqm)	Estimated Food and Beverage Floorspace Capacity (sqm)	Estimated Services Floorspace Capacity (sqm)	Total Floorspace Capacity (sqm)
MRT Transport Hubs	400	411	319	339	1,469
Open University Walton Campus Strategic Brownfield site	55	57	44	47	203
Wolverton Works Strategic Brownfield site	55	57	44	47	203
Eastern Strategic City Extension	1,035	1,063	826	877	3,800
East of Wavendon Strategic City Extension	310	319	248	263	1,140
South of Bow Brickhill Strategic City Extension	179	184	143	152	659
Levante Gate Strategic City Extension	172	177	138	146	633
Shenley Dens Strategic City Extension	138	142	110	117	507
Other small and brownfield sites	412	424	329	350	1,515
Total	**8,260**	**8,483**	**6,593**	**10,002**	**33,338**

4. Emerging Planning Policy Considerations

Introduction

4.1 The Council progressed its Plan to a Regulation 18 consultation between 17th July and 9th October 2024. We comment below on a range of themes emerging from the consultation which have implications for the retail and commercial leisure elements of the RCLS. We summarise those representations and advise of any suggested changes to the policies and related explanatory text in the next stage Regulation 19 Plan.

Universal Destinations & Experience Theme Park

4.2 Some respondents to the Regulation 18 Plan have asked what the implications of the recently announced Universal Theme Park, near Bedford, might be for Milton Keynes. Universal has been known to hold an interested in land within Bedford Borough for a number of years, but that interest has gathered pace in recent months and the Government has announced in April 2025 that Universal has been given the go ahead to pursue their plans subject to Planning and all other statutory obligations.

4.3 Milton Keynes Council has issued a press release welcoming this news stating "*A green light for a world class attraction just 20 minutes from Milton Keynes unlocks major opportunities for our thriving city and will be transformative for the whole region. Obviously, there's great economic potential which we're in a strong position to make the most of, and the opening of the East West Rail line will bring even closer connections. We'll benefit from the creation of thousands of new jobs, and city businesses can expect a significant boost to visitor numbers and spend. Development of this scale goes hand in hand with improved infrastructure alongside investment in housing, community facilities and beyond*".

4.4 As part of the RCLSU, we are asked to consider what impact this development might have on the hotel, retail and entertainment sectors in Milton Keynes. We approach this exercise by considering what additional accommodation spend might be generated by tourists (both domestic and foreign) and how this might support additional hotel, retail and entertainment development. This is a high-level exercise, as much is yet to be known about the Universal proposals in terms of ultimate timeframes, trip attraction, the regional infrastructure response in terms of roads and rail, and the proposals of other Councils and private companies across the region in seeking to benefit from the growth opportunities in terms of providing new visitor accommodation and associated facilities.

4.5 Notwithstanding, we set out in Figure 4.5.1 below our assessment of the scale of potential spending on hotel, retail and entertainment floorspace in Milton Keynes if/when the park opens for business. Our analysis is based on Universal's assessment that the park will attract around 8m visitors per annum on opening, and that 70% of those visitors will be domestic whilst 30% will be international[3]. We assume that based on general theme park visitation, most visitors will spend 2 or 3 days at the park, with international visitors likely to require an additional night's accommodation (2 no. nights on average) when contrast to domestic visitors (1 no. night on average). Building on this, we also assume that some visitors to the park would either stay with friends of family in the area or find other non-hotel accommodation (e.g. Airbnb or equivalent). We have assumed a higher prevalence of this for domestic visitors. We must also identify a rate of attraction to Milton Keynes. In doing so, we have assumed that there is highly likely to be a concurrent increase in hotel provision in nearby larger settlements such as Luton (where most international visitors would fly to), Bedford (where the park is most closely located to) and potentially the likes of Cambridge, Oxford and London (each of which will benefit from the potential to attract linked trips). Taking these factors into account, we have assumed that Milton Keynes would attract around 20% of all overnight stays. In practice, we consider that whilst this may be conservative, it is necessarily robust at this stage given the commercial and infrastructure unknowns highlighted above. Finally, we have

[3] https://www.bbc.co.uk/news/articles/c5yrg95rp5wo

assumed that the average room occupancy for theme park visitors would be 3 persons per room, noting that the demand is likely to be heavily accented towards families.

Figure 4.5.1

	Domestic	International	Total
Visitors per annum	5,950,000	2,550,000	8,000,000
Average Visitor Nights	1	2	
Total Visitor Nights	5,950,000	5,100,000	11,050,000
Percentage assumed to require paid-for overnight accommodation	50%	90%	
Total Overnight Accommodation Need	2,975,000	4,590,000	7,565,000
Percentage staying in Milton Keynes	20%	20%	
Total Overnight accommodation demand in Milton Keynes (persons)	595,000	918,000	1,513,000
Assumed Average Room Occupancy (persons)	3	3	
Total Overnight accommodation demand in Milton Keynes (rooms)	198,300	306,000	504,300

4.6 Based on these assumptions, we expect that Milton Keynes may attract just over 1,500,000 additional visitor accommodation nights per annum, which would equate to a demand for just over 500,000 additional room stays. To put this into context, we carried out a detailed exercise in Section 5 of the RCLS which looked at visitor attraction to Milton Keynes based on known supply and average occupancy rates. That assessment showed that Milton Keynes had a supply of 4,010 hotel rooms at that time, with an average occupancy rate of 68.5% in 2023. If we assumed a lower existing average of 2 persons per room for non-theme park stays, then this would equate to around 500,000 room stays per annum. Therefore, it is possible that the impact of Universal could be to double current levels of demand for overnight accommodation in Milton Keynes from around 500,000 rooms stays per annum to around 1,000,000 per annum. Viewed economically, and adopting the Average Daily Rate ('ADR') set out in the RCLS (c£75), this would equate to an injection of an additional £37.5m per annum into the Milton Keynes hotel sector.

4.7 Viewed from a supply perspective, there is room to absorb some of this growth within existing hotel space in Milton Keynes with average occupancies at only around 68.5%. However, our assessment shows that there would still likely be a shortfall. After accounting for new hotel openings, we calculated in the RCLS that there would be a total supply of 4,178 hotel rooms in Milton Keynes by 2031 Assuming that those rooms were to operate at an inflated 80% occupancy, with an average of 3 persons per room, then current supply could theoretically cater for around 405,000 rooms stays per annum. This would be around 100,000 room stays short of demand every year, based on our high-level assessment. This would conservatively equate to a need to provide at least an additional 300 hotel rooms to cater for anticipated demand. However, this assessment assumes a flat year-round rate of attraction, when in practice, there would highly likely be seasonality. During those periods, such as the summer and Christmas holidays, the shortfall would be exacerbated. This assessment also does not differentiate for the quality of accommodation. In practice, not all accommodation is the same and each has different prices points, facilities and the ability to cater for different demands (including family rooms, for example). Therefore, we consider that the level of true demand for new hotel accommodation in Milton Keynes, to suit all needs, is highly likely to be a figure in excess of 500 rooms.

4.8 We are also asked to assess what the potential spin-off of trade might be for retail and food and beverage spending in Milton Keynes. Our assessment in this regard leans on some of the assessment carried out earlier on in this RCLSU (see Section 2) and also research by Whitbread/Premier Inn into spin-off trade from their hotels[4]. Based on these data sources, we have calculated the potential additional spend in the Milton Keynes area in Figure 4.8.1 below.

Figure 4.8.1

	Food and drink	Non-food shopping	Evening Entertainment
Total overnight room demand in Milton Keynes	504,300	504,300	504,300
Average spend in the local area per room per night[5]	£25.59	£20.39	£12.02
Total spend	£12,905,000	£10,282,700	£6,061,700
Assumed sales density[6]	£8,000/sq m	£4,800/sq m	£5,000/sq m
Potential Floorspace Demand	1,610 sq m	2,140 sq m	1,210 sq m

4.9 Figure 4.8.1 takes the room demand figures from Figure 4.5.1 and applies the findings of the Whitbread/Premier Inn research to establish potential spending across a range of spending categories. The estimates suggest that as well as £37.5m per annum additional spending on hotel stays, the retail and evening entertainment sector across Milton Keynes might benefit from an additional £29.2m per annum.

4.10 We have sought to convert this to potential additional floorspace demand through utilising average sales densities. This assessment shows that such spending might support in the order of a further 5,000 sq m of retail and entertainment development across the city area.

4.11 For the avoidance of doubt, this exercise around the potential impact of the Universal Destinations & Experience Theme Park does not factor into our earlier assessment of capacity in Section 2. The project is still at relatively early stages and, as we have highlighted, there are currently a number of key factors which are unknown at this point in time. Notwithstanding, we would recommend that the Council seeks to update their forecasting when the picture around delivery, timeframes, transport infrastructure and planning applications for commercial infrastructure related to the theme park, become clearer.

Central Bletchley

4.12 Central Bletchley is a specific policy focus of the MK City Plan 2050. The Council was successful in securing £22.7m of Towns Fund in April 2021 which has led to a number of projects being developed through the Bletchley & Fenny Stratford Town Fund. These projects include upgrading Bletchley Railway Station to capitalize on the East-West Rail route, as well as various other public realm and accessibility improvements.

4.13 The Regulation 18 Plan set out the Council's policy aspirations for 'Supporting investment in Central Bletchley' under Policy CB1. The draft policy focusses in on the Brunel Centre, which is subject to an accompanying Development Brief

[4] https://cdn.whitbread.co.uk/media/2023/08/The-Economic-Impact-of-Premier-Inn-hotels_2022-study_final.pdf

[5] Table 4.2 of footnote 3

[6] As per Appendix A, Tables 6d and 18c

(February 2024). The Brief proposes a mixed-use development of the site which would centre around the public transport hub and the draft Policy conveys this by making provision for around 1,000 new homes alongside a comprehensive redevelopment of the land associated with the former Wilko store, former Brunel Centre, former Sainsbury's store and Stanier Square. In terms of main town centre uses, proposals on this part of the site incorporate a new convenience store at ground floor level, as well as provision for the evening economy, leisure, culture, offices and community use.

4.14 Away from the Brunel Centre, Policy CB1 also encourages other mixed-use development proposals within Bletchley Town Centre to include an appropriate mix of retail, residential, community and other main town centre uses.

Policy CB1 Supporting investment in Central Bletchley
Policy type: Strategic
Objectives: All
Site/sub-area: Central Bletchley
A. Within the Central Bletchley area, as defined on the Policies Map, provision of around 1,000 new homes will be made. B. Development proposals within the Central Bletchley area will be guided by the following principles: 1. Residential-led development proposals should be within a density range of 150-250 dwellings per hectare. 2. Comprehensive redevelopment of land associated with the former Wilko store, former Brunel Centre, former Sainsbury's store and Stanier Square will be supported where it provides: i. A new convenience store at ground floor level; ii. An appropriate mix of homes; and iii. An appropriate mix of other community amenities, such as a health hub, and main town centre uses that improve the overall provision within Central Bletchley for the evening economy, leisure, culture, offices and community. 3. Other mixed-use development proposals within Bletchley Town Centre must include an appropriate mix of retail, residential, community and other main town centre uses. 4. Mixed-use residential development on the former Police and Fire Station sites will be supported, subject to compliance with other policies in the plan. 5. To strengthen Bletchley Railway Station as a major transport hub, development proposals must not prevent the delivery of improved access and egress to Bletchley Railway Station east of the railway line. 6. Development proposals that improve the connectivity between Bletchley Station and the Town Centre through safe, direct and inclusive active travel routes that embrace people friendly and healthy streets principles will be strongly supported. 7. Development proposals that provide public realm improvements along Queensway and Aylesbury Street and/or enhance or create a network of community and cultural spaces will be strongly supported. 8. Development proposals that maintain or improve the learning and visitor facilities at Bletchley Park intended to enable the renovation and enhancement of this internationally important historic and educational site will be strongly supported.

4.15 Regulation 18 responses to Policy CB1 were largely supportive of its intent and purpose. However, respondents have raised questions on a number of specific matters listed below, beneath which we have commented on each.

- *Is the suggestion of a new convenience foodstore a viable proposition?*

  The RCLS identified that, relative to other Town Centres in the city's retail hierarchy, Bletchley had a very low share of convenience goods trade (see Figure 19.31.1). Kingston, Westcroft and Wolverton, by contrast, are all anchored by at least one large foodstore. Alongside this, Policy GS5 of the draft Local Plan notes that the role of a Town Centre is to "*cater for the daily and weekly convenience and comparison shopping and service needs of their suburban population as well as the population of neighbouring suburbs*". This is with good reason, as a foodstore can demonstrably add very significant footfall to a centre and provide substantial spin-off trade to other traders, as well as ensure that local residents within a walk-in catchment area do not need to travel further afield, usually by private car, to access their food shopping.

With this said, we recognize that the previously incumbent Sainsbury's operation left the Brunel Centre in 2021 for a range of reasons, including presumably the trading conditions.

Market conditions though should improve. As we have highlighted, significant Towns Fund has been allocated to the area and this will inevitably see improvements in the physical and business condition of the area. East/West Rail is highly likely to be a boon to the area, and the addition of over 1,000 new homes will provide a large additional walk-in customer catchment.

For the combination of these reasons, we consider that it remains appropriate to plan for a new convenience goods store as part of the Brunel Centre redevelopment. We believe that such a store is likely to be attractive to retailers seeking to exploit the new commuter and resident flows in and around Bletchley. Recognising that market testing would need to be carried out to prove or disprove this, we also note that Policy CB1(b2) uses the language that proposals "will be guided by the following principles" and that a convenience store would "be supported". In our view, the policy wording is sufficiently flexible that it does make it a pre-condition that a convenience store must be delivered on the site if there is demonstrably no demand for one. However, we think it appropriate that the level of demand should be tested at an appropriate point in the emerging proposals.

- *Should the Policy specify a minimum floorspace for the convenience store?*

Building on the above, there are two important considerations in this regard. Firstly, our health-check for Bletchley in the RCLS showed that the centre has a relatively thriving independent trading sector. Independent operators featured prominently amongst the 20. no units who were surveyed to offer convenience goods at that time (see Figure 8.6.1). It would therefore be important that any new convenience store would seek to capture a different type of trade, such as a more main food shop which is likely to have dissipated elsewhere as a result of the closure of the former Sainsbury's unit.

The second consideration, linked to the previous question, is that it is important not to render the scheme unviable by setting any unrealistic floorspace expectation. We would certainly not advocate for a superstore type format (i.e. 3,000 sq m net plus) as such stores are seldom brought forward in the current market. Instead, it is likely to be more marketable for the convenience goods offer to be around 1,000 sq m net, thus representing the typical size of foodstores actively being sought by operators in the current market. Such a store would be likely to provide sufficient offer to cater for main food shopping, whilst also being of more modest size and attractive to future commuters to the railway station.

It may therefore be helpful to specify, either in floorspace or character terms, the type of convenience goods retail which is sought within the site allocation in order to assist with viability and overlap of trade considerations.

- *Should the Primary Shopping Area for Bletchley be reduced so that the focus is on Queensway, and allowing the southern part of the Brunel Centre to be developed for new homes?*

  The RCLS recommended a series of Primary Shopping Area boundaries at its Appendix J. Whilst boundaries were amended for some centres, no changes were recommended in Bletchley. In keeping with our observations above, we think that the Brunel Centre is likely to have a mixed-use role and that this is likely to be viable once the other town centre investments have been realised. For this reason, we would not advocate excluding the Brunel Centre from the Primary Shopping Area.

- *Would specific reference to a need for a new hotel assist with boosting the local evening and leisure economies?*

  The RCLS commented on the general capacity for new hotel bedrooms in Milton Keynes at its Section 5. The general findings were that, at the time, the city had 46 hotels supplying 4,010 rooms at an average occupancy rate of 68.5%. This was below national average. It was therefore felt that the Council should take a conservative approach to new hotel development, especially whilst a number of newly permitted and/or constructed hotels in and around CMK took root and increased occupancy rates.

  However, the RCLS also noted that there were very few hotel rooms available in the town centres, including Bletchley. In light of the investment in the town centre, together with the arrival of East/West Rail, it would seem sensible to welcome any hotel operator who would wish to locate within the town centre.

  Policy CB1(B2iii) already advocates improvement of the ‘evening economy’, but in our view it would be a positive addition to include ‘hotels’ within the list under that criterion to provide added emphasis.

- *Would any comparison goods retail forming part of the mixed-use allocation represent a threat to CMK as the regional shopping centre?*

  Our comparison goods capacity assessments at Figures 2.26.1 to 2.26.4 show that there is significant capacity for additional comparison goods across the city area.

  In terms of considering relative impacts, the RCLS noted at 19.9 that capacity does not equate to need and that qualitative judgments were also relevant. Specifically on the matter of comparison goods capacity, the RCLS also noted at 19.11 that, at that time, there were a number of significant vacancies at Midsummer Place in CMK. However, Midsummer Place has experienced an upswing in the period since the RCLS was published with a number of notable new openings. Moreover, we do not consider that the size of provision at Bletchley is likely to be of a scale which would threaten the retail hierarchy. Bletchley is a town centre in its own right and, as per Policy GC5, is expected to cater for daily and weekly comparison goods shopping needs to service its own suburban population. Whilst the Brunel Centre redevelopment would be a very welcome boost for the vitality and viability of Bletchley town centre, once residential and other mixed-use components are accounted for, the comparison goods component is likely to be relatively modest and unlikely to deter trade from CMK. The Council also has it in their gift to control this through its development management function as part of any forthcoming planning application.

Specific Policy Responses

Overview

4.16 Having discussed two key emerging place-specific policy topics – Universal Destinations Theme Park and Central Bletchley – we consider below a series of more general comments raised in respect of the key policies relating to main town centre uses in the Plan.

Retail Hierarchy

4.17 Policy GS5 sets out the retail hierarchy and reflects some of the recommendations of the RCLS at 19.23 – 19.35. The policy sets out the role and function of each tier of the hierarchy and which specific centres sit in those tiers.

Policy GS5 Our Retail Hierarchy

Policy type: Strategic

Objectives: 3, 12, 14

Site/sub-area: Central Milton Keynes (CMK) city centre, town centres, district centres and local centres.

A. To maintain and enhance the vitality and viability of centres in the retail hierarchy, proposals for additional retail development within the primary shopping area of existing town centres as defined in national policy will be supported. Proposals for other main town centre uses appropriate within town centres will also be supported. The role of each centre in the retail hierarchy is as set out in Table 4 below:

Table 4 Retail Hierarchy

Retail Hierarchy	Role	Centres
1.City Centre	The Primary Shopping Area (PSA) within CMK will function and develop as a regional shopping centre for comparison shopping.	The Primary Shopping Area of Central Milton Keynes
	The remainder of the City Centre will cater for other main town centre uses. The City Centre will provide significant leisure functions, as well as important clusters of civic and public buildings.	City centre outside the Primary Shopping Area
2.Town Centres	These will cater for the daily and weekly convenience and comparison shopping and service needs of their catchment populations as well as for the populations of neighbouring suburbs.	Bletchley, Kingston, Westcroft and Wolverton
3.District Centres	These will function primarily as local shopping destinations catering for the shopping and service needs of their local catchment populations and surrounding rural hinterlands.	Newport Pagnell, Olney, Stony Stratford, and Woburn Sands
4.Local Centres	These will provide convenience shopping and service facilities to reduce car dependence and to ensure ready access by non-car owning households and other people with limited or impaired mobility.	Various

4.18 Respondents to the Regulation 18 consultation made a number of comments on the retail hierarchy and we have summarised some of the key ones below, together with our advice to the Council.

Topic	Regulation 18 comments	Recommendation
Retail Development outside Town Centres	Should Policy GS5 encourage retail development outside the retail hierarchy if it does not conflict with the aims of the Policy?	NPPF Paragraph 90 explains that the purpose of planning policies should be to define the extent of town centres and make clear the range of uses permitted in such locations. The emphasis is on providing the parameters for ensuring the vitality of town centres. This does not mean that out of centre proposals cannot be supported where the tests set out in Paragraph 94 of the NPPF are met, where they relate to impact and the sequential test. However, it would be out of kilter with the NPPF for Policy GS5 to consider out-of-centre locations as this policy expressly seeks to drive main town centre uses to locations within the retail hierarchy. Instead, these maters are properly set out at Policy ECP3 ('Sequential and Impact Tests') of the draft Plan. Under that policy, the parameters for determining the acceptability or otherwise of proposals for out-of-centre development are clearly set out.
Vacant Floorspace	Should Policy GS5 make it clear that vacant floorspace should be taken into account when determining if their if capacity for new floorspace?	The supporting text to Policy GC5 summarises the findings of the RCLS in terms of capacity and refers to the RCLS as the evidence base document. Within the RCLS, it is stressed that capacity does not equate to need and that there are a range of relevant factors to consider in plan-making, not least maintaining the vitality and viability of different centres. Within that context (see 19.11), the RCLS stressed that, at that time, there were a number of vacant units in CMK which should be monitored for their re-occupation. This is reflected at Paragraph 56 of the Regulation 18 Plan which notes that "*In the case of CMK, short-term pressure for additional comparison goods may be accommodated by the occupation of vacant shop units*". The Council is therefore cognisant of this and is advised to be mindful of this in any development management activity, especially if/when large-scale comparison goods proposals come forward within CMK. We do not though consider that it is necessary to provide any further clarification on this under the Regulation 19 Plan.

Defining supermarket provision	Should Policy GS5 be more specific about where new supermarket development might come forward? Is there any conflict with Policy GC4 on rectifying food deserts?	Through the RCLS, the Council has identified capacities for convenience goods floorspace within CMK and within the rest of the city. At the time of the RCLS and of the Regulation 18 Plan, the location of large future housing developments had not been clarified. However, some guidance was provided at 19.12 of the RCLS, which linked to identified 'food deserts' in the city (see also Section 18 of the RCLS). However, now that the Council has a more definitive idea of its strategic housing designations, it is potentially able to plan more specifically for any potential future supermarket development. The work in Sections 2 and 3 of this RCLSU should assist in this regard and will allow the Council to be more specific under the Regulation 19 Plan. E also point to the wider context of Policy PFHP3 on Local Centres, which provided further detail.
Implications of the Retail Hierarchy	Does CMK's higher ranking in the hierarchy potentially harm the prospects for smaller centres?	The NPPF seeks to take a positive approach to each centres growth, management and adaptation. Within this approach, there are naturally different expectations for each centre within a hierarchy as each has its own distinctive characteristics. The role and function of CMK is set out in Policy GS5 alongside the anticipated role and function of all other centres. It is the duty of the Council to ensure that those respective roles and functions are observed and encouraged. In practical terms, a City Centre would be expected to meet different needs to, say, a District Centre. If a large anchor store serving a regional catchment areas was looking to locate to the area, it would be right and proper that it first sought to examine opportunities in CMK. However, for more everyday needs, it might be more appropriate for other retail or leisure providers to focus their concentration on Town or District Centres, where localised walk-in catchments exist and where property may be more affordable.
Flexibility	Is the Plan sufficiently flexible in terms of meeting needs all the way through until 2050?	Both the RCLS (19.8) and the Regulation 18 Plan (Para 56) were keen to stress that long-term forecasts should be treated with caution. Attention was especially drawn to the forecast for 2040 and 2050 as being 'indicative' and in need of reviewing over time.

		This RCLSU has provided an update at 2025 and we anticipate that in line with PPG guidance, the Council would want to refresh the capacity assessment again within a 5-year horizon.
Local Centres	Should they be defined and should there be specific focus on areas for improvement?	We understand that the Council is seeking to introduce a GIS mapping layer which will define Local Centres and this is encouraged.
Rural Retail	Should the Plan make reference to supporting rural retailers?	Rural retail can play an important role in providing for smaller communities. Such facilities may form part of smaller Local Centres, but may also be standalone facilities. It would not be practical to recognise such facilities within the Rural Hierarchy, and it may also not be desirable as whilst most rural enterprises may be small-scale, others may grow over time and become themselves out-of-centre threats to town centres. It is therefore appropriate for the development control system to govern the day-to-day operations of such facilities (including Policy ECP2). We also note that Class F2(a) of the Use Classes order, protects a shop of not more than 280 sqm, and which mostly sells essential goods including food, and where there is no other such facility within a 1,000 metre radius, from a change of use. This mechanism seeks to ensure that vital rural retail is not lost to the communities which might need it most. Policy ECP4 of the Plan also covers this topic.

Vitality & Viability

4.19 Policy ECP2 sets out the Council's policy for supporting the vitality and viability of the different tiers of centre set out under Policy GS5.

Policy ECP2 Supporting the vitality and viability of centres
Policy type: Strategic
Objectives: 14
Site/sub-area: Centres as defined on the policies map and in the plan

A. Development that enhances the vitality and viability of town centres, district centres and Central Milton Keynes as a regional shopping, leisure and tourist destination, will be supported.

CMK

B. Located within the City Centre boundary, the Primary Shopping Area of Central Milton Keynes comprises the Primary and Secondary Shopping frontages, alongside a secondary shopping frontage in the Xscape building, which are shown on the Policies Map.

C. Within the Primary Shopping Frontages at ground floor level, development for Retail uses, Food & Drink and Financial, Professional, and other services, gyms, creche, leisure and cultural uses will normally be permitted.

D. Within Secondary Shopping frontages at ground floor level, development for Retail uses, Food & Drink and Financial, Professional, and other services, gyms, creche, leisure and cultural uses and drinking establishments, medical and health services will normally be permitted.

Town and District Centres

E. Within the Primary Shopping Areas of defined town and district centres at ground floor level, development for Retail, Food & Drink Class and Financial, Professional, and other services, gyms, creche, leisure and cultural uses and drinking establishments and hot food takeaways will normally be permitted.

F. Within Kingston and Westcroft town centres, which do not have a primary shopping area, development proposals for Retail uses, Food & Drink Class, and Financial, Professional, gyms, creche, leisure and cultural uses and hot food takeaways will normally be permitted.

G. Within town and district centres, the use of upper floors within the Primary Shopping Area for main town centre uses, town centre community or residential use will be supported.

Local Centres

H. Proposals for the expansion or redevelopment of a Local Centre will be supported where:

1. It would enhance the provision of local floorspace for main town centre uses; and
2. It would not have a significant impact on a Town or District Centre.

4.20 Respondents to the Regulation 18 consultation made a number of comments on the retail hierarchy and we have summarised some of the key ones below, together with our advice to the Council.

Topic	Regulation 18 comments	Recommendation
Boundaries	Is there a necessity for Primary and Secondary shopping frontages in CMK?	The RCLS recommended that there was no requirement for Primary and Secondary Boundaries in any centre other than in CMK. The exception for CMK was a reflection of its overall size and diversity in terms of character and land use composition. The inclusion of those boundaries in CMK assists the Council with defining the types of main town centre uses it envisages being appropriate in different parts of CMK. This is played out in Policy ECP2 where the Council defines a wider grouping as being suitable within its Secondary Frontage (i.e. drinking establishments, medical and health services). In doing so, the Council is appropriately seeking to distinguish between those area where it seeks to focus family and daytime activities, and those areas where it would also be appropriate to accommodate nighttime and medical uses (both of which have different requirements for stewardship and accessibility).
Xscape	Policy ECP2 is confusing as it suggests that Xscape is within the Primary Shopping Area when the Inset Map suggests that it is not.	We agree with this. The wording of Policy ECP2 b can be read to suggest that Xscape is within the Primary Shopping Area. The wording of this clause should be amended to reflect the fact that, whilst Xscape has Secondary Shopping Frontage, it is not located within the Primary Shopping Area.
Protecting the shopping function	Should Policy ECP2 be less permissive of alternative uses within shopping areas when it has a growing population?	This question lends further importance to the designation of Primary and Secondary frontages (see above) as it allows for greater restriction on certain frontages. We recognise that there is a difficult balance to strike between managing the move away from traditional high street retail (accelerated by the pandemic and the growth of online shopping) and ensuring that there remains enough floorspace to cater for retail demand, especially in a city which is projected to grow rapidly. On this, our view is that traditional retail is now necessarily part of a more flexible offering, with consumers seeking more experiential trips to their traditional centres,

		incorporating social interactions and leisure pursuits This is evident in CMK where a department store in Midsummer Place closed for a lengthy period of time and has now been replaced by a combination of retail and leisure floorspace (Sports Direct/Flannels and Lane 7). We are also cognisant that there remain development sites within CMK which have the potential to accommodate further retail growth in the near future, should demand exist.
Healthy Centres	Should hot food take-aways be encouraged under this policy?	The question arises as to whether ~~hoot~~ **hot** food takeaway should be encouraged when the Council is also advocating healthy neighbourhoods. In this regard, Policy ECP2 E & F explains that hot food take aways would 'normally be permitted' within the Primary Shopping Area of town and district centres (or the boundary of Kingston and Westcroft town centres). However, if there was considered ever to be an over-concentration of such uses, the provision of ECP2 A where it explains that "*development which enhances the vitality and viability of…centres will be supported*" could be utilised to provide a question mark where it was felt that such development did not enhance the vitality and viability of centres. This is capable of enforcement as hot food take-aways are classified as sui generis under the Use Classes Order and so require planning permission for a change of use.
Local Centres	Should the text on Local Centres be more specific?	Respondents have suggested two wording changes to Policy ECP2. It is suggested that ECP2 H1 should read that proposals for the expansion of redevelopment of a Local Centre will be supported where "it would enhance the provision of local floorspace for main town centre uses *proportionate to the local population"*. We think that this is a sensible addition as it provides qualification around the scale of enhancement which might be sensible. Respondents also suggest that Local Centres should be added to clause ECP2 H2, such that Local Centre development should also not cause significant impact on other Local Centres. Our view is that this is not necessary as this would be out of keeping with the hierarchy set out in Policy GS5. The intent of this clause is to ensure that lower order centres do not

		undermine the function of higher order centres and remain subservient to them.
Community Involvement	Should Policy ECP2 include reference to the benefits of community involvement in regenerating centres?	Residents highlight a number of examples of pro-active working in this regard, including for example Pilot Community Improvement Districts such as Wolverton. We agree that this would be a positive addition to the text of the Local Plan. Whilst this is likely to be too prescriptive to add into the text of Policy ECP2, we think reference would sit well at the end of Paragraph 240 of the supporting text to the policy as an example of how communities can work together to 'evolve and adapt' their centres.
Marketing of retail units	Should there be a prescribed period for marketing retail units before their change of use is considered?	Policy provisions of marketing vacant retail units have traditionally been relatively commonplace. As we have described elsewhere, there is a need to retain degrees of flexibility in modern centres such that changes of use can be beneficially brought forward in areas blighted by long-term vacancy. This is why we have advocated for the removal of Primary and Secondary Shopping frontages outside CMK. On balance, we think that a marketing clause is likely to be too onerous in CMK, Town and District Centres, which are already governed by the provision of Policy ECP2 in terms of preferred uses within their Primary Shopping Areas. However, where no such boundary exists in the case of Local Centres, we consider that such a provision may be a sensible inclusion on the basis of the more limited provision of retail units in those locations. This could be added as a new Clause H3 to Policy ECP2. If the Council were to agree, then it would be necessary to define that the assessment of marketing would not only cover a period of time, but that judgment would also be made about the quality of the marketing effort in terms of where and how the marketing has been undertaken, and the terms on which the unit was put to market.

Sequential and Impact Tests

4.21 Policy ECP3 reflects national policy on the sequential and impact tests set out at Paragraph 94 of the NPPF. The Regulation 18 draft policy is worded as follows.

Policy ECP3 Sequential and Impact Tests

Policy type: Strategic

Objectives: 14

Site/sub-area: N/a

Sequential Test

A. Proposals for retail uses outside identified primary shopping areas and which are not on sites that are specifically allocated for such uses, will be subject to the sequential test.

B. Main town centre uses which are outside an identified centre, and which are not on sites that are specifically allocated for such uses, will be subject to the sequential test.

Impact Test

C. Proposals for retail development outside a Primary Shopping Area (PSA) and for leisure development outside a defined town centre area and which are not on sites that are specifically allocated for such uses, will be subject to an impact assessment provided the proposal is above the following thresholds:

1. Central Milton Keynes - 900 sq.m (gross)
2. All other Centres - 350 sq.m (gross)

4.22 Respondents to the Regulation 18 made limited comment on Policy ECP3 and we have summarised the one substantive issue below.

Topic	Regulation 18 comments	Recommendation
Impact Threshold	Is the figure of 350 sq m too large for centres outside CMK?	The figure of 350 sq m was arrived at by the Council who considered that this figure is typical of small convenience goods stores and major comparison goods retailers. We agree that this is a sensible starting point for analysis. If the Council wanted to address this matter in more detail, Paragraph 015 of the Town Centres and Retail PPG sets out a checklist for determining the appropriate scale of a Local Impact Threshold. The Council may wish to address this matter in a short topic paper prior to Examination.

Rural Economy

4.23 Policy ECP4 The Regulation 18 draft describes how the Council will support a diverse rural economy and the policy is worded as follows.

Policy ECP4 Supporting a Diverse Rural Economy
Policy type: Non-Strategic
Objectives: 1, 3, 12
Site/sub-area: N/a
A. Proposals for the growth and expansion of employment uses located within the Open Countryside and rural settlements will be supported where they relate to the: 1. Expansion of an existing business; 2. Diversification of agriculture and other rural businesses requiring a rural location; or 3. Rural tourism and leisure developments. **And** 4. They involve the conversion or re-use of an existing building; or 5. Involve new buildings that are of a scale and design that respond positively to the character of the surrounding countryside or existing rural settlement and, where practicable, are located in close proximity to existing buildings. B. The loss of a retail premises or public house, or other community facility, within a rural settlement will only be supported where: 1. Alternative and enhanced provision has already been made, or will be delivered, within the rural settlement; or 2. The existing use is no longer commercially viable and has been marketed for a minimum period of six months.

4.24 Respondents to the Regulation 18 made limited comment on Policy ECP4 and we have summarised the one substantive issue below.

Topic	Regulation 18 comments	Recommendation
Marketing period	Should the marketing period under B2 be extended from 6 months to 12 months? Should the policy specify more detail on what is considered to be adequate marketing? Should the policy include provision for marketing the sale of units at a fair commercial value to local residents?	As per our advice under Policy GS5, we would also draw attention to the provisions of Class F2(a) of the Use Classes order, protects a shop of not more than 280 sqm, and which mostly sells essential goods including food, and where there is no other such facility within a 1,000 metre radius, from a change of use. Notwithstanding, we agree that a marketing period is necessary in situations where there might be more than one retail unit within a 1,000 metre radius and this is in keeping with our recommendations for Local

	Centres at Policy ECP2 above. There is subjectivity as to whether this should be for 6 or 12 months, but we agree that there should be more specificity in the supporting text as to what constitutes a 'robust' marketing period. In keeping with our comments on Policy ECP2, it is important that the marketing would not only cover a period of time, but that judgment would also be made about the quality of the marketing effort in terms of where and how it has been marketed, and the terms on which the unit was put to market. In the case of rural retail, one such consideration should be whether the property has been made suitable available to local residents by virtue of notification and sensible terms. The Council may wish to add text to this effect to Paragraph 253 of the Draft Plan.

New Local Centres

4.25 Policy PFHP3 of the Regulation 18 draft prescribes the location of new Local Centres and the scale and nature of provision which might be located within those new centres.

Policy PFHP3 New Local Centres
Policy type: Strategic
Objectives: 3, 5, 14
Site/sub-area: N/a
A. Sites in the following areas are allocated for the provision of new Local Centres: 1. Eaton Leys 2. Strategic Land Allocation (Glebe Farm/Eagle Farm South) 3. Tattenhoe Park 4. New locations within new strategic allocations. B. Development proposals for a general convenience store in Conniburrow to address lack of provision and support people friendly and healthy places will be supported. C. Land and/or buildings for convenience retail use should be located so that most new homes are within 800 metres of the use via active travel routes. D. The scale of retail and service provision provided within new areas of residential development larger than 1,500 homes should increase the provision of convenience retail use floorspace commensurate with the scale of the proposed residential development. The scale and location of this use will be indicated within Development Frameworks /Master Plans adopted by the Council.
E. Proposals for retail and service uses within new residential development should cater for the needs generated by the residential development's population and not draw significant trade from existing centres.

4.26 Respondents to the Regulation 18 consultation made a number of comments on the new Local Centres policy and we have summarised some of the key ones below, together with our advice to the Council.

Topic	Regulation 18 comments	Recommendation
Duplication	Does Policy PFHP3 duplicate the provisions of Local Centre policies elsewhere in the Plan?	Whilst Policy GS5 sets out the scale and function of a Local Centre within the retail hierarchy, Policy ECP3 necessarily specifies the location of new Local Centres and expectations in terms of accessibility and convenience retail provision. In our view it is right that this forms a separate place-specific policy.
Charity Shops	Should Policy PFHP3 make specific reference to the need to provide space for charity shops?	This is not a matter which could realistically be conditioned through the development management process as charity shops are considered as comparison goods (Class E) and do not have a separate use class. Whilst charity shops may be supported as forming part of a Local Centre we would therefore advise against making specific policy provision for this.
Comparison Goods	Should Policy PFHP3 signpost the provisions of Policy EP3 where it relates to the sequential and impact tests?	We consider that this would be repetition and is unnecessary.

Central Milton Keynes

4.27 Policy CMK2 of the Regulation 18 draft describes how the Council envisages bringing forward development within the CMK Development Framework Area. We discuss below the area which relate to main town centre uses.

Policy CMK2 Central Milton Keynes Development Framework Area

Policy type: Strategic

CMK Objectives: All

Site/sub-area: Central Milton Keynes, including Campbell Park

A. Development proposals in Central Milton Keynes will be required to demonstrate that they are in accordance with the CMK Development Framework shown in Figure 3.

B. Over the plan period, development in Central Milton Keynes will be supported for:

1. 11,000 additional new homes.
2. 26,900 additional jobs.
3. Around 300,000 sq.m. of office floorspace.
4. Up to 66,200 sq.m. of comparison retail floorspace.
5. Development of higher education facilities, including purpose-built student accommodation.
6. Additional food, drink, hotel, leisure and cultural provision.
7. A multi-use events venue.
8. Community facilities and other services to support a growing city centre population.
9. Creation of new and improved public open space and green infrastructure, including an improved connection for active travel modes into Campbell Park from the city centre.
10. Improved provision for public transport and active travel, including a new Greenway along Midsummer Boulevard which includes space for Mass Rapid Transit.
11. Improved justice facilities including a new Crown Court.

CMK Quarters

C. Proposals should use flexible building forms that can be adapted for other uses as needs change and reinforce the existing patterns of land use within the CMK quarters as shown in Figure 4:

1. Development within the 'Downtown' business quarter (Blocks A1-4, and B1-3) will be supported where at least 80% of the active, non-ancillary floorspace is for office, education or research and development use. This includes provision for the delivery of in-person Higher Education teaching, other Higher and Further Education provision, purpose-built student accommodation, office or lab floorspace and/or a multi-use events venue.
2. Development within the 'Midtown' quarter (Blocks C1-4, D1 and D4) will be supported for a mix of uses including residential-led mixed use development and other community, cultural, retail, office, and civic uses. In Block C1 proposals that improve the city's justice, law and governance provision, including proposals for a Crown Court, will be strongly supported.
3. Development proposals within the 'Uptown' leisure quarter (Blocks D2, D3, and E2 – E4) will be supported where they are retail, cultural and leisure-led.
4. Development proposals within the 'Parkside' quarter (Blocks E1, F1 and F4, G1 and G4, H1 and H4) will be supported for residential-led development that provides a mix of homes which meet the needs of new and growing families within CMK, including homes with three or more bedrooms, for future residents of CMK.

D. Development proposals on sites adjacent to another quarter will be supported where they meet that quarter's primary objective or provides a blend of uses appropriate to both quarters.

Block B4

E. As the last remaining undeveloped CMK block, with strategic importance to the future growth of the city centre, development proposals on Block B4 must take a comprehensive masterplan approach for the block as a whole. Development of Block B4 should demonstrate how it enables growth across the Downtown business quarter, in particular technology and innovation uses. As part of the masterplan approach, development that follows the building lines established by recent and adjoining development on Avebury Boulevard will be supported.

Design and Development Parameters

F. Development that maintains and respects the grid structure of the city centre will be supported subject to the following:

1. Residential development within the following density ranges:

   i. Up to 425 dwelling per hectare within the Central Spine (Blocks B1/2, C1/2, D1/2, E1/2) subject to criteria set out in 3.a-c above;
   ii. Up to 350 dwellings per hectare elsewhere in the city centre subject to criteria set out in 3.a-c above;
   iii. Up to 135 dwellings per hectare within the Parkside quarter.

2. Development on Silbury and Midsummer Boulevards must retain the existing, established building lines; and
3. Building lines may be permitted to extend into existing surface parking areas where they front onto the Gates, subject to it being demonstrated this would be consistent with the Development Framework in Figure 3, including:
   i. Retention of existing street trees that line the Gate verges;
   ii. Creation of multifunctional sustainable drainage systems parallel to the retained Gate verges; and
   iii. Provision of footways and new Redway cycle path(s) running parallel to the Gate(s) running between the proposed building line and the Gates themselves.

G. Where new building lines fronting Avebury Boulevard or the Gates would compromise the continued usage of existing pedestrian underpasses, proposals to replace underpasses with high-quality public realm including at-grade pedestrian crossings, will be supported.

H. In accordance with Figure 3 (CMK Development Framework), development proposals on areas of surface level car parks along North and South Row will be supported, where this enhances pedestrian crossings into neighbouring estates and enables a more comprehensive development to be delivered, subject to:

1. improved public and active travel provision being in place; and
2. suitable alternative replacement parking has been provided elsewhere in CMK, or evidence demonstrates the spaces are no longer required due to lack of demand.

I. Proposals for taller buildings will be supported where they are in accordance with the Tall Building Strategy contained in Figure 5.

4.28 Respondents to the Regulation 18 consultation made a number of comments on the CMK policy and we have summarised some of the key ones below, together with our advice to the Council.

Topic	Regulation 18 comments	Recommendation
Interim uses	Sustainable interim uses should be allowed in order to support CMK's vitality.	We agree that interim or meanwhile uses are an increasingly important tool in maintaining on-going vitality and viability in shopping places where vacancies have arisen. Encouragement for this could be added as a criterion under Policy CMK2 b. This is also part-covered at Policy CMK3 a2.
Convenience retail	Policy CMK2 should specify how convenience goods retail will be brought forwards in CMK.	In Section 2 of this RCLSU we have updated capacity calculations for convenience goods development in CMK. These results show there is Notwithstanding, whilst there is no plan-led development of new convenience goods retail within CMK, there is no prohibition against new convenience good retail within the Primary Shopping Area were market demand to exist. Such development would not be

	subject to sequential or impact testing, in line with Policy ECP3.

Policy CMK3 Supporting a thriving CMK
Policy type: Strategic
CMK Objectives: All
Site/sub-area: Central Milton Keynes, including Campbell Park
A. Proposals that create a thriving city centre will be supported where they: 1. Protect premises within the Primary Shopping Area and Primary and Secondary Shopping Frontages of Central Milton Keynes, as defined on the Policies Map, in accordance with Policy ECP2. 2. Create small, flexible premises for retail, leisure or cultural uses to support start-up and independent businesses. 3. Deliver cultural and leisure facilities that diversify the city centre offer and encourages people to spend time in CMK. 4. Deliver new, expanded and/or improved justice facilities in Block C1, based around the existing County and Magistrates Court. 5. Deliver development and interventions associated with other infrastructure projects in the city centre as identified through the Milton Keynes Infrastructure Study and Strategy including Mass Rapid Transit.

4.29 Policy CMK3 establishes how the Council will support a thriving CMK. Themes arising from the Regulation 18 responses are summarised as follows:

Topic	Regulation 18 comments	Recommendation
Rents and Independent Retail	Local businesses are priced out of CMK because of high rents.	Planning policy cannot dictate rents. However, Policy CMK3 a2 seeks to encourage the provision of start-up and independent businesses. The Council should remain mindful of this where it considers new development under its development management function.
Markets	Should Policy CMK3 include encouragement for the existing outdoor market at CMK?	We agree that general encouragement for market space should form a new criteria under Policy CMK3. Currently the Plan is silent on the existing outdoor market, which the RCLS found to be an important component in contributing to the vitality and viability of CMK (7.31 to 7.35).
Evening Economy	Should there be a separate policy on the evening economy?	We agree that this idea has merit. CMK is well-provided-for in terms of daytime and nighttime uses. However, the Council has ambition to create greater linkages between the largely daytime shopping function of CMK and the day-round leisure function in

		the wider City Centre, including for example, Xscape and the Theatre district. Consideration should be given to a policy which dictates how this might arise, perhaps through accessibility and marketing initiatives. Such a policy may also provide greater clarity on the retail function of Xscape, which is separately a query raised by respondents to the Regulation 18 Plan.

Inset Mapping

4.30 A number of respondents to the Regulation 18 Plan have suggested amendments to the Council's Inset Maps. We comment on place-specific questions as follows:

Topic	Regulation 18 comments	Recommendation
John Lewis, CMK	The John Lewis store should be located within the Primary Shopping Frontage.	The Inset Mapping already includes John Lewis within the Primary Shopping Frontage.
Radcliffe Street, Wolverton	Radcliffe Street should be included within the Primary Shopping Area for Wolverton.	We understand that the Agora development is now planned for start of above ground works in 2025. This development would provide the link between the PSA identified on the Inset Map, and Radcliffe Street. If there is now certainty that the Agora development, which will itself accommodate commercial units, will come forwards then it would seem sensible to extend the PSA to include the Agora redevelopment site and Radcliffe Street.

5. Overall Summary

5.1 This RCLSU updates the Council's evidence base in terms of the capacity for convenience and comparison goods retail across the Council area. Its findings update the figures contained within the RCLS, but its overall content should still be read alongside the RCLSU which provides important added context.

5.2 Our capacity findings have been utilised to inform a series of new policy considerations, such as the proposed arrival of the Universal Theme Park, as well as to assist with addressing a number of comments made to the Council's Regulation 18 Plan and which we anticipate will translate into the min town centre use policies put forward to the Regulation 19 Plan.

Appendix A – Scenario A Capacity Modelling Tables

Appendix B – Scenario B Capacity Modelling Tables

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