

Consultation Statement

For the Milton Keynes City Plan 2050



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Introduction

Purpose

This Consultation Statement provides a summary of our consultation process, the responses received, our response to these and outcomes for the production of the MK City Plan 2050. It covers:

- Who has been consulted
- How we consulted and the consultation activities supporting the Regulation 18 stage
- A summary of the main issues from responses received to each draft policy
- Amendments to each of the draft policies for Regulation 19

The responses received to each draft policy can be viewed in full in the digital version of our Consultation Statement available online through scanning the QR code below or by following this weblink: <https://placemaker.miltonkeynes.urbanintelligence.co.uk/p/document/141/>.



This Consultation Statement sets out how Milton Keynes City Council has carried out proactive and direct engagement with local residents, community groups, businesses and other organisations and stakeholders. In accordance with the National Planning Policy Framework (NPPF), our Statement of Community Involvement (2024) and the relevant statutory requirements we have proceeded with the development of the Milton Keynes City Plan 2050 (MKCP 2050).

The statement focuses specifically on the Regulation 18 consultation on the draft Milton Keynes City Plan 2050, which we carried out between the 17th of July until 5pm on the 9th of October 2024 (for a period of 12 weeks). As part of this, we organised and attended a range of activities to proactively support meaningful community engagement with the consultation.

Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) prescribes, among other requirements, that a Consultation Statement setting out who was invited to make representations on the plan at the Regulation 18 consultation stage, how those representations were invited, a summary of the main issues raised, and how the representations were taken into account be submitted with the plan for examination.

Background

We previously consulted on the Ambition and Objectives for the MK City Plan 2050, where the New City Plan Ambition and Objectives, and Sustainability Appraisal Scoping Report, were published for consultation between the 31st of January and the 16th of March 2023. A summary of the main issues raised can be found in the Statement of Consultation for the Ambition and Objectives consultation. Comments made during the Ambition and Objectives consultation helped to shape the policies and proposals set out in the draft Milton Keynes City Plan 2050.

The Regulation 18 Consultation on the Draft Milton Keynes City Plan 2050 was open for a period of 12 weeks from the 17th of July until 5pm on the 9th of October. During this period, we received 609 individual representations to the Plan (331 representations via our online consultation platform on Urban Intelligence, and 278 representations via email and / or letter).

Overall, we received over 7500 individual responses across a range of key themes, issues and specific draft policies. We also received 196 signed survey responses from residents of Whaddon Parish.

The Consultation Statement outlines the approach taken to community participation and stakeholder engagement in the preparation of the emerging Local Plan. It summarises the key issues raised in the representations received for each draft policy and, where relevant, details the amendments incorporated into the Regulation 19 version of the Plan.

Consultation Activities

Introduction to the Consultation

We utilised a digital consultation platform (PlaceMaker) to collate and analyse responses received during the consultation period, there were also hard copies of the Plan available across 10 public libraries in Milton Keynes. Including:

- Central Milton Keynes Library
- Bletchley Library
- Kingston Library
- Newport Pagnell Library
- Olney Library
- Stony Stratford Library
- Westcroft Library
- Woburn Sands Library
- Wolverton Library
- Woughton Library

As demonstrated in Figure 2, accessible formats of the draft Plan such as an accessible PDF, large print, easy read, audio-recording or braille (and other alternative formats) were available upon request via telephone and / or email.

The following section sets out the range of methods we used to engage with the public, and other interested parties, to promote the Plan, and evidence base, during the Regulation 18 consultation stage.

These measures were based on those set out in our Statement of Community Involvement (SCI). The SCI identifies a number of bodies that need to be consulted. These include specific consultation bodies (comprising various statutory authorities) and general consultation bodies. The general bodies include a large number of organisations with an interest in planning, including business and residents' groups, amenity groups, civic groups, cultural organisations, places of worship and voluntary organisations.

Who was consulted and how was that undertaken?

The figures below detail our webpages which we dedicated to the Milton Keynes City Plan, and how we promoted the consultation and sign posted key information, documents and links to interested parties.

We maintain a *Consultation Database* with the contact details of around 4,000 organisations, individuals or agents who have responded to a planning policy consultation in the past, or have asked to be kept informed of the preparation of our planning documents. To help promote the consultation we organised a comprehensive mail-out, to those on our Consultation Database, setting out information regarding the start date and duration of the Regulation 18 consultation period. This mail-out included a direct link to our dedicated webpage for the Milton Keynes City Plan 2050, which set out the different ways to get involved and respond to the consultation (see Figure 1 below for a screenshot of the landing page).

We also published the evidence base underpinning the draft Milton Keynes City Plan 2050 (MKCP 2050) on our dedicated webpage. Including our draft Topic Papers, which set out the evidence, drivers for change and rationale behind the formulation of the policies in the draft Plan. As well as our draft Sustainability Appraisal for Regulation 18, setting out our preferred options for growth and respective assessment and scoring of options. Our draft Policies Maps were also available as an *Interactive Map* (sign posted on our landing page, see Figure 1) on Urban Intelligence, our digital consultation platform, (see Figure 4) or via PDF format on our webpage.

Figure 2 below demonstrates how during the Regulation 18 consultation our webpage set out the start date and closing deadline for comments on the draft Plan. Our webpage also contained information outlining the purpose of a Local Plan, including a short video which set out the process for creating a Local Plan, what a Plan typically covers and the duration of the Regulation 18 Consultation Stage on the draft Milton Keynes City Plan 2050.

Our webpage also signposted individuals to a dedicated page containing information on the in-person exhibition events we organised and attended in support of the Regulation 18 consultation stage. As shown in Figure 3, this included setting out the purpose of the events and the location, date and time of the respective exhibition event.

We also set out further information on the draft Plan on a dedicated FAQ page on our website, covering the opportunities and challenges for Milton Keynes, the contents of the MKCP 2050 and how much growth the MKCP 2050 plans for. This page also promoted a link to our digital consultation platform, as well as the PDF version of our *Consultation Response Form*.

Figures 6-9 showcase the interactive version of the draft MKCP 2050 on our digital consultation platform during the Regulation 18 consultation stage.

Consultation Statement

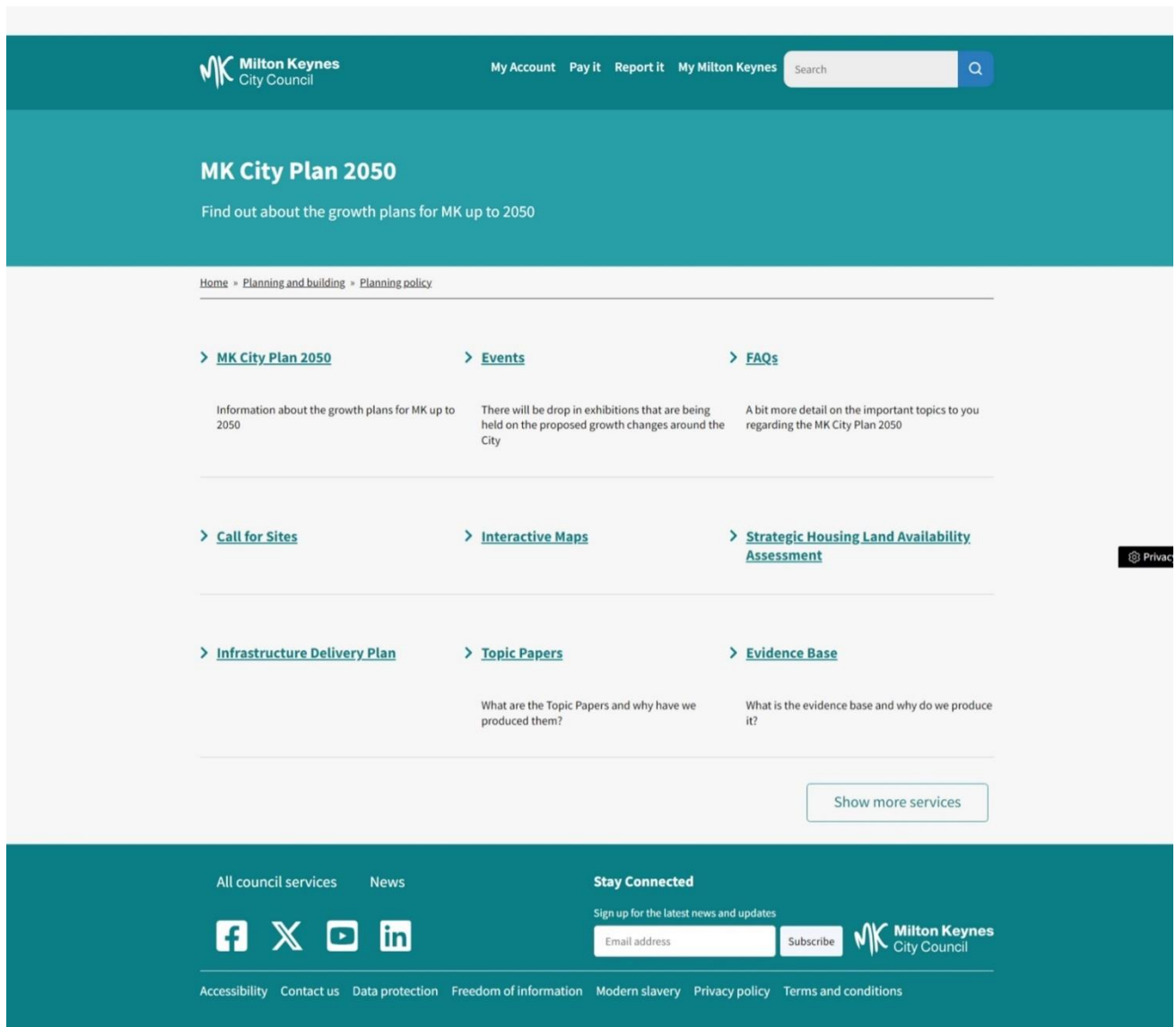


Figure 1: Landing Page for the MK City Plan 2050 on the Council's website

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MK City Plan 2050

Information about the growth plans for MK up to 2050

Home > Planning and building > Planning policy > MK City Plan 2050

Page Contents

Development Plans team contact information





Have your say in this consultation

Local authorities such as Milton Keynes City Council must set out plans to provide more homes. Our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our green spaces and rural areas.

We want to make sure infrastructure is put first (such as health facilities, schools and shops). We want to ensure developers provide what communities need to benefit local people. We also want Milton Keynes to grow sustainably, tackling and reducing the impact of climate change.

To do this, we create what's called a local plan and review it every five years. Our current plan (PlanMK) is now five years old, and we've been working to create a new plan to help deliver our ambitions for the future of MK.

Our new plan, the MK City Plan 2050, is an important planning document that sets out how Milton Keynes will change and grow in the years ahead. It guides where future development should happen in the city until 2050, and where it shouldn't in order to protect our environment.

If we don't produce a plan, we risk having very little influence over where new development happens and will not be able to take an infrastructure first approach.

As well as telling us what you think about the draft Plan, you also have the opportunity to:

- Tell us your priorities for growth and infrastructure.
- Comment on our emerging Sustainability Appraisal through commenting on the Growth Strategy Chapter of the MKCP questions 1-4 and 13-20.
- Promote a site to the Council as part of our 'Call for Sites'.

Your views are really important to us. We want to hear from people who live, work and have an interest in the city.

Local Plan Welcome Video

Watch Later Share

Watch on YouTube

Making comments

You can view the plan and comment online [here](#). Please note: you will need to register in order to provide your feedback.

A guided tour for the published online platform will load when you visit the site for the first time. If you'd like to see it again (after the first time) you'll have to use incognito mode within your web browser as the tour only loads on a first visit.

Our privacy notice can be viewed [here](#).

Writing the Plan involves extensive evidence gathering, public consultations and joint working with neighbouring authorities and partners. Along with the evidence that we have gathered, the views you have submitted through previous consultations have helped us shape the MK City Plan 2050 that is emerging. The approach to public engagement taken by us in developing the Local Plan is set out in our [Statement of Community Involvement](#). The plan will also need to meet the requirements of the [National Planning Policy Framework \(NPPF\)](#).

What is the wider Planning Context?

To understand what a Local Plan is please [watch this video by the Planning Inspectorate](#).

For some useful national planning context, please view this series of [Fact Sheets relating to new homes and regeneration](#) published by Homes England (the government's housing and regeneration agency).



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Evidence Base and Topic Papers

A key component of the Local Plan is the evidence base. We have undertaken a number of different studies, including the Sustainability Appraisal to inform the development of the draft MK City Plan 2050. All policies in the plan must be based on evidence to ensure that they are sound.

- To read our evidence based documents click [here](#).
- To read our topic papers click [here](#).
- To read our sustainability appraisal click [here](#).
- To read our other consultation documents, including the draft plan and policies maps, click [here](#).

Physical copies and alternative formats of the MK City Plan 2050

If you need any of the consultation documents in a different format like accessible PDF, large print, easy read, audio recording, or braille, or if you find another accessibility problem, please email nco.engagement@milton-keynes.gov.uk or telephone 01908 252358.

If you need this in hard copy or another format, please contact the city council at: nco.engagement@milton-keynes.gov.uk.

Thank you very much to everyone who takes the time to respond to the consultation.

Next Steps:

We intend to consult on a final version of the MK City Plan 2050 in early 2025. We then intend to submit the plan to the Secretary of State for examination in public by the end of June 2025. If and when adopted, the MK City Plan 2050 will replace PlanMK.

- Guide the development and use of land in Milton Keynes up to 2050
- Address the needs of our growing population.

View our timeline image below:



Development Plans team contact information

01908 252358
nco.engagement@milton-keynes.gov.uk
Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ

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Figure 2: General information regarding the Regulation 18 Consultation Statement and direct link to the consultation portal

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Come talk to us - Drop in sessions

There will be drop in exhibitions that are being held on the proposed growth changes around the City

Home » Planning and building » Planning policy » MK City Plan 2050

We are holding thirteen drop-in consultation events during August/September 2024, and closer to these dates you will be able to view the exhibition material on our website.

What will the community events cover?

The events are intended to provide you with the opportunity to find out more about the new Local Plan and the process so that you can tell us what you think, ask questions and leave feedback.

The events will explain what a Local Plan is, what stage we are at, and when we will go out to formal public consultation.

Whilst explaining the process, we would also like to hear your likes and dislikes about where you live and your aspirations for the city over the next 25 years on matters such as the environment, future needs for local housing, jobs, green spaces, and existing and new infrastructure etc. This is about planning for the future and addressing the issues of the present.

Where are the community events taking place?

The events are open to all members of the community. You may attend any event in any of the locations identified.

The events are taking place at the following locations and times:

Where	When	Time
Hanslope Village Hall, MK19 7NZ	Friday 9 August	2pm - 8pm
The Olney Centre, Olney, MK46 4EF	Tuesday 13 August	2pm - 8pm
Summerlin Centre, Woburn Sands, MK17 8SG	Friday 16 August	2pm - 8pm
Kings Community Centre, Wolverton, MK12 5LY	Tuesday 27 August	9:30am - 4:30pm
Newton Leys Pavilion, MK3 5SP	Tuesday 3 September	12pm - 6pm
Bow Brickhill Pavilion, MK17 9JB	Thursday 5 September	2pm - 8pm
Green Park Community Centre, Newport Pagnell, MK16 0NJ	Friday 6 September	9:30am - 3:30pm
Kents Hill Conference Centre, MK7 6BZ	Tuesday 10 September	2pm - 8pm
Margaret Powell House, Central Milton Keynes, MK9 3BN	Friday 13 September	2pm - 8pm
Moulsoe Millennium Hall, MK16 0HB	Tuesday 17 September	2:30pm - 8pm
MK Conferencing, MK Christian Centre Church, Oldbrook, MK6 2TG	Wednesday 18 September	9:30am - 4:30pm
West Bletchley Community Centre, Bletchley, MK3 6BH	Friday 20 September	2pm - 8pm
Whitehouse Community Centre, Barrosa Way, Milton Keynes MK8 1JS	Tuesday 24 September	2pm - 8pm
Wavendon Community Hub, Dankworth Way, MK17 8ZN	Friday 27 September	2:30pm - 7:30pm

Do I need to register to attend?

No appointments or registration is required.

How do I provide feedback?

If you have any feedback that you would like to give please use the [feedback form](#).

We will also have feedback forms available at all our in-person events.

All feedback must be provided by 5pm on Wednesday 9 October.

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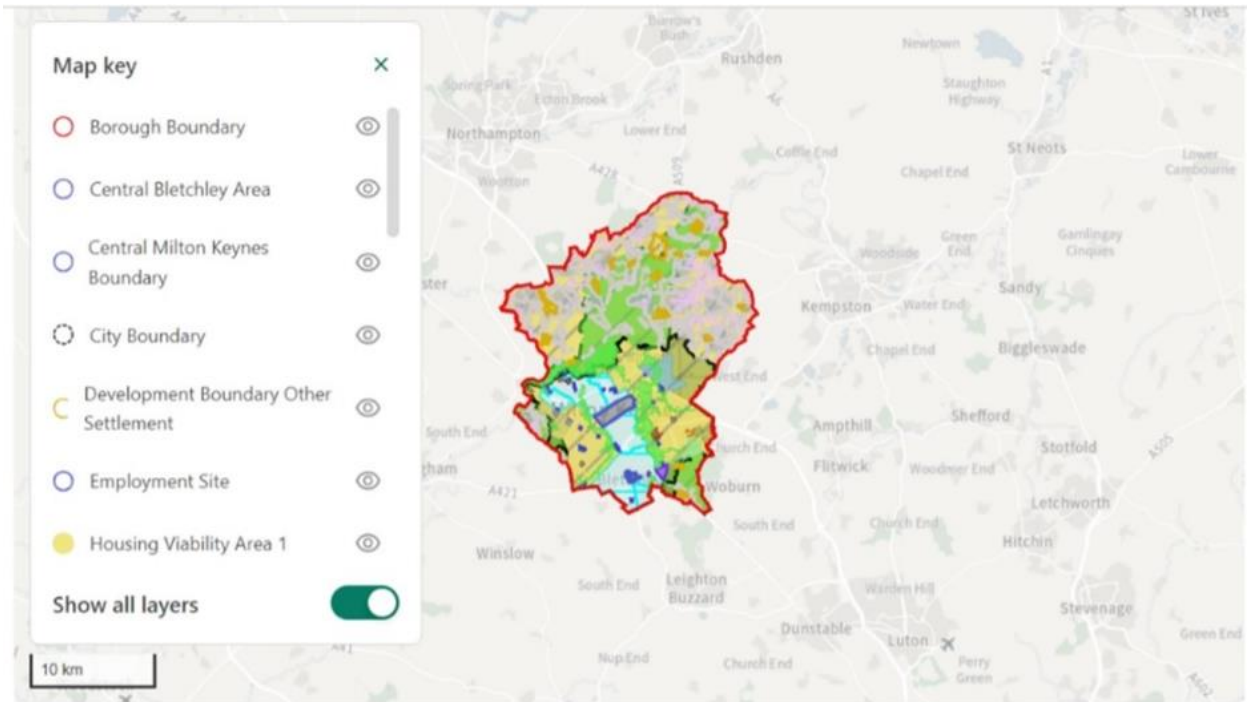
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Figure 3: List of exhibition events and details of events advertised on the Council's webpage

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MK City Plan 2050 Policies Map

Figure 4: Interactive policies map for the MKCP 2050 on online consultation portal

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FAQs

A bit more detail on the important topics to you regarding the MK City Plan 2050

Home » Planning and building » Planning policy

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What are the challenges and opportunities for Milton Keynes?
What's in the MK City Plan 2050?
How much growth are we planning for?
What opportunities are there in Central Milton Keynes?

What is the MK City Plan 2050 and why do we need it?

The UK Government aims to build 300,000 new homes in England each year to keep up with population growth and other factors.

Local authorities such as Milton Keynes City Council must set out plans to provide more homes. Our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our green spaces and rural areas.

We want to make sure infrastructure is put first (such as health facilities, schools and shops). We want to ensure developers provide what communities need to benefit local people. We also want Milton Keynes to grow sustainably, tackling and reducing the impact of climate change.

To do this, we create what's called a local plan and review it every five years. Our current plan (Plan:MK) is now five years old, and we've been working to create a new plan to help deliver our ambitions for the future of MK.

Our new plan, the MK City Plan 2050, is an important planning document that sets out how Milton Keynes will change and grow in the years ahead. It guides where future development should happen in the city until 2050, and where it shouldn't in order to protect our environment.

If we don't produce a plan, we risk having very little influence over where new development happens and will not be able to take an infrastructure first approach.

What are the challenges and opportunities for Milton Keynes?+

What's in the MK City Plan 2050?+

How much growth are we planning for?+

What opportunities are there in Central Milton Keynes?+

How to have your say

Our research to prepare the MK City Plan 2050 started more than a year ago and thousands of local people engaged in that research, with many contributing ideas to the draft Plan.

A twelve-week formal consultation runs from Wednesday 17 July to Wednesday 9 October 2024 and during that time we'll be holding events around the city so we can keep listening. Some of these events will be held in schools to involve more of the young people who will need the local jobs and homes that the Plan describes.

We are inviting comments on the Plan online through a user-friendly website [here](#).

You can share feedback with us there or by emailing nep.engagement@mkcc.gov.uk

Once the consultation is complete, we'll consider what we've heard and adjust the Plan accordingly. Everyone will have a further opportunity to comment before the Plan is submitted to the Secretary of State next year.

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Figure 5: List of FAQs on web page



Draft Local Plan Regulation 18 Consultation

July 2024

← Previous 1. Welcome, we're glad you're here 2. Our ambition and objectives for growth 3. Our growth strategy 4. Cent Next →

1. Welcome, we're glad you're here

← Previous 1. Welcome, we're glad you're here 2. Our ambition and objectives for growth 3. Our growth strategy 4. Cent Next →

2.1. Our ambition

2.2. Our objectives

Question 1(a) – our ambition and objectives for growth 1/3
X Question not answered

2. Our ambition and objectives for growth

1. The MK City Plan 2050 will take forward, and should be read alongside, our Strategy for 2050^[1] which sets out a bold vision for Milton Keynes. This vision seeks to bring transformational change, while protecting that which is unique to Milton Keynes and will play an important role in our future success. The Strategy for 2050 also provides important context that has been integrated into the City Plan's evidence base and policies. An integrated plan is one

← Previous Our ambition and objectives for growth 3. Our growth strategy 4. Central Milton Keynes 5. Central Bletchley Next →

3.1. Our spatial strategy

Question 2(a) – Policy GS1 Our spatial strategy 1/3
X Question not answered

Question 2(b) – Policy GS1 Our spatial strategy 2/3

Question 2(a) – Policy GS1 Our spatial strategy

Do you agree with the draft policy?

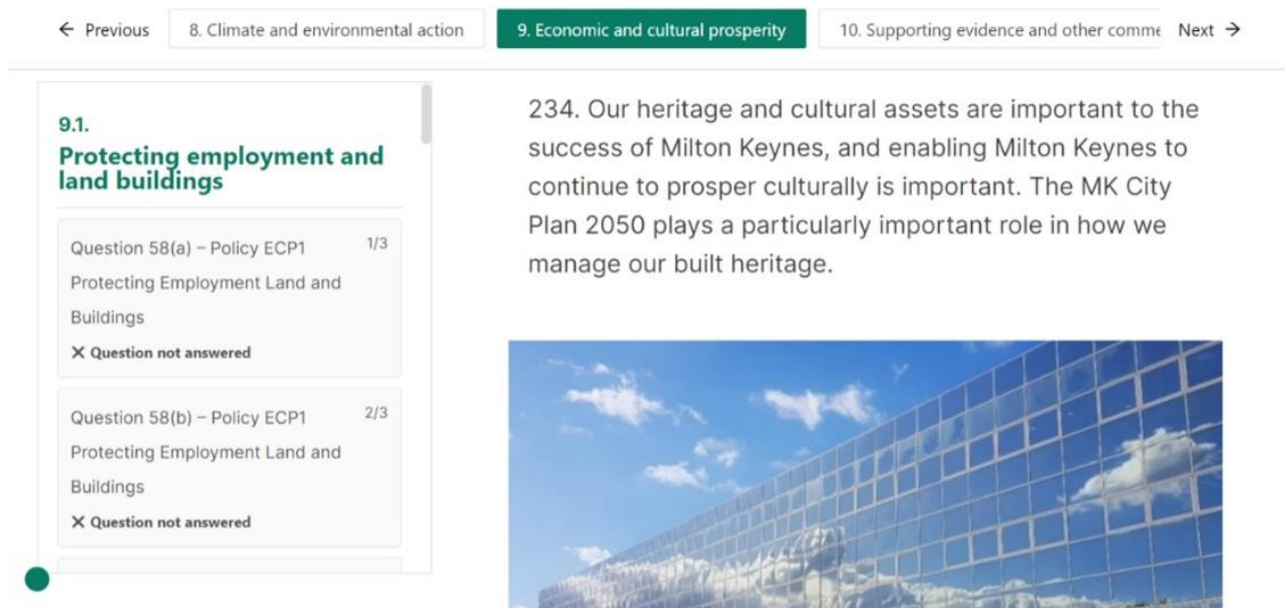
☐ Yes

☐ No

Clear

Submit

Question 2(b) – Policy GS1 Our spatial strategy



Figures 6-9: Sample of the Regulation 18 version of the MKCP 2050 on the online consultation platform (Urban Intelligence)

Promoting the Regulation 18 Consultation:

To help bolster engagement and participation, we promoted the dates and methods for participating in the Regulation 18 consultation via our dedicated social media channels. This approach aimed to raise awareness of the ongoing consultation and encourage as much feedback as possible. The comms on social media included information on how to get involved, key consultation dates, and links to relevant materials via our dedicated webpages.

Throughout the consultation period, information about how to get involved and participate was also advertised on digital boards across Milton Keynes. In addition, the consultation was promoted on the local MKFM radio station to further increase public awareness and encourage feedback. MKFM also advertised information on the exhibition-events drop-in sessions and how to get involved on their social media channels.

Exhibition Events in Support of the Regulation 18 Consultation Stage

In addition to the above activities to help promote engagement, we also hosted a series of in-person *Exhibition Events* across various locations in Milton Keynes.

The drop-in exhibition events were attended by officers, and members of the public were invited to attend and ask questions and seek advice from officers in relation to the Draft Milton Keynes City Plan 2050 (and other supporting documents, studies and maps). The exhibitions were planned across a series of mornings, afternoons and evenings from between August to September, as well as across a range of locations in Milton Keynes. Details of these exhibition events were published on our website.

A full list of the exhibitions, their locations, dates and times can be seen in **Table 1** below.

Table 1: Details of Exhibition Events supporting the Regulation 18 Consultation

	Venue	Date (2024)	Time
1	Hanslope Village Hall, MK19 7NZ	Friday 9 August	2pm – 8pm
2	The Olney Centre, Olney, MK46 4EF	Tuesday 13 August	2pm – 8pm
3	Summerlin Centre, Woburn Sands, MK17 8SG	Friday 16 August	2pm – 8pm
4	Kings Community Centre, Wolverton, MK12 5LY	Tuesday 27 August	9:30am – 4:30pm
5	Newton Leys Pavilion, MK3 5SP	Tuesday 3 September	12pm – 6pm
6	Bow Brickhill Pavilion, MK17 9JB	Thursday 5 September	2pm – 8pm
7	Green Park Community Centre, Newport Pagnell, MK16 0NG	Friday 6 September	9:30am – 3:30pm
8	Kents Hill Conference Centre, MK7 6BZ	Tuesday 10 September	2pm – 8pm
9	Margaret Powell House, Central Milton Keynes, MK9 3NB	Friday 13 September	2pm – 8pm
10	Moulsoe Millennium Hall, MK16 0HB	Tuesday 17 September	2:30pm – 8pm
11	MK Conferencing, MK Christian Centre Church, Oldbrook, MK6 2TG	Wednesday 18 September	9:30am – 4:30pm
12	West Bletchley Community Centre, Bletchley, MK3 6BH	Friday 20 September	2pm – 8pm
13	Whitehouse Community Centre, Barrosa Way, Milton Keynes MK8 1JS Hall	Tuesday 24 September	2pm – 8pm
14	Wavendon Community Hub, Dankworth Way, MK17 8ZN	Friday 27 September	2:30pm – 7:30pm

Table 2 provides a breakdown of the recorded attendance at the exhibition events, listed above, in support of the Regulation 18 Consultation.

Table 2: Recorded attendance at the exhibition events supporting the Regulation 18 Consultation.

	Venue	Date	Number of Attendees
1	Hanslope Village Hall, MK19 7NZ	09/08/2024	55
2	The Olney Centre, Olney, MK46 4EF	13/08/2024	41
3	Summerlin Centre, Woburn Sands, MK17 8SG	16/08/2024	45
4	Kings Community Centre, Wolverton, MK12 5LY	27/08/2024	17
5	Newton Leys Pavilion, MK3 5SP	03/09/2024	16
6	Bow Brickhill Pavilion, MK17 9JB	05/09/2024	65
7	Green Park Community Centre, Newport Pagnell, MK16 0NJ	06/09/2024	17

8	Kents Hill Conference Centre, MK7 6BZ	10/09/2024	19
9	Margaret Powell House, Central Milton Keynes, MK9 3BN	13/09/2024	26
10	Moulsoe Millennium Hall, MK16 0HB	17/09/2024	28
11	MK Conferencing, MK Christian Centre Church, Oldbrook, MK6 2TG	18/09/2024	15
12	West Bletchley Community Centre, Bletchley, MK3 6BH	20/09/2024	18
13	Whitehouse Community Centre, Barrosa Way, Milton Keynes MK8 1JS	24/09/2024	1
14	Wavendon Community Hub, Dankworth Way, MK17 8ZN	27/09/2024	69
Total			444

Other Meetings We Attended in Support of the Regulation 18 Consultation Stage

To help promote and support the Regulation 18 consultation on the draft MKCP 2050, we also attended a series of meetings with local organisations, civic groups and businesses. A full list of these events and engagement activities can be seen in **Table 3** below.

Table 3: Other Events and Meetings attended in Support of the Regulation 18 Consultation Stage

	Engagement Activity	Date
1	Presentation to MK Youth Council	22/07/2024
2	Da Vinci Café, Queensway, Bletchley. Business Networking Event	20/08/2024
3	Slug & Lettuce CMK Business Event	10/09/2024
4	Environment and Place Scrutiny Committee	12/09/2024
5	Meeting with the Open University	19/09/2024
6	Meeting with the Business Improvement District (BID) Board	19/09/2024
7	Meeting with the MK Forum	23/09/2024
8	Meeting with the Parks Trust	26/09/2024
9	Meeting with MK College	26/09/2024
10	New Business Narrative Launch, South Central Institute of Technology, Bletchley	26/09/2024
11	Meeting with Community Action:MK	03/10/2024
12	Meeting with Historic England	03/10/2024

Summary of Responses and Amendments to Draft Policies for Regulation 19

During the consultation period, we received feedback covering a range of key themes and specific policy areas.

The responses received formed a key input during our policy redrafting stage for the Regulation 19 stage of the MKCP 2050. The digital version of our Consultation Statement (available online through scanning the QR code or by following the weblink on page 2) sets out the responses received and includes:

- A graph of each of the responses to the closed-text questions for each individual policy, which formed part of our consultation response form for the Regulation 18 stage (these graphs only represent the representations received directly in our digital consultation platform PlaceMaker).
- A table publishing respondents' answers to the questions asked for each individual policy, the summary we produced and the tags we assigned to the response (for the representations received in our digital consultation platform, PlaceMaker)
- A table publishing the responses we received via emails and / or letters relating to an individual policy and the tags we assigned to the response.
- A breakdown of the main issues raised in relation to each policy area
- A list of amendments made to each individual policy for the Regulation 19 stage of the MKCP 2050.

This Consultation Statement includes:

- A breakdown of the main issues raised in relation to each policy area
- A list of amendments made to each individual policies for the Regulation 19 (Reg 19) stage of the MKCP 2050.

Our digital Consultation Statement with a further breakdown of responses received during our Regulation 18 Consultation can be viewed online through scanning the QR code or by following the weblink on page 2.

Analysis of Responses Received, Main Issues Raised and Amendments Per Draft Policy

Our Growth Strategy

Draft Policy GS1 Our Spatial Strategy

Main Issues for Draft Policy GS1

- General support for concentrating growth in urban and edge of urban areas rather than rural areas, although some concern that rural areas are still being impacted. Support for focussing growth within and adjacent to the city to maximise use of existing infrastructure and transport options.
- Objections and suggestion by a number of developers that a more dispersed spatial strategy, with more growth in Olney and rural areas (apportioned and allocated), should be pursued to provide a more diverse housing supply, meet local rural housing need and facilitate neighbourhood planning. Some alternative development sites were promoted.
- Olney should remain identified as a 'key settlement' (as per Plan:MK). References are contained in the plan to 'key settlements' but this 'tier' is not included in the settlement hierarchy. Comments that there is no evidence provided to support this change. Concerns raised about amalgamating all settlements outside of MK city into one tier within the hierarchy does not reflect the different roles amongst villages and Olney as service centres, etc.
- Concern that Strategic City Extensions won't functionally relate well to the city and would be car dependent.
- Concerns around focussing development in wholly new sites and not pursuing regeneration opportunities resulting in a two-speed city.
- Mixed support for further eastward expansion, with some suggesting it is appropriate to make use of new infrastructure investment there and to protect more sensitive landscape on the west of the city. Others consider the amount of growth eastward is too much and skewed resulting in existing and planned infrastructure being overwhelmed.
- Concern regarding the lack of small site allocations, less than the 10% target set out by the NPPF, and ongoing reliance on larger sites.
- Support and encouragement for a brownfield land first approach, with many respondents suggesting additional brownfield land should be identified, in part to satisfy national requirement for 10% of housing to be on brownfield land.

- Some objection to Newport Pagnell being merged with MK city within the settlement hierarchy.
- Some concern around the transparency of the site selection approach and scores, and why some sites were chosen over others.
- Lack of detail on how capacity figures have been derived for the various elements of the growth strategy (such as 'transport hubs').
- Support for denser development around transport hubs.
- Some concern over the coverage of the 'reasonable alternatives' in the SA and why some options are not covered (i.e. more distributed growth across the rural area allowing for continued sustainability and vitality in these areas).
- Developers broadly supported the proposal to focus growth within/adjacent to the City/urban areas that has significant infrastructure, recognising that it can best support a sustainable pattern of development/infrastructure requirements.
- Phasing of new development and the housing trajectory needs to be set out, along with a five year housing land supply when publishing the Regulation 19 plan.
- Support for the role Neighbourhood Plans would continue to play in guiding growth of their local areas. Some consider that a housing target or figure should be set for the rural area or parishes to guide preparation of neighbourhood plans. The strategy should allow for neighbourhood plans to come forward in tier 1 settlements too.
- Suggested that there should be a phased approach to growth, and more clarity should be provided relating to projected growth to 2030, 2040 and 2050.
- Community involvement should be improved as part of future planning for the Strategic City Extensions.
- There should be further investigation into options for types of transport systems, and more clarity about how the transport strategy will be implemented.
- Some support for the strategic aim to create a vibrant Central Milton Keynes highlighting positive impacts on businesses and providing more homes.
- Some comments that the aspiration to reach a population of 410,000 is not clearly justified, nor is why such a large buffer against housing needs is planned for.

Amendments for Draft Policy GS1

- Between the Regulation 18 and Regulation 19 stages of the Milton Keynes Plan, the settlement hierarchy policy was refined for clarity and inclusivity. In Tier 1, the term "designated urban area of Milton Keynes City" was simplified to "City of Milton

Keynes”, and the phrase “considerable majority” of development was softened to just “majority”, reducing the emphasis on the scale of development expected there.

- For Tier 2, the scope was broadened. While Regulation 18 referred to “Olney and rural settlements”, Regulation 19 now specifies “Olney and villages beyond the City of Milton Keynes”, offering a clearer and more inclusive description of areas outside the urban core. The requirement for development to be within defined settlement boundaries and aligned with made neighbourhood plans remains consistent, though the wording has been streamlined for readability.

Draft Policy GS2 Strategy for Homes

Main Issues for Draft Policy GS2

- Concern that the term "key settlements" is used within Policy GS2 (relating to neighbourhood plan-led development), although this is undefined in Policy GS1's settlement hierarchy, causing confusion.
- Respondents noted that the Council need to ensure that 10% of all the homes being delivered will come forward on small sites of less than 1ha in line with Paragraph 70 of the NPPF.
- Concern that the policy framework is ineffective and confusing due to incomplete coverage of neighbourhood plans across MK
- Respondents noted that although intended to be helpful the provision of nominal housing figures (per NPPF 23 s67) of one dwelling (in s23 of the supporting text but not in the policy itself) is not enough to provide Town, Community and Parish councils with confidence that MKCC will engage NPPF23 s 14 in decision making
- Concern that the approach fails to consider PDL sites adjacent to, on the edge of, sustainable village, towns or rural settlements. Policy GS2A)iii) allows for small brownfield opportunity sites within designated settlements as windfall homes but that this doesn't accommodate sites adjacent, close by or well-related to these settlements
- Newport Pagnell Town Council object to the change in status of Newport Pagnell to become part of the MK City Boundary and request that the town is defined by the settlement boundary as per the emerging Neighbourhood Plan (NPNP3).
- Suggestions that Table 1 in Policy GS2 needs updating to reflect Policy GS14(C1), the latter of which states that 7,750 homes would be delivered in the ESCE by 2050.
- Suggestions that Brownfield land should be prioritised
- Suggestion that housing targets should be reviewed as past completions require higher targets
- Concern that development is disproportionate to the existing villages and infrastructure

- Concern that home building will be impacted by planned revisions to NPPF.
- Respondents suggested that concentrating development in a few key sites preserves the character of the City.
- Respondents suggested that Previously Developed Land sites should be supported across the plan, not just in settlements or the city. Approach fails to consider PDL sites adjacent to, on the edge of, sustainable village, towns or rural settlements. Policy GS2A)iii) allows for small brownfield opportunity sites within designated settlements as windfall homes but that this doesn't accommodate sites adjacent, close by or well-related to these settlements.
- Respondents suggested that strategic decisions on PDL should be in the MKCC, not deferred to neighbourhood plans.
- Suggestions that it would be clearer to state in Policy the minimum numbers of homes required to be delivered
- Some respondents felt that the policy should be more ambitious by considering growth in the whole administrative area.
- Concern that the lack of pro-active mechanisms to ensure proportional growth in villages. Without clear housing requirements/ indicative figure in Table 1 for neighbourhood plan areas (para. 67 and 68 of the NPPF) or justification of why a figure cannot be provided, the policy risks the vitality of local services and does not comply with national policy guidelines for proportional sustainable growth.
- Suggestion that the policy should be drafted to consider appropriate sites adjacent to these boundaries to ensure proportional growth (which is essential for the sustainability, viability and vitality of local services).
- Responses noted that the Council need to ensure that 10% of all the homes being delivered will come forward on small sites of less than 1ha in line with Paragraph 70 of the NPPF. The Council will need to ensure that these are identified as an allocation in the Local Plan or Brownfield Register and does not consider small site windfalls as contributing to the 10% requirement. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders.
- Suggestion for the housing numbers to reflect a 20% buffer.
- Respondents suggested that this also be applicable to the regeneration of estates to ensure all areas of MK are healthy and environmentally friendly (with further regeneration plans established from the outset).
- Concerns raised regarding contradictions in policies GS1 and GS2 regarding developments in rural areas.

- Concern that there is an overemphasis on quantity and affordability of new homes, rather than quality.
- Suggestion that the strategy should consider each settlements unique opportunities.
- Concern that the term "key settlements" is used within Policy GS2 (relating to neighbourhood plan-led development), although this is undefined in Policy GS1's settlement hierarchy, causing confusion.
- Suggestion that the spatial strategy should direct proportionate growth to key service centres like Olney. Milton Keynes Strategy for 2050 (dated 2021) included Olney as a sustainable location within a growth option due to the sustainable transport modes available and opportunity for an active lifestyle, range of services and facilities, access to nature and potential transport improvements (either a bypass and/or mass rapid transit connection (MRT)).
- Suggestion to raise the contingency from 18% to 20% which would allow MKCC to allocate an additional 1,200 homes, particularly focused around/in rural settlements with primary schools. This could impact the vitality of these locations and aid to support services like primary schools, which struggle without new housing.
- Suggestion that a 20% buffer would help the Council maintain a five-year housing supply and avoid speculative development. To significantly boosting the supply of homes and aid implementation and delivery (para. 60 of the NPPF) support a 20% allowance of developable reserved sites to provide extra flexibility and/or to help to address any actions as a result of the Government's housing delivery test.
- Concern raised that there is no explanation as to why MK is seeking to grow so big so fast.
- Respondents felt that Moulsoe is disproportionately affected.
- Concern raised regarding dropping population in rural areas.
- Concern that Policy GS2 Strategy for Homes could result in an over-supply (of homes) if demand does not exist. Suggestion that development should be phrased in the light of demand.
- Suggestion that the Council sets out how housing need was calculated more clearly within the draft plan and potentially re-run the regulation 18 consultation.
- Concern raised regarding the number of homes, infrastructure requirements, and duration of the plan. Recognise that the plan would be reviewed every five years and suggests the later years of the plan should be presented as more indicative given they could change.
- Concern raised that the housing need has not been substantiated, as it is based on projections from 2014.

- Concern raised that the target of 11000 homes in CMK is too low.
- Concern raised regarding developing on green space
- Concern raised that MK has changed from a city of trees to a city of low quality development. Concern that estates are quickly constructed with little regard to the impact on the wildlife and its surroundings.
- Concern that too much land is allocated for development in the rural north and east of the borough, and that the focus should instead be on densification.
- Concern that GS2 will cause the city to grow too large absorbing the village communities.
- Respondent sought absolute clarity on the rural area housing requirements and that a proportionate approach considers viability.
- Concern that a specific strategy for rural area housing is lacking within the drafting currently. A continued failure to meet the needs of the rural area will prolong speculative planning applications.
- Suggestion that a more balanced housing supply is required, and that this should include a wider range of sites that can be considered deliverable in the short term to provide sufficient flexibility.
- Concern that there is no guarantee that the various proposed allocations, especially strategic scale development, will be delivered at all or to the extent projected within the proposed plan period. It will be necessary for a thorough review to be undertaken of the proposed housing allocations and for this to lead to an update to the housing trajectory.
- Concern raised that additional land may be required to be identified for housing development. This might be based on the projected shortfall from current sites and/or the need for an appropriate buffer of housing sites.
- Concern that the figures in Table 1 should not be seen as maximum limits, especially for sustainably located sites.
- Suggestion that the housing requirement should be higher than the top of the range. Strongly disagree with statements in the Sustainability Appraisal indicating that there was no justification for a greater figure as consider there are additional deliverable sites which can contribute to achieving a higher number.
- Concerns raised regarding the effectiveness of the proposed housing supply. Note the need to evaluate a breakdown of completions and commitments, a need to evidence the supply from 'Transport hubs', issue with viability in certain locations, achievable delivery rates from strategic sites, the evidence behind the 11,000 units proposed for CMK.

- Suggestion that the housing requirement should be expressed as "at least 63,000" homes to remove any uncertainty.
- Suggestion to include a housing trajectory, being mindful of realistic lead in times and delivery rates.
- Concerns raised over how the SHLAA has assessed the promoted site, referencing the approach to best & most versatile agricultural land, the identification of constraints, and how flood issues could be addressed.
- Suggestion that there is a need to consider the impact/implications of the spatial strategy on neighbouring areas (particularly Buckinghamshire) as the growth strategy progresses. Evidence indicates a cross-boundary relationship in housing and employment demand, which could impact migration and commuting patterns between MK and Buckinghamshire. Both Milton Keynes and Buckinghamshire Councils need to address these strategic cross boundary issues through cooperation/evidence in their planning processes (via the Duty to Cooperate - a legal test under the planning system).
- Suggestion that smaller, deliverable sites are essential for maintaining a consistent housing supply and meeting short-term needs.
- Concern that the draft Plan does not consider the unmet housing needs of neighbouring areas like Bedford Borough and Buckinghamshire.
- Responses noted the importance of ensuring housing sites meet the NPPF definition of 'deliverable,' highlighting concerns about large outline sites where permissions might expire before reserved matters are submitted. They call for a thorough assessment of site deliverability to update the housing trajectory.
- Suggestions to enhance the policies map, recommending that it specifically identifies sites with over 10 dwellings expected to contribute to meeting housing needs over the plan period
- Responses noted that there is an allowance in the plan for 115 units per year from sites under 10 dwellings. suggests adding a line in the table for homes on suitable and deliverable sites over 10 dwellings (identified in the SHLAA).
- Concerns raised regarding the assumed capacity of sites against the likely deliverability identified in Policy GS2. feel this may result in lower-than-anticipated supply.
- Concern that the draft Plan does not set out a 'deliverable' housing supply, with housing numbers considered to be vague and overly reliant on longer term strategic sites.
- Concern that the draft Plan does not identify a short-term supply from available and developable sites, or for subsequent periods.

- Concerns raised regarding the calculations behind the number of homes being planned for, and question whether the proposals are going beyond the timeframe to 2050.
- Concern raised that the quantum of development identified from this source appears to be dependent on windfall sites coming forward. In the absence of more detailed information around the locations which this policy relates to and whether indeed such sites are, available, achievable and deliverable, they believe the policy as drafted lacks the requisite compelling evidence that they will provide a reliable source of supply. Suggest that to avoid this and potential double counting of sites, specific sites should be identified and allocated for development.
- Responses acknowledged the role of Neighbourhood Plans in meeting local housing needs within defined settlement boundaries and agree with the MK City Plan emphasis (policy GS2) that “Neighbourhood Plan-led development within villages and rural settlements should be of a scale appropriate to the size of the relevant settlement”.
- Concern that MKCP 2050 seeks to provide Neighbourhood Plans with a steer but focuses only on their role in planning for homes as part of the spatial strategy in draft Policy GS1, and only in the 'Tier 2' areas (similar to the draft Policy GS2 'Strategy for Homes' A - ii.). Suggestion that this is amended to encourage and enable new and modified Neighbourhood Plans to come forward within the Tier 1 City as well.
- Responses highlighted the Wolverton Town Centre Neighbourhood Plan as an exemplary neighbourhood plan which supports growth and housing development on brownfield sites (where policies were developed in collaboration with the local community).
- Suggestion that there is greater certainty and clearer prescriptions/minimum housing requirements for each parish/area to meet local needs and provide proportionate growth. As drafted, delivery could be 1 dwelling per neighbourhood plan area. Alternatively, request that land is allocated at key settlements/villages within the Local Plan itself.
- Suggestion that the level of development needed to be delivered in each neighbourhood forum/parish council area should be prescribed from the outset. This would allow neighbourhood plans to consult on the spatial approach and allocation of land necessary to meet local market and affordable housing needs.
- Responses noted that Neighbourhood Plans may be supported by an infrastructure delivery plan or aspirational and necessary infrastructure for such growth. Responses sought clarity on whether such infrastructure can be funded by S106 mechanisms when its proportionate growth.
- Newport Pagnell Town Council consider that Policy GS2 should make reference to the total housing that should be delivered by Neighbourhood Plans (collectively and individually).

- Criticism of the reliance on Neighbourhood Plans for rural development, noting their historical ineffectiveness in delivering housing.
- Concern raised regarding whether affordable homes will be genuinely affordable.
- Responses felt it was essential that a greater proportion of new homes built are affordable, and they support the target of 40% across MK, including CMK.
- Concern that the current delivery of affordable homes in CMK has been limited due to a failure of the planning system enabling developers to avoid affordable housing and S106 contributions through S106 contributions for off-site provision.
- Suggestion that there should be more social housing, not just affordable housing.
- Concerns raised on the over-reliance on strategic urban extensions for affordable housing. suggests including an additional buffer in the Local Plan to ensure continuous housing provision, given the proposed changes within the NPPF to the standard method for calculating housing needs.
- Concern that 40% affordable housing is a new high level for the present Milton Keynes market, and it is not clear that this will be achieved.
- Suggestion that affordable housing should consider a variety of ownership models and support diverse community needs.
- Representations noted the importance of ensuring that new homes are built with safe and attractive cycle routes to the city centre and argues that promoting car reliance is unjust, particularly due to affordability and environmental sustainability.
- Suggestion to amend the policy to specifically mention Cohousing, which provides mutual support for older people (citing Still Green Cohousing as an example).
- Suggestion for the policy wording to allow new forms of housing, particularly community-led options like Cohousing, to meet the needs of older people.
- Concern that the MKCP 2050 Policies Map lacks details on Phase North – South MRT
- Respondents requested no high-rise development on Campbell Park.

Amendments for Draft Policy GS2

- In the Regulation 18 draft, the plan proposed delivering between 53,245 and 63,000 new homes by 2050, with a detailed breakdown of allocations across strategic sites and urban regeneration areas. The policy emphasised three delivery routes: estate regeneration, neighbourhood plan-led development, and windfall brownfield sites. It also included specific figures for Gypsy and Traveller pitch provision and highlighted the role of strategic extensions in meeting specialist housing needs.

- By the Regulation 19 stage, the housing target was revised to a minimum of 50,372 net new homes, with a planned supply of 59,779 homes to provide a buffer and support growth ambitions. The delivery mechanisms were streamlined, now focusing on estate regeneration and neighbourhood plans that allocate at least one home. The windfall category was retained but rephrased as “small opportunity sites.” The table of housing supply was updated with revised figures for each strategic site, notably increasing the allocation for Central Milton Keynes and reducing some brownfield site capacities. Additional provisions were introduced for Travelling Showpeople, and the policy now includes a requirement for development within Metro Corridors to align with Policy HQT4.
- Overall, the Reg 19 version presents a more structured and quantified approach, with clearer distinctions between minimum requirements and planned supply, and a more focused delivery strategy aligned with infrastructure and spatial priorities.

Draft Policy GS3 Strategy for Economic Prosperity

Main Issues for Draft Policy GS3

- Support for the policy as it supports improvements to working, living and shopping in CMK.
- Concern that CMK should not be so heavily relied upon to situate office space (citing concerns that, with the added housing here, transport routes may be overwhelmed).
- Suggestion that the Council adopts a broader economic strategy that moves beyond warehousing, urging the council to diversify into sectors like technology, healthcare, education, and tourism to boost resilience. Respondents felt a more varied economy would also improve quality of life by offering greater job options, services, and amenities, making the area more appealing to residents and newcomers alike.
- Concern that MK does not need a university due to the closeness of Northampton University
- Concern that para 36, bullet point 1 is unclear how the amount of floorspace required to replace ageing stock is more than that required by economic growth. At bullet point 2, the statement that there is need for 480,000-520,000sqm of offices and 300,000sqm of this is to be in CMK is unclear. This does not align with GS3 A1 where the 300,000sqm figure includes education or research and development uses. Please clarify the office sqm requirements, as recent proposals in CMK indicate a lack of demand for offices, at least in the short term.
- Suggestion that a market led approach should be encouraged. Suggestion that Plan:MK and the Article 4 direction placed on the CBD highlights a conflict between market requirements for more homes in CMK and a lack of demand for office floorspace. Suggestion that one way to alleviate this may be to promote mixed use

development in CMK, which could include office and residential as per para 43. The increased height profiles also covered by the Plan may support commercial viability of such schemes.

- Suggestion that GS3 should support refurbishment, extension and redevelopment of aging stock and a flexible approach to end uses, such as Classes E, C3 and other suitable uses. The criteria to reuse existing stock must be balanced with the benefits of redevelopment, such as enhanced public realm and connectivity. Support for start-ups should be market led.
- Suggestion that the policy should allow a range of uses within Class E or other suitable uses (subject to other policies) to enable all sizes/types of employment units to come forward. To support inward investment, policies can focus on high demand uses. Mixed use office and/or residential led development along with increased height and density in CMK, as per the draft Plan, is one way to potentially achieve this, subject to site specific viability.
- Concern that the policy should not be too restrictive, for example by requiring unachievable thresholds of supporting uses in residential led schemes, such as Class E. Instead, the existing approach to active frontages on key streets should be used, thereby allowing a variety of commercial uses to come forward.
- Red Bull Technology are supportive of the broad approach to economic growth but disagree with Policy GS3 which they consider to be too rigid. Consider that the policy as drafted fails to adequately recognise the delivery of R&D uses in areas outside of Central Milton Keynes. Propose that the policy is amended to support the provision and expansion of R&D uses across the City, and the potential for clusters such as around Tilbrook.
- Concern that land allocation prioritises short-term economic benefits, especially warehousing, at the expense of sustainability. Respondents highlighted challenges like unaffordable business units, uncertain economic contributions of warehousing, and insufficient energy policies. Concerns include freight reduction, environmental impact, job quality, and road maintenance. They call for collaborative planning, a holistic evaluation framework, and the adoption of Doughnut Economics to ensure informed trade-offs.
- Support for policy suggests residential and mixed-use conversion to redevelop older buildings.
- Supports replacing old buildings with more efficient ones and repurposing of buildings
- Suggestion that aging commercial buildings should be easily able to convert to residential and social housing where tenants would be close to amenities.

- Suggestion to expand on the possibilities of land use and 'old stock' refurbishment / reuse to encourage major charities, small high-tech businesses, restaurants etc. to consider the concept of building their respective businesses in MK.
- Suggestion to include purpose-built start-up facilities in new developments, possibly near retail sites.
- Suggestion to install solar panels on buildings or car parks and not on fields to give an income to the building to help with refurbishment.
- Concern about whether research has been done on business space needs and call for planning policies to support small business units, live-work spaces, and flexible, short-to-medium lease options to boost SME opportunities and employment variety.
- Suggestion for more affordable sites to accommodate and develop such business start-ups and scale ups.
- Support for a diversified economy. Over-concentration on one sector can exaggerate the effects of an economic downturn in that sector, there should be scope for the development of other, hopefully counter-cyclical, sectors) to counter economic downturns.
- Support to make MK a varied and successful economic area, believing existing skills should be leveraged
- Concern that the changes in working patterns and places since Covid may not have fully been considered.
- Urban&Civic, Taylor Wimpey Strategic Land, and The Society of Merchant Venturers consider that the employment needs as set out in the HEDNA should be addressed and included in Policy GS3. Consider there is the opportunity to boost the City' economic potential with a wider range of employment sites including provision at Milton Keynes North.
- Moulsoe Parish Council consider that projected economic needs should be re-evaluated and question whether there is realistic demand for the employment uses proposed
- Suggestion that there should be consideration of a buffer and/or flexibility to allow for changing circumstances in economic activity.
- Concern that the Council's approach is unsound, and that additional sites should be identified to meet shortfalls.
- Concern that GS3 currently prejudices sites outside of Central Milton Keynes and that, in order to accord with the National Planning Policy Framework, the policy should facilitate expansion and upgrade of existing facilities, and infrastructure provision, to support the knowledge-based economy.

- Storey Homes broadly supports the draft policy but points out that it overlooks the significance of village-based employment in fostering local community and economic well-being
- Suggestion that MK must boost its cultural funding to unlock talent, attract business, and grow as a tourist destination.
- Concern that the figures (from 2022) are out of date – with there being empty parking spaces and shops within CMK and Bletchley.
- Historic England highlight the potential for developing skills in sustainability and resilience, particularly in older, traditionally built structures. A Borough-wide survey of pre-1919 buildings is recommended to identify opportunities, aligning with findings in a related Historic England report.
- Historic England supports encouraging the redevelopment of historic buildings, emphasizing the importance of heritage-informed approaches. The response highlights the need for heritage expertise to ensure positive design outcomes and references resources from Historic England for guidance.
- Concern raised that planning policies alone can't drive inward investment; they must be backed by a proactive Economic Regeneration team to attract businesses and promote Milton Keynes as a business hub.
- Concern regarding whether the impact of permitted development (leading to the loss of commercial space) has been considered.
- Concerns raised regarding high rise development
- Concerns raised regarding the emphasis on warehousing which has led to complicated footpath diversions, and future developments should avoid this or provide efficient alternatives.
- Concern raised that developing Milton Keynes as an information technology centre will increase energy demands, potentially limiting planning and other needs like EV charging; and there is a lack of focus on the need for specialist building skills, essential for both new developments and retrofitting older dwelling; suggestion that the current review of local FE provision should address this.
- Hallam Land seek clarification on the amount of employment land proposed for the Eastern Strategic City Extension, noting that Policy GS14 requires around 40ha, which is not listed in Table 2 which provides a detailed breakdown of the 275.5ha requirement.
- Buckinghamshire Council consider that the level of employment growth shown in Policy GS3 falls short of the forecast need, and it is not clear how much of the proposed supply is already committed or to be provided via new sites.

- Galliford Try raised concern that the overall requirements for employment floorspace in CMK is ambitious and does not align with recommendations of the background evidence. Request clarification on whether the amount of floorspace indicated is gross provision or net having regard to potential loss.
- West Northamptonshire Council (790.4) considers that the Plan appears to make insufficient provision for warehousing and general industrial purposes in accordance with evidence set out in the HEDNA, and notes concern about implications of additional pressures this will place on nearby Authorities
- Objection to expanding logistics operations due to their visual impact and tendency to be replaced regularly and lack of jobs for the area
- Objection to the development of new warehousing
- Concern that demands for warehousing will fall in the future
- MK Forum raise concern that the claims that Milton Keynes is becoming an IT hub is not supported by the evidence such as the NOMIS Labour Market Profile, which shows that only 7.8% of MK's workforce is categorized as Professional, Scientific, or Technical compared with averages of 9.6% (region) and 9.1% (UK). Likewise, 9.4% work in Transportation and Storage compared with 4.8% (region) and 5% (UK).
- MK Forum suggest that MK should be making better use of existing institutions such as the Open University itself as well as Milton Keynes College, the University Hospital, and nearby institutions such as Cranfield and Buckingham Universities to raise the employment profile of the city.
- Milton Keynes Development Partnership (MKDP) supports plans for a mixed-use city centre and new office development in CMK but questions the scale proposed—300,000 sq. m.—while based on the HEDNA report, does not reflect historical supply or current commercial challenges, that exist in the city centre and region, especially post-pandemic. MKDP advocates for a more sustainable approach by prioritising reuse of current space over large-scale new development.
- Concerns about the extent of office floorspace
- Hallam Land requests flexibility in the commercial uses permitted in allocation policies, especially for those delivering employment land in the medium to long term, like the Eastern Strategic City Extension
- Varsity Town Planning representing RO Group suggests that roadside uses like food and drink and Electric Vehicle (EV) charging should receive stronger policy support within this employment policy. Suggestion that the policy should be broadened to support diverse employment uses that contribute to inward investment.
- Kier Group Limited raise concern that the employment strategy in the Plan will be ineffective in delivering employment in Newport Pagnell and other settlements to the

north of the district and that the promoted site should be included to provide additional services and facilities

- Concern that the Universal Studios project and the East West rail link are not well reported in the plan, suggesting that these are crucial factors which will attract investors and thus should be highlighted
- MK Community Foundation strongly support the ambition for a residential undergraduate university to be located in the city centre, as part of attracting young people and creating vibrancy.
- Future Wolverton Limited calls for stronger support for the co-operative and mutuals sector in Milton Keynes, highlighting access to finance as a key challenge. They criticise the city plan for overlooking this sector's growth needs and emphasize the importance of the Milton Keynes School for Social Entrepreneurs. They urge Milton Keynes City Council (MKCC) to align with national policies to support co-op business skills development.
- Suggestion that Policy GS3 should do more to support social entrepreneurship, especially in disadvantaged areas
- Suggestion to disperse adult education to improve skills. Many people who would like to acquire an employable skill are limited by having to travel several miles. Suggestion that more use should be made of outlying village/community halls
- Suggestion that to support the skills agenda there should be more accessible university and college and apprenticeships
- Gayhurst Parish Council, suggest more emphasis on "maintaining, improving or delivering new mass rapid transit, public transport and/or active travel modes
- Cllr Hopkins considers the plan should make provision for HGV parking within or adjacent to employment provision
- Responses expressed frustration with the current congestion on the M1 and the inadequacy of Junction 14 for Milton Keynes.
- Concern raised that transport is of little focus in the Policy.
- Suggestion that the Plan should help small businesses grow and offer council partnerships to help them. Criticize the current plan for not attracting major tech firms and suggest that converting office space to apartments misses opportunities for economic growth and innovation
- Suggestion for a more dynamic, flexible, and inclusive approach to economic development—one that empowers small businesses while reimagining how urban spaces and ageing assets can be transformed

Amendments for Draft Policy GS3

- The opening sentence is more direct and formal in Reg 19, removing phrasing like “supports our economic prosperity” and replacing it with “will be directed to locations shown on the Policies Map.”
- The reference to “Blocks A1-4 and B1-4” in Reg 18 is refined in Reg 19 to “Blocks A1-4, and B1-3 and the Tech and Innovation Area within Block B4,” offering more precise locational guidance.
- Reg 19 introduces clearer and more consistent formatting in the employment land table, including a “Source of supply” column and standardised use descriptions.
- Phrasing like “development proposals for the refurbishment of existing buildings” in Reg 18 is expanded in Reg 19 to include “refurbishment, reuse, and/or extension... and/or redevelopment,” broadening the scope of supported activity.
- Support for education and skills development is consolidated in Reg 19 into a single clause, whereas Reg 18 separates it into two.
- References to “superfast broadband and wireless communications” in Reg 18 are simplified in Reg 19 to “digital communications infrastructure.”
- Transport-related support is updated from “mass rapid transit, public transport and/or active travel modes” to “Metro and public transport infrastructure and services,” aligning with updated terminology.
- Reg 19 introduces new wording to support small-scale employment units, specifying size ranges for office, serviced office, and industrial/warehousing floorspace—this was not present in Reg 18.

Draft Policy GS4 Strategy for People Friendly and Healthy Places

Main Issues for Draft Policy GS4

- General support for the policy’s focus on promoting physical and mental health in strategic development proposals.
- Suggestion that applicants should be able to commit to implementing a marketing strategy post-permission to define the mix and distribution of social infrastructure.
- Suggestion that the policy should recognise the contribution the Grand Union Canal infrastructure contributes to opportunities for active travel.
- Sport England recommend the strategy clearly references Active Design Principles and recommends completion of the checklist for planning applications to ensure embedded in design.

- Concern that there is a Lack of focus with continuing greening of MK. Suggests 30% tree canopy, at least 3 trees in sight of every home, school, workplace, every home within 300m of a park.
- Concern that Dense urban living fosters feeling of being trapped. Concern increasing density, height and reduced room sizes.
- Support for concept of encouraging close proximity to amenities.
- Suggestion to include definition of 'strategic' – assumption that this relates to strategic allocations, but clarity is sought
- Concern that Infrastructure provision based on Table 3 distances alone is inadequate – need to account for existing local infrastructure, viability and proposed scale of population.
- Suggestion that the Table 3 distances should be requirement not guidance
- Concern that over restrictive and aspirations not possible to achieve on every site, para 49 explains not required of every house yet policy requires provision of an appropriate mix 'in line with' Table 3, suggest change to 'have regard to'.
- Suggestion that putting MRT along routes must not result in the loss of the existing services on other parts of those routes.
- Suggestion that Active Travel routes should be direct and have strong 2-way legibility to encourage use.
- Suggestion that walking should be encouraged. Walk / cycle connections should be promoted to schools.
- Suggestion that the policy should emphasise the importance of work and employment in health.
- Suggestion that the policy needs a more nuanced discussion obesity v climate in terms of having vital and viable centres and local accessibility to services / sustainability. Concerns could be better addressed through restricting opening hours.
- Smith Jenkins question why a hospital use is required to provide a HIA.
- Concern that it is unreasonable to restrict HFT close to primary schools when primary children are unlikely to use them. Should balance with NPPF principle of supporting economic development (since superseded)
- Suggestion that there is no need to require suicide prevention in building design as this is covered by building regulations.

- Concern that allotments are not required. People should be able to choose what facilities are near their home, if no access to healthy food it doesn't mean they are unhealthy.
- Suggestion that People Friendly Healthy Places should form more of a major part of the plan.
- Suggestion that the links between health and planning should be more explicit and more said about mental health.
- Eliminating food deserts and encouraging mixed use development supported.
- Concern that the policy is too prescriptive
- Responses queried how development at Bow Brickhill can be delivered in accordance with this policy, including loss of valuable landscape.
- View that places should be clean and safe, and that effective policing would make streets safer. Suggestion that security and safety should be higher priority.
- Suggestion that the promotion of good physical and mental health should apply to existing communities too.
- Concern that Local Centre Glebe Farm has no local shop or health infrastructure
- Concern regarding how this policy is applied in a rural setting.
- Concern that MK hospital needs to be upgraded and expanded.
- Suggestion that HIAs should be mandatory for all new developments to ensure healthy sustainable transport choices are made including the proportion of active travel.
- Support / need for early provision of doctors and dentists in new developments; or temporary services in place.
- Concern about sufficient provision to meet the needs of the growing population.
- Suggestion for the need for a clearer definition of and guidelines for health impacts.

Amendments for Draft Policy GS4

- The Reg 19 version introduces a trigger/threshold: it applies specifically to developments of 10 or more dwellings, whereas Reg 18 applied to all strategic development proposals.
- The phrase "*promote good physical and mental health*" in Reg 18 is changed to "*improve physical and mental health*" in Reg 19, suggesting a more active role for development.

- Reg 19 adds “cultural infrastructure” to the list of facilities to be provided or contributed to, expanding the scope beyond just social and community amenities.
- The movement hierarchy in Reg 19 is broken down into three clear sub-points (a, b, c), making the prioritisation of transport modes more explicit and structured.
- The phrase “*safe, direct and accessible routes*” in Reg 18 is expanded in Reg 19 to include “*inclusive*”, reinforcing the emphasis on equitable access.
- Reg 18 separates the design and public realm elements into two points; Reg 19 merges them into one, streamlining the policy and improving flow.
- Housing is described in Reg 19 as “*accessible, adaptable, and well-designed*”, adding “adaptable” to the Reg 18 wording and slightly reordering the terms for clarity.
- The final clause in Reg 19 adds “*mitigating noise pollution*” to the environmental considerations, which was only implied in Reg 18.
- Reference to Table 5 added.

Draft Policy GS5 Our Retail Hierarchy

Main Issues for Draft Policy GS5

- Responses highlighted the importance of Midsummer Place's as a key retail and leisure centre.
- Responses emphasised the need for early consultation on the Mass Rapid Transit (MRT) plans
- Concern that there is no mention of retail in rural area, and suggestion that the plan should support remaining rural retailers.
- Criticism of the policy for not supporting retail development outside town centres. Responses felt that the current retail hierarchy underestimates the need for retail space on or near strategic sites. Suggestion that the policy is amended to support demand-driven retail development at strategic sites where a need can be demonstrated. Suggested policy wording “that additional retail development outside the retail hierarchy may be supported if it meets local needs and does not conflict with aims set out within the retail hierarchy.”
- Suggestion that local centres should be delivered prior to development and that existing centres need redevelopment.
- Support for draft Policy GS5, believing in equality of access to facilities (with or without a car), and the need to reduce urban traffic.
- Tattenhoe Parish Council are supportive of the draft proposals.

- Request for a comprehensive method to predict retail floorspace requirements to guarantee the plan's effectiveness. Respondents acknowledged the reason for concentrating on immediate retail needs given the uncertainties of long-term predictions but insisted on clearer explanations in the supporting documents to prevent issues. Recommendations to detail the ability of current vacant floorspace to satisfy identified needs and how this aligns with the redevelopment of Midsummer Place.
- Suggestion to explicitly state that there is no short to medium-term necessity for new retail floorspace to avoid speculative developments outside of central areas.
- Request clarification on the draft policies map for CMK, particularly the extent of the Primary Shopping Area (PSA) and shopping frontages.
- Suggestion to enhance nightlife by connecting the theatre district with the dome and new flats, incorporating dining, drinking, and artisan retail to create a more vibrant atmosphere.
- Concern that a supermarket at one extreme end of CMK should not be considered as “local” to the other end 2km away. CMK cannot be regarded as a single space for convenience shopping if active travel is to be promoted. The same will be true of the largest proposed new areas. For this reason, small and medium sized supermarkets should be actively preferred over superstores in district and local centres.
- Concern that it is not clear from the information given what size or number of convenience stores will be required in the new strategic areas. Some guidance should be given.
- Concerns that flexibility should be allowed for shops to change use
- Responses emphasised the importance of local shopping, as many residential areas lack local shops, leading to increased car usage for short trips.
- Has concerns that prioritisation of CMK may harm smaller centres.
- Suggestion that movement and parking are essential for the topic of this policy
- Agreement with draft Policy GS5, supporting the hierarchy, however concern raised that it conflicts with draft Policy GS4 – clarification sought on how food deserts will be rectified without additional building provision.
- Support for draft Policy GS5, however concern raised regarding the provision for villages, as many villages have lost their shops and pubs.

Amendments to Draft Policy GS5

- The opening sentence is slightly reworded for clarity and flow, with Reg 19 removing the reference to “national policy” and simplifying the structure.

- Reg 19 introduces “Various existing Local Centres and newly delivered Local Centres within Strategic Urban and City Extensions” under Local Centres, expanding the scope beyond just existing centres.
- The roles of each centre type remain broadly consistent, but wording is slightly refined for conciseness and consistency (e.g. “shopping and service needs” is used more uniformly).
- Reg 19 removes the phrase “*as defined in national policy*” from the description of town centres, streamlining the language.
- The City Centre description is unchanged in substance but slightly reformatted for clarity.

Draft Policy GS6 Open Countryside

Main Issues for Draft Policy GS6

- Francis Jackson Homes (FJH) suggests that the wording “similar built footprint and volume of built form to that which already exists and enhances its immediate setting” be omitted. They also propose that a site-specific impact should be introduced to GS6 to allow suitable Previously Developed Land sites to be developed in the Open Countryside where they are well-related to existing sustainable settlements.
- Some concern that Policy GS6 is overly restrictive compared to NPPF Paragraph 84, which restricts “isolated homes” in the countryside.
- Francis Jackson Homes suggest that Policy GS6 should be more flexible and permissive to genuinely take a “brownfield first” approach and maximise the use of PDL for new homes as per the NPPF.
- Some suggest greater flexibility for open countryside development aligned with housing and infrastructure goals. Some suggest expanding GS6 to support developments that address cross-boundary sustainable housing needs, especially where there are significant housing shortfalls.
- Some disagree with Policy GS6 because it isn’t strong enough to protect the Open Countryside from speculative development.
- Some request no development in the Open Countryside.
- Some feel that a proportion of open countryside should remain as farmland
- Disagreement with the inclusion of Moulsoe Parish into the urban area. Some suggest that Moulsoe should have a greater buffer and feel it has been protected inequally.
- Concern that Policy GS6 threatens open countryside in Moulsoe and North Crawley.

- Historic England suggest that support for Enabling Development is inappropriate in GS6 (remove from criterion iii.) Proposed wording "The development would represent the optimal viable use of a heritage asset."
- Suggestion that if criterion 7i-iii is all required, iv should be part of iii rather than an independent criterion.
- Some agree with the policy if criteria B1-7 are alternatives rather than all requirements.
- Storey Homes suggest that the policy should include references to rural exception sites in the Open Countryside as per the NPPF. Storey Homes request that a link is incorporated between Policy GS6 and Policy HQH9 due to their interrelatedness.
- Some suggest that the GS6 encourages tree planting, landscaping, and enhancements to the Open Countryside.
- Gayhurst Parish Council request that the "Horse related development" policy from Plan:MK is carried forward into draft Policy GS6 Open Countryside.
- Suggestion that GS6 should refer to other suitable land uses in the countryside, including sports facilities and affordable housing schemes as per Policy HQH9 and NPPF Paragraph 70b
- Smith Jenkins suggest point 7 of GS6 should be separated into two separate criteria for new or replacement isolated homes in the Open Countryside.
- Smith Jenkins and Stockgrove Homes consider that Paragraph 2 of Policy GS6 is overly restrictive.
- Some suggest that the protection of the surrounding landscape is addressed in draft Policy PFHP7(8), making it unnecessary for GS6 to restrict proposals based on landscape impact.
- Anglian Water Recommend Policy GS6 parts 4 and 5 reference water recycling infrastructure in open countryside, to avoid refusal subject to permitted development changes.
- Smith Jenkins and Stock Grove Homes and others consider it inappropriate for draft Policy GS6 (criterion 'd') to restrict the redevelopment or reuse of brownfield land to non-residential brownfield land as it is not in accordance with the NPPF which seeks to make best use of all Brownfield Land. Suggestion that Policy GS6 is more restrictive than national policy on Green Belts, which allows redevelopment of previously developed land regardless of its current use.

Amendments to Draft Policy GS6

- Reg 19 introduces a reference to Policy CEA12, linking the policy to wider landscape protection guidance.

- The criteria structure is clearer in Reg 19, with more detailed sub-clauses and expanded explanations, especially for rural worker dwellings.
- The rural worker dwelling clause is significantly expanded in Reg 19, requiring evidence of:
 - Need for proximity to work,
 - Economic sustainability of the enterprise,
 - Proportionality of dwelling size to enterprise needs.
- Reg 19 introduces new criteria:
 - Reference to Policy ECP4 and HQH9 for certain development types.
 - Support for Gypsy and Traveller pitches where unmet need is evidenced and sites are accessible.
- The heritage asset clause is retained but slightly reworded for clarity.
- The reuse of buildings clause is simplified in Reg 19, focusing on footprint and volume, and removing “non-residential brownfield land” wording.
- The clause on extensions and ancillary structures is reworded in Reg 19 to focus on proportionality of footprint and volume.
- The subdivision of residential buildings is retained with minimal change.
- The replacement isolated homes clause is restructured in Reg 19, with clearer formatting and slightly refined wording (e.g. “substantially the same footprint and volume”).
- Reg 19 separates out new isolated homes of exceptional quality into a distinct final criterion, repeating the design standards for emphasis.

Draft Policy GS7 Wind and Solar Development Strategy

Main Issues for Draft Policy GS7

- Some respondents want policy to reflect national policy approach and other material considerations, such as the Wind Turbines SPD.
- Support for solar/wind farms should be conditional on no negative impacts to BMV agricultural land, SLAs, and compliance with other policies.
- Support for the policy wording as drafted and support for renewable energy generation due to need to tackle climate change.
- Support for local generation and community owned energy infrastructure.

- Suggestion that it should be easier to build renewable energy provision in MK.
- Support for using existing built form for solar panels where use retrofitting may not be possible elsewhere due to heritage and viability issues.
- Support for energy storage, including from solar panels on industrial rooftops and over car parks, subject to safeguards.
- Concern that renewable energy would not protect the environment.
- Concern regarding potential conflict with Special Landscape Areas and local landscapes generally. Suggestion that SLAs be excluded for areas of search.
- Some respondents raise concerns about using agricultural land, open spaces, and open countryside for solar and wind farms. Some concerns about impacts on food security.
- Suggestion that farmland needs to be improved instead of building on it.
- Suggestion that the focus should be on offshore wind and nuclear energy.
- Suggestion that policy should consider new designs and technologies.
- Suggestion that policy should consider impacts on designated and non-designated heritage assets and their settings and require a Heritage Impact Assessment.
- Policy approach should be consistent with Policies GS6 and CEA12, which could be said to conflict. Wind turbines and solar farms conflict with the notion of open countryside.
- Concern regarding impact on residents, local communities, woodlands, biodiversity, linear parks, and infrastructure.
- Suggestion that policies should consider potential landscape, heritage, and visual impacts of solar and wind farms in other authority areas.
- Suggestion that MKCC should partner with local community energy organisations, such as Wolverton Community Energy to supply energy and provide other benefits to communities.
- Suggestion that further consultation is needed.
- Suggestion that Agricultural land should have greater priority than wind turbines and solar farms and policy should consider criteria for associated infrastructure and development.
- Suggestion that usable development land should not be used for solar farms, due to constrained MK land supply.

- Some advocate using buildings, parking canopies, and developed areas instead. Suggests renting warehouse roof space to generate electricity from solar panels.
- Further explanation is needed about how the areas of search have been selected.
- Suggestion that areas of search be refined to identify more certain allocations.
- Queries as to why some SHLAA sites had been included in the solar farm area and others excluded.
- Suggestion that a minimum stand-off distance for wind farms from residential properties should be included.
- Suggestion that solar panels should be made mandatory on all new homes and grant schemes introduced to support retrofitting solar panels.
- Energy from new renewable energy generation should feed into new and existing developments.
- Suggestion that the policy should encourage solar panels more.
- Suggestion that energy needs are offset by better building standards, heat pumps, and retrofitting of existing houses.
- Greater emphasis should be placed on micro-generation to protect greenfield land.
- One respondent suggested that energy storage is not green in and of itself.
- Suggestion that policy needs to consider air traffic routes.
- Some support for wind but not solar due to visual impact.
- Some object to new wind turbines in principle.
- The Plan should specify the maximum size of wind/solar farms that could come forwards, to ensure efficient use of land.
- While the carbon study concluded that Grades 1 and 2 agricultural land are unsuitable, wind and solar developments do not permanently prevent future agricultural use. Suggestion that the policy should support wind and solar, subject to grid infrastructure, access, radar, ecology, and site-specific considerations.
- Suggestion that designated sites should be listed within footnotes linked to Paragraph 63 in the Plan, and wording of GS7 should include that development “would not adversely affect and would seek to significantly enhance biodiversity”
- Suggestion that operational and utility resilience may support projects in locations outside the designated areas.

Amendments for Draft Policy GS7

- The term “solar farm development” in Reg 18 is simplified to “solar development” in Reg 19, broadening the scope beyond just large-scale farms.
- Reg 18 specifies a minimum size of 5MW for solar farms; this threshold is removed in Reg 19.
- Reg 19 introduces new criteria for assessing proposals, including:
 - A suitable restoration plan and after-use of the land.
 - Avoidance of adverse cumulative impacts with other energy developments.
- The requirement in Reg 18 to avoid “unacceptable impact on the availability of best and most versatile agricultural land” is removed in Reg 19.
- The final clause supporting solar panels and canopies on parking structures and buildings is retained in Reg 19, but the wording is slightly simplified and streamlined.

Draft Policy GS8 Hanslope Park

Main Issues for Draft Policy GS8

- Historic England (HE) raised concern about the impact on the three listed buildings on site. HE suggests that the policy should clarify how these buildings and their settings will be protected, supported by a heritage impact assessment.
- Some concern regarding the designated assets on site and therefore the suitability of a Local Development Order. Hanslope Parish Council object due to the impact of development on the designated assets at Hanslope Park. Hanslope Parish Council object due to increasing light pollution from Hanslope Park, impacting the setting of the Grade I listed St James the Great Church.
- Suggestion that GS8 contradicts the strategy of the MKCP 2050 which emphasises development within defined settlement boundaries to meet local needs.
- Some suggest that Hanslope Park remain Open Countryside. Hanslope Parish Council object to the changing open countryside designation. Councillor Andrew disagrees with the changing designation from open countryside.
- Some raise concern regarding insufficient road infrastructure and the unsuitability of travel plans.
- Some concern that expansion of Hanslope Park should not be encouraged due to poor transport linkage and inadequate capacity for public transport.
- Concern that expansion of staff numbers would worsen the strain on an overloaded and unsuitable road network.

- Hanslope Parish Council object due to there being no regular bus service. Concern regarding maintenance of local road infrastructure.
- The MK Green Party suggest that development at Hanslope Park should only be permitted if public transport is improved.
- Some concern regarding the insufficient access to the site via narrow rural roads, used as rat runs at peak time through Hanslope, Tathall End and Haversham Road causing danger and disruption to locals.
- Some raise concern that local flood risk and adverse impacts mean a Local Development Order would not be in accordance with the NPPF.
- BBOWT highlight that Little Linford Wood is close to Hanslope Park and would be impacted by any development. They suggest to not permit any development closer to the wood than is existing. Suggested wording: "There are no impacts to Little Linford Wood Local Wildlife Site and development does not encroach any closer than already exists."
- Some raise concern regarding the impact on the Biodiversity Opportunity Area near to the site.
- Hanslope Parish Council object due to the impact on biodiversity, noting that the site borders a Biodiversity Opportunity Area.
- Concern regarding the impact on surrounding wildlife and natural habitats.
- Some raise concern regarding loss of green space
- Some concern that the LDO would remove the need to apply for planning permission to check and balance development on site.
- Some concern that the sites surrounding Hanslope Park were deemed unsuitable for development due to infrastructure limitations and therefore an LDO would not be suitable on the site. Some suggest removing the LDO proposal from the Plan. Councillor Andrew raises concern regarding infrastructure and disagrees with the establishment of an LDO.
- Some suggest exploring alternative locations or satellite offices.
- Suggestion that proposed development should take account of the surrounding countryside and villages.
- Some concern regarding increased noise pollution. Concern regarding an increase in pollution.
- Suggestion to add "highways upgrade as appropriate" as well as travel plans to accommodate for increased traffic.

- Concern regarding speeding and congestion in the local area. Some concern regarding safety of pedestrians.
- Concern regarding the impact of development on local flooding; especially in Tathall End. Concern regarding previous flooding issues worsened by construction.
- Hanslope Parish Council object to GS8 due to local flooding, referencing the September/October 2024 flooding which affected the roads and access to the Park.
- Concern raised regarding flooding and sewage overflows.
- Suggestion to add: 'All new development should only take place within the existing built area with no extensions beyond the boundary into open countryside'
- Suggestion to add: 'There should be no additional car parking added which would further increase the volume of traffic on the existing Hanslope to Haversham road.'
- Suggestion to add: 'There should be no additional residential development in nearby villages to support growth. Any new development should fund a redway to Hanslope and to MK via Castlethorpe and Wolverton, a Sustrans route has already been devised for this using existing footpaths and bridleways.'
- Hanslope Parish Council object to GS8 due to no explanation of the details of the development that will be permitted under the LDO. Castlethorpe Parish Council note the potential for a Local Development Order for Hanslope Park and consider that more information will be needed to assess proposals and potential impacts.
- Hanslope Parish Council object to GS8 due to lack of information regarding the lifetime of the LDO or the exact area for the LDO.
- Hanslope Parish Council object due to there being no safe pedestrian or cyclist access to the site. Hanslope Parish Council object as there are active travel facilities required along Newport and Park Roads.
- Hanslope Parish Council object due to the insufficiency of the narrow rural roads.
- Hanslope Parish Council object as road improvements are required around "Devils Dip" - an accident hotspot.
- Hanslope Parish Council object as the Call for Sites land surrounding Hanslope Park was assessed as unsuitable due to 'access constraints' and the significant costs associated with delivering strategic infrastructure to install suitable access.
- Hanslope Parish Council object due to Sustainability Concerns; believing that local highway infrastructure, active travel facilities and local facilities are not suitable for future development.
- Hanslope Parish Council request that GS8 is removed from the Plan.

- Suggestion that development should be no taller than existing buildings on site.
- Some feel the surrounding local roads are dangerous, citing serious traffic incidents.
- Some cite the low occupancy rates of the Bus service provided from Milton Keynes Station. Hanslope Parish Council object due to there being no regular bus service.
- Suggestion to include stronger wording regarding travel access.
- Suggestion that staff utilise park and ride facilities.
- Some object to GS8 due to a lack of consultation with local residents.
- Suggestion that Policy GS8 is strengthened by requiring implementation of improved transport initiatives to ease current traffic issues.
- Suggestion that Policy GS8 also requires Traffic Management Plans
- West Northamptonshire Council note that care is required when considering the further expansion of Hanslope Park, ensuring it doesn't impact on the character of the wider area including via transport impacts.
- West Northamptonshire Council note that GS8 should recognise the existing and planned growth in West Northamptonshire which also needs to be considered.
- The Conservative Group consider an LDO to be inappropriate relative to the site's location and context. Raising concerns regarding impacts on landscape, biodiversity, natural environment, flooding and transport impacts.
- Suggestion regarding the importance of a development buffer should the New Towns Taskforce allocate a new settlement to the south an east of Hanslope Park.
- Suggestion to remove the reference to Open Countryside
- Suggestion to remove the requirement for Travel Plans.

Amendments for Draft Policy GS8

- The Reg 19 version adds a new clause stating that proposals must maintain or enhance Hanslope Park's role in national security and/or governmental logistics, which was not referenced in Reg 18.
- The term "redevelopment" in Reg 18 is broadened to "(re)development" in Reg 19, allowing for both new development and redevelopment.
- Reg 19 introduces additional criteria for assessing proposals:
 - Impact on heritage assets, with reference to Policy ECP6.
 - Impact on protected species and habitats.

- The requirement for a Travel Plan in Reg 18 is replaced in Reg 19 with a broader expectation that sustainable transport initiatives are maximised, removing the need for a specific document at this stage.
- Reg 19 adds a new clause requiring a Transport Statement for proposals that lead to additional employment or storage floorspace, to assess impacts on the highway network and parking demand.

Draft Policy GS9 Supporting Growth with Infrastructure (This policy has now been captured in a new chapter of the Regulation 19 Plan named *Infrastructure First*. As such Policy GS9 now relates to transit-oriented development in the Reg 19 version of the Plan).

Main Issues for Draft Policy GS9

- Widespread support for the principle that infrastructure should precede development.
- Many respondents emphasised the importance of timely delivery of different forms of infrastructure.
- Developers and landowners of some strategic sites stressed that infrastructure requirements must not undermine the viability of developments.
- Calls for flexibility in applying infrastructure requirements, especially where viability assessments show constraints.
- Repeated calls for all policies—especially those requiring infrastructure or affordable housing—to be subject to viability testing.
- Several respondents cited past failures to deliver infrastructure on time (e.g., Glebe Farm, Kingsmead).
- Concerns that “infrastructure-first” is more of a slogan than a reality.
- Include stronger enforcement mechanisms to ensure infrastructure is delivered before or alongside development.
- Tariff System: Support for continuing the Milton Keynes Tariff approach to funding infrastructure.
- Upfront Payments: Suggestions that Section 106 contributions should be paid earlier to ensure infrastructure is delivered on time.
- Infrastructure providers: call for investment from all those with infrastructure provision responsibilities, to make the plan more impactful – not just a reliance on s106 system.

- Requests for ongoing dialogue and clearer processes to identify infrastructure needs per development.
- Emphasis on involving residents, ward councillors, and local councils in planning decisions.
- Calls for deeper, ongoing participation of residents in shaping the City Plan, not just one-off consultations.
- Concerns that the City Plan overrides or ignores existing Neighbourhood Plans, particularly in Castlethorpe and Newport Pagnell.
- Calls for better cooperation with neighbouring authorities (e.g., Buckinghamshire, Central Bedfordshire) to better support infrastructure to serve regional housing needs, and climate, water, and energy resilience (especially in cross-boundary developments).
- Suggestions to Amend Part D to explicitly state that infrastructure delivery should be “subject to viability testing.”
- Suggestions to include flexibility for phased infrastructure delivery where appropriate.
- Suggestions to Add “and connecting green corridors” after “Linear Parks” in Part F.
- Suggestions to Strengthen language to require long-term stewardship and biodiversity net gain.
- Suggestion to clarify that linear parks should be included “where appropriate” to avoid overburdening smaller sites.
- Suggestion relating to Criterion (f): incorporate linear park requirements into Development Framework instead.
- Revise Part E to require that “proposed long-term management and maintenance arrangements for green and blue infrastructure must be secured and clearly set out.”
- Criterion (e): review requirement for maintenance arrangements as may not be known at application stage.
- Clarify references (e.g., change “2.b” to “B.2”) for better readability.
- Concerns about grid road capacity, junction bottlenecks, and cross-boundary traffic impacts.
- Many respondents cited overloaded rural roads.
- Concerns about poor connectivity, infrequent bus services, and lack of integration with new developments.
- Calls for delivery of the Mass Rapid Transit (MRT) system.

- Underuse of Redways due to safety, maintenance, and wayfinding issues; calls for expansion and integration of the Redway network, grade-separated crossings, and better cycling infrastructure.
- Concerns regarding the need for coordinated traffic assessments with neighbouring authorities.
- Capacity issues: Existing schools are at or over capacity.
- New provision: Calls for timely delivery of primary, secondary, SEND, early years, and post-16 education facilities.
- Integration: Education infrastructure should be embedded in new developments and accessible by sustainable transport.
- Support for Further Education: Emphasis on the importance of Milton Keynes College and the South-Central Institute of Technology in meeting local skills needs.
- Concern at potential loss of the Open University.
- Scepticism about a New University: Concerns that the proposed city-centre university campus is unrealistic given demographic trends and government policy
- Terminology: Refer to 'healthcare and social care'; to clarify these are planned separately with different organisations responsible.
- Funding: Requests for social care infrastructure to be integrated into the Local Plan and viability assessments
- GP surgeries: Overwhelmed by recent growth; long wait times and lack of capacity.
- Some raised concern regarding the need for an additional hospital.
- MK Hospital cited as having the longest waiting lists nationally.
- Concerns about the adequacy of services for an aging population.
- Identified need for hundreds of new care beds and facilities.
- Concerns about increased pressure on emergency services due to traffic and development sprawl.
- Infrastructure planning: Calls for emergency services to be considered in strategic planning.
- Concern at the lack of understanding of what a community facility is.
- Under-provision: Delays in delivering community centres, shops, and meeting spaces in new developments.
- Need for viable and sustainable community spaces in any strategic extension.

- Social infrastructure: Emphasis on the importance of community development workers and early engagement.
- Cultural infrastructure: Requests for cultural infrastructure to be embedded in community planning. Need for flexible spaces for events, arts, and heritage protection, preservation and enhancement.
- Indoor Leisure & Recreation
- Support for provision of on or off-site facilities and maintenance arrangements from new development, based on latest evidence (Like Playing Pitch Strategy).
- Preference for provision of built facilities rather than financial contributions.
- Some views about the lack of current provision.
- Linear parks - Strong support for the principle of establishing new linear parks from some.
- Site promoters questioning the principle of linear parks being a requirement of new sites and suggesting there being flexibility about provision.
- Calls for long-term stewardship and biodiversity enhancement.
- Concerns about long-term management and funding of green spaces.
- Requests for green corridors linking parks and natural areas.
- Requests for new household waste recycling centres, especially in eastern MK.
- Wastewater treatment Concern about infrastructure being overcapacity in existing systems; Need for upgrades and better planning. Importance of water infrastructure planning, flood mitigation.
- Broadband: Calls for fast fibre to be a prerequisite for new developments. Smart city goals: Digital infrastructure seen as essential for business, education, and supporting vulnerable residents.

Amendments to Draft Policy GS9

- Draft Policy GS9 deleted from the Regulation 19 Plan, supplemented by new Infrastructure First Policies.

Draft Policy GS10 Movement and Access

Main Issues for Draft Policy GS10

- Suggestions to repair and upgrade existing infrastructure, and improve safety on routes

- Crossover or change to the redway needs to be more robust considering safety of users, visibility
- Suggestion that the Policy should better integrate sustainable travel, biodiversity corridors, and emphasise active travel even more
- Concern regarding the consistency with NPPF (mitigation requirements, access)
- Suggestions for more flexibility regarding car parking, especially in CMK and transport hubs
- Suggestions regarding requirements for transport plans
- Concern that cycle parking should be required
- Suggestion that additional clarity and emphasis needed on public transport priorities
- Suggestion that more criteria is needed to address transport links to rural settlements
- Concern that the policy must still protect vehicular flows around the city as many areas underserved by public transport, and ensure elderly in these areas are considered
- Suggestion that the policy emphasise Active Travel further
- Concern regarding the details of grid road dimensions

Amendments to Draft Policy GS10

- Reg 19 introduces a new opening clause stating that development proposals causing severe highway impacts or unacceptable safety risks will be refused unless effectively mitigated. This sets a firmer tone than Reg 18.
- The movement hierarchy is explicitly referenced in Reg 19 (via Policy GS4), whereas Reg 18 refers more generally to minimising travel and promoting accessibility.
- Reg 19 added a new criteria to require development proposals to maintain and where feasible expand the Public Rights of Way network. This will support objectives to increase connectivity within the city and access to the countryside.
- Reg 19 expands the list of requirements for development proposals, including:
 - Integration of wayfinding, seating, and lighting in walking and cycling connections.
 - Design considerations for people with disabilities and reduced mobility.
 - Integration of sustainable urban drainage systems and biodiversity enhancements.
 - Inclusion of mobility hubs in public transport infrastructure.

- Safeguarding and enhancing access to public rights of way.
- Parking standards are now linked to a specific appendix in Reg 19, with a clearer expectation for evidence if standards are not met.
- Parking design must now follow the movement hierarchy in Reg 19, prioritising active travel within parking areas.
- The clause about not prejudicing adjoining site development is retained but moved to the end of the list in Reg 19.
- Grid road extensions in Reg 19 must now follow an agreed design code and enable connection to the existing network, whereas Reg 18 focused more on physical design features like width and green infrastructure.
- Reg 19 strengthens protection of the redway network by stating proposals to remove or cross redways will be refused unless they prioritise active travel and maintain safety.
- Reg 19 introduces a requirement for major developments to connect to and mitigate impacts on the redway network through financial contributions.
- A new clause in Reg 19 requires private infrastructure on highway land (including redways) to be screened with landscaping.
- The headings in the policy are removed.
- Reg 19 adds two new clauses related to canals:
 - Development near the Bedford to Milton Keynes Waterway Park must not compromise its delivery.
 - Development adjacent to canals must protect access to towpaths and, where possible, provide new inclusive public access.

Draft Policy GS11 Adjacent and Cross Boundary Growth

Main Issues for Draft Policy GS11

- Suggestion from some neighbouring authorities and other stakeholders that MK should consider taking potential unmet needs from surrounding authorities
- Suggestion that adjacent land in neighbouring authorities should be identified for their growth potential (similar to the approach taken in MK Strategy 2050), particularly in Central Bedfordshire and Buckinghamshire
- Support for the cross-boundary cooperation and infrastructure planning to meet regional housing needs
- Concern regarding whether the policy is flexible enough

- Concern about not having clear public transport system
- Suggestion of promotion of sustainable development (integrating public transport, green infrastructure, enhancing connectivity, prioritising development close to boundary)
- Suggest that the policy needs revising in light of the updated NPPF
- Suggestions to amend policy wording to include 'where possible'
- Some respondents stressed the importance of parking
- Suggestion that the policy is renamed for clarity
- Suggestion to include a reference to East West Rail
- Suggestion that the policy and supporting text should go further to identify areas for such cross boundary discussions or development through Local Plan processes i.e. MKCC and CBC land
- Suggestion that the proposed development of the Eastern Strategic City Extension and a Mass Rapid Transit (MRT) connection towards Cranfield already brings growth east of the M1 and that this development can enhance the MRT system's viability by providing significant residential growth along its corridors
- Concern raised that if Central Bedfordshire Council allocates Wharley Farm for development, Milton Keynes City Council must ensure its plan is flexible enough to bring the site forward comprehensively
- Requests that the Local Plan should allocate Hallam's land around Wharley Farm for development to support the delivery of MRT, and ensure it is considered in the Central Bedfordshire Local Plan process. Marrons on behalf of Hallam Land is keen to discuss this further with both councils to support MRT and address housing needs in Cranfield
- Some respondents acknowledged the benefits in extending the Eastern Strategic City Extension into Central Bedfordshire, enhancing connectivity
- Suggestion to recognise that there are on ward connections to M1 Junction 13, to Magna Park and Richmond Station (reference to Transport Representations submitted) and supporting infrastructure investments
- Suggestion to incorporate biodiversity corridors and the existing green infrastructure network to support local ecosystems
- Suggestion to align with national policies on sustainable transport and biodiversity (NPPF 2024 para. 105 and 174)
- Suggestion that the policy should include a high-level reference to the strategic approach to energy provision

- Suggestion to include a reference to the importance of early engagement
- Suggestion that adjacent developments in neighbouring authorities should be included as part of MK's housing requirement.
- In all site-specific sections, it is suggested that at the end of the first sentence relating to archaeology field studies the following is added: "in accordance with Policy EH5, before any below-ground tests or work occurs".
- Some requested that the principles continue those in Policy SD15 from Plan:MK. Some appreciated the policy's goals, especially relative to concerns about the impact of new developments on local roads, including the B4034
- Suggestion that if neighbouring authorities do not co-operate, or are not compelled to co-operate, development on Milton Keynes boundaries should be subtracted from this plan by a corresponding reduction in housing growth, infrastructure and population-related expansion into green space
- Suggestion that water and drainage services must be accommodated, and that water supply and sewerage should be considered alongside SuDS and flood risk
- Suggestion that there is no development on good arable farmland to improve food security
- Suggestion that the expansion of MK should include extensions of the grid road network with traffic separated from pedestrians with underpasses / bridges instead of crossings, separated redways and grass verges, trees to act as a sound barrier. New development should take the character and design of the existing transport network of MK
- Some reject the principles, noting ineffective approaches to cross boundary cooperation such as in health services
- Support for the approach water resource management, but suggestions that policy GS11 should be supported by guidance and avoid Sites of Special Scientific Interest or local wildlife sites
- Recommendation that the design of the development should be based on a strategic landscape appraisal and proposal to amend point 4 to: "The design of the development should be based on and take into account a strategic landscape appraisal and should respect its context as well as the character of the city."
- Concerns regarding high-level heritage implications and suggest a focused heritage assessment for proposed allocations
- Suggestion to highlight the challenge of extending the grid road system, redways, and linear parks into rural areas with historic settlements like Moulsoe

- Suggestion that development should be phased, and that adequate time and effort should be dedicated to ensuring communities are fostered, not just that houses are built
- Suggestion that the name of Policy G11 is modified to provide clarity on the sites that the principles will apply, including reference to cross-boundary proposals

Amendments to Draft Policy GS11

- The opening clause in Reg 19 is more formal and structured, referring to “preparation of, and any joint-working upon” proposed allocations or development proposals, whereas Reg 18 refers more generally to “when, and if, development comes forward.”
- Reg 19 adds an expectation for early engagement between authorities and infrastructure providers, which is not mentioned in Reg 18.
- The clause about securing developer contributions is moved up in Reg 19 (from point 10 to point 2), giving it greater prominence.
- Reg 19 expands the description of the urban extension to include “people-friendly and healthy, climate-resilient” qualities, and refers to integration with both urban and rural areas, whereas Reg 18 focuses only on integration with the existing city.
- Water resource management in Reg 19 is more detailed, including flood controls, drainage, water supply, foul sewerage, and sewage treatment capacity, compared to the broader reference in Reg 18.
- Reg 19 simplifies the design clause to focus on respecting context and character, while Reg 18 includes more emphasis on the city’s design principles.
- The linear parks clause in Reg 19 adds biodiversity protection to the list of benefits, which is not mentioned in Reg 18.
- Traffic impact assessment in Reg 19 includes identifying a hierarchy of routes and off-site improvements, whereas Reg 18 focuses more broadly on impacts and improvements to public transport and parking.
- Reg 19 introduces a new clause supporting residential access from H6 Whitney roundabout into proposed growth areas at Shenley Park, which is not present in Reg 18.
- The reference to community amenities in Reg 19 replaces “social and commercial facilities” in Reg 18, with slightly refined wording.
- The Park and Ride clause in Reg 19 includes integration with public transport and Metro networks, whereas Reg 18 refers only to linking with the city road system.

Draft Policy GS12 Redevelopment of Wolverton Railway Works

Main Issues for Draft Policy GS12

- Suggestion that the location adjacent to the Canal, and the importance of recognising its character and activating it as a resource within the development should be included in the Policy wording.
- Respondent suggests that any future design coding or master planning should include a vision of how the site will connect and interact with the canal.
- Respondent suggests Towpath improvements should be considered to encourage active travel for future residents.
- Respondent notes that the Wolverton Conservation Area Review (2009) demonstrates a robust appreciation of the amenity value of the Grand Union Canal, and the benefit it offers in affording high quality views of the London and Birmingham Railway Company Carriage Works.
- Historic England suggests that Criterion viii should explicitly refer to heritage impact assessments rather than general surveys of built heritage. They highlight the omission of the site's intersection with a conservation area on the Heritage at Risk Register and stresses the need to address this in the local plan. The response recommends conducting a heritage impact assessment to guide Wolverton's growth while preserving its historical character and examining the site's relationship with a nearby Scheduled Monument.
- Concern that sites should be preserved next to railway as if railway infrastructure changes, use may not be predictable.
- The map of the primary retail area should be amended to include Radcliffe Street. GS12 A.8: Insert "industrial archaeology" after "built heritage".
- Suggestion that Wolverton is characterised by small residential streets, and any new development, especially housing, should be based on a street pattern similar to the Victorian parts of the town.
- General support the redevelopment of Wolverton Works, and feels it will be a significant opportunity to unify Wolverton with development on the north side of Stratford Road, especially if this could incorporate local shopping to complement that on the south side of the street providing a more cohesive double-sided shopping street. Respondent strongly suggests that as part of a mixed-use development, workshop and studio spaces are provided for small local businesses to support the growing IT and creative sector in Wolverton.
- Section VIII is important, Wolverton Works is the last substantial surviving nineteenth century carriage works and thus of national importance. Suggestion that housing proposals must respect and work with the surviving buildings, which the last set of proposals for the site significantly failed at.

- Future Wolverton Limited emphasises the suitability of Wolverton Railway Works for housing development due to its sustainable location near the town centre and the West Coast mainline. Future Wolverton Limited suggest that any development of the site should allow the railway works to continue operating (albeit on a smaller part of the site). Key issues to Future Wolverton Limited highlighted in the policy include: 1. Improved Linkages and Movement 2. Conserving Heritage of the site 3. Community Amenities for the whole community 4. Housing Mix 5. New Infrastructure: including access to the Grand Union canal. Future Wolverton Limited emphasise that there should be a commitment to exploring the potential to link the site to the Waste Recovery Park and use the generated energy.
- Concern for the lack of road connections
- Suggestion to modifying the phrase “Incorporate plans for primary and secondary education and health, as appropriate to the scale and nature of the development proposal” to “incorporate plans for how education and health will be delivered, as appropriate to the scale and nature of the development.” This change ensures that all phases of education, not just primary and secondary, are supported and delivered for all individual sites in the City Plan.
- Potential issues such as increased traffic congestion, strain on existing infrastructure, and noise and air pollution from construction activities. The respondent also emphasizes the risk of losing the historical value of Wolverton Railway Works and the negative impact on local businesses due to reduced accessibility and increased congestion. The respondent points out the potential for community disruption through displacement of residents and businesses, and environmental concerns such as loss of green spaces and harm to local wildlife. It suggests prioritizing sustainable development practices to mitigate these effects.
- Concerns over heritage, ecology, contamination constraints, and note that there are viability concerns that have not been overcome.
- Respondent raises concerns that policies GS12-GS19 do not provide a specific policy framework to ensure that flood risk is mitigated through site design, and highlights that the scale of the development means that flood risk cannot be mitigated through standard practices. The respondent also raises concerns that the policies do not contribute to flood risk mitigation (as per NPPF guidance) and suggests how to define the potential flood risk of new developments; they also suggest that they could allocate areas as Critical Drainage Areas. The respondent raises further concerns that the Strategic Flood Risk Assessment recommendations have not been fully integrated into policy, as well as suggesting a level 2 SFRA is conducted in order to ensure a full evidence base. The respondent is pleased that green and blue infrastructure has been considered and raises the opportunity of enhancing blue infrastructure along the Wolverton Railway Works site (though requiring that there be an 8m buffer between development and the canal).

- MK Community Foundation consider that proposals to redevelop Wolverton Railway Works must include viable and sustainable community spaces.
- MK Forum suggest that the Railway Works is an important historical site that should be redeveloped as an outstanding example of conservation, appropriate to its importance within the history of railway development. Notwithstanding existing planning consents, MK Forum believe that there should be a concerted move to redevelop this site to provide a mixed-use development providing local employment opportunities (see e.g., The Paintworks in Bristol) in addition to residential use or even acting as a visitor attraction in the manner of STEAM (Museum of the Great Western Railway) at Swindon. MK Forum suggest there should be a full frontage to the canal together with a footbridge across the canal.
- The MK Green Party consider that the policy related to Wolverton Railway Works should also include the need to interact with the canal.
- Concerns about the potential diminishing of heritage through proposed growth. They note that the plan's objectives mention conserving heritage but lack foundations for positive responses. The high-level nature of proposed site allocations limits heritage impact assessment, necessitating further work to address heritage sensitivities through Heritage Impact Assessments (HIA). Historic England Advice Note 3 outlines a 5-step approach to Heritage Impact Assessments (HIA) that is outlined in their response. And suggest that given the scale of areas covered, an approach similar to that of Warwick and Stratford-on-Avon District Councils in assessing the heritage sensitivities of places to change is used.
- The response highlights the need for comprehensive heritage impact assessments, including 3D modelling to understand visual impacts on important views. It also emphasises the importance of analysing both designated and non-designated heritage assets to identify opportunities and minimise harm. Concern that the plans for Wolverton railway works fails to consider the impact on listed buildings and heritage areas. The response calls for more detailed heritage and sensitivity analysis for all strategic urban extensions and areas around transport hubs to ensure informed allocation of housing.
- The Parks Trust highlights the site's proximity to the Ouse Valley Linear Park, which has high environmental value. They suggest that residents of the redeveloped site should be able to access and enjoy the park in a managed way. This would require additional infrastructure to handle increased public access and educate visitors about the park's environmental sensitivity. Therefore, they request adding the point below to the policy to address these needs. "A9: Include a reasonable contribute to the provision of infrastructure that enables and facilitates managed access to the nearby environmentally sensitive areas of the Ouse Valley Linear Park."

- Any retail floorspace in the site must be proportional to the development size, Wolverton's position in the centre hierarchy, and meet local need only, so that it does not compete with the hierarchy of centres as at GS5 and the criteria/tests of ECP2.
- Any retail floorspace in expansion areas/redevelopment sites must be proportional to the development size, where the local area is in the hierarchy of centres, and meet local need only, so that it does not compete with the hierarchy of centres as at GS5 and the criteria/tests of ECP2.
- Support for building on brownfield sites
- A brownfield site that can be sympathetically developed to provide housing and services for the area.
- Supports redevelopment of Wolverton railway works and feels that the heritage value is very low
- AWS supports Policies GS12, GS13, GS14, GS15, GS16, GS17, GS18 and GS19 and the quantum and phasing of allocations subject to the comments and specific criteria set out above. We particularly welcome the quantitative carbon assessment of spatial options including embedded carbon in existing infrastructure that underpins the evidenced based selection of the strategic growth sites.
- Suggestion that housing as well as a museum to highlight the history of the Wolverton Works would be more appropriate.
- Suggests tower blocks diminish quality of life.
- Suggestion that the provision of community facilities should apply to surrounding villages as Wolverton residents use these.

Amendments to Draft Policy GS12

- Reg 19 introduces a comprehensive masterplan requirement for the delivery of around 400 homes.
- Education provision is expanded in Reg 19 to include early years, primary, secondary, and SEND contributions.
- Health provision in Reg 19 includes both primary and social care, whereas Reg 18 only mentions health generally.
- Reg 19 adds a requirement for non-residential floorspace and community uses that complement Wolverton Town Centre.
- Reg 19 requires a Heritage Impact Assessment covering both on-site and nearby heritage assets, including the Wolverton Conservation Area.

- Structural surveys are required in Reg 19 to assess the feasibility of reusing existing buildings, with demolition needing justification.
- Reg 19 introduces canalside development with active frontages and mixed uses that respect the site's heritage and setting.
- More concise language around low and zero carbon energy infrastructure in Reg 19.
- Reg 19 includes specific reference to integrating the canal towpath into active travel infrastructure.
- Reg 19 adds a requirement for public transport improvements for Wolverton Town Centre.
- Highway infrastructure requirements in Reg 19 consider the site's proximity to Wolverton Town Centre, adding nuance to traffic mitigation.

Draft Policy GS13 Redevelopment of Walton Campus

Main Issues for Draft Policy GS13

- Support for policy as long as new OU site maintains green spaces.
- Concern over Public transport being provided. This site may provide an opportunity to provide land for Kents Hill primary school. Improvements are needed for Church Lane Road and the footpath. The Infrastructure Delivery Plan and Sustainability Appraisal need to split these sites up.
- Suggestion that sections of the policy need revising due to the OU's intentions for the site. A masterplan should be required.
- Suggestion that the density of the proposed Walton allocation is too high and out of keeping with the Neighbourhood Plan area.
- Suggestion that the Local Plan should be supported by up-to-date evidence, including assessment of existing and potential components of ecological networks. This should inform the SA, ensure that land of least environmental value is chosen for development, ensure the mitigation hierarchy is followed, inform enhancement opportunities, and development criteria for specific sites. Priority habitats within the Walton Campus and Eastern Strategic City Extension sites should be retained and enhanced as part of allocations. Appropriate policies should be in place to protect irreplaceable habitats such as ancient woodland, and ancient and veteran trees; see standing advice on this prepared by us and the Forestry Commission.
- The MK Green Party consider that the policy related to Walton Campus should also include the need to retain and reuse as many of the existing buildings as possible.

- MK Community Foundation consider that proposals to redevelop the Walton Campus must include provisions to support the creation of a city centre university campus, and that the redeveloped original site must include viable and sustainable community spaces.
- Respondent raises concerns that policies GS12-GS19 do not provide a specific policy framework to ensure that flood risk is mitigated through site design, and highlights that the scale of the development means that flood risk cannot be mitigated through standard practices. The respondent also raises concerns that the policies do not contribute to flood risk mitigation (as per NPPF guidance) and suggests how to define the potential flood risk of new developments; they also suggest that they could allocate areas as Critical Drainage Areas. The respondent raises further concerns that the Strategic Flood Risk Assessment recommendations have not been fully integrated into policy, as well as suggesting a level 2 SFRA is conducted in order to ensure a full evidence base. The respondent is please that green and blue infrastructure has been considered and raises the opportunity of enhancing blue infrastructure along the Wolverton Railway Works site (though requiring that there be an 8m buffer between development and the canal).
- The Parks Trust highlights the ecological sensitivity of the Walton Campus site, adjacent to the Ouzel Valley Linear Park and Walton Lake. They stress the need for measures in any redevelopment to mitigate increased footfall and manage impacts on the park. Existing issues like vandalism and habitat disturbance are noted, and the addition of 1,600 homes is expected to exacerbate these pressures. Their response suggests that the policy should include requirements to mitigate the impact of increased access pressure on the adjacent linear park. They request adding an additional point: "A10: Include a reasonable contribute to the provision of infrastructure that manages and mitigates the impacts of increased access to the nearby environmentally sensitive areas of the Ouzel Valley Linear Park." Their response supports C.6 but suggests strengthening it to ensure long-term sustainable stewardship of green and blue infrastructure and open spaces. They recommend amending the policy to include this requirement: "C.6. A strategic green and blue infrastructure framework and open space strategy, to meet strategic and local requirements. The framework and strategy shall include proposals and provision for the long-term sustainable management and maintenance of the green and blue infrastructure and open space by an appropriate stewardship body."
- Suggestion for any retail floorspace in the redevelopment must be proportional to the development size and meet local need only, so that it does not compete with the hierarchy of centres as at GS5 and the criteria/tests of ECP2.
- Agreement with draft Policy GS13, believing that the Open University should be located near Central MK railway station, and that building houses in this location is a good idea if undesirable tower blocks are prevented from being built in CMK.

- Support of redevelopment of brownfield site and feels it is logical.
- Suggestion that brownfield sites must be the first option for expansion.
- AWS supports Policies GS12, GS13, GS14, GS15, GS16, GS17, GS18 and GS19 and the quantum and phasing of allocations subject to the comments and specific criteria set out above. We particularly welcome the quantitative carbon assessment of spatial options including embedded carbon in existing infrastructure that underpins the evidenced based selection of the strategic growth sites.
- The respondent values The Open University's unique and historically significant campus, highlighting its well-designed grounds and adjacent park. They argue that the successful distance learning model makes face-to-face teaching unnecessary and relocating to the city centre would increase parking demands. The established faculties contributing to space and TV programs should remain. Additionally, developing civic amenities for 1600 homes would be necessary. They suggest redeveloping the East campus, formerly de Montfort University, due to its proximity to schools.
- Concern that if the Open University relocate, the site would be preferable as a campus-style business HQ.
- Suggestion for student accommodation be built on the existing East Campus site and funds provided to construct lecture halls on the current site.
- Concern and opposition to high rise developments.
- MK Forum would argue that the claims that Milton Keynes is becoming an IT hub is not supported by the evidence such as the NOMIS Labour Market Profile, which shows that only 7.8% of MK's workforce is categorized as Professional, Scientific or Technical compared with averages of 9.6% (region) and 9.1% (UK). Likewise 9.4% work in Transportation and Storage compared with 4.8% (region) and 5% (UK). There is also a significant discrepancy in Human Health and Social Work Activities - only 9.4% of MK's workforce is employed in this sector compared with 12.7% and 13.5% respectively. These figures should also be explored and better understood but, on the face of it, they indicate that we are not exploiting our position at the centre of the Oxford-Cambridge Arc as far as labour skills are concerned. MK's concern in this matter is exemplified by draft Policy GS13, which proposes the repurposing of the Open University site for residential use (for which MK has plenty of land available) rather than retaining it for its existing use or repurposing it for something that would make better use of the existing buildings, such as a biomedical campus. MK Forum feel that MK should be making better use of existing institutions such as the Open University itself as well as Milton Keynes College, the University Hospital, and nearby institutions such as Cranfield and Buckingham Universities to raise the employment profile of the city.

- MK Forum respects that the choice of whether or not the Open University moves from Walton Campus is a business decision for the University. If it does leave, however, MK Forum do not support the demolition of the buildings and their replacement with housing, due particularly to the waste of embodied carbon and the greater potential of the site for employment use. As outlined previously in their comments on draft Policy GS3, MK Forum believe that the site is hugely important and, if it becomes vacant, then it should retain its existing employment use and become a business park, possibly taking the benefit of its position on the Oxford-Cambridge Arc to be marketed as a biomedical campus. In any event, MK Forum believe that some of the buildings would be suitable for Statutory Listing and they will be pursuing this matter when the buildings are considered in the second wave of assessments for the Milton Keynes New Town Heritage Register.
- Concern over timescales for housing to be delivered.

Amendments to Draft Policy GS13

- Reg 18 proposes around 1,600 homes across the Walton Campus site; Reg 19 significantly reduces this to around 450 homes (300 on Site 1 and 150 on Site 2).
- Reg 18 links the allocation to the Open University's relocation; Reg 19 removes this contingency.
- Reg 18 refers to a Strategic Brownfield Site Development Framework SPD; Reg 19 does not mention this document.
- Reg 18 includes a wider range of housing types including older persons and specific needs housing; Reg 19 does not specify these categories.
- Reg 18 includes convenience and service retail units; Reg 19 omits reference to retail provision.
- Reg 19 introduces a 1000m catchment consideration for community uses and facilities, which is not present in Reg 18.
- Reg 19 adds protection of the grid road buffer and a link to the Ouzel Valley Linear Park within the green and blue infrastructure framework.
- Reg 18 includes a requirement for archaeological surveys; Reg 19 omits this.

Draft Policy GS14 Eastern Strategic City Extension

Main Issues for Draft Policy GS14

- A respondent expressed concern about the lack of meaningful community involvement, especially from neighbouring communities and local authorities, and called for improved engagement during delivery.

- Hallam Land broadly supports the Eastern Strategic City Extension allocation, considering it justified and aligned with national planning policy. They control significant, deliverable land within the area and have submitted technical evidence confirming its suitability. While committed to collaborative working and master planning, they raise concerns about access restrictions, infrastructure viability, and certain policy requirements—particularly around housing types and energy infrastructure. Hallam Land seeks greater flexibility, early engagement, and clarity to ensure timely and effective delivery of up to 2,750 homes and employment land.
- Council documents restrict Broughton Grounds Lane to emergency and non-motorised access; Hallam Land proposes temporary use for early phases (up to 500 homes), citing benefits for connectivity and MRT access.
- Hallam Land agrees with the positive Sustainability Appraisal and minimal environmental constraints.
- Suggestions for adapting the MK East SPD template for the wider area.
- Policy clarifications requested on self/custom-build housing, specialist housing quotas, Gypsy and Traveller pitch suitability, and low/zero carbon energy infrastructure requirements.
- Some respondents are withholding support until they can review submissions from local councils.
- Historic England stresses the need for proportionate heritage assessments, especially regarding Moulsoe's Grade I church, Moulsoe Old Wood, and Tickford Farmhouse (Grade II).
- Heritage assessments should be carried out by applicants, not just the Council, and include desk-based and field evaluations.
- Criterion D should explicitly reference heritage and archaeological assessments, and its relationship with Criterion E should be clarified.
- Preservation in situ should be based on the significance of archaeological remains.
- Concerns raised about the scale and speed of the Eastern Strategic City Extension's implementation.
- Suggestion to expand existing Gypsy and Traveller sites in Milton Keynes rather than allocate new permanent pitches in Newton Leys.
- Desire to preserve the old Wavendon golf course as green space.
- Support for public transport and MRT integration, with a call for more stringent transport infrastructure requirements.
- Active travel routes to Brooklands are needed.

- Support for development in principle, but due to its scale, it should be planned as a new town.
- Concern that existing infrastructure has not kept pace with housing growth, including roads, public transport, utilities, healthcare, and education.
- Fears of traffic congestion, environmental damage, and disruption to communities due to rapid development.
- Questions the economic viability of the extension without adequate infrastructure and amenities.
- Suggests the Council should prioritise improving existing resources over expanding development.
- Anticipates significant resident opposition due to quality of life concerns.
- Concern that allocating land and funding for new sites may divert resources from essential services like healthcare and education.
- Suggests integrating Gypsies and Travellers into existing communities as a more inclusive and cost-effective approach.
- Worries that new site allocations could negatively affect property values and reduce community investment.
- Requests a review of open space allocation, arguing East MK is already overdeveloped.
- Opposes further building on green space.
- Impact on neighbouring authority Central Bedfordshire parishes- Hulcote and Salford Parish. They note that the draft policy states that this site will allow MK to explore opportunities for cross boundary growth with Central Bedfordshire. They do not support any proposal for the extension of Milton Keynes into Central Bedfordshire. They are concerned about the impact this allocation may have on infrastructure in neighbouring Central Bedfordshire, and stress the importance of infrastructure - especially where it is required to mitigate growth - being delivered first. The respondent suggests all traffic assessments for the East of Wavendon Strategic Extension allocation must include a full cross boundary impact assessment, with the appropriate mitigation identified and also agreed with Central Bedfordshire Council. They are unclear as to the nature or role of a mass rapid transit service or how it might relate to neighbouring villages in Central Bedfordshire. They emphasise further the importance of cross boundary consultation and involvement with local residents, Parish Councils and ward Councillors should this location be taken forward. - Junction 13, M1- The respondent suggests that given the heavy weighting of development to the East of Milton Keynes, the impact on the wider arterial road network must also be fully considered. They remain deeply concerned at the cumulative development proposals

in Beds Borough, Central Beds and MK - and the impact these will have on the national network, especially at Junction 13, where there seem to be absolutely no proposals coming forward to improve capacity with the consequent impact on all the local communities. They note the recent and difficult experience of the closure of the A421 (due to flooding at Marston) and the consequent congestion, disruption and road chaos forced on local communities.

- Concerns regarding the MK2050 growth study.

Amendments to Draft Policy GS14

- Reg 19 updates provision for Gypsy and Traveller sites, from 22 to 28 pitches across two sites by 2035.
- Reg 19 includes higher housing densities around transit hubs and Metro routes to support public transport.
- Reg 19 introduces Metro infrastructure requirements, including funding and dedicated routes through planning obligations.
- Reg 19 specifies SEND education provision alongside early years, primary, and secondary education.
- Health provision in Reg 19 includes primary health care facilities on-site and contributions to wider infrastructure.
- Reg 19 includes district/local centres that must not undermine Newport Pagnell or Milton Keynes East centres.
- Reg 19 requires community facilities and retail units in centres, aligned with Policies GS4 and GS5.
- Green and blue infrastructure must follow an approved strategy and link to the Infrastructure Delivery Plan.
- Transport infrastructure in Reg 19 is more detailed, including:
 - Segregated active travel routes and mobility hubs.
 - Dedicated Metro routes and lanes.
 - New/upgraded highway routes, including cross-boundary connections.
 - Crossings of the M1 for active travel and vehicles.
 - Traffic management to divert trips away from Moulsoe while maintaining access.
 - Safeguarding future connections eastward beyond the extension area.

- Reg 19 still requires heritage and ecology assessments with mitigation but the wording has been amended.
- Reg 19 introduces a requirement for pre-determination archaeological evaluation.

Draft Policy GS15 East of Wavendon Strategic City Extension

Main Issues for Draft Policy GS15

- Opposition to the proposed allocation for the following reasons:
 - Lack of buffer around Wavendon
 - Increased traffic
 - Lack of public transport
 - Too little green space
 - Historic significance of Wavendon House and other heritage assets
 - Increased risk of flooding
 - Impact on existing protected trees and impact of protected trees on the green space
 - Insufficient infrastructure including healthcare and education
 - Environmental impacts
 - Light pollution
 - Damage to privacy
 - Damage to character of the area
- Suggestion that extensions to grid roads and safeguarding for Mass Rapid Transit (MRT) should align with South East Milton Keynes. Suggested specific policy change to GA15 E. X. iii. 'the access only Newport Road should align with the connection coming from the West through South East Milton Keynes'.
- Suggestion that a Heritage Impact Assessment should be carried out to inform the Development Framework SPD. The policy should make specific references to heritage impact assessments.
- Suggestion that the policy should focus on the significance of heritage assets with specific suggestion that the policy is amended to 'conserve and enhance the significance (including the setting) of designated and non-designated heritage assets within the site and wider area that may be affected, including Wavendon House and the Registered Park and Garden, in accordance with Policy ECP4.

- Suggestions that the policy intentions regarding the Scheduled Monument Motte castle near Wavendon Manor should be made clear.
- Suggestion that a large park based on and around the golf course should be created for several reasons:
 - To provide safe community access to green space, recognising the lack of green spaces and parkland in the area
 - The health benefits of accessible green space.
 - To preserve the heritage assets.
 - To protect the ecology and biodiversity of the area
 - To establish a green corridor from Caldecotte Lake along Caldecotte Brook to Wavendon via Phoebe Lane and across Newport Road via existing footpaths to access the new Wavendon Park. To the east of the Park, the green corridor could extend to access Marston Vale.
- The proposed 12 hectares for a new District Park is insufficient due to existing local deficiencies and the needs arising from the new development. Various suggestions for sizes of between 20-30 hectares.
- Conversely, there is the view that more, smaller green spaces would be preferable to a single larger space as this would be more accessible.
- The new Park should include:
 - A new east/west leisure route along the course of the Old Carriageway from Newport Road to Wavendon House.
 - A new north/south cycle and pedestrian route linking Woburn Sands with Eagle Farm and Glebe Farm.
 - A new park centre/hub where these two routes intersect, containing a coffee shop and washroom facilities and ideally an activity room.
 - A fitness track with exercise equipment.
 - A picnic and barbeque area.
 - A children's play area.
- Restoration of the old ponds to provide enhanced biodiversity and recreational opportunities.
- Car parking for visitors.
- Concern about clause C of the policy as it implies unrestricted development

- Concern about clause E3 as it is deemed unrealistic, arguing that development of this scale cannot protect or enhance an area's character.
- Suggestion that traffic calming is needed in estates to prevent accidents
- Question whether the new District Park will be looked after by the Parks Trust
- Support for delaying large-scale development until after 2038 to allow infrastructure development but propose providing the park earlier to address current lack of accessible green space. Recognition that this may require some limited housing development to fund its creation.
- Suggestion that a buffer to protect Cross End is essential due to its heritage significance, and this should be integrated into the park
- Concern regarding the need for safer crossing from Glebe Farm redway across Lower End Road
- Suggestion that a future development road access should avoid using Lower End Road, Cranfield Road, Cross End or Newport Road as these routes are either unsuitable or already at capacity. The proposed 'secondary access' is problematic as people are likely to use the most convenient route
- Suggestion that a new entry road from the west (possibly connecting to the H10) and an additional road entering from Keightley Gate are needed.
- Concern that the creation of Wavendon Park will leave considerable land available for residential development on the old golf course. The principles of environmental preservation and low-density development should apply to developments adjoining the park.
- Some feel that 2038 is too early given to uncertainty around East West Rail and New Towns and the amount of development in recent years in this location.
- Some feel that development should be allowed before 2038
- Some suggest that the policy should be amended to ensure all phases of education are provided for, not just primary and secondary.
- Some question what Central Bedfordshire Council's view is
- Some request financial compensation should development go ahead
- Some suggest the effects of increased freight traffic should be studied
- Concern regarding the lack of consultation
- Some question the viability of the proposed extension

- Suggestion that the policy should be amended to refer to protecting the character of Wavendon and Woburn Sands

Amendments to Draft Policy GS15

- The housing allocation is reduced from around 3,000 homes in Reg 18 to around 2,250 homes in Reg 19.
- Reg 19 introduces a requirement for a Framework Masterplan and site-based Design Code to be approved before planning permission; Reg 18 refers to an SPD but not a design code.
- Reg 19 includes higher housing densities around transit hubs and Metro routes; Reg 18 does not mention this.
- Reg 19 adds Metro-related infrastructure and mobility hubs as part of the transport strategy; Reg 18 refers to Mass Rapid Transit but not Metro branding or hubs.
- Reg 19 includes SEND education provision and primary health care facilities; Reg 18 refers more generally to education and health.
- Reg 19 introduces local centres with a condition not to undermine Woburn Sands District Centre; Reg 18 refers to retail units but not this condition.
- The District Park size increases from 12 hectares in Reg 18 to 15 hectares in Reg 19. Reg 19 requires alignment with an approved Strategic Green and Blue Infrastructure and Open Space Strategy; Reg 18 refers to a general framework.
- Reg 19 includes pre-determination archaeological evaluation; Reg 18 requires surveys and a geophysical study but not explicitly pre-determination.
- Reg 19 strengthens language around heritage protection, including layout and design to conserve and enhance assets and their settings.
- Reg 19 refines transport infrastructure to include segregated Metro routes, mobility hubs, and integration with surrounding areas; Reg 18 includes similar elements but with less specificity.

Draft Policy GS16 Wavendon Strategic Buffers

Main Issues for Draft Policy GS16

- Some request a large buffer around Wavendon
- Support the need for Wavendon Strategic Buffers but criticizes the proposed buffers as inadequate. Some emphasise the necessity for additional buffering to mitigate environmental noise from southern developments, including landscaping along the H10 road extension. Concern that using open space for football pitches would not

provide an effective buffer and insists that the buffer should be landscaped and accessible to all, rather than being flat, unsheltered sports grounds. This perspective should inform the approach to clause B.

- Suggestion that it would be ideal to connect this area to the nearest park area to create more green space.
- Some feel that Wavendon has experienced sufficient development.
- Suggestion that the buffer south of Wavendon Recreation Ground should be developed as a nature and leisure reserve to preserve a sense of nature for residents. The reserve would provide a natural space accessible to all, enhancing the area's environmental and recreational value.
- Some supports the concept of strategic buffers and would support the integration of sports and leisure facilities in these spaces.
- Support for the designation of Wavendon Strategic Buffers to maintain the open character between Wavendon and surrounding developments, preserving its distinct and historic identity within Milton Keynes
- Some emphasise the importance of green buffer zones and addressing traffic issues on Walton Road. The heavy traffic is damaging old properties with poor foundations, threatening the village's character. Some urge for infrastructure to divert traffic from rural roads and appreciate the opportunity to contribute to the consultation.
- Some express concerns about the management of the field opposite the Wavendon Arms, which is currently untended. They suggest maintaining this land for community use, such as playgrounds and sports pitches, and note that the presence of a high-pressure gas pipeline and footpath makes it unsuitable for residential development.
- Respondent highlights the necessity of mitigating recreational access impacts from nearby developments and suggests adding the new paragraphs below to reinforce the policy, particularly regarding the importance and long-term maintenance of green and blue infrastructure. "C. Development proposals that will generate public recreational access pressure on the land within the Strategic Buffers will be required to include proposals that will mitigate these pressures D. Development proposals which include provision for or contribute to the appropriate long-term management and maintenance of the landscape and/or access routes with the Strategic Buffers by appropriate stewardship bodies will be supported."
- Respondents highlight significant constraints on development for the field opposite the Wavendon Arms, including a public footpath, a high-pressure gas pipeline, and proximity to Grade II listed buildings. Suggestion that this field should be part of a key buffer for Wavendon, preventing it from becoming an eyesore and proposing its use for community purposes such as sports pitches and a play area.

- Some support the idea of establishing a local park and creating a buffer zone around Wavendon. They request that the park's size be increased, as twelve hectares is the minimum requirement for a district park and constitutes only a small portion of the total land proposed for development - allocating 20 hectares would be more reasonable, allowing for the inclusion of additional features and cultural artefacts from the old Wavendon House grounds.
- Concern that the approach to the identification of the Wavendon Strategic Buffers is not accompanied by evidence to assess the landscape quality and function of the land or its requirement as a buffer.
- Concern that the proposed buffer is arbitrary, and that open space matters could be addressed through a comprehensive approach to spatial planning of extensions, and question why this is the only specific policy relating to the location of a buffer. Consider that the policy should be removed and that all land should be allocated to form part of a comprehensive scheme.

Amendments to Draft Policy GS16

- Reg 19 introduces a more specific test for refusal: development proposals will be refused if they significantly harm the open character of land at the time of the plan's adoption, whereas Reg 18 simply states that development within the buffers will be refused.
- Reg 19 removes the blanket refusal of all development and allows proposals that do not significantly harm the open character and that enhance open space function and landscape quality.
- Reg 18 focuses on maintaining the open character between Wavendon and surrounding built development; Reg 19 shifts emphasis to retaining Wavendon's distinct and historic character within the wider built-up area.
- Reg 19 repeats the condition about enhancing open space and landscape quality but adds the requirement that this must not significantly harm the open character of the land as it exists at the time of plan adoption.

Draft Policy GS17 South of Bow Brickhill Strategic City Extension

Main Issues for Draft Policy GS17

Objection to the proposed allocation for the following reasons:

- Impact on the Brickhills Special Landscape Area
- Impact on the Greensand Ridge
- The area should remain undeveloped

- Impacts on the character of Bow Brickhill
- Impacts on the A5 and M1
- Likely to result in unaffordable, poor-quality housing
- Poor connectivity and reliance on car travel
- Congestion and safety concerns on Brickhill Street
- Inadequate options for active travel
- Isolation from the MK redway network
- Impact in adjoining public woodland which is a vital community amenity
- Impact of existing planned developments at South Caldecotte and South East Milton Keynes
- Increased traffic
- Lack of public transport
- Loss of green space and associated health impacts
- Historic significance of Wavendon House and other heritage assets
- Increased risk of flooding which cannot be mitigated through standard practices
- Impact on existing protected trees and impact of protected trees on the green space
- Insufficient infrastructure and lack of critical mass for necessary infrastructure including healthcare and education
- Impact on biodiversity
- Environmental impacts
- Light pollution
- Damage to privacy
- Damage to character of the area
- The reasonable alternatives perform poorly against sustainability objectives, being constrained and remote from community facilities
- Some support for the strategic extension, if residents' opinions are respected.
- Suggestion that South of Bow Brickhill, Levante Gate and Eaton Leys should have a combined masterplan, at least for key transport and other strategic infrastructure.

- Objection to increased density in the area.
- Questions what the fall-back position is if Bow Brickhill railway station is closed.
- Suggestion that a new redway should be incorporated between Bletchley and Aspley Guide adjacent to the railway line.
- Suggestion that the policy should reference heritage impact assessments and desk-based assessments, supplemented by field evaluations if necessary.
- Suggestion that a heritage-based design code should be developed for this area.
- Suggestion that building on Areas of Attractive Landscape should be avoided as MK would lose the defining landscape surrounding the city and this would set a precedent for further landscape erosion. Densities should be increased on other allocations.
- Some felt that the development of this site should also be delayed to post-2038 (as suggested for the East of Wavendon allocation). This is suggested for several reasons:
 - To allow SEMK to embed
 - Lack of detailed transport modelling and
 - Unknown impact on infrastructure
- Concern that there is an inconsistency between the delivery restriction for the proposed East of Wavendon Strategic City Extension (SCE) (delivery post-2038) and the proposed South of Bow Brickhill SCE which has no such restriction. The sites are in the same catchment area and neither site should have a delivery restriction.
- Concerns relating to the flooding evidence including:
 - The recommendations of the Level 1 Strategic Flood Risk Assessment haven't been fully integrated into policy
 - Critical Drainage Areas should be allocated
 - A Level 2 Strategic Flood Risk Assessment for the site should be carried out
- Suggestion that the Policy should focus on the significance of heritage assets with specific suggestion that the policy is amended to 'conserve and enhance the significance (including the setting) of designated and non-designated heritage assets within the site and wider area that may be affected, including Wavendon House and the Registered Park and Garden, in accordance with Policy ECP4.
- Suggestion that Criterion C8 should be strengthened to include reference to long-term management and maintenance of green and blue infrastructure and open spaces.

- Concern that a South of Bow Brickhill Strategic City Extension Development Framework Supplementary Plan/Supplementary Planning Document is unnecessary. If it remains a requirement, this should be applied flexibly.
- Note that the provision of any new secondary school would need to be jointly funded and accounted for in an agreed Infrastructure Delivery Plan. Wider growth including at the Levante Gate allocation should be considered.
- Suggestion that the new park should include:
 - A new east/west leisure route along the course of the Old Carriageway from Newport Road to Wavendon House.
 - A new north/south cycle and pedestrian route linking Woburn Sands with Eagle Farm and Glebe Farm.
 - A new park centre/hub where these two routes intersect, containing a coffee shop and washroom facilities and ideally an activity room.
 - A fitness track with exercise equipment.
 - A picnic and barbeque area.
 - A children's play area.
- Restoration of the old ponds to provide enhanced biodiversity and recreational opportunities.
- Car parking for visitors.
- Concern regarding clause E3 as it is deemed unrealistic, arguing that development of this scale cannot protect or enhance an area's character.
- Suggestion that traffic calming is needed in estates to prevent accidents
- Scepticism relating to the consultation process and whether local residents' concerns will be taken into account
- Support for delaying large-scale development until after 2038 to allow infrastructure development, but propose providing the park earlier to address current lack of accessible green space. Recognition that this may require some limited housing development to fund its creation.
- Suggestion that a buffer to protect Cross End is essential due to its heritage significance, and this should be integrated into the park
- Concern regarding the need for safer crossing from Glebe Farm redway across Lower End Road
- Note that there is no mention of EWR that could provide a hub and economic benefit

- Support for quantitative carbon assessment of spatial options including embedded carbon in existing infrastructure that underpins the selection of the strategic growth sites. An allocation of this size is sufficient to provide carbon economies of scale.
- Anglian Water expressed that they would want to work with the Councils and site promoters on the application of integrated water management approaches within the sites and surrounding catchments to reduce water demands, cut wastewater volumes and ensure the sites and communities are resilient to climate change
- Suggestion that a new entry road from the west (possibly connecting to the H10) and an additional road entering from Keightley Gate are needed.
- Suggestion that the Creation of Wavendon Park will leave considerable land available for residential development on the old golf course. The principles of environmental preservation and low-density development should apply to developments adjoining the park.

Amendments to Draft Policy GS17

- The housing allocation is reduced from around 1,500 homes in Reg 18 to around 1,300 homes in Reg 19.
- Reg 19 introduces a requirement for a Framework Masterplan and site-based Design Code to be approved before planning permission; Reg 18 refers to an SPD but not a design code.
- Reg 19 includes a more detailed landscape-led approach to layout and design, specifically referencing distribution and mitigation of impacts on the Brickhill Special Landscape Area.
- Reg 19 separates education provision into early years, primary, secondary, and SEND, and includes accommodation of demand from the Levante Gate Strategic City Extension; Reg 18 refers more generally to education.
- Reg 19 includes primary health care facilities and contributions to wider health and social care infrastructure, also accommodating demand from Levante Gate; Reg 18 refers generally to health provision.
- Reg 19 introduces local centres; Reg 18 refers to convenience and service retail units.
- Reg 19 requires alignment with an approved Strategic Green and Blue Infrastructure and Open Space Strategy and the Infrastructure Delivery Plan; Reg 18 refers to a general framework and strategy.
- Reg 19 refines transport infrastructure to include mobility hubs and integration with Levante Gate; Reg 18 does not mention mobility hubs or Levante Gate.

- Reg 19 removes the reference to Mass Rapid Transit and instead refers to public transport and mobility hubs.
- Reg 19 requires pre-determination archaeological evaluation; Reg 18 requires surveys and a geophysical study but not explicitly pre-determination.
- Reg 19 omits specific mention of built heritage surveys, though it retains ecology and mitigation requirements.

Draft Policy GS18 Levante Gate Strategic City Extension

Main Issues for Draft Policy GS18

Opposition to the proposed allocation for the following reasons:

- Loss of green space
- Loss of valued landscape
- Too far from CMK
- Transport impacts on A5
- Concerns relating to capacity of A5 roundabout
- Unsuitable, isolated location
- Too small to bring forward appropriate local infrastructure
- The site scored poorly in the Sustainability Appraisal
- Lack of opportunity for active travel
- Significant infrastructure requirements will mean site cannot be delivered quickly
- Impact on existing local services including schools and the hospital
- Lack of local employment opportunities locally
- Impact on Little Brickhill
- 'landscape led' development is contradictory
- Will create noise and air pollution
- There are more suitable sites that should be considered
- Supportive, provided development respects residents.
- Connections with the rest of Milton Keynes are particularly important, in view of the retention of the level crossing at Bow Brickhill station.

- The policy should make specific references to heritage impact assessments.
- South of Bow Brickhill, Levante Gate and Eaton Leys should have a combined masterplan, at least for key transport and other strategic infrastructure.
- Supportive but concerned about environmental impact on flood plains.
- Additional traffic impacts must be mitigated.
- The development should have a time limit as the area has been subject to lots of development recently.
- There should be cooperation between local planning and highway authorities in the detailed planning of this allocation. This should consider impacts on communities, landscape and transport within Buckinghamshire.
- Proposals must include viable and sustainable community spaces
- The policy should be strengthened to require long term management of green and blue infrastructure and open spaces.
- Concerns relating to the flooding evidence including:
 - The recommendations of the Level 1 Strategic Flood Risk Assessment haven't been fully integrated into policy;
 - Critical Drainage Areas should be allocated; and
 - A Level 2 Strategic Flood Risk Assessment for the site should be carried out
- Some support for the policy
- The policy should be amended to ensure all phases of education are provided for, not just primary and secondary.
- Questions viability of delivering the site and 40% affordable housing.
- East West Rail could significantly impact site allocations and deliverability, and this uncertainty should mean the local plan process is delayed.
- A design code should be prepared alongside a masterplan, rather than an SPD.
- The archaeological significance of the local area should be preserved
- Freestanding settlements should have been considered as a reasonable alternative.

Amendments to Draft Policy GS18

- Reg 19 introduces a requirement for a Framework Masterplan and site-based Design Code to be approved before planning permission; Reg 18 refers to an SPD but not a design code.

- Reg 19 refines the landscape-led approach to include distribution, layout, and design, whereas Reg 18 focuses more generally on layout and design.
- Reg 19 separates education provision into early years, primary, and SEND, and includes contributions to secondary education facilities in the South of Bow Brickhill Strategic City Extension; Reg 18 refers generally to primary and secondary education.
- Reg 19 includes contributions to primary health care facilities in the South of Bow Brickhill Strategic City Extension and wider health and social care infrastructure; Reg 18 refers generally to health provision and access for Eaton Leys residents.
- Reg 19 introduces local centres; Reg 18 refers to convenience and service retail units.
- Reg 19 requires alignment with an approved Strategic Green and Blue Infrastructure and Open Space Strategy and the Infrastructure Delivery Plan; Reg 18 refers to a general framework and strategy.
- Reg 19 refines transport infrastructure to include mobility hubs and integration with South of Bow Brickhill Strategic City Extension; Reg 18 does not mention mobility hubs or this integration.
- Reg 19 simplifies the transport access wording but retains the same primary access point from the A4146.
- Reg 19 removes specific mention of Mass Rapid Transit and instead refers to public transport and mobility hubs.
- Reg 19 requires pre-determination archaeological evaluation; Reg 18 requires surveys and a geophysical study but not explicitly pre-determination.
- Reg 19 omits specific mention of built heritage surveys, though it retains ecology and mitigation requirements.

Draft Policy GS19 Shenley Dens Strategic City Extension

Main Issues for Draft Policy GS19

- Supportive of allocation in principle.
- The policy should make specific references to heritage impact assessments.
- Public transport must be provided.
- Supportive but concerned about environmental impact on flood plains.
- Transport links to nearby settlements must be provided.
- The policy should be amended to ensure all phases of education are provided for, not just primary and secondary.

Opposition to the proposed allocation for the following reasons:

- Landscape constraints, which was one reason the site was rejected during the 2005 local plan examination. The Inspector concluded that the Shenley Ridge was a logical long-term boundary for the city
- The site is in a Special Landscape Area
- The site has a sense of remoteness as it lies beyond the planned buffer to the Western Expansion Area to the north
- Impact on Whaddon village
- Lack of connectivity with the rest of Milton Keynes
- Too small to bring forward appropriate local infrastructure
- The site scored poorly in the Sustainability Appraisal
- Lack of evidence to justify this allocation
- Limited public transport opportunities
- Limited employment opportunities
- Distance from services and facilities
- Transport impacts and associated safety concerns, including worsening of rat-running through Whaddon
- Impacts on existing services
- Allocation is contrary to the aim of the plan '...the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our green spaces and rural areas'

Concerns relating to the flooding evidence including:

- The recommendations of the Level 1 Strategic Flood Risk Assessment haven't been fully integrated into policy;
- Critical Drainage Areas should be allocated; and
- A Level 2 Strategic Flood Risk Assessment for the site should be carried out
- The policy should be strengthened to require long term management of green and blue infrastructure and open spaces.
- Proposals must include viable and sustainable community spaces

- The LUC Review of Local Landscape Designations recommends policy wording to ensure that development does not adversely affect the special landscape character of the area and makes a positive contribution to it, but the allocation of Shenley Dens ignores this.
- No detail is given about how and what transport mitigation will be required
- Expect MKCC to require that Shenley Dens Farm is rebuilt after it was destroyed by fire.
- Objection to any access onto the unclassified Stratford Road
- Questions Buckinghamshire Council's view of this proposed allocation, and suggests that without their support, the allocation of this site is premature until the Buckinghamshire Local Plan is published.

We also received 195 signed survey responses from residents of Whaddon. The survey form contained 8 statements and respondents indicated whether they agreed or disagreed with these statements. The table below sets out the number of respondents who agreed or disagreed with the formal statements, as set out in the survey response form.

Statement	Agree (No. of Respondents)	Disagree (No. of Respondents)
"Oakhill Wood forms a strong visual boundary. The area to the west is a distinctive 'natural area with strong landscape features and attractive views' (Llewelyn-Davies – 1996 MK Expansion Study update).	193	1
"This part of the city is a sensitive topographical location, where a permanent city edge must be created and the visual impact from the countryside protected". (Llewelyn-Davies – 1996 MK Expansion Study update).	195	0
"I do not see the logic of regarding the Whaddon Valley as a possible long term development area. To do so, disregards the qualities of the Whaddon landscape and the merit of	193	2

the Shenley Ridge as a logical and clear long term boundary". (Planning Inspectorate – MK Local Plan Public Enquiry 2004).		
“The housing development that would spill over the ridgeline, should this policy be adopted would not have regard to the landscape of the wider locality, would not respect the distinctive identity of the neighbouring villages and, far from enhancing local character, would damage local character beyond repair” <u>and</u> “This proposal would only add to the visual intrusion, and any further erosion of the landscape should be restricted”. (Buckinghamshire Council October 2003 in their reply to the current MK Plan.	194	0
MK Council should “Avoid the introduction of large-scale elements or development which breaches the ridge along the urban edge of Milton Keynes, which would have a visual impact over a wide distance”. LUC Evaluation and Recommendation to MKCC (from their own appointed landscape consultants) on the ‘Calverton Plateau – Candidate For Special Landscape Area 2024’. <i>It is worth noting that their introduction photograph for this section of the report shows the views across Shenley Dens Farm – <u>the very site that MKCC are now proposing for development!</u></i>	193	2

Shortly following the introduction of the Shenley Dens Farm into proposed development policy GS 19, the grade two listed farmhouse was mysteriously destroyed by fire and demolished shortly after. MKCC should absolutely insist that the developer owners of the land should rebuild the farmhouse to its former glory (before they allowed it to go into disrepair), whatever the outcome of the development proposal maybe.	194	1
If by any chance this development were to be approved in the Plan MK 2050 – under no circumstances should there be any vehicular access onto the Stratford Rd, which is already an unacceptable and worsening rat-run from MK Central & North to the A421 and south.	193	0
I strongly OBJECT to Policy GS 19, and the proposed development of 1000 new houses at Shenley Dens Farm. “I clearly favour the eastern option (<i>over the M1 motorway</i>) as the logical direction for large-scale expansion of the city in the longer term”. (K. Holland, Local Plan Inspector – Public Inquiry to the current MK Plan – 2004).	192	1

Amendments for Draft Policy GS19

- Reg 19 introduces a requirement for a Framework Masterplan and site-based Design Code to be approved before planning permission; Reg 18 refers to an SPD but not a design code.

- Reg 19 refines the landscape-led approach to include distribution, layout, and design, whereas Reg 18 focuses more generally on layout and design.
- Reg 19 expands heritage protection to include non-designated barns alongside the grade II listed Shenley Dens Farmhouse; Reg 18 only mentions the farmhouse.
- Reg 19 separates education provision into early years, primary, SEND, and contributions to secondary education; Reg 18 refers generally to primary and secondary education.
- Reg 19 includes primary health care facilities and contributions to wider health and social care infrastructure; Reg 18 refers generally to health provision.
- Reg 19 introduces local centres; Reg 18 refers to convenience and service retail units.
- Reg 19 requires alignment with an approved Strategic Green and Blue Infrastructure and Open Space Strategy and the Infrastructure Delivery Plan; Reg 18 refers to a general framework and strategy.
- Reg 19 refines transport infrastructure to include mobility hubs; Reg 18 does not mention mobility hubs.
- Reg 19 requires pre-determination archaeological evaluation; Reg 18 requires surveys and a geophysical study but not explicitly pre-determination.
- Reg 19 omits specific mention of built heritage surveys, though it retains ecology and mitigation requirements.

Central Milton Keynes

Draft Policy CMK1 Central Milton Keynes Development Framework Area (Now Policy CMK2 in Reg 19 version of the Plan)

Main Issues for Draft Policy CMK1

- Suggestion that more evidence is needed on the impact of proposals, including capacity, density and height on heritage assets/constraints, and assumptions around redevelopment/rebuilding over adaptive re-use. Suggested additions to the policy wording with respect to the placemaking principles in particular.
- Suggestion that principles could do more to connect with the distinctive heritage of CMK, including Campbell Park and other heritage assets.
- Support using/respecting the existing grid structure of the city centre.
- Need to include a definition of classic infrastructure
- Suggestion that the policy should support developments that reverse the damage done to the original principles of MK
- Support for retaining setback along Boulevards but being more flexible on the Gates. Setbacks contribute to the city centre feeling like a car park and disjointed.
- Concern that reference to 'new townscape setting' in Objective CMK2 implies this is not an evolution of what is already there.
- Some do not support encroachment of the building lines in CMK
- Some support for flexibility on building lines on the Gates and pragmatic approach to retention of classic infrastructure and adaptive re-use of existing buildings
- Concern that the design of CMK is no longer 'modern' and shouldn't constrain design of new buildings. Some of MKDC's designs provided levity – the Point, the Winter Gardens.
- Suggestion that development must be high quality, not soulless bland blocks and unattractive high-rise buildings.
- Suggestion that the proposal for the replacement of the Point was different and interesting and would have been a great addition to the skyline.
- Suggestion that the Council should develop a CMK Heritage Management Plan and a CMK Resilient Design SPD
- Some not confident that public transport will be effective or efficient. Concern that MRT will be a waste of money as there is no traffic issue in MK.

- Some suggest that care is needed in the discussion about changes to parking provision. Some suggest that this is best dealt with through parking standards and transport plan and need to consider how this will work with individual planning applications.
- Some suggest that building out of the Gates should only be considered when it can be demonstrated that the parking is seriously underused, and a green buffer/edge should be retained.
- Some suggest there should be no building on parking areas, at the very least not until an analysis has been carried out based on current and projected needs, reflecting that ease of parking is a positive attribute for CMK.
- Some suggest that electric vehicles remove the environmental issue of cars in CMK
- Some believe that people will always want to drive to the city centre, they want comfort and convenience.
- Concern that reducing parking will harm retail and the economy and will also make access for those from the rural area more difficult.
- Some believe high car parking charges are leading to vacant units in CMK.
- Suggestion that there is still need for parking for disabled users, e.g., close to Midsummer Boulevard to allow easy access to Greenway for public transport.
- Concern that reducing parking before a very good alternative exists will mean retail and leisure businesses suffer.
- Some suggest providing more 'front of house' and other surface level car parking.
- Some suggest providing more vertical parking at train station and shopping areas where more parking is required
- Some agree with move away from cars and towards creating a more cohesive city centre
- Some support for overall aim to reduce 'front of house' parking
- Some suggest that there are already large numbers of vacant parking spaces in CMK.
- Some believe there should be no removal of underpasses, suggesting that signalised junctions are difficult for cyclists and wheelchair users.
- Suggestion to prioritise underpasses rather than at-grade crossings
- Some suggest that there should be no development in Station Square; it should be a public square and provide more space for transport interchange.

- Some suggest that Traffic assessments are needed to consider impacts of closing Witan and Saxon Gates to car traffic as part of Greenway proposal, including for emergency services and access for servicing
- Some suggest the Council should deliver a state-of-the-art transport link from the station to Campbell Wharf
- Some suggest that the city needs a public transport hub/bus station and taxi rank
- Some suggest that the Council shouldn't re-route buses away from Midsummer Boulevard as it would remove easy interchange possibilities.
- Some concern that the MSB Greenway will move pedestrians away from the front of well-occupied buildings where they would be able to get help if they are attacked or mugged. Suggestion that instead the bus lane on MSB is removed, with the potential to create a green walk on one or other side of the boulevard using existing pavements.
- Concern that removing cars from MSB may remove surveillance in the evening.
- Some feel that cycling and walking in CMK can be unpleasant and dangerous

Amendments to Draft Policy CMK1:

- Reg 19 introduces a clearer structure by grouping content under headings like "CMK Quarters," "Block B4," and "Infrastructure and land use principles," whereas Reg 18 integrates these into a broader narrative.
- Reg 19 refines the Downtown Business Quarter policy by allowing an exception for a multi-use events venue on the Old Bus Station site and adds hotel use to the list of supported uses.
- Reg 19 strengthens the requirement for Block C1 to support justice-related uses, stating proposals must not undermine delivery, whereas Reg 18 simply supports such proposals.
- Reg 19 simplifies the Midtown Quarter description and expands supported uses to include hotel use.
- Reg 19 updates the Uptown Leisure Quarter to include hotel and community uses, which were not explicitly mentioned in Reg 18.
- Reg 19 retains the Parkside Quarter's residential-led focus but simplifies the language around housing mix and family needs.
- Reg 19 introduces a requirement for a Council-approved masterplan for Block B4 before planning permission is granted, whereas Reg 18 refers to a "comprehensive masterplan approach."

- Reg 19 adds new infrastructure and land use principles, including support for:
 - Small, flexible, or affordable premises for start-ups and independent businesses.
 - Inclusive cultural and leisure facilities to support the evening and night-time economy.
 - Meanwhile uses to maintain vitality during vacancies.
 - Residential-led mixed-use development on North and South Row (excluding Downtown).
 - Development linked to infrastructure projects identified in the Milton Keynes Infrastructure Study and Strategy.
- Amended A.3 to say "Promoting inclusive and safe pedestrian links and routes through Central Milton Keynes Blocks and Blocklets and improve wayfinding to enhance pedestrian accessibility between Boulevards and Gates and increase legibility for all users"

Amendments to Draft Policy CMK2:

This policy is now Policy CMK2 and CMK1 now refers to the CMK Development Framework Area. The key differences between the content are as follows:

- The Reg 19 version removes the Land Use heading and content of the policy and goes straight into Movement.
- Reg 19 places stronger emphasis on inclusive design and accessibility, including references to safe pedestrian links, shelter from weather, and legibility for all users.
- The Reg 19 version introduces more detailed guidance on active travel infrastructure, including new Redways, wayfinding, seating, and lighting, which were not specified in Reg 18.
- The green bridge connection to Campbell Park is retained in Reg 19 but now includes a clearer emphasis on legibility and inclusive access.
- Reg 19 updates the parking strategy to include reprovision of parking in appropriate locations and flexible usage, whereas Reg 18 focuses more on phased reduction and convenience.
- Reg 19 simplifies the language and removes references to specific masterplan approaches (e.g. for Block B4).
- Reg 19 expands the streets and pavements section to include shelter design and new Redways along Gates, which were not mentioned in Reg 18.

- The green infrastructure section in Reg 19 introduces new guidance on open space provision, retention of street trees, and above-ground sustainable drainage systems.
- The Reg 19 has moved the specific residential density ranges for different blocks and quarters, to Policy CMK 2 in the Reg 19 version of the Plan as they are more design-related rather than land use. They were previously in Policy CMK2 of the Plan (now CMK1).
- The concept of landmark buildings is more clearly defined in Reg 19, with gateway locations and key nodes identified, and linked to the Tall Building Strategy and other policies.
- Reg 19 simplifies the building design section but retains the emphasis on perimeter block typologies and public/private frontages.
- Future design code for CMK mentioned in new paragraph 117. This further details about how healthy placemaking principles can be put in place in CMK rather than this being set out within the policy.

Draft Policy CMK2 Central Milton Keynes placemaking principles (Now Policy CMK1 in the Reg 19 version of the Plan)

Main Issues for Draft Policy CMK2:

- Some support for town houses and family homes in Campbell Park, but needs to be in balance with CP as a place to promote healthy living and nature, including parking for residents and visitors.
- Some suggest there should be no buildings on the events plateau in Campbell Park. No need for cultural attraction in Campbell Park; the space is needed for visiting fairs, music events etc.
- Some suggest considering alternative uses for Campbell Park Northside that provide a different attraction for the city – residential development can happen elsewhere.
- Suggestion that more information on capacity calculations for CMK needed and justification for the proposed densities. Some suggest that further evidence is needed demonstrating that the proposed 11,000 additional homes can be accommodated and that there is a market/demand for it.
- Concern that the City centre already a multitude of flats and apartments as the default for every redundant building or open space.
- Concern that there are too many homes proposed, some believe that the City centre is not the place for extra housing and they are concerned the city centre will become like everywhere else.

- Worry that new homes will not be affordable.
- Some suggest that there is a need for affordable homes in the city centre for low-waged city centre workers.
- Concern that delivery seems predicated on build to rent but needs to be more balanced between tenures.
- Some suggest that policies should be based on what the city wants, not what the market demands.
- Suggestion to make it clear that residential-only schemes will be allowed in Midtown, not just residential-led mixed use schemes.
- Some support for building new homes, but not high-rise developments
- Suggestion that CMK3 should make specific reference to new residential homes.
- Some believe that greater density and numbers of people living in the city centre will make it easier to justify investment and make MK amazing.
- Suggestion that there should be a requirement for greater levels of affordable housing than proposed and requirement for a minimum proportion of homes to be 3+ bedroom and accessible/adaptable
- Suggestion to provide more interpretation on what is planned within individual blocklets/plots/sites.
- Suggestion to include identification of gateway locations and ensure consistency with tall building map.
- Suggestion to recognise that some of the development proposed/identified in the policy/framework may happen beyond the lifetime of the plan e.g Midsummer Place redevelopment – which should not prevent investment/meanwhile development in the interim
- Suggestion for more detail on the proposals, including the Midsummer Boulevard Greenway, improved connectivity to Campbell Park
- Suggestion to address current challenges before new development happens.
- Some stressed the need to renew certain areas of the city centre
- Suggestion to provide clarity on what is planned/proposed for various key sites e.g. Toys R Us, The Point, Food Centre, movement of open market
- Some believe that dividing the city centre into specific neighbourhoods with their own design parameters will help to improve the identity and vibrancy.

- Suggestion that clarity is needed on status of the CMK Business Neighbourhood Plan and whether proposed land use proposals will supersede this, and the policy status of the framework plan.
- Suggestion that there needs to be more focus on active travel and maximising open space access in placemaking principles
- Concern that development shouldn't be at the expense of existing and new greenspace provision.
- Suggestion that the policy needs to encourage rejuvenation and improvement of existing spaces.
- Suggestion that Play on the way needs to be included as part of the Greenway proposal, including free play features to climb, sit on, run around etc.
- Concern that removing trees to build closer to the carriageways will increase air pollution.
- Concern that new proposed green space would be an oversupply even with population growth.
- Suggestion that the Council should commission an open space needs assessment for the city centre
- Some suggest that areas of hard landscaping may serve the purpose of a green space in some places.
- Some suggest the policy should be more ambitious on biodiversity net gain and protections for existing open space
- Some suggest that parts of the green frame could be used for open space with development that overlooks and activates the space
- Concern that a university in city centre may become superfluous given increase in distance learning and other unis struggling financially.
- Some suggest that there should be a focus on further education rather than higher education
- Some feel that the new university would bring benefits but important that it provides courses relevant to the MK economy.
- Concern that the Plan must not ignore the arts and should include space for cultural activity.
- Suggestion that a feasibility study for a university in CMK must be undertaken.
- Suggestion that the university should be just outside of CMK, so that students can afford to live where they study.

- Suggestion that university accommodation should be in retail/leisure area to encourage students to move around the city centre more.
- Some suggest that a university would need to provide its own accommodation as local rental market cannot meet demand.
- Some suggest there is a need to make sure the city centre is an attractive place to make students want to come here.
- Some suggest that a university needs to actively support local nightlife.
- Some suggest considering an alternative educational model, via a School for Social Entrepreneurs as a model of 'learning by doing'.
- Some believe there isn't a need for a university, with three within an easy commute.
- Some suggest that a university should be close to the station.
- Some suggest providing a learning centre which promotes more STEM and vocational courses closely linked to business needs, and support for more apprenticeships.
- Some suggest that plans need to account for student car use, provide suitable accommodation and drive partnerships with city institutions and employers.
- Concern that there is not enough reference to all phases of educational provision in CMK, including adult education provision in the city centre.
- Suggestion that Tech Quarter proposals should also include creative, arts and cultural sectors.
- Some suggest there is a need to provide unrivalled 5G and high speed wifi, data centre and server hosting, clustering of tech types, good 'back office' functions, advice centres and access to funding sources.
- Suggestion that new businesses in MKDP buildings should have a 'social commercial' requirement to provide space for the start-up community.
- Suggestion to create linkages between accommodation providers and companies to provide accommodation for new staff.
- Suggestion for the need to include world class industry names to invest and stay in the area to create jobs and raise the profile of MK.
- Some suggest the need to provide support (including through link with OU) to the social enterprise sector to increase growth and innovation.
- Concern that focussing a tech quarter in CMK would undermine dispersed land uses and will result in congestion.
- Suggestion to establish satellite campuses and research centres within Tech Quarter

- Concern that there is too much employment space allocated
- Suggestion that the Downtown Quarter should be open to other town centre uses, not just employment.
- Suggestion that incentives are needed to encourage transformation in office market
- Suggested amendments to the policy wording and clarity sought on how the overarching development framework is applied
- Some believe that some parts of CMK can cope with higher buildings and there needs to be a policy that withstands political cycles.
- Some support use of zones and increasing density and activity, and facilities to serve a larger population.
- Some suggest there needs to be a holistic approach to the tall building/skyline strategy through a holistic approach rather than through piecemeal development.
- Some support for much greater density and intensity, but with unique green spaces adjacent to provide complementary benefits
- Suggestion that Station Square should be within tall building zone.
- Some believe there needs to be a density of population to attract business and services
- Some suggest that appropriate building heights and location of gateway buildings should be determined through planning applications rather than pre-determined through overly prescriptive policy. Suggestion that criteria-based policies would be more appropriate.
- Some against high rise/tall buildings and greater density. Some feel that high rise buildings have no sense of community and will lead to alienation.
- Some suggest that the Policy should require that no building is permitted taller than the tallest tree in the borough.
- Some suggest that buildings should be capped at five storeys (Shenley Brook End and Tattenhoe Parish Council), six storeys (Historic England), and some suggest no more than 20 storeys in CMK
- Some suggest a maximum of six storeys in Campbell Park.
- Some feel that the buildings part of the Campbell Park Northside application are too high, and should instead be similar to building heights on south side. Some feel that lower heights of three storeys adjacent to Downs Barn is appropriate and will give skyline symmetry on this visible site rather than being a mixture of styles and heights.

- Objection to taller gateway developments as they would detract from the green character of the city centre, and that the greenery should be the impression that one gets when approaching the city centre rather than concrete.
- Some believe there is no need for gateway buildings in Campbell Park – and that these should be focussed on central area.
- Some suggest that gateway buildings should not be taller than surrounding buildings but be outstanding or notable for another reason.
- Some suggest that developers need to prioritise high quality affordable living rather than density.

Draft Policy CMK3 Central Milton Keynes Skyline and Tall Buildings Strategy

Main Issues for Draft Policy CMK3:

- Some concern that the City centre is soulless and more needs to be done to create an attractive place that is good for shopping and nightlife.
- Some concern that the City centre Feels like a desolate and large car park with low quality architecture and small pockets of activity.
- Some stress the need to ensure existing cultural assets are being looked after before building new ones.
- Some stress the need for a large 15,000 capacity outdoor cultural venue/performance space as Campbell Park can't cope with the number of visitors.
- Some suggest that Campbell Park needs improved connectivity and facilities.
- Some suggest the need for more independent activities – retail, cultural and community spaces, as well as performance and studio spaces – to create a more urban feel.
- Some suggest the need for office and retail developments to provide some smaller units with flexible leases to create a better mix.
- Some stress the need more affordable rents for small independent businesses.
- Some stress the need for a Concert Hall of a size that makes orchestral concerts viable. c.800 seats.
- Some note that MK has an events venue at the Stadium.
- Some suggest the need to consider needs of young people including public spaces where they don't have to pay to be and won't be considered a nuisance.

- Some suggest displaying internationally recognised exhibits at the Gallery and performances at the Theatre.
- Some stress the need for diverse offerings to cater to different interests and age groups. More community events, and partnerships with local businesses to offer discounts and membership/loyalty programmes to encourage greater use of facilities and local enterprises.
- Some suggest that convenience retail will be needed in areas where significant numbers of new homes are being delivered, and question the current figures proposed
- Some stress the need for schools, play areas, nurseries etc to accommodate families and doctor surgeries in the City centre.
- Some suggest the need to ensure a greater focus on the nightlife industry which has been in decline locally.
- Some suggest the need to mention the market and any plans to expand and diversify.
- Some suggest that the Council should provide an improved indoor market with subsidised rents.
- Some question what 'new communities' means
- Some believe that more detail is required on the development of the evening economy, the tech quarter and university proposal
- Some suggest making reference to important role of the market
- Some suggest using port cocheres and bus stops for green roofs and supporting renewable energy
- Some suggest the need to consider impact on existing areas and the quality of life of their residents.
- Some stress the need to retain a balance between the growing city and providing adequate infrastructure and services.
- Concern raised that the Plan must not be too CMK-centric at the expense of other district and town centres.
- Some suggest that there should be a section dedicated to helping rough sleepers
- Suggestion that CMK retail needs investment
- Some concern that the objectives are vague and lack accountability
- Concern raised that people do not feel safe in the City centre

Amendments to Draft Policy CMK3:

- The contents of Reg 18 CMK3 have now been included into the new CMK1 and CMK2 Policy, and Reg 18 Policy CMK3 has effectively been deleted. Reg 19 Policy CMK3 is a totally new policy that takes the tall building elements from Reg 18 CMK1 and CMK2 into a standalone policy.
- Reg 19 includes a requirement for Design Review Panel engagement for buildings exceeding eight storeys, 25 metres, or the height thresholds.
- Reg 19 sets out detailed design expectations for tall buildings, including articulation of the base, middle, and top of buildings, which is absent in Reg 18.
- Reg 19 introduces criteria for clustering, transitions in scale, architectural quality, and material integrity, none of which are addressed in Reg 18.
- Reg 19 includes environmental and amenity considerations, such as wind tunnelling, daylight, sunlight, and microclimate impacts, which are not covered in Reg 18.
- Reg 19 requires servicing, maintenance, and management of tall buildings to be integrated into the design, including avoiding blank ground floor elevations—this operational detail is not present in Reg 18.
- Reg 19 mandates cumulative impact assessments for tall buildings, considering visual, functional, and environmental effects, which is not a requirement in Reg 18.
- Overall, Reg 19 replaces the general city centre vitality policy with a specialised and comprehensive policy on tall buildings and skyline management, reflecting a significant shift in focus and regulatory detail.

Central Bletchley

Draft Policy CB1 Supporting investment in Central Bletchley

Main Issues for Draft Policy CB1

- Support for the regeneration and improvement of Central Bletchley from several source
- Some concern that the strategy will gentrify Bletchley (citing cuts to public transport and the closure of Sainsbury's) and force out residents.
- Historic England criticised policy CB1 for not addressing the local historic environment not referencing the conservation area and listed buildings. They warn that the policy's flexibility might harm the significance of old Bletchley and its heritage.
- MKDP raise concerns that the density range for development in Bletchley is too restrictive, suggest wording to provide more flexibility on what can be delivered in Bletchley and the primary shopping area in Bletchley on the proposals map should be reduced. They suggest that the 150-250 dwellings per hectare (dph) range in Policy CB1 is too restrictive due to viability issues. They suggest changing it to 100-200 dph, considering the surroundings.
- Regarding the convenience store requirement, MKDP raise concern that adding this requirement in Policy CB1 could make schemes unviable. They propose allowing mixed-use developments to include various uses, consistent with the SPD and Development Brief. The current policy and proposed District Centre size may make redevelopment difficult.
- MKDP recommend reducing the Primary Shopping Area on the proposals map to focus on Queensway, allowing the southern part of Brunel Centre and former supermarket site to be developed for new homes, aligning with the surrounding Victorian houses.
- Suggestion that retail development should follow retail hierarchy and not threaten CMK's regional shopping centre.
- MK Green Party consider that Policy CB1 should include a specific commitment to improved public transport facilities including an eastern entrance to the rail station.
- Milton Keynes College Group suggest there needs to be greater reference to both the South-Central Institute of Technology and Milton Keynes College Group Bletchley campus to meet the skills needs of Bletchley residents through formal and informal learning, and to the College's role in bringing vibrancy to Central Bletchley.
- Urban& Civic, Taylor Wimpey Strategic Land, and The Society of Merchant Venturers support investment and renewal in Central Bletchley but have concerns about the

justification for the proposed growth. They seek clarification on which sites will provide the 1,000 new homes, require more evidence to justify the proposed density range, and question the viability of the plans, particularly regarding affordable housing requirements.

- MK Community Foundation emphasizes the need for viable and sustainable community spaces in Central Bletchley. They support addressing inappropriate uses and express a preference for community spaces that accommodate credit union services.
- Buckinghamshire Council strongly support the provision of East West Rail, and request whether the plan can also support the proposed East West Rail Aylesbury Link to enhance local connectivity between key settlements.
- Some question whether the suggestion of a new convenience store in Central Bletchley is a viable proposition
- Bletchley and Fenny Stratford Town Council suggest that the draft policy specifies the minimum floorspace for the convenience store
- Some question whether the Primary Shopping Area for Bletchley be reduced so that the focus is on Queensway, allowing the southern part of the Brunel Centre to be developed for new homes
- Some question whether a specific reference to a need for a new hotel would assist with boosting the local evening and leisure economies
- Suggestion that the Policy should start with a vision statement for Central Bletchley, drawing from the Towns Fund and Town Investment Plan, to define its unique selling point (USP) for 2050. They believe the Policy lacks ambition, particularly regarding employment opportunities in technology, digital, and innovation sectors.
- Some question whether the scale of comparison floorspace development permitted in Bletchley would it constitute a threat to CMK
- MKDP supports the approach to affordable housing and changes in Housing Viability Areas. It owns key sites in Bletchley, including the former police and fire stations, and is advising the Towns Board on planning and development. Due to lower residential values and viability challenges, MKDP proposes reclassifying Bletchley town centre from Housing Viability Area 2 (25% affordable homes) to Area 3 (15% affordable homes). They request updating the Policies Map accordingly, covering key sites like the Brunel Centre and former Wilko store. They suggest that this aligns with similar high-density development plans for CMK, the only other separately designated area in the Plan.

Amendments to Draft Policy CB1

- The overall structure and intent of the policy remain consistent, but the Reg 19 version is more concise.
- Reg 19 specifies the size of the convenience store in the redevelopment area as 1,000 sq. m (net), whereas Reg 18 only refers to “a new convenience store.”
- Reg 19 adds a requirement for affordable housing, which is not mentioned in Reg 18.
- Reg 19 simplifies the language around community amenities and town centre uses, focusing on enhancing provision and supporting the evening economy.
- Reg 19 strengthens support for mixed-use development in Bletchley Town Centre by stating it will be “strongly supported,” whereas Reg 18 uses softer language (“must include”).
- Reg 19 simplifies the clause on the former Police and Fire Station sites, removing the reference to compliance with other policies.
- Reg 19 reframes the railway station access clause to focus on safeguarding delivery of eastern access and egress, rather than just ensuring development does not prevent it.
- Reg 19 simplifies the connectivity and public realm clauses, removing references to “people friendly and healthy streets principles” and “enhancing or creating a network,” while retaining the core intent.
- The clause supporting Bletchley Park’s learning and visitor facilities is removed in Reg 19.
- Definition of Health Hub added to Plan glossary.

People-friendly and Healthy Places

Draft Policy PFHP1 Delivering Healthier Places

Main Issues for Draft Policy PFHP1:

- Some support for the policy.
- Some suggest the Council produce an Age Friendly SPD to guide developers on designing age-friendly developments
- In relation to the health impact assessment requirements, some suggest removing the need for older person housing to undertake an HIA because scheme have several health benefits.
- Some suggest their developments are supportive of the wider health outcomes of the council, so should not be required to provide a health impact assessment. Some suggest removal of HIA requirement for residential schemes.
- Some suggest that HIA for medium / large leisure developments should be required.
- Some suggest that more detail is required related to design.
- Suggestion that the policy should include reference to Active Design Principles demonstrated through the Active Design Checklist. (sport England)
- Some suggest that the Healthy place making principles such as active design could be closer linked to the development management process.
- Some suggest introducing the mandatory 3-30-300 principles and a need for a SMART target.
- Historic England suggest that cultural infrastructure should be added to the principles.
- Some suggest considering how publicly accessible spaces in tall buildings can be secured against risks of suicide.
- Concern regarding Criterion F and G and respondents questioning why Shisha premises are singled out in relation to proximity to schools.
- Concern that underpasses are neglected, dark and bad for mental health and movement.
- Storey Homes support the draft policy but request supporting guidance regarding specific explanations of what an HIA should cover is also consulted upon.
- Some suggest that the policy should provide link / direction to guidance and advice from Public Health.

- Need clear explanation of how health infrastructure will be improved.
- Concern that there is insufficient health infrastructure, and this is not being dealt with by the plan.
- Concern that the policy goes beyond the scope of the development plan, re. infrastructure and green spaces.
- Concern that it is contradictory to limit access to takeaways and yet encourage proximity to pubs.
- Concern that the plan is against private vehicles as a mode of transport
- Suggestion that health concerns raised through health impact assessments should be addressed or the development should be refused.
- Support for the suicide prevention policy, however suggestion that adequate mental health services are required.
- Some stress that there is mounting evidence that arts engagement supports mental health, saving money through prevention.
- Suggestion that developers should have to justify any plans which discourage active travel to ensure alignment with health and sustainability goals.
- Some suggest that the HIA should be mandatory for all developments, particularly re, transport options to ensure healthy and sustainable travel choices.
- Suggestion that the Healthy Food Principles encourage access to healthy food but should also limit access to unhealthy options.
- Suggestion that the Policy should include reference to all the 12 TCPA healthy home principles
- Suggestion that there is a need for a threshold for B6 new and expanded minerals and waste sites.
- Regarding Part C requiring addendum HIA for Reserved Matters applications, concern this might be difficult if works have already started.

Amendments to Draft Policy PFHP1:

- Reference added to the Council's Designing Dementia Friendly Neighbourhoods SPD in the policy's supporting text
- Combined Part A & B
- Health Impact Assessment now also required for Adult Gaming Centre / Betting Shops, Pay-day Loan Shops and Shisha premises & Hot food takeaways and fast-food outlets if consistent with PFHF4.

- Reference added to the Council's Health Impact Assessment SPD in the Policy's supporting text
- Reference added to the guidance on the [Public Health Intelligence webpage](#)
- Reference to Cultural Infrastructure added in Policy GS4 (Strategy for People Friendly & Healthy Places)
- PFHP1 C sets out that development proposals which would have a positive impact on the health of Milton Keynes' population will be supported where it can be demonstrated that the design of the scheme has been informed by the conclusions of a HIA
- Criteria F.3. (from the Reg 18 version) removed
- Additional guidance relevant to the clustering of Adult Gaming Centres, Betting Shops, Pay-day Loan Shops and Shisha Premises
- PFHP1 I & G (from the Reg 18 version)
- Requirement to complete a HIA for major energy generation added to PFHP1 A.

Draft Policy PFHP2 Provision and Protection of Community Facilities

Main Issues in Relation to Draft Policy PFHP2:

- Suggestion for a 20mph speed limit for new residential developments in policy wording, 50mph elsewhere and apply to existing area.
- Some suggested that housing and parking design should be updated to account for higher numbers of home workers.
- Some suggest clearer definitions and standards to avoid ambiguity and delays. They also emphasise the need to protect existing community facilities and ensure new developments provide adequate spaces for community use.

Amendments to Policy PFHP2:

- Additional criteria A.2. requiring that community facilities meet the needs of the local population.
- Community amenities reworded to 'community facilities' throughout.
- Additional criteria B.4. setting out the need to demonstrate that an existing use is no longer commercially viable and has been appropriately marketed for at least six months.
- Overall amendments to the grammar and formatting to improve readability.

Draft Policy PFHP3 New Local Centres

Main Issues in Relation to Draft Policy PFHP3:

- Suggestion that PFHB3 A2. Strategic Land Allocation (Glebe Farm /Eagle Farm South deleted from policy.
- Suggestion to remove Conniburrow from the policy where there is an existing convenience store and others within walking distance.
- Hallam Land emphasise assessing the scale of retail and other town centre uses, and request collaboration with the Council to determine the appropriate level and range of these uses.
- Support for the policy for the creation and enhancement of local centres.
- Urban&Civic, Taylor Wimpey Strategic Land, and The Society of Merchant Venturers consider that Policy PFHP3 relating to New Local Centres should be deleted or modified to avoid any duplication with other policies and sites where new local centre are required.
- Suggestion that any retail floorspace in expansion areas/redevelopment sites must be proportional to the development size, where the local area is in the hierarchy of centres, and meet local need only, so that it does not compete with the hierarchy of centres as at GS5 and the criteria/tests of ECP2.
- Gallagher Developments and Chicheley Farms Limited suggest a modification to policy to provide flexibility for locations to be determined via frameworks, masterplans and/or via planning applications.
- Persimmon Homes note that there should be flexibility around the scale of development and incorporation of local facilities such as retail and service provision.
- West Bletchley Council supports the creation of new local centres but wants to understand how to improve existing ones to ensure they remain safe, attractive, and meet community needs. The local centres at Whaddon Way and Melrose Avenue, despite their valuable services, suffer from limited parking and poor-quality public spaces.
- Support for the prioritisation of provision of doctors and dental surgeries early on in the development process and discussion with NHS from outset to understand their infrastructure requirements.

Amendments to Draft Policy PFHP3:

- Removed reference to Conniburrow & Glebe Farm / Eagle Farm South from the Policy.
- Amendment of Policy ECP2 criteria H1 to ensure that retail floorspace on development sites is proportional to the development size.

Draft Policy PFHP4 Delivering a healthier food environment

Main Issues in Relation to Draft Policy PFHP4:

- Some support for the policy which does not just focus on restricting Hot Food Takeaways.
- Concern that part E(ii) is discriminatory because it allows takeaways in wards with lower obesity levels
- Suggestion to add a policy a criterion allowing the applicant to commit to a Healthier Catering Commitment – such as Waltham Forest Policy 51.
- Some feel that clustering can be a good thing and attract customers.
- Suggestion that takeaways should provide bins and pay for their servicing. Takeaway businesses should be penalised for littering problems they create.
- Some believe that individuals responsible for their own and their children's health, they feel takeaway choice should not be restricted and the focus should be on education instead.
- Some believe that obesity is due to poor eating habits, influenced by media and lack of education, healthy habits and deciding not to cook.
- Some agree there should be access to a range of food choices including education about healthy choices.
- Some suggest that community centres could provide the space for allotments as well as education cookery courses.
- Some raise concern that takeaways are difficult to manage and that once development is approved the use over time could be changed to a takeaway, they suggest this needs monitoring and enforcing
- Some suggest the need for a policy for school meals.
- Some suggest the need for healthy eating awareness sessions, free exercise classes, psychological support and restricted media promoting unhealthy food.
- Some feel that not everyone will want to use the private space for growing – however policy generally supported.
- Some suggest that the Council needs evidence of demand and standards for food growing and allotments.
- Concern that regarding the location of hot food takeaways, there is need for a more nuanced discussion, particularly in newer development areas.

- Concern that the policy will not limit deliveries from restaurants using Deliveroo etc. so would be of limited benefit. Some suggest instead the issue could be addressed by limiting opening hours to 17.00 onwards on weekdays.
- Some support for the policies intentions, however some feel it is unreasonable since primary school children are unlikely to visit and the policy needs to balance against the NPPFs support for economic development
- Some feel that part C is unnecessary and inappropriate to new homes to provide facilities for onsite food growing.
- Suggestion that the requirement for allotments (0.25ha (20) per 1000 hh) should be amended to 0.5ha per 1000 population.
- Some question how criteria C and D can be implemented in high-density residential areas such as CMK.
- Suggestion that the policy should provide further clarity about how to demonstrate when on-site is not feasible and to calculate off-site contributions.
- Some suggest the policy needs to clarify thresholds and standards for new provision.
- Some suggest the policy should recognise Community Growing Facilities, including adding the following wording to para 130 “Community Food Infrastructure, such as allotments, and urban food growing and community-wide food growing spaces such as community orchards, is also a key component of the Food Environment.”

Amendments to Draft Policy PFHP4:

- Additional criteria A.2. that community facilities meet the needs of the local population
- Community amenities reworded to 'community facilities'
- Additional criteria B.4. setting out the need to demonstrate that an existing use is no longer commercially viable and has been appropriately marketed for at least six months
- PFHP4 E. additional wording added to clarify that the criteria applies to proposals outside of an existing town centre listed in Policy GS5
- Definition of park added to the policy for clarity
- PFHP4 E.1. additional references to further education facilities, youth or community centres, leisure centres and parks
- Criteria E.2.ii. (from Regulation 18 Plan) removed
- Additional wording added to provide guidance on the clustering of Hot Food Takeaways

Draft Policy PFHP5 Designing People Friendly Places

Main Issues in Relation to Draft Policy PFHP5:

- Suggestion that Building for a Healthy Life should be used to assess major residential development proposals.
- Suggestion that schemes should be evaluated using the Active Design principles.
- Some support the use of Building for a Healthy Life and Healthy Streets.
- Concern that PFHP1 already requires submission of HIA, and that further validation requirements to address healthy living would be onerous.
- Some support policy which they feel will encourage good waterside design.
- Concern that there is no mention of Secure By Design or equivalent and this should continue to be a requirement.
- Some suggest that a healthy life should also include decent sized plots for houses with space between them and ample sized gardens.
- Concern that Criterion VI refers only to the built and natural environments, which offers an incomplete approach. Suggestion to amend wording to: "VI. Integrate well with the surrounding built, historic and natural environments..."
- Concern that the policy excludes the most important aspect of the active travel routes – that they, and not the vehicle routes – should be as direct as possible from the main clusters of homes to the main desire points.
- Some agree with draft policy PFHP5; however, they feel further clarity and context is required, particularly on active travel.

Amendments to Draft Policy PFHP5:

- Amendment to PFHP5 B(3) to "Respond positively to the landscape characteristics of the site, whilst retaining established and healthy landscape features".
- Amendment to Policy PFHP5 (C) setting out design principles which development proposals must adhere to
- Reference to the Active Design principles in the Policy's supporting text
- Additional text in Policy PFHP5 C (4) "The layout should be designed to maximise the surveillance of the public realm, considering the prevention of crime and minimise the perception of crime."
- Definition of 'Active Travel' added to the Plan Glossary

Draft Policy PFHP6 Designing healthy streets

Main Issues in Relation to Draft Policy PFHP6:

- Some agree with the general theme of this draft Policy; however they suggest the mandatory inclusion of the 30-30-300 principle.
- Some recommend that the design for all new streets should incorporate more tree planting and low-level planting between footways and carriageways and seating should be provided at regular intervals along streets.
- Some believe that streets should not be dominated by car use, the use of the Manual of Streets to assess all new development proposals is supported.
- Some recommend that all new residential developments should be designed as No Traffic Neighbourhoods to discourage rat running through residential roads, and that all new residential developments should have 20mph speed limits.
- Concern that the current parking standards and design guide make it challenging to avoid streets dominated by car parking or significant visitor parking bays. Respondent feels that this is particularly noticeable in Olney and rural villages, where they feel such parking arrangements can be excessive and out of character.
- Francis Jackson Homes Ltd suggest that it is essential to consider the anticipated delivery mechanisms and potentially update the parking standards and design guide.
- Suggestion that the Plan should express a preference for street furniture and infrastructure to be publicly rather than privately maintained.
- Suggestion that service areas should be accessible.
- Some suggest implementing publicly administered residents only parking courts or multi-storeys rather than on-plot parking and street visitor spaces.
- Suggestion that hard surfaces are easier for people with limited mobility or with pushchairs.
- Some requests no block paving due to maintenance cost. Suggestion for additional wording in PFHP6 A.7: "with ground floor detailing to provide interest and waymarking."
- Some suggest policy wording is amended with more details of what constitutes cycle safety and convenient and accessible pedestrian crossing points.
- Some suggest that especial care and consideration needs to be given to pedestrian / cycle crossings at road junctions, as some of the existing Redway crossings at estate access roads are poor as cars come off grid road roundabouts at speed, and vehicles need to be prevented from doing this.

- Some disagree with draft Policy PFHP6, believing that streets should be for people (particularly children), suggesting adding a 'doorstep play' aspect to the policy.
- Some highlight issues with the poor quality of local public realm and pavements, making them unsafe for vulnerable users.
- Some note that the lack of significant new development in their parish limits opportunities to improve the public realm.
- Some disagree with draft Policy PFHP6, believing secure bike storage facilities should be considered to encourage cycling.
- Some request assurance that removed parking is compensated elsewhere.
- Concerns are raised around rural villages being disconnected from redways and excessive speeds of traffic, including busses.
- Some agree with draft Policy PFHP6, so long as this refers to streets within developments and not grid roads.
- Some suggest amendments to include more mention of cars, and maintenance of the existing street hierarchy of MK.
- Some believe that the draft text is very prescriptive and could prove to be divisive for some schemes – especially if significant constraints dictate the layout of built development.
- Suggestion that the first sentence is re-drafted to say: - 'Development proposals will be permitted if they follow the guiding principles and where they do deviate this must be evidence based:' This will allow for sites which can more easily follow the guidance to do so and those that cannot, due to the constraints upon them, can demonstrate through sufficient evidence why they do not. It will also aid timely delivery.
- Some consider that additional flexibility is required to allow different types and scales of proposals to address the principles.
- Suggestion that PFHP5 and PFHP6 explicitly acknowledge the commitment to apply Natural England's Green Infrastructure Framework for the design of people-friendly places to ensure sufficient coverage of green space.
- Some seek confirmation that the Healthy Streets principles can be applied to smaller sites.

Amendments to Draft Policy PFHP6:

- Guidance provided in the supporting text for Policy PFHP6 on the definition of streets, where for the purposes of this policy 'streets include the wider public realm that contributes to the multi modal movement network'.

- Comments regarding the need for secure cycle storage noted, requirement for secure cycle storage added to PFHP7 Design of Buildings and Spaces
- Text has been amended to clarify that the policy is not written exclusively around the Healthy Streets indicators.

Draft Policy PFHP7 Well-designed buildings and spaces

Main Issues in Relation to Draft Policy PFHP7:

- Some agree with the draft Policy. They suggest that, considering events elsewhere, all buildings must be safe regarding cladding materials etc.
- Some question whether the policy should refer to engaging with a Design Review Panel.
- Concern that the policy does not refer to heritage significance, excluding an important consideration in design, they suggest that explicit mention of heritage significance is necessary for effective conservation and enhancement. Historic England suggest the following additional wording: “For sites that affect the setting of one or more heritage assets, and/or the character of a conservation area, the application should demonstrate how the development would respond sensitively to the heritage significance of any assets affected”.
- Historic England also recommend including reference to a Heritage Impact Assessment in paragraph 139, alongside Landscape and Visual Impact Assessment, with a cross-reference to the heritage section of the plan.
- Some suggest better design solutions are required at key points in housing estates, especially at entrances to the estates to create a sense of identity and place. They suggest there needs to be a greater variety of design and choice of materials.
- Some advocate for constructing more houses to the Passivhaus standard, which emphasizes energy efficiency and sustainability, such as solar panels.
- Suggestion to add “but ground floor detailing, variation of form, etc can be a viable alternative way of differentiating the building, particularly in areas where most traffic will be pedestrian, and not looking upwards.” to PFHP7 A.3.
- Some suggest solar panels should be used more on new buildings.
- Some emphasise the importance of preserving natural vistas, noting that Milton Keynes’ founding principles included integrating structures with surrounding trees, which has been achieved with low-rise developments.
- Some believe tall buildings should be limited to the central metropolis and stress the importance of appropriate mass and scale, particularly in CMK’s Parkside quarter.

- Some disagree with draft Policy PFHP7, believing A(iii) is confusing and suggesting a stricter policy (such as 'a building cannot be greater than 4 storeys taller than the nearest 4 properties'); similarly they believe that A(viii) is too subjective.
- Criticism of the policy for lacking attention to design details, which could lead to poor architectural decisions.
- Some feel there are too many poorly designed build-to-rent schemes.
- Some stress the importance of design codes in Neighbourhood Plans and supporting the original Milton Keynes masterplan's design principles
- Some suggest requiring that no building will be permitted which is taller than the tallest tree in the borough.
- Some feel that well-designed buildings will encourage increase in active travel.
- Some feel it is unnecessary and inappropriate for part A10 of the policy to refer to buildings being designed to prevent suicide, they feel this is a matter which is addressed through Building Regulations and social care.
- Some feel there is a need to review the approach to tall buildings against proposals for CMK and building height/density standards to ensure consistency.
- Some question whether important views are to be identified by the policies and maps.
- Some feel that housing and parking design should better reflect increased home working to ensure MK is as attractive place to live, work, and play as possible.
- Suggestion that Part VIII should be reworded or removed due to the ambiguous term "important view." Storey Homes feel that this term is open to interpretation and could be unnecessarily onerous. Storey Homes ask for a more comprehensive explanation of what constitutes an important view, or alternatively that the policy is removed.

Amendments to Draft Policy PFHP7:

- Reference added to Design Review Panel in the supporting text of the 'New MK Design Codes' chapter
- New policy and additional supporting text added 'PFHP8 - Tall Buildings Outside of CMK' providing guidance and assessment criteria for tall buildings outside of CMK
- PFHP7 A (3) amended wording to 'Buildings are of an appropriate scale, massing and height in relation to their context or the strategic aims of this Plan

Draft 'A New MK Design Code'

Main Issues in Relation to 'A New MK Design Code':

- Suggestion that the MK Design Code needs to be flexible to changing design styles over time.
- Concerns regarding the lack of detail for the design code.
- Concerns regarding the proposed area typologies for the design code, which are that set out in the National Model Design Code – rather than being set according to the unique context of MK.
- Questions on approach to design coding for strategic extensions
- Hallam Land suggest that the Strategic Allocations are treated as distinct Area Types given their unique context and relationship with the city
- Sport England note that they are developing Active Design Codes Guidance to support LPAs in embedding Active Design Principles in Design Codes
- Respondents feel the design code vision will support the objectives of People Friendly and Healthy Places
- Suggestion to add an additional area type for 'Waterside Places'
- Note that the Canal and River Trust are currently working on a design code for Waterside Places
- Historic England raise concerns about the code's applicability to both the city and its smaller historic towns and rural areas, suggesting bespoke character based codes for these areas.
- Historic England suggests amendments to the vision to accommodate the city's evolution while ensuring it remains aligned with the original vision.
- Respondents not supportive of tall buildings
- Some concern that the skyline of Central Milton Keynes has been diminished
- Respondents highlight the importance of engaging with the local community to develop the design code
- Suggestion that the Design Code should be reinforced by the need for all new major development applications to be reviewed by a Design Panel
- Suggestion that the Design Code needs to balance competing objectives like parking provision and maintaining good urban design principles
- Suggestion that the Design Code carefully considers densities and building heights
- Some disagree with the proposed vision
- Suggestion that there should be a Design Code adopted for existing areas

- Storey Homes suggest that the Design Code should not cover villages / rural areas in Milton Keynes.
- Suggestion that Neighbourhood Plans should guide design principles for their local areas.
- West Bletchley Council raise concern that the proposed area types fail to capture the unique characteristics of mature pre-New Town areas like West Bletchley
- Some concern that the Design Code could dilute the original design principles of Milton Keynes
- Concern that the vision is not economically sustainable
- MKDP suggest that the reference to the Design Code should be removed to avoid confusion over densities and uses in an area.
- Concern that a new MK Design Code could introduce an unnecessary additional layer of policy, requesting evidence of need
- Some concern that developers are being asked to prepare design codes for large development sites and suggest that instead MKCC should take the lead
- Respondents highlight the importance of considering and enhancing the important views in the City's planning.
- Concern raised that the MK Design Code needs to be tailored to Milton Keynes' unique urban form, characterised by its gridded road system and dispersed land uses.
- Some suggest that the MK Design Code should place more emphasis on blue and green infrastructure.

Main Issues in Relation to 'A New MK Design Code':

- Revised position relative to the December 2025 update to the National Planning Policy Framework which moved away from encouraging authority wide design codes. The City Council welcomed this advice as there were significant concerns about the resource required to produce this code and its limited value given the scale of the area it needed to cover. Our revised approach is to expect lead developers to produce a framework plan, in discussion with ourselves, followed by an area design code for the strategic expansion areas and site codes, if there are multiple developers on a site or phase.
- The framework and the code are to be linked to the planning permission, via conditions that ensure the application follow the design guidance within these documents. This results in design codes in Milton Keynes that focus on areas of change and growth. Importantly this would ensure coding for the Eastern Strategic City Expansion Area

and Central Milton Keynes. The vision for these more localised codes would remain the same focussing on People Friendly and Healthy Places.

High Quality Homes

Draft Policy HQH1 Healthy Homes

Main Issues for Draft Policy HQH1

- Concern that there is an unclear justification to the approach of having self-build being provided on strategic sites. Some do not believe that Subclause E (Self-Build and Custom Homes) is strong enough.
- Some expressed a preference to smaller, non-strategic sites, and Neighbourhood Plan allocations, and suggested that the level of provision should be evaluated individually for each site.
- Some felt that 'reasonable needs' should be defined so the policy can be enforced
- Some raised concerns about the suitability of large housebuilders to bring self-build sites forward on strategic sites.
- Some suggest that self-build sites should be serviced plots made available to genuine builders, not sold to developers or builders for onward sale on the open market, and that there needs to be a resident requirement in the lease.
- Some suggest that self-build plots on strategic allocations may remain vacant (grated but not delivered) and revert to mainstream market dwellings after 12 months, potentially leading to unmet self-build needs and loss of S106 receipts.
- Concerns raised regarding viability around 5% of new market homes to meet Building Regulations Part M4(3) wheelchair accessible standards, and some question whether this has been considered in the Viability Study.
- Concern that M4(3) housing may reduce independence for older people, and some recommend that older persons' housing, especially extra care housing, should be addressed separately in the Local Plan.
- Some suggest amending Policy HQH1 to allow for flexibility in housing mix for each development, considering the latest evidence of need and other material factors such as viability.
- Concern about the lack of wording regarding the need for social housing, as opposed to the ill-named affordable housing, and new-build council housing.
- Concern regarding the volume of build-to-rent units being developed in CMK which some feel do not create sustainable communities
- Suggestion that parts B and D of the policy are combined to ensure that the policy does not convey conflicting requirements. Criteria in both sections should be made

subject to viability and site-specific constraints; ensuring deliverability of sites, including in CMK where demand is predominantly for smaller households.

- Suggestion that there is a need for high quality bungalows in MK for the increasing ageing population
- Some would prefer to aim for co-housing groups including low-cost self-build homes, rather than leave it to the market which is producing high priced "custom" homes many of which are indistinguishable from each other.
- Some suggest that solar panels should be used more on new buildings.
- Some suggest that Cohousing in the City Plan is essential, providing companionship, mutual support, neighbourliness, and informal care, leading to longer, healthier lives. MKCC should allocate sites for Cohousing as part of their commitment to healthy homes.
- Some suggest that the percentage of custom/self-build homes should be reviewed before submission is made and adjusted based on demand and viability.
- Some recommend that the policy should allow flexibility to deviate from this mix based on local needs (provided evidence supports this).
- Some suggest that infrastructure should be the priority
- Some suggest positively encouraging more such development across all of MK - rural as well as designated areas.
- Suggestion for a 3% self-build home provision, believing self-builds create a diverse character.
- Suggestion that affordable homes be defined as being 4x the average salary for MK, and that most affordable homes should be available on the free market.
- Some suggest adding a reference to where the Council's latest evidence of need will be published for clarity.
- Concern that it is unrealistic to expect small developments (fewer than 10 new homes) to fully meet the need and some note that the policy has not been viability tested.
- MK Forum do not believe that Subclause E (Self-Build and Custom Homes) is strong enough. The reaction of developers to Policy HN5 (Self-Build and Custom Housing) in Plan:MK is lamentable, and the subject has not even been mentioned in the various Design Codes for the Expansion Areas. They note that the Council's register of custom and self-build monitoring shows a shortfall of 323 plots as of 30 October 2023 and they stress that serious action is required address this.
- Some consider that the effectiveness of Policy HQH1 with respect to housing mix and adaptable/accessible homes would be limited, and that there would be few

developments of 10 or more houses in Newport Pagnell and surrounding areas, and a lower threshold should be more appropriate for rural areas.

- Some suggest increasing the requirements for accessible and adaptable homes in CMK.
- Some suggest an amendment to ensure references are consistent and up to date

Amendments to Draft Policy HQH1

- Definition of 'Self-build' added to the Plan glossary
- Policy wording amended to provide clarity that development will be supported in sustainable locations
- Policy title amended to 'Healthy Mix of Homes'
- Amenity section of the policy relocated to new policy HQH10
- Reference added to the People Friendly Healthy Places chapter
- Definition of 'dual aspect' added to the Plan glossary
- Policy requirement added for 5% of new homes on Strategic Sites to be Self-build and custom homes.
- Additional wording added in the supporting text regarding the allocation of Self-build homes in Neighbourhood Plans.
- 'Reasonable' removed from part G.3 of HQH1 and relocated to new policy HQH10.
- Additional wording added to provide clarity on the percentage of Self-build required on each site, and emphasising the potential for smaller site allocations in Neighbourhood Plans
- Additional policy wording setting out the Council's support for locally proposed self-build projects identified within a Neighbourhood Plan will be supported.
- Additional wording providing guidance regarding the 12-month marketing period, setting out that where plots have been made available and marketed appropriately for at least 12 months and have not been sold, the plot(s) may either remain on the open market as self-build or be built out by the developer.
- 3% Self-build provision requirement added for Strategic Sites to reflect the Council's self-build register
- Grammatical and formatting amendments to improve overall readability of the policy.

Draft Policy HQH2 Affordable Homes

Main Issues for Draft Policy HQH2

- Some call for further evidence to ensure that a 40% affordable housing target won't hinder strategic allocations delivery, noting that 40% should be seen as a maximum, not a minimum.
- Some advocate for including shared ownership in the affordable housing mix to help first-time buyers and caution against over-delivery of social and affordable rented housing, which could impact market home ownership and overall affordability of open market housing.
- Some suggest the tenure mix in criteria Aii) should also consider upcoming changes to the NPPF.
- Some believe without the inclusion and provision of social housing; no proposed tenure mix will ever truly meet the needs of all Milton Keynes residents.'
- Some note that the affordable housing requirement for developments in 'Viability Area 1', including the Eastern Strategic City Extension, is proposed to be 40%, up from 31% in the 2019 Plan: MK. Although the 2024 Whole Plan Viability Study suggests strategic greenfield sites can support 40% affordable housing, it does not specifically test the Eastern Strategic City Extension's viability considering its infrastructure demands.
- Some suggest Part A2 of the policy should be flexible to adapt to changing needs over time, potentially including site-specific adjustments.
- Some note that all intermediate housing is currently planned as First Homes, which have a £250,000 price cap. They suggest the Council should consider other types of intermediate housing, such as shared ownership, discount market sale, and intermediate rent, to provide more options for those in need.
- Suggestion that there needs to be a clear tenure mix for CMK to avoid all new homes being 1 and 2 bed flats with little or no family housing, as this will not create sustainable communities.
- Some suggest no zoning of the percentage required, there should be a minimum of 30% across the whole of MK.
- Some express concern that the 10% requirement proposed for CMK or financial contributions only from Built to Rent developments means there will be little affordable housing in CMK, a location where affordable housing is required to support workers on low wages with no access to cars.
- Some suggest that the percentages used (e.g., 16%, 62%) are not very practical for smaller sites (10-20 houses), as they cannot be easily rounded.
- Some suggest that Part 2 of the policy should enable more flexibility in tenure mixes based on site-specific requirements, such as location.

- Some suggest A.3 needs making more explicit, as per the Plan:MK policy.
- Some suggest A.4 should also include 'The aim should be to deliver the largest number of bedrooms possible within the original target, with the best mix of homes possible'
- Some questions if Build to Rent is necessary and if the viability assessment element of the policy is needed.
- Some concern raised at the return to the standard definition of affordable rent and wish to retain the requirement for rents to be limited to LHA rates.
- Some are concerned that the Government's viability tests reduce the amount of affordable housing, particularly in CMK.
- Some suggests moving away from Build to Rent and focusing on shared ownership and investment in people accessing affordable homes and building communities.
- Some question the strength of the policy
- Some question the definition of affordable homes
- Concern that current developments do not appear to be delivering affordable housing
- Objection to requirement for 40% social housing in new development, noting that the Eastern Strategic City extension is rural, moving people there takes them away from families and services etc. The 40% figure is too high, and they feel the policy should be concentrated in the CMK area only.
- Some state that for smaller rural sites, the tenure split may not be viable or suitable. Agree with the inclusion of the clause "except where site specific conditions dictate otherwise," as it allows flexibility and for the market to determine the appropriate split in these locations.
- For redevelopments in West Bletchley, such as former garage courts and REEMA construction blocks, West Bletchley Council requests 100% social rent housing.
- MKDP suggests changing Bletchley town centre from Housing Viability Area 2 (25% affordable homes) to Area 3 (15% affordable homes). This is due to lower residential values making it difficult to meet the 25% target and the pressure higher densities place on viability.
- MKDP request updating the Policies Map for Bletchley (or an area that includes key opportunity sites, such as fire/police station and Wilko/Brunel) is changed to Housing Viability Area 3 (at least 15% affordable). This is the same for CMK and these two areas are the only separate sections in the Plan and both seek high-density developments.

- Some concern that focusing on strategic urban extensions may delay affordable housing delivery, and stress the need for affordable housing in Central Milton Keynes, where recent permissions have fallen short of the 15% target for Area 3.
- Some concern regarding the brownfield sites within the central area – which do not deliver the same level of AH as other parts of the authority, which could mean that delivery of 11,00 homes is not possible.
- Some suggest the requirement for 16% of affordable homes to be First Homes is not supported by evidence from the HEDNA. It highlights that only 239 households can afford First Homes with a 30% discount, and even with a 50% discount, the viability of schemes and the delivery of other affordable units would be compromised. Suggestion that Shared Ownership schemes are a more accessible and realistic route into home ownership, as they require a lower deposit and allow for staircasing.
- Some criticise the requirement for proposals with fewer than 10 new homes to consider adjacent sites as one comprehensive site, arguing that this is unrealistic and lacks precision.
- Some note the disadvantages of First Homes, such as their inflexibility and the potential for creating dependency, with concerns about their resale process and suitability for many households
- Some consider that the true requirement for affordable housing is higher than that set out in the HEDNA.
- Some stress the need for affordable housing for NHS staff and other health and care providers in the local authority area. Ensuring NHS staff have access to affordable housing near their workplace is crucial for delivering high-quality healthcare services. Recommend that the Council engage with local NHS partners, factor the need for affordable housing for NHS staff into housing needs assessments, and consider site selection policies to address this need, especially near large healthcare employers.
- Some raise concern that the proposed tenure mix is unsuitable and does not align with Registered Provider preferences, for the inclusion of shared ownership properties within the mix to provide a more balanced portfolio. They recommend that RPs be explicitly consulted on this tenure mix and their opinions considered.
- It is suggested that policy wording is changed to 'Subject to viability, affordable housing should be provided as follows...' before detailing the requirements for the three viability areas. This amendment would make it clear that meeting the target is subject to viability and avoid the ambiguity that using the word 'maximised' brings to the policy
- Some suggest referring to affordable housing in HQT3

- Some request specific targets for affordable housing mix in CMK, including a minimum percentage of 3+ bedroom homes.
- Some raised concern about the deliverability of First Homes. Suggesting that where viability assessments are required for major developments that these are made public.

Amendments to Draft Policy HQH2

- Affordable Home Ownership added into Policy to replace First Homes following the update to the National Planning Policy Framework (2024)
- Policy requirement added that where the provision of affordable homes falls below the expectations set out in part 1 of this policy, a review mechanism will be used to test the longer-term viability of the development. The format of this mechanism will vary depending on whether the units are for ownership or sale, the tenure and the funding model for the development.
- Amendment to HQH2 Part B, now requiring that where development comprises solely of Build to Rent homes, a financial contribution in lieu of the provision of on-site affordable homes will be accepted subject to a viability assessment and a review mechanism in the same terms as set out in Part A.6. of Policy HQH2.
- Amendments to the required tenure mix of affordable homes, to 13% Affordable Home Ownership, 67% Social Rent and 20% affordable rent
- Removal of requirements D.3. & D.5. from HQH2 from the 'Adjacent Sites' section.

Draft Policy HQH3 Supported and specialist homes

Main Issues for Draft Policy HQH3

- Some concerns about the requirement for 1 in 5 homes in strategic allocations to be specialist housing. Hallam Land state this could impact development viability and delay delivery if there is lower demand for specialist housing. They suggest the Council consider specific allocations for specialist housing, like their suggested approach for specific allocations for self and custom-build home delivery.
- Some feel it is absolutely imperative for MKCC to make it essential that supported and specialist homes are provided within Milton Keynes.
- Some suggest the policy should be flexible to adapt to changing needs over time. Part B of the policy could include a clause allowing for adjustments based on updated evidence, including site-specific needs.
- Some consider that the level of provision (around 2,800 homes out of 16,000) is excessive. They note that the HEDNA report identifies a need for 8,000 additional specialist homes by 2050 but itself suggests this figure might be an overestimation due to uncertainties regarding future demand for these types of homes. They consider that Policy HQH3 should be amended to avoid a specific percentage requirement and

instead align with Policy HN3 in Plan:MK, which asks for such housing provision commensurate to the scale and nature of the scheme.

- Some feel that Policy HQH3 is unclear about how the percentage requirement relates to the affordable housing requirements in Policy HQH2.
- Suggestion that benefits such as significant health, social, and economic benefits of such housing, including reduced demands on health and social services, improved resident health, and more efficient use of public resources should be emphasized in the policy's supporting text.
- Some note that there is sufficient evidence to show that older people enjoy being located close to activity where they can see and hear what is going around them, and access to shops / other facilities is essential.
- Suggestion that a definition of 'strategic development' should be provided in the glossary. It is assumed this is strategic site allocations; however, clarity is needed.
- Some stress there is no mention of children's homes, which is a requirement of the NPPF.
- Some suggest the Plan should include a commitment to providing sites for Cohousing schemes (which can be for people over 55 or multi-generational).
- Some would prefer the policy to focus less on care homes, and more on the promotion of independent living and building more bungalows suitable for the elderly.
- Some suggest dedicating some homes for rough sleepers
- Some suggest that allocations for supported, and specialist homes should ensure sensible access and facilities, be uniformly spread across the city, and set overall targets rather than specific area targets. They also recommend monitoring delivery and processing applications based on overall need.
- Some suggest there should be specific allocations for different types of supported housing.
- Some suggest that greater flexibility should be included in policy in respect of the provision of supported and specialist homes to allow an adaptable approach given potential changes in local needs and market conditions
- Suggestion that Supported and Specialist Housing Policy HQH3 overlaps with policy HQH2, creating ambiguity regarding affordability and tenure split requirements. Clarification is needed, as well as the Council's definitions of 'care homes,' 'sheltered homes,' and 'extra care homes.'

- Some feel it is unclear if standalone site provisions across Milton Keynes have been tested. It is unclear if the potential for such opportunities has been investigated by MKCC as an alternative to the provision within strategic city extensions.
- Suggestion that it is uncertain if operators prefer a concentration of specialist housing in expansion areas. Some feel this will lead to a concentration of provision in the future in certain areas, which might not be desirable. They recommend allocating specific sites for specialist housing elsewhere in the Plan.
- Some stress there is not sufficient clarity in the definition of these types of homes and how they compare on a 1:1 basis. Suggest this should be reduced in scope to requiring a proportion of specialist homes to contribute to the assessed needs of the Council. Alternatively, and to meet the question of clarity raised above, the level of supported homes could be calculated on a square metre basis, i.e. for every Xsqm of gross residential floorspace Xsqm of C2 care/extra care homes or sheltered housing should be provided.
- Some suggest there should be specific consideration of ethnic minority elderly care.
- Concern raised over criterion D in relation to the loss of supported and specialist homes, which should also allow for situations where these are no longer viable (including where the quality of accommodation is not suitable).
- Some stress that there is a need for specialist housing in Newport Pagnell and the surrounding rural areas, but due to the location of the proposed strategic allocations the plan does not provide the same opportunities for all parts of the community and fails to align with the NPPF.
- Some consider that the approach fails to recognise the significant issue in Milton Keynes of homelessness, they suggest that this should be recognised by the HEDNA and in policies in the Plan.
- Some note a conflict between HQH2 and HQH3 in the requirement for schemes seeking over 50% affordable housing to be subject to the preparation of up to date evidence of need, and consider that this would be an unnecessary and expensive burden on providers of specialist housing.
- Some suggest increasing the requirement to 25% in CMK based on evidence of need, including design requirements to achieve mixed, inclusive communities, setting a specific target for extra care housing provision and requiring an accessibility strategy for each development.
- Some suggest the policy does not currently reflect children's social care requirements. These are: Existing Plan:MK requirements: 29,000 homes: 203 beds New Plan:MK requirements: 33,750 homes: 239 beds Total potential requirements: 62,750 homes: 442 beds Of the 442 beds overall, there should be at least 45 complex residential beds.

Amendments to Draft Policy HQH3

- Amended need figures to reflect the updated figures from the Housing and Development Needs Assessment Update Report; need for bedspaces for residential institutions (C2) amended from 1,400 to 2,500
- Removal of requirements A.3. & A.5. from Policy HQH3
- Relocation of Part C of HQH3 into Part B of the Policy
- Amendments to Part B of Policy HQH3, setting out that supported and specialist homes will be sought as an integral part of strategic housing allocations, and that where on-site provision is not feasible, financial contributions will be sought to enable provision of specialist and or supported homes off-site. Removed the requirement for 17.5% of the total of homes to be supported and or specialist homes on new strategic developments & removed the percentile breakdown of the Council's latest assessment of need
- Additional Policy requirement (now Part C) requiring that affordable housing contributions will be required in accordance with the requirements of Policy HQH2 depending on whether the accommodation falls within C2 or C3 of the Use Classes Order
- Amendment to wording of Part D of Policy HQH3, from 'suitable alternative provision is made elsewhere' to 'suitable alternative provision has or will be made elsewhere'
- Amendment to wording of Part E.1. removing reference to 'sizes and types' of households
- Removal of the reference to 'facilities' in Part E.2 of HQH3
- Removal of requirement E.3

Draft Policy HQH4 Supporting Transit-oriented Development and Estate Regeneration (Now Policy GS9 in the Regulation 19 version of the Plan).

Main Issues for Draft Policy HQH4

- Some concerns that little reference is made to retention and refurbishment of buildings, without mention of carbon benefits etc.
- Some comments feel there are not measurable metrics to assess effectiveness of meeting the policy.
- Support for including social and community planning through the policy, and particularly community amenities, not just housing.

Amendments to Draft Policy HQH4

- Policy title amended to 'Supporting transit-oriented development and estate regeneration
- New policy criteria now HQH4 part A, setting out support for Major development proposals within the Metro Corridors, and/or those associated with the regeneration of a residential estate(s) where they meet the relevant criteria set out in A.1. - A.4.
- Additional policy criteria now HQH4 Part B, setting out that Major development proposals within 600m of existing or proposed interchange hubs within the Metro Corridors will only be supported where they accord with the requirements set out in Part B.1. - B.2. of Policy H
- Amendments to wording Part C of Policy HQH4, formerly Part A, specifying that Major development proposals associated with the regeneration of residential estate(s) will be supported where they accord with the requirements of Part C.1. - C.4. of Policy H
- Additional requirement added (HQH4 C.3.) for Major development proposals associated with the regeneration of residential estate(s) to demonstrate how collaboration with the local community has shaped the proposals in line with the Community-Led Regeneration and Estate Renewal Strategy
- Additional requirement added (HQH4 C.4.) for Major development proposals associated with the regeneration of residential estate(s) to demonstrate, where demolition and replacement of building is proposed, that reuse and refurbishment of the existing buildings is not feasible and/or would significantly prejudice meeting any other criteria required within Policy HQH4 or the wider objectives of the Plan
- Criteria from A.1. - A.7. relocated into other sections of the amended Policy HQH4
- Relocated to the Growth Strategy Chapter
- Overall grammatical and formatting amendments to improve readability of the policy

Draft Policy HQH5 Homes for co-living (Now Policy HQH4 in Reg 19)

Main Issues for Draft Policy HQH5

- Some suggest the policy should consider the impact of this type of home on car parking, and set out parking requirements for homes for co-living.
- Some suggest Homes for co-living should be provided for workers as well as students in or close to CMK.
- Some stress that the provision of student accommodation is important.

- Some questions how homes for co-living of at least 50 units will not change the character of an area, and suggests that the policy instead refers to contribute positively to the area
- Some suggest the policy should be expanded to include a commitment to all forms of community-led housing including community land trusts, co-housing, and self-build.
- Some suggest homes for co-living should be licenced, maintained and in proportion with their location.
- Some support for the policy, particularly where homes are in highly accessible locations in CMK.
- Some suggest the policy should be amended to ensure homes for co-living can be effectively integrated.
- Some suggest a diverse mix of student accommodation will be required to meet needs.
- Some suggest that the definition should clarify that housing co-operatives are included.
- Some believe that the number of single room homes in CMK will continue to rise disproportionately to Newport Pagnell and other areas.

Amendments to Draft Policy HQH5

- Amendment to part A.2. specifying that proposals are in highly accessible locations by public transport, walking and cycling to community facilities and reference added to Policy GS4
- Part A.3. of the policy amended to 'positively integrate with the surrounding area', from 'make a positive contribution to the character of the area'
- Grammatical and formatting amendments to improve readability of the policy.

Draft Policy HQH6 Houses in Multiple Occupation (Now Policy HQH5 in Reg 19)

Main Issues for Draft Policy HQH6

- Some suggest that the necessity of sufficient parking provision and consideration of the impact of parking is addressed within the draft Policy.
- Suggestion that the consideration of the impact of refuse bins on surrounding area and neighbours is addressed in HQH6.
- Historic England recommends including a reference to the building's heritage significance, highlighting that it can influence decision-making in certain cases.

- Some suggest requiring the inclusion of the policies in the SPG on HiMOs.
- Suggestion that the policy should specify that some are "affordable" and preferably at LHA rent levels.
- Some suggest that Clustering will need more definition to be enforceable.
- Haversham PC suggest that the policy should include requirements for additional HMOs from existing housing stock to meet current needs and simplify the licensing and planning permission process.
- Suggestion that there needs to be greater control of any new conversions to ensure that houses are safe and not unhealthy through overcrowding.

Amendments to Draft Policy HQH6

- Reference added to the Council's local HMO Amenity Standards in the policy's supporting text
- Amendments to part A.2. of Policy HQH6, requiring that suitable provision is made for waste and recycling storage, cycle and car parking and drying areas.
- Amendment to part A.3. of Policy HQH6 requiring that proposals for HMOs, or the sub-division of existing dwellings into flats, must not result in the number of HMOs exceeding 35% of the total number of properties within a 100 metre diameter buffer from the centre of the application property; and one property, HMO or non-HMO, being sandwiched between two HMOs.

Draft Policy HQH7 Pitches for Gypsies and Travellers (Now Policy HQH6 in Reg 19)

Main Issues for Draft Policy HQH7

- Suggestion that the requirement for 14 pitches in the Eastern Strategic City Extension needs further assessment. Hallam Land seek clarity to understand where these pitches would be accommodated within the site, as this may influence the scale of provision drafted in the policy.
- Some disagrees with the draft Policy, due to loss of light or overshadowing. Overlooking/loss of privacy Visual amenity (but no loss of private view) Adequacy of parking/loading/turning Highway safety Traffic generation Noise and disturbance resulting from use Hazardous materials Smells Loss of trees Effect on listed building and conservation area Landscaping Road access Local, strategic, regional and national planning policies.
- Some raise concern that additional pitches will displace wildlife.

- Some raise concern that smells from the landfill which will impact future occupants.
- Suggestion that the number of pitches required at the Eastern Strategic City Extension to 2050 needs to be clarified.
- Objections raised to the planning application at Newton Leys (under ref. 23/02652/FUL)
- Some suggest that adequate screening with advanced planting needs to be provided, and that sites should be effectively managed.
- Some disagree with the draft policy due to impacts on visual amenity and traffic generation.
- Some strongly oppose any new G&T sites, and suggests that Bucks CC should locate their sites away from MK.
- Strong objection to the allocation of permanent pitches in Newton Leys
- Some express a preference for the expansion of existing sites or using brownfield sites instead of developing new sites on green space.
- Some suggest that the increase in provision has not been justified and is not in line with census data.
- Some agrees with the policy for permanent pitches, but suggest it also requires some provision for temporary pitches.
- Some express that the G&T community has just as much right to housing as the rest of the community and raises concern that their options are being removed.
- Some raise concern that the proposed locations may not fully consider the actual needs of the Gypsy and Traveller communities. They suggest the community prefer locations close to major roads to support their travelling lifestyle. Their response also highlights that their Land off Phoebe Lane, Wavendon lacks such nearby provisions.
- Some raise concern that the existing infrastructure in Newton Leys is insufficient and thus would suffer under additional strain anticipated from this site, including road congestion, school spaces and waste collection.

Amendments to Draft Policy HQH7

- Amended supporting text to reflect our updated Gypsy and Traveller Accommodation Assessment (2025), figures updated from an identified need of 29 permanent pitches up to 2040, to a need of 75 permanent pitches across the Plan period of up to 2050.
- Additional supporting text setting out our current provision and identified need for 10 plots for Travelling Showpeople, based on our updated Gypsy and Traveller Accommodation Assessment (2025).

- Removed the reference to Newton Leys as a proposed location for meeting our needs for the allocation of new Gypsy and Traveller sites.
- Part B of Policy HQH7 amended to remove the eight permanent pitches allocated within Newton Leys
- Amendment to Part B of Policy HQH7, altering the allocations of pitches within the Eastern Strategic City Extension
- Amendments to Part C of Policy HQH7, removing reference to 'new' and specifying that allocated Gypsy and Traveller sites shall be safeguarded from redevelopment and change of use. Wording 'or has been provided elsewhere', amended to 'or has been provided in an alternative location in the city'.
- Amended wording of Part D of Policy HQH7, from 'New permanent and transit Gypsy and Traveller sites and extensions to existing lawful sites will be permitted where' to, 'The provision of permanent and/or transit Gypsy and Traveller sites, including extensions to existing lawful sites, shall only be permitted where.'
- Part D.3. of Policy amended to 'the site has good access to community facilities'.
- Policy wording of Part D.5. amended to 'The site has suitable highway access to the local or major road network'.
- Removed requirement D.4.
- Additional Part E. to Policy HQH7, setting out the allocations for permanent Travelling Showpeoples Pitches for the Plan period up to 2050
- Additional policy criteria setting out criteria to be met by proposals for new sites for Travelling Showpeople
- Additional policy criteria setting out that any net loss or reduction in the number of authorised plots for Travelling Showpeople will only be permitted where it can be robustly demonstrated that the overall need for sites or pitches/plots no longer exists.
- Additional policy wording setting out requirements for a good standard of amenity for future occupiers and protecting the health and safety of children.

Draft Policy HQH8 Accommodation for boat dwellers (Now Policy HQH7 in Reg 19)

Main Issues for Draft Policy HQH8

- The Canal and River Trust object to the wording of the policy and the types of mooring referenced. They object on the basis that Council appear to be misunderstanding the different types of moorings, using confusing and inappropriate language to describe moorings and not making associated permitted development rights clear. The policy

refers to residential moorings as permanent and leisure moorings as temporary. The use of a mooring may be for a short period (i.e. a 24-hour visitor mooring) but the mooring itself may be permanent. There is a difference between the 'mooring' as a location and the mooring of a boat as an action. The location may be permanent but the action temporary.

- The Canal and River Trust stress that the use of a permanent mooring does not imply that a residential use has been granted or is taking place. Many boats have a permanent mooring, i.e. the location that it is moored at when not cruising, but this is not a residential mooring if the boat owner lives elsewhere, even if the mooring is used overnight occasionally. The policy covers both moorings for boat dwellers and leisure moorings. Many boat dwellers do not want to remain in one location but prefer to continuously cruise and use leisure moorings. Such moorings, when on the mainline of the canal are unlikely to require planning permission although land-based facilities supporting them such as car parks, sanitary facilities etc may constitute a change of use requiring permission. Nor does the policy recognise that off-line moorings such as Marinas and layby moorings need an agreement from the Canal & River Trust regardless of whether planning permission is granted.
- Some support for the policy and the provision of accommodation for boat dwellers.

Amendments for Draft Policy HQH8

- Removed references to temporary (leisure) moorings, focusing only on permanent moorings.
- introduced a cross-reference to Policy GS4 for assessing accessibility to community facilities, which was not present in Reg 18.
- Reg 19 combines and streamlines criteria related to utilities and servicing, explicitly including communal areas for showers, laundry, and WCs, and emphasising design quality.
- Reg 19 adds a new criterion requiring parking and service areas to be well-designed in terms of safety, circulation, and appearance.
- Reg 19 removes the Reg 18 requirement for emergency services access as a standalone point, instead integrating it into the general access and highway safety clause.
- Reg 19 removes the Reg 18 clause about not impeding navigation or towpath use in the Open Countryside section, though similar principles are retained in the general criteria.
- Reg 19 simplifies the lighting requirement to only essential lighting designed to minimise light pollution, improving clarity.

Draft Policy HQH9 Exception Sites (Now Policy HQH8 in Reg 19)

Main Issues for Draft Policy HQH9

- Some disagree with draft Policy HQH9, believing that the rural area is the worst place to provide social/affordable housing (due to remoteness, lack of infrastructure, transport and amenities), and that this overburdens the rural area.
- Councillor Andrew notes opposition to Policy HQH9 and considers that rural areas would be unsuitable for additional social/affordable homes due to the lack of local infrastructure.
- Some note that First homes are no longer a requirement.
- Some suggest that the policy should mention Neighbourhood Plans. Haversham Parish Council suggest that policies for exception sites within a Neighbourhood Plan, especially rural ones, should take precedence over Milton Keynes level policies
- Storey Homes support the policies inclusion but disagree with Parts A1 and C1 which limit rural exception and first homes sites to 0.5 hectares or 10 homes. Storey Homes state that this criteria restriction does not align with Paragraph 73, which supports community-led development proportionate to the village size. Storey Homes suggest following footnote 37 of the NPPF which allows sites up to one hectare or 5% of the existing settlement size to better meet community needs.
- Some highlight that the £250,000 price cap after the 30% discount is not viable in Milton Keynes, even with 35% market housing. They recommend that the policy be adjusted to reflect the development viability in the area.
- Grand Union Housing are concerned that the wording for Rural and First Homes exception sites may limit development. They suggest that specifying which villages are included could help, as some neighbourhood plans might prefer development in small hamlets or larger settlements outside parish boundaries.
- Suggestion that the text should be changed to remove the restrictions on size and should instead be 'compatible and of a scale with the existing settlement'.
- Kier Group Limited consider that Policy HQH9 is less effective than including specific housing allocations to provide affordable housing in rural areas.
- Smith Jenkins are concerned that the criteria for assessing Rural Exception sites (limited to 0.5 hectares or ten homes and must not lead to settlement merging) are not aligned with national planning policy, which does not impose such quantitative or spatial restrictions
- Smith Jenkins, regarding First Homes Exception Sites, note that these sites should be on unallocated land next to existing settlements and proportionate in size. They note

there is no strict definition of what constitutes a proportionate scale but using guidelines for Entry-Level exception sites suggest a site should not exceed 1 hectare or 5% of the existing settlement's size. As currently drafted, they feel the policy would constrain the delivery of such exception sites and hinder sustainable development and therefore should be revised.

Amendments to Draft Policy HQH9

- Additional supporting text regarding the allocation of sites within Neighbourhood Plans for the delivery of affordable housing, to meet identified need in their local area.
- Additional policy criteria added relating to Community-Led Development Sites in accordance with the National Planning Policy Framework (2024).
- Overall formatting and grammatical amendments to improve overall readability.

Climate and Environmental Action

Draft Policy CEA1 Sustainable Buildings

Main Issues in Relation to Draft Policy CEA1:

- General support among respondents for the policy on climate grounds.
- Some support for renewable and low carbon energy to be required with all new development.
- Support for energy efficiency but some underline the need for affordability.
- Concerns regarding viability and feasibility of policy but others think policies should be more stringent. Request for evidence of viability of policy, including whole life cycle carbon target.
- Concerns regarding the impact of proposed standards for energy efficiency and use on the deliverability and speed of delivering homes.
- Concern that increased energy efficiency, use and low carbon developments may hinder design quality where standardisation will be required to meet the targets set.
- Concerns regarding the impact of proposed standards for energy efficiency and use disproportionately on SMEs.
- Suggestion that policy requirements be made subject to viability and practicality.
- Some question whether viability evidence is locally specific.
- Suggestion that the policy needs to consider the viability challenges of delivering older persons' housing.
- Suggestion that net zero should apply to whole developments rather than individual homes.
- Concern that the wording "latest net zero generation technologies" is open to interpretation and should be removed.
- Suggestion that renewable energy should count towards achieving the energy use targets.
- Suggestion that new buildings should not be connected to the gas network.
- Suggestion that solar panels should be mandatory on new developments.
- Some question the soundness of the Carbon Offset Fund requirement.
- Some suggest the Carbon Offset Fund should support nature-based offsetting solutions.

- Some suggest there is a lack of evidence for offsetting related to WLCA.
- Suggestion that the plan should be based on the Future Homes Standard instead.
- Suggestion that overheating monitoring is unnecessary as Building Regulations Part O provides certification already; policy would create additional untested costs.
- Concerns regarding the deviation from the standards set out in Building Regulations, and points regarding the Written Ministerial Statement and deviation from national standards.
- Some question how to implement in-use monitoring as this requires resident buy in. Suggestion that only 5% of units be monitored.
- Some raise issues with the consideration of embodied carbon for denser urban proposals.
- Concerns regarding viability impact of the embodied carbon standards.
- Energy Use Intensity and WLCA criteria should be made “desirable” with net zero emissions being for regulated emissions only. Policy requirement could be made subject to viability and feasibility.
- Suggestion that CEA1G be deleted and suggests the policy lacks reference to other ways of reducing carbon e.g. good urban design, smart energy, & mobility hubs.
- Suggestion that the Council needs to ensure suppliers provide embodied carbon figures.
- Suggestion that proposals to redevelop historic buildings must consider an assessment of whole life carbon for retrofitting alongside demolition/rebuild, plus consideration of heritage assessment.

Amendments to Draft Policy CEA1:

- Amendments to Part C.1.- C.3. 1. setting out that Major residential development must achieve a: 60% regulated carbon emissions reduction over the Target Emission Rate set out in Building Regulations Part L 2021; and less than 625 kgCO₂e/m² as whole lifecycle carbon requirement, unless this would render the proposal unviable. Major non-residential development (excluding warehouse and industrial buildings) must achieve a: 20% regulated carbon emissions reduction over the Target Emission Rate set out in Building Regulations Part L 2021; and less than 750 kgCO₂e/m² as whole lifecycle carbon requirement, subject to viability. 3. After achieving the Target Emission Rate requirements set out in 1 and 2 above (where they apply), all major residential and non-residential development proposals must provide 25% of electricity demand through on-site low/zero carbon energy generation. Where roof-top solar PV panels are used, these should be focused on buildings where green roofs are unfeasible,

such as residential buildings with pitched roofs and industrial buildings with low structural loading capabilities.

- Amendment to wording of Part E. of Policy CEA1, 'Major residential developments will implement monitoring of energy use, overheating, and indoor air quality in 10% of all dwellings for the first five years of occupation to assess any disparity between the “as designed” and “as built” building performance.
- Reference added to paragraph 223 on the link between mitigating and adapting to climate change and supporting public health.

Draft Policy CEA2 Green Roofs and Walls

Main Issues in Relation to Draft Policy CEA2:

- Support for the policy in terms of enhancing biodiversity, improving air quality, reduce the heat island effect, and climate resilience in new developments.
- Retrofitting of green roofs to existing buildings is supported.
- Some support green roofs on many surfaces, including small rooftops.
- Inclusion of bat and bird boxes in CEA2 is supported. Some question whether this requirement conflicts with the Biodiversity SPD which requires these in all cases.
- Some respondents considered that the policy should apply to both commercial and residential buildings.
- Suggestion that the policy should be updated to require that green roofs are feasible, viable and appropriate, in line with paragraph 196 of the supporting text.
- Suggestion that the policy should also acknowledge aesthetic and heritage reasons why green roofs and walls would not be appropriate, as well as what building types it is expected the policy would apply to.
- Suggestion that the wording “where feasible and viable” makes this an aspirational policy rather than one that could be enforced. Another respondent considered this was a benefit because it makes the policy flexible. Suggestion that an explanation of what feasible and viable means is required.
- Some felt the requirement for all buildings, including apartments and non-residential buildings, is too prescriptive. This would restrict design flexibility, and the policy should be focused on high density areas like CMK where urban greening is more critical.
- Suggestion that due to variable scheme viability, the policy requirement should be “encouraged” rather than mandatory.

- The feasibility and viability criteria mean that most Anglian Water applications will be exempt from policy requirements as most likely applications (for kiosks) will be too small for green roofs to be practical.
- Suggestion that there would be support for schemes if there were funding mechanisms in place for them.
- Concern raised that there is little evidence that green walls are practical nor produce environmental benefits claimed, due to permanent irrigation, less energy efficiency, higher costs, and maintenance.
- Suggestion that the policy should also be made subject to fire safety requirements, as well as structural feasibility and viability.
- Suggestion that opportunities for wastewater recycling in green roofs/walls should be considered.
- Concern raised that green roofs are not as effective in net cooling as assumed based on new data.
- Suggestion that green roofs should be in line with the GRO code of good practice. MK should aim to be a green roof capital of the world.
- Suggestion that green roofs should be used for insulation and for absorbing CO2.
- Suggestion that Policies CEA1 and CEA2 should note that solar panels and green roofs can be compatible, as “bio solar roofs”.
- Some question whether green walls only be installed on buildings up to 3 storeys high.
- Suggestion that all major developments should be supported by a Green Infrastructure plan, including information on CEA2. A proportionate approach should apply to minor applications.
- Suggestion that proposals need to include a management and maintenance plan for green roofs to ensure they do not have negative impacts over time, such as high plant failure rate, and due to irrigation needs.
- Concern raised that the policy is unspecific, and use of terms such as “unacceptable impacts” and “feasible and viable” need further explanation.
- Concern that solar gain for green walls and roofs may not always be possible.

Amendments to Draft Policy CEA2:

- Amendment to Part A. of Policy CEA2 to include dwellings with flat roofs and/or gentle roof pitches.

- Amendment to Part A.3. of Policy CEA2 to 'Incorporate a variety of appropriate plant species which are low maintenance and drought resistant'.
- Removal of requirement in Part A.5. & A.9.
- Additional policy wording to clarify that the integration of bat and bird boxes is in relation to green walls
- Amendment policy wording from 'use natural hardscape materials' to 'use simple hardscape materials'.

Draft Policy CEA3 Resilient Design

Main Issues in Relation to CEA3:

- Support for the policy given climate change.
- Suggestion that well-designed houses can self-regulate temperature, reducing costs and carbon emissions.
- Some support for mechanical ventilation and heat recovery as a technology, noting its use as part of Passive House construction.
- Some question where the reference to Neighbourhood Plans is.
- Some question whether the policy will be technically and financially feasible, and whether it will impact on the viability of development.
- Suggestion that overheating and indoor air quality assessments required must be tested in the viability study.
- Suggestion that a challenge of these assessments is that indoor air quality will depend on occupant lifestyles.
- Some feel that prescribing specific design solutions is too rigid; the policy should set flexible guidelines to promote resilient design outcomes.
- Suggestion that the policy should prioritise position of homes, materials, and tree planting as ways of mitigating overheating and then use external blinds/shutters if necessary. Currently the policy reads as if blinds/shutters will be required on all habitable rooms.
- Suggestion that the policy should include minor developments as well.
- Concern that Part A of CEA3 would duplicate Part O of Building Regulations, contrary to paragraph 16f of the NPPF.
- Suggestion that Part F of Building Regulations covers indoor air quality.

- Suggestion that Trees, landscaping, and green spaces need to be referenced in the policy.
- Suggestion that the policy should also reference flood resilience, water ingress prevention, and adaptable drainage systems. Planting resilience should also be added, given the city's character and limited planting palette.
- Suggestion that Tower blocks should only be as high as the tallest tree to mitigate noise and air pollution and reduce the need for air conditioning.
- Suggestion that green roofs and solar panels should be allowed together.
- Suggestion that the policy should address climate adaptation to higher than predicted temperatures. There needs to be a policy on cooling dwellings and infrastructure that can tolerate more extreme weather. Passivhaus standards should be used. Requiring external blinds/shutters is welcome.
- Concern raised that CMK site size and design constraints limit opportunities for passive solar shading, ventilation, and dual aspect designs. Additional tree planting is also limited.
- Concern that the policy is not tailored to CMK's design context and heritage. Suggestion that a CMK resilient design SPD is needed to ensure this is considered, in consultation with local stakeholders.

Amendments to Draft Policy CEA3:

- Removal of reference to CIBSE TM59 Design Methodology in Part A. of Policy CEA3
- Policy criterion relating to design and heritage impacts in Part A. of CEA3 set out as separate criteria in Part B
- Reference added to the Council's Sustainable Construction SPD in Part D of Policy CEA3
- Amendment to Part A. of Policy CEA2 to include dwellings with flat roofs and/or gentle roof pitches.

Draft Policy CEA4 Retrofitting

Main Issues in Relation to Draft Policy CEA4:

- Suggestion that there is a need for policy support for retrofitting due to concerns about wider aspirations, and clarification is needed on how Article 4 Direction interacts with retrofitting policy needed.

- Support for the policy approach. Improving thermal performance of existing developments is important for reducing emissions as this reduces energy use and general energy efficiency.
- Support for new town heritage and value of buildings currently seen as unfashionable/scruffy.
- Support for consideration of the viability of retrofitting heritage assets.
- Suggestion that an additional paragraph D should be added to include reference to Historic England Advice Note 18 with regards to adapting historic buildings for energy and carbon efficiency.
- Suggestion that suitable types of energy installations on Listed Buildings should be included in the policy, including scope to install on roofs.
- Note that Heritage properties, e.g. Wolverton terraces, face the challenge of retrofitting but in a sympathetic way. Suggestion that policy should allow for sympathetic changes that improve energy efficiency.
- Some question how this policy would interact with Article 4 directions affecting heritage properties. Concern that banning solar PV on the fronts of houses in Wolverton prevents PV installations in some cases.
- Some suggestions that we should ease heritage constraints to allow more retrofitting to adapt to and mitigate climate change.
- Some support retrofitting but note that this may not be possible due to building designs.
- Suggestion that existing nests and biodiversity habitats in buildings should be retained by retrofit works and mitigated if this is not possible, particularly for bats, swifts, sparrows, and house martins.
- There is support for a Retrofit Hub to educate people on home improvements, risks and training for trades and the public.
- Suggestion that there needs to be better explanation of the property types the policy would apply to.
- Concern that the ability to apply this policy will be case dependent and subject to other policy requirements.
- Suggestion that wording regarding “unacceptable impacts” and “feasible and viable” need to be more specific and explained to be robust.

Amendments to Draft Policy CEA4:

- Amended criteria in Part B to reflect updates to Historic England's guidance on retrofit proposals
- Additional reference to Historic England Advice Note 18 (Adapting Historic Buildings for Energy and Carbon Efficiency) to the supporting text;
- Policy wording amended to clarify that it applies to all proposals
- Amendments to policy formatting to improve readability and conciseness

Draft Policy CEA5 Water Efficiency

Main Issues in Relation to Draft Policy CEA5:

- Anglian Water expressed support for CEA5.
- Respondents note that Milton Keynes is in an area of Water Stress, with chalk streams drying up, aquifers and reservoirs low.
- Some note the policy will only be effective if water companies cooperate.
- Support for the policy from a range of stakeholders as a better way of using resources and addressing water availability.
- The proposal to consider evidence from professionals on feasibility of water efficiency technologies is welcome.
- Support for higher efficiency targets subject to sufficient evidence they can be achieved and maintained.
- Support for the additional criteria in Part B of the policy.
- Concern regarding the impacts in terms of pollution to lakes, rivers, and air.
- Suggestion that more development should not take place until water shortages are dealt with by credible and funded mitigations. New development should ensure it does not increase demands on already low supplies.
- Water efficiency requirements should also include requirements for enhanced water conservation measures on all new developments.
- Some question why smaller developments have a less stringent water use target
- Suggestion that harvested rainwater and/or wastewater should be used for toilet flushing and drought resistant lawns should be sown as standard. Harvesting can reduce water deficits.
- Suggestion that outside taps should be banned and all homes should have rainwater harvesting.

- Comments on the need for prompt repairs of leaks and water infrastructure generally.
- Suggestion that the policy should also address agricultural and motorway run-off.
- Suggestion that the Local Plan must consider the River Basin Management Plan. LPAs can set tighter water efficiency standards in new developments to mitigate risks caused from over-abstraction by water companies.
- Suggestion that the policy should explicitly require water efficient technology, fixtures, and fittings (incl. smart water meters).
- Suggestion that new commercial buildings over 1,000 sqm should comply with either BREEAM excellent or outstanding standards for water consumption.
- Suggestion that policies should also support retrofitting older buildings to reduce water consumption.
- Anglian Water note that the latest Water Resource Management Plan (2024) shows significant changes in supply/demand since 2019. Spare capacity may already be taken up elsewhere, and Anglian Water already faces licence reductions on some groundwater licences and new development must ensure sustainable supply. Anglian Water may not be able to supply all non-domestic development covered by the Plan. Long-term viability of water supply therefore needs to be considered.
- Responses note that reductions in abstraction and climate change buffers means that there is no longer headroom in the Ruthamford South WRZ to meet non-domestic demands. Therefore, there is a need to improve water efficiency in new and existing properties to provide sufficient headroom for new connections.
- Suggestion that the supporting text should note Anglian Water's requirements for water intensive non-domestic uses to provide a Water Resources Plan ahead of development coming forward, to ensure such proposals can be supported.
- Suggestion that there is a need to align standards with the recent Darwin Green decision in Cambridge.
- Suggestion that Part B1 could be deleted as this is a form of rainwater harvesting covered by B4.
- Some disagreement with the policy as "subject to feasibility and viability" could be a loophole.
- Suggestion that the supporting text should be amended to mirror policy wording about the respective instances where the 80 and 100 litre requirements would apply.
- Some question how the policy will be assessed and monitored in practice
- Concern about technical and financial feasibility of the policy and overburdening new development.

- It is suggested that Building Regulations optional standards be used instead for new developments.
- Some feel it is difficult to achieve the proposed requirements in a functional way without rainwater harvesting on site, however, this is not common due to costs, management issues, embodied carbon, and additional carbon emissions.
- Some respondents suggest that targets of 100 or 110 litres per person per day (PPPD) would be more achievable.
- Suggestion that the proposed standards are inconsistent with national policy, which states the 110 litres PPPD target is sufficient in water stressed areas. A national approach to reducing standards is being considered and MKCC should align with this to maintain deliverability.
- Suggestion that water saving measures must be practical and not negatively impact future applicants. Otherwise, there is a risk that measures will be removed and replaced with less sustainable alternatives.
- Concern that rainwater collection occurs only when demand is low and provides dirty water.
- Suggestion that greywater recycling may require third party operation subject to how the system works.
- Suggestion that the Plan should demonstrate how water supply considerations have informed the growth and phasing strategy. Abstraction related to new development has the potential to put ecological pressure on waterbodies. Water supply is a strategic matter. The LPA must work with water companies to assess risks and identify appropriate mitigations.
- Concern regarding a lack of new reservoirs to accompany new growth in Milton Keynes.

Amendments to Draft Policy CEA5:

- Amend Policy to reflect the Shared Standards in Water Efficiency for Local Plans
- Amended Policy CEA4 to reflect support for retrofitting to achieve greater water efficiency
- Amended supporting text to provide clarification that water intensive non-residential developments will need to be supported by a Water Resources Plan to demonstrate that there are no adverse impacts on water availability for other uses.
- Amended Policy to clarify the residential standards are to be achieved via a fixtures and fittings approach

- Amended policy to reflect the recommendations for non-household development in accordance with the Shared Standards on Water Efficiency in Local Plans (add link)
- Amended policy to reflect requirement that rainwater harvesting, and water reuse systems include suitable cleaning measures as suitable for the intended use.

Draft Policy CEA6 Low and Zero Carbon

Main Issues in Relation to Draft Policy CEA6:

- Supportive of the principle of low carbon energy development, solar panels on buildings and developed land (like over car parks).
- Support for CEA6 on the basis that it supports decarbonisation of water treatment facilities.
- Anglian Water noted they use biowastes from water recycling to generate electricity at larger sites, including Cotton Valley. Carbon capture technologies are planned for Cotton Valley by 2030. They support the policy.
- Support for small scale micro-generation schemes and a suggestion that wind turbines be used to establish a fund to support community projects.
- Support for new electric vehicle charging points and recycling sites to the east of the city.
- Major concern of using available land for solar and wind farms, many propose to instead require developers to put solar panels on top of roofs of houses and commercial buildings.
- Suggestion that clarity is needed on how this policy will work with GS7, energy provision in the strategic allocations, and the practicalities and heritage impacts of the integrated network strategy.
- Suggested additional wording, including to reflect impacts on best and most versatile agricultural land, special landscape areas, and listed buildings, to ensure there are no negative social, economic, or environmental impacts associated with the use, and to ensure it aligns with other policies.
- Some question whether the policy conflicts with GS6
- Suggestion that there is a need to consider potential landscape, ecology, heritage, and visual impacts of wind and solar farms beyond administrative boundaries.
- Suggestion that the Policy should support better use of the CHP network in CMK and support its expansion.

- Suggestion that part of the policy should be deleted on the basis that gas fired CHP systems results in more carbon emissions than grid supplied electricity.
- Suggestion that the policy needs to consider potential for other energy sources, such as waste heat from data centres, being enabled. The Council should ensure the current Combined Heat and Power network in CMK is utilised to a greater extent, by supporting more modern power sources and a CMK wide energy network. Policy should protect existing and potential routes through the underpass system alongside measures to improve at grade crossings in CMK.
- Suggestion that Part C should clarify that where a CHP network does not exist, requirements would not apply.
- Suggestion to place more onus on community and public ownership, and on energy storage.
- Suggestion that the Policy needs to support both community- and public-owned energy assets.
- Suggestion that more needs to be done to support community energy sourcing and promote renewable energy generally. The policy should explain the approach more, particularly in terms of potential health impacts of schemes.
- Suggestion that electric vehicle charging points should be provided on top of existing requirements for other vehicle types.
- Suggestion that the policy should have explicit support for EV charging stations and hubs, and related amenities and grid upgrades.
- Suggestion that the Plan should specify the maximum size of potential wind turbines and efficiency of solar panels to ensure effective use of land.
- Suggestion that the policy should consider technologies that have no negative impact on cost, quality, practicality, efficiency, reliability, and convenience.
- Suggestion that new buildings should have mandatory solar panels to reduce need for industrial scale sites.
- Suggestion that the policy should address the potential for water sources, such as canal water, to be used for the heating/cooling of buildings.
- Suggestion that schemes should provide public benefits such as reduced rate energy.
- Suggestion that the policy should include a statement on energy security.
- Suggestion that the Plan should contain carbon reduction targets.
- Suggestion that MKCC should develop a GIS tool which enables approved and operational renewable energy projects and power capacities to be viewed.

Amendments to Draft Policy CEA6:

- Amended policy wording to reflect need to consider cross boundary effects
- Additional supporting text clarifying the Council's support for energy generation from a range of delivery and ownership models
- Amended policy wording to clarify that energy storage and electric vehicle charging are among other types of infrastructure supported in principle by Policy CEA6
- Additional reference in supporting text to the solar and wind development size thresholds set out in the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025.
- Amended supporting text to reflect on the importance of local energy provision for energy security
- Amended policy formatting to improve readability and conciseness.
- Reference to health added to Clause A.

Draft Policy CEA7 Mitigating Wider Environmental Pollution

Main Issues in Relation to Draft Policy CEA7:

- The EA suggests that a range of informative notes on planning decisions be used to highlight other legislative requirements, and the environmental permitting regime, when groundwater, contaminated land, and waste management are material considerations.
- Some question what is the definition of unacceptable impact on human health.
- Suggestion that there is a need to define “wider environment”.
- Concern that terms like “unacceptable impacts” should not be used due to the ambiguity over what “unacceptable” means, resulting in less robust policy. Any impacts on the environment are unacceptable.
- Suggestion that new developments should have minimal environmental impact. The policy needs to address the potential for pollution to negatively impact on the historic environment.
- Concern that there are limited policies regarding impacts on soils.
- Suggestion that CEA7 needs to protect soils to a greater extent, as they are multifunctional and have multiple benefits, including ecosystem services, food production landscape character and geodiversity. It is important to protect BMV.

- Suggestion that the Plan needs to be supported by modelling of the impact of air quality (including nitrogen and ammonia) emissions from traffic and other sources on natural environment to inform the Sustainability Appraisal/Habitats Regulations Assessment. This should include assessment of air quality impacts on SSSIs and wider biodiversity due to ammonia emissions and nitrogen deposition and acidification.
- Suggestion that the air quality section must also address the need to mitigate dust arising from the construction process.
- Support for discussions about a Bletchley southern bypass to mitigate air pollution from the A421 and B4034.
- Concerns regarding air pollution from the Cotton Valley sewage works.
- Anglian Water recommends that while odours from WRCs are not a risk to human health, sensitive development should not be located close to WRCs and a stand-off distance of 400m should be used.
- Suggestion that Part E3 (air quality and odour) should only apply to dwellings rather than the wider site so that development is not unduly burdened.
- Suggestion that the list of major roads in Part E and in relation to odour impacts should be definitive to avoid ambiguity.
- Suggestion that the reference to nutrient neutrality does not align with the Milton Keynes context.
- Anglian Water note they are unlikely to support growth of settlements served by the eight water recycling centres (WRCs) in MK with descriptive permits regarding discharge of fluids from the site. These are typically small sites and there is a risk that incremental development (from Neighbourhood Plans and/or windfall) over time could overload capacity of these sites. Point L of CEA7 should address the cumulative impact of smaller developments.
- Suggestion that an additional requirement is needed so that smaller developments demonstrate there is sufficient sewage treatment capacity (in both works and the wider network). Private sewage networks must only be allowed where a public connection is not reasonable.
- Some stress that groundwater is important, and additional wording is needed to reflect the importance of aquifers in the local area, principally those in the northwest and southeast formed by limestone and sandstone. The area of sandstone to the SE is a Source Protection Zone, with several public water supply abstractions. Secondary aquifers are also present which support local water supply and abstractions for agricultural, industrial, commercial, public, and domestic users.
- Suggestion that SUDs should not be installed in contaminated ground.

- Suggestion that the policy should be extended to deal with agriculture and motorway runoff.
- Suggestion that contaminated land policies must follow the latest version of the EA Land Contamination Risk Management guidance. There does not seem to be an overall policy for dealing with land contamination and actively supporting brownfield development.
- Suggestion that excavated materials on a development site should be reused on site in line with the CL:AIRE DoWCoP however any contaminated materials must be discarded off-site in line with relevant legislation.
- Support for more electric vehicle charging, including for boats. The policy needs to better support EVs in rural areas.
- Suggestion that electric bollards should be provided for boaters to reduce noise and air pollution caused by boat generators.
- Some feel that Milton Keynes should have electric buses.
- Suggestion that provision should be made for secure storage of electric vehicles, and EV charging points required at linear and country parks.
- Suggestion that Part M (electric vehicles) would be better suited to Policy CEA6. Part M3 could be amended to clarify its applicability to CMK and sites close to the strategic road network.
- Suggestion that there should be stronger measures to address light pollution and noise.
- Suggestion that Milton Keynes should be the first city to have a dark skies policy.
- Concern that requiring a lighting assessment for any development is not proportionate.
- It is recommended that the agent of change principle be applied to protect existing sports facilities from being sterilised by nearby sensitive receptors by way of noise, ball strikes or other issues.
- Concern that the policy does not address current issues at the Hub relating to noise pollution between uses. Permitted development rights enabling conversions from restaurants to nightclubs exacerbates a lack of sufficient insulation between commercial and residential units. Effective policy support for a vibrant nightlife in CMK must include strong requirements for noise pollution mitigations.
- Suggestion that there is a need for long term endowment funding models for these spaces

Amendments to Draft Policy CEA7:

- Amendments to wording of Part C. of Policy CEA7, adding requirement for soils to be managed appropriately to maintain soil structure, function, and chemical and organic content
- New Policy Part F, setting out relevant criteria (F.1. - F.5.) for where minor development will also be required to address the matters outlined in Part E. of Policy CEA7
- Part G of Policy CEA7 now requires an odour assessment for residential development proposed within 400 metres of a Water Recycling Centre to demonstrate that odours from the site would not adversely affect residential amenity
- Part J of the Policy adds reference to the existing Strategic Road Network, Major Road Network, Grid Roads, the A422 (including proposed additions).
- Part M of Policy CEA7 amended, setting out that where identified by Natural England as a material consideration in the authority area, proposals must also demonstrate how nutrient neutrality would be achieved.

Draft Policy CEA8 Provision and Protection of Accessible Open Space

Main Issues in Relation to Draft Policy CEA8:

- Suggestion that consideration is given to design safety to adequately support social and community needs.
- Concern that building on greenfield space is at odds with policy on provision and protection of open space.
- Concern that green space will not be protected in favour of increased housing.
- Suggestion that the focus needs to be on improving connections between the existing spaces to enhance their amenity for residents and their value as habitats.
- Suggestion that current expansion plans, particularly in CMK are at odds with the protection of green space
- Suggestion that offsite contributions to new open space/formal outdoor playing areas should be based on viability testing as part of overall planning obligations test.
- Suggestion that Criterion H has a heritage dimension e.g., the Scheduled medieval manor of Simpson lies within the area allocated for linear parks as this has been the case in previous planning studies (MK planning study 1969).
- Concerns that CEA8 is contrary to national policy – wording interchanges playing pitches and fields, whereas pitches are an important aspect of a field. National

Planning Policy Framework (NPPF), paragraph 103, and its Playing Fields Policy does relate to playing fields and not just the pitches.

- Concern that no distinction is made between formal and informal playing pitches. (recommendation: CEA8 refers to all playing field and uses the definition of a playing field in The Town and Country Planning (Development Management Procedure) (England) Order 2015.)
- Concern with the standards approach set out in Annex B that would be partly used to inform new provision or accept loss of provision
- Suggestion to remove the reference to standards for playing field/pitches and relies on the emerging Playing Pitch Strategy to inform provision which should result in this policy align with the NPPF, paragraphs 102 and 103
- Suggestion that the provision of new playing field/pitches, ancillary provision such as pavilion, changing rooms etc. are also accepted where needs similar to what is acceptable for Linear Parks later in Policy CEA8 G
- Concern that limited preservation of existing green space will create a two tier system where new developments have higher quality open spaces.
- Concern around land-banking of landscape by developers.
- Suggestion to review past allocations to allow for alternative land uses.
- Concern around distance between open space and homes doubling – proximity of open space essential for families and general wellbeing – return to use of 300m as in previous plan
- Suggestion to reference canal in H3 of policy CEA8

Amendments to Draft Policy CEA8:

- Additional reference to the NPPF and Strategic Housing Land Availability Assessment in the supporting text, to clarify that any greenfield land allocated for development is based upon a Land Availability Assessment, deeming the land suitable to build upon.
- Additional supporting text highlighting Part E of Policy CEA8, where deficit surplus is taken into consideration before granting development resulting in the loss of open space.
- Amendment to policy wording and supporting text, altering 'playing pitches' with 'playing fields'
- Additional reference to canals in Part H3 of Policy CEA8.

Draft Policy CEA9 Biodiversity and Habitats Network

Main Issues in Relation to Draft Policy CEA9:

- Some note that Policy CEA9 part B, currently states losses must be avoided onsite and if they can't applicants must provide (a) habitat creation offsite or (b) purchase statutory credits however, this misses part of the hierarchy. They suggest that the correct order is: avoid onsite losses, provide creation and enhancement onsite, then seek offsite options either through creation or purchase of units and only then can statutory credits be considered as a final resort
- Concern that there is limited evidence that the LNRS has been integrated into the Plan. The Plan should be supported by evidence of existing and potential local ecological networks
- Suggestion that the LNRS should inform the next stages of the Local Plan before it reaches its submission version to ensure that opportunities to enhance nature and increase public access are not overlooked in allocations or policy
- Support the requirement for Biodiversity Net Gain (BNG). However, some question the policy wording that development must avoid any loss of habitat on site; acknowledging that some habitat loss is inevitable to enable development, but that this can be compensated for via on-site habitat enhancements elsewhere.
- Suggestion that the LNRS Responsible Authority should include the Canal and River Trust in the Local Nature Recovery Strategy consultation database and consider the Canal as an 'area of particular importance for biodiversity'
- Some note that new or altered habitats within historical landscapes can impact heritage assets and suggests adding a paragraph on this topic
- Suggest adding a requirement for the installation of swift bricks on all new dwellings in CEA9 (universal nest bricks for small bird species). Responses emphasise that swift bricks and existing nest sites are not included in the Biodiversity Net Gain calculation and should be protected
- Disagreement with Policy CEA9 as developers should not be allowed to create off-site habitat where there is a loss on site
- Recommend rewording the policy to state "10% or higher net gain" instead of "higher than 10% net gain."
- General concern that 10% BNG is not high enough, with one respondent recommending 20% BNG (referencing Kent County Council's assessment) which found that increasing BNG from 10% to 20% generally does not affect development viability
- Suggest deleting the term 'MK Wildlife Sites' and placing Local Wildlife Sites at the head of the list, as this is the term used by the Government

- Suggestion that Priority Habitats in Milton Keynes should be shown on the Policies Map to alert developers to prevent their inclusion in development proposals
- Concern that stating development which provides higher than 10% will be strongly supported reads as if we would strongly support anything providing over the bare minimum
- Part B: As the policy is regarding statutory net gain, reference to the new biodiversity gain hierarchy, which is a statutory instrument in the legislation and builds on the existing mitigation hierarchy of the NPPF, must be included in the wording of the policy
- Additional policy wording suggested - requiring the submission of a draft biodiversity gain plan with all applications (subject to the general biodiversity gain condition). Whilst not legally required, the government guidance does state LPA's can ask for additional information as a local requirement to aid decision making
- Suggested requirement for new developments to include integrated bat and bird boxes is supported, this would be best placed in the wording of Policy CEA9 as the measures aim to deliver benefits for biodiversity
- Suggest adding 'nature reserves managed by others' and 'Milton Keynes Wildlife Verges' to Local Designation List
- Concern that the Plan overlooks building-dependent biodiversity
- Suggest referencing the Great Crested Newt District Licensing Scheme in the Plan's text
- Additional point to the Policy requested, to align with the legislative requirements in relation to intentional degradation of habitats prior to development. Could alternatively be included within Policy CEA9 relating to biodiversity net gain
- Some agreement with the draft Policy
- Some questions the wording that development must avoid any loss of habitat on site; acknowledge that some habitat loss is inevitable to enable development, but that this can be compensated for with habitat enhancements elsewhere on the site – request that the Council review wording
- Some request that rather than provide off-site credits, which MK would not benefit from, developers should provide off-site contributions which MKCC can use to improve biodiversity within the city
- Acknowledgement of the aspiration of Policy CEA9 to support development proposals with over 10% biodiversity net gain but advises against setting a requirement higher than the 10% mandated by the Environment Act 2021. However, concern raised that exceeding this threshold does not meet the planning obligations criteria in paragraph 57 of the NPPF and references recent Planning Policy Guidance, which states that

higher percentages must be justified with evidence of local need, opportunities, and viability impacts. Responses advise maintaining the 10% biodiversity net gain (BNG) requirement to ensure it aligns with national policy and is fair and reasonable in scale and kind to the development. Suggestion that the Council reconsider additional wording to ensure the policy is not overly burdensome and is consistent with updated guidance and regulations. Also emphasize that developers should decide whether to exceed the 10% BNG, as costs can vary significantly depending on the site's baseline biodiversity and the measures needed to achieve the gain. Responses recommend that the Council only seek a minimum of 10% BNG to avoid rendering sites unviable.

- Suggestion that the Canal should be acknowledged as significant blue / green infrastructure, serving as a catalyst for regeneration, a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical outdoor activity; an ecological biodiversity resource, a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a provider for water supply and transfer, drainage and flood management; the Canal forms part of the historic environment, the character, cultural and social focus of the parts of the region
- The Canal and River Trust highlight that they have produced a document (attached) setting out how collaboratively opportunities can be identified and delivered for habitat enhancement on the waterways through Local Nature Recovery Strategies (LNRS) to meet local and national aspirations for access to blue-green space, habitat quality and connectivity
- The Canal and River Trust highlight that they have recently completed an exercise to quantify and map biodiversity across their water network. Resulting in the creation of an Ecological Data Hub, providing an advanced understanding of the related Biodiversity Net Gain units and condition scores of all their habitats
- Recommendation to acknowledge the relationship between natural and historic environments in the policy or supporting text. It notes that new or altered habitats within historical landscapes can impact heritage assets and suggests adding a paragraph on this topic
- Suggestion to add that swift bricks (universal nest bricks for small bird species) should be installed on all new dwellings
- Suggested policy change: Swift bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where an ecologist specifically recommends it; the rationale is that bird boxes/bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric and should be covered in local policy; state that the Government's response to the 2022 BNG consultation supports this

- Responses note that bird bricks are recommended in best practice guidance and the National Model Design Code Guidance Notes Part 2 and are suitable for various small bird species, including swifts, house sparrows, and starlings; they are preferred over external bird boxes due to their permanence, zero maintenance, aesthetic integration to the building, and better thermal regulation
- Recommendation for a standard planning condition for biodiversity enhancement measures like swift bricks, bee bricks and hedgehog highways
- Suggestion that if statutory credits are sought then the development should be refused
- Suggestion that the policy should not replicate the national BNG requirement. If this is retained, it should clarify that the national exemptions criteria would apply
- Concern that provisions are not mapped to show out the Nature, Green and Blue Infrastructure Strategy should interact with the established urban areas and growth locations
- Concern that the strategy is not up to date with the draft MKCP 2050's proposals in this area and deferring policy to a separate non-statutory document is not effective; suggests this is another MKCP policy area that would benefit from integration with the evidence base and proposals of the emerging Bletchley and Fenny Stratford Neighbourhood Plan
- Suggestion that developers should not be allowed to create habitat off site if they cause a loss on site.
- Recommend rewording it to state "10% or higher net gain" instead of "higher than 10% net gain." Storey Homes feel that this change would ensure that all proposals aligning with the provisions of the Environment Act 2021 are strongly supported
- Concern that MK's original design was amazing and visionary; however, pressure for more homes has caused the original vision of 60/40 housing and green space ratio to be ignored
- Suggestion that greenspace should not comprise of several small areas of grass scattered between housing and busy roads. Greenspace should be a significant and comprehensive area of park or wild area. The north and western sector of MK are prime examples of outstanding design
- Objections to the use of BNG, feeling that there is too much subjectivity in value interpretations, suggesting that any human presence detracts from biodiversity
- Support for policies to protect greensand ridge, including designation as a Special Landscape Area (SLA) and protection of its setting and surrounding land
- Opposition to the use of statutory credits for biodiversity mitigation

- Suggestion that the weight given to an asset will reflect where it is in the hierarchy of bio-/geo-diversity designations
- Suggestion that the Plan should identify and pursue opportunities for BNG, but setting at least 10% target for development proposals, with higher percentages supported by evidence. The Plan should set out the BNG strategy, including on-/off-site provision, identifying strategic habitats and areas for BNG (e.g. mapping ecological networks), advise on the metric to use to calculate BNG, e.g. Defra's latest Biodiversity Metric 2.0. This new metric is supported by guidance and a tool to help apply it. We encourage adopting the 10 best practice BNG principles developed by CIRIA/CIEEM/IEMA.
- Suggestion that the Plan should aim to achieve wider environmental gains beyond BNG, to include natural capital gains such as improved water and air quality and recreation.
- Suggestions for specific wording changes to Policy CEA9, at sections A and B, and that Biodiversity Net Gain should be mentioned
- Suggestion that the Council should not set a higher biodiversity net gain requirement than the 10% current legal requirement. Consider that Plan should be amended so that it is consistent with any updated national guidance and regulations. recommend that the policy is amended to only seek a minimum of 10% biodiversity net gain
- Suggestion that the approach to biodiversity should be more comprehensive. Suggest that nature reserves should be added to the definition of 'local designations'. Note that the status and intent of Biological Notification Sites should be reflected in the policy. Suggest that Priority Habitats should be shown on the Policy Map.
- Suggestion that there is a need for a minimum of 20% Biodiversity Net Gain (BNG) in development proposals to ensure true net gain and support nature's recovery (e.g. Oxfordshire Plan; Kent Plan); BNG should be maintained in perpetuity, ideally for at least 125 years, as defined by the Perpetuities and Accumulations Act 2009; welcomes the mention of the Local Nature Recovery Strategy (LNRS) and encourages adherence to upcoming government guidance.
- Concern that the term 'local nature reserve' lacks a single agreed definition nationally, other than for Local Nature Reserves (LNRs) designated under Section 21 of the National Parks and Access to the Countryside Act 1949, by principal local authorities
- Suggest that Priority Habitats in Milton Keynes should be shown on the Policies Map to alert developers to these so that they avoid including them in any proposals for development
- Suggest deleting the term 'MK Wildlife Sites' and placing Local Wildlife Sites at the head of the list, as this is the term used by the Government, Natural England, other local authorities and other bodies

- Suggest much more is required on Biodiversity - beyond solely biodiversity net-gain (notes that there is already a biodiversity crisis, with many species endangered or lost)
- Suggest “and nature reserves managed by other bodies” should be added to the definition of “Local Designations”. This description of ‘Local designations’ has omitted important types of Local Biodiversity Designation
- Some note that in effect Biological Notification Sites (BNS) are sites awaiting full assessment, in retain the prospect of becoming Local Wildlife Sites with provisional acceptance of that potential future status – suggest that this should be made clear in draft Policy CEA9 and its supporting text
- Some believe Part B of the proposed policy would harm delivery and could lead to worse results, and also conflicts with both part A and national legislation contained within the Environment Act 2021
- Suggestion that Part A of the policy should add that all new development proposals should provide areas of natural greenspace also connected into the existing networks
- Suggestion that the provision for their long-term management and maintenance should also be required
- Suggestion that Part B should make specific mention of the NE GI Framework and access to open space targets rather than just reference to “open space standards”
- Suggestion that the management and maintenance strategy should include the need for “long term” management and maintenance including action in circumstances of a change of ownership
- Suggestion that E(II) – the loss of open spaces should include an assessment of the impacts on nature. This may at least partly come from statutory BNG requirements
- Concern that it is unclear in respect of which developments the policy is applicable to and is inconsistent with national requirements
- Note a lack of clarity in respect of the potential creation of replacement habitat on site
- Note Policy should be made explicit that it relates to Biodiversity Net Gain.
- Objection to the policy as currently worded as it does not go far enough in addressing the unique context of CMK. Suggest incorporating more ambitious targets for biodiversity net gain, stronger protections for existing green infrastructure, and clear, detailed requirements for how CMK developments can contribute significantly to the wider ecological network
- Suggestion that there should be greater clarity on maps to show how the approach to nature, green and blue infrastructure will interact with established urban areas and growth locations

- Some consider that the City Plan should include a clearer strategy to enhance biodiversity enhancement
- Suggested amended wording: “Development proposals which provide a significant uplift on the mandatory 10% net gain for biodiversity will be strongly supported, provided the habitat types delivered contribute towards the aims of the Local Nature Recovery Strategy.”
- Suggestion that as the policy is regarding statutory net gain, it should reference the new biodiversity gain hierarchy, a statutory instrument in the legislation that builds on the existing mitigation hierarchy of the NPPF.
- Request for an Additional part (C) to this policy, requiring the submission of a draft biodiversity gain plan with all applications subject to the general biodiversity gain condition.
- Suggestion that Paragraph 212 needs expanding to refer to all local ecological designations including:
 - Biological Notification Sites
 - Local Wildlife Sites, Milton Keynes
 - Wildlife Corridors
 - Biodiversity Opportunity Areas
- Suggestion to amend the wording at the beginning of paragraph 209. to align with the wording of legislation and government guidance.

Amendments to Draft Policy CEA9:

- Additional part B to Policy CEA9, setting out that development proposals that provide biodiversity enhancements not included as part of the metric will be strongly supported
- Amended and additional requirements in part C.1 - C.3 of Policy CEA9, where the loss of habitat is unavoidable.
- Footnote added setting out exempt development proposals in relation to Part C. of Policy CEA9.
- Reference to Great Crested Newt District Licensing Scheme in the Plan's supporting text
- Reference to collaborative working to obtain the best delivery of the Local Natural Recovery Strategy included in the Plan's supporting text
- Reference to the Council's Adopted Biodiversity Supplementary Planning Document (2021) included in the supporting text

- Reference to national exemptions from mandatory Biodiversity Net Gain included in the supporting text
- Overall grammatical and formatting amendments to supporting text and policy to improve readability
- Reference added to 10 best practice Biodiversity Net Gain principles, developed by CIRIA/CIEEM/IEMA in the supporting text
- Reference added to long-term management and maintenance of Biodiversity Net Gain (minimum of 30 years)

Draft Policy CEA10 Protection and enhancement of environmental infrastructure network, Priority Species and Priority Habitats

Main Issues in Relation to Draft Policy CEA10:

- CEA10 is not considered to be strong enough and should be modified
- Suggest these specific standards and their impact on development capacity and viability need more thorough developer assessment
- Some respondents agree with the draft Policy
- Supports the protection and enhancement of the environmental infrastructure network but questions alignment with paragraph 181 of the NPPF (particularly in distinguishing between the hierarchy of sites)
- Concern that the policy may exceed the principles of paragraph 186 of the NPPF and suggest it is reviewed for consistency
- Supportive of more controls, however they feel that the draft Policies do not go far enough to protect existing habitats
- Suggestion that current overuse of flailing to cut down hedgerows and shrubbery around MK by farmers and landscape management teams should be better controlled to ensure that sapling native trees are allowed to grow, and that natural bird feeding corridors are not replaced by stunted dense hedgerows
- Suggestion that Paragraph 211 should reference Registered Parks and Gardens, emphasizing the integral relationship between natural and historic environments; recommend incorporating this point into the text and refers to the Natural England Green Infrastructure Framework for more information
- Concern that there are too many exceptions to the principle of protection
- Suggestion that developments causing environmental harm should not be permitted under any circumstances

- Suggestion that there should be no caveats to points C or D of the policy
- Suggestion to add “Registered Historic Parks and Gardens” to the footnote
- Bletchley and Fenny Stratford Town Council notes and support the provisions of the draft Policy as they appear to complement the proposal in the emerging local Neighbourhood Plan
- Suggestion that this is an MKCP policy area that would benefit from integration with the evidence base and proposals of the emerging Bletchley and Fenny Stratford Neighbourhood Plan
- Concern that the qualifications of these restrictions, the circumstances under which the damage to an important site will be permitted, are significantly weak
- Suggestions to include reference to the Great Crested Newt District Licensing Scheme in the plans text
- Suggestion that development proposals which cause harm to special landscapes or protected areas should not be permitted under any circumstance otherwise it is pointless having designations
- Suggestion that areas like the Greensand Ridge should be protected and enhanced, not eroded through adjacent development
- Suggested amendment to the draft Policy, to specifically add Historic Parks and Gardens
- Disagreement with clause C I. If there are no suitable alternative sites to accommodate the development, then development should not take place
- Suggest adding "Registered Historic Parks and Gardens" to the footnote to policy CEA10
- Concern that it is incomplete without including the proposed Special Landscape Area Designation in Milton Keynes
- Support for policies to protect greensand ridge, including designation as a Special Landscape Area (SLA) and protection of its setting and surrounding land
- Concern about the allowances for exceptions in Policy CEA10
- Suggested wording changes (in sections B, C, D and F), correcting typos and making clarifications, also raising that reference to Biodiversity Net Gain may need to be amended, as well as the addition of several comments, specifically the following: ‘of instead of ‘or’
- Suggested amendment to part B to read: ‘There is a presumption against development proposals which would likely cause harm to the nature conservation or geological

interest of internationally important sites (RAMSAR sites, Special Areas of Conservation and Special Protection Areas). Such developments will not be permitted unless [...]

- Suggested amendment C to read: 'There is a presumption against Development proposals which would likely cause direct harm to a National Nature Reserve, Site of Special Scientific Interest or irreplaceable habitat. Such developments will not be permitted unless...'
- Concerns about Section C Point 2, unless there is a clearly defined method of weighing up the adverse impacts versus the development benefits. Without this method, the policy is ambiguous and may become ineffective.
- Recommendations to add a fifth point to Section C which says the following: '5. Any adverse impacts on the wider network of SSSIs must also be considered.'
- Recommended rewording of section D to: 'There is a presumption against development proposals which would likely cause harm to the biodiversity or geological conservation value of a site of countywide or local importance. Such developments will only be permitted where...'
- Concerns regarding Section D Point 1 unless there is a clearly defined method of weighing up the adverse impacts versus the development benefits. Point 1 should include a clearly defined method. Without this method, the point weakens the policy.
- Concern that Section F may not be in line with Policy CEA9 which discusses BNG. BNG does not cover priority or protected species.
- Suggestion that the creation of any new habitats should aim to maximise multiple benefits, for example SuDs, natural flood management, green infrastructure, etc
- Suggestion that all Priority Habitat areas should be shown on the Policies Map to alert developers long before they bring forward a Planning application
- Suggest that Paragraph 211 should reference the NEP "Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes" alongside the MK Nature, green and Blue Infrastructure Strategy (see above as for Policy GS9)
- Suggestion that supporting text should also mention the "Forward to 2030 Biodiversity Action Plan for Buckinghamshire and Milton Keynes", produced by the NEP which sets out the main issues impacting on wildlife in the county and some of the measures needed to help our wildlife
- Some consider that Milton Keynes North would provide various opportunities to achieve the objectives

- Some consider that South of Bow Brickhill would provide various opportunities to achieve the objectives
- Suggestion that the LNRS should inform the next stages of the Local Plan before it reaches its submission version to ensure that opportunities to enhance nature and increase public access are not overlooked in allocations or policy
- Suggestion that Part B should make specific mention of the Natural England GI Framework and access to open space targets rather than just reference to “open space standards”.
- Suggestion that the policy should include additional flexibility to align with the NPPF in respect of potential for mitigation and compensation
- Suggestion that it should include a clearer strategy to enhance biodiversity enhancement
- Suggestion that (E) needs to be more strongly worded to align with the NPPF. Suggested wording: “Planning permission will be refused if development proposals fail to demonstrate no harm to protected species or priority habitats will occur as a result of the development.”
- Suggestion for an additional part (G), to align with the legislative requirements in relation to intentional degradation of habitats prior to development.

Amendments to Draft Policy CEA10:

- Additional wording relating to where the benefits of development outweigh broader impacts on the national network of Sites of Special Scientific Interest
- Reference added to Registered Parks and Gardens in the supporting text
- Add Nature, Green and Blue Infrastructure Strategy layer to Policies Maps
- Reference added to the Great Crested Newts District Licensing Scheme in the supporting text
- Reference added to Paragraph 193 (b) of the NPPF (2024) in the supporting text relative to the wider SSSI network
- Amendments to grammar and formatting to improve readability of the policy and supporting text

Draft Policy CEA11 Urban Greening, Trees and Woodland

Main Issues in Relation to Draft Policy CEA11:

- Hallam Land stress that these specific standards and their impact on development capacity and viability need more thorough developer assessment. Hallam Land plans

to conduct this assessment and share their findings with the Council before making further comments.

- Suggestion there should be, in MKCC's words, a clear matrix of different types and scale of development and corresponding geographical area they need to take into account.
- Suggestion for a clear matrix which also includes maturity of the specimens required
- McCarthy Stone's response addresses the Urban Greening Factor (UGF) requirements, which mandate that new developments maintain or achieve a specified level of green cover. They highlight the need for commercial and residential developments to meet specific UGF target scores. Their response references NPPF paragraph 16, emphasizing that plans should be aspirational yet deliverable, and paragraph 136, which underscores the importance of trees in urban environments for their aesthetic and climate benefits. Their response emphasizes the importance of tree-led planning policies and the incorporation of trees in developments, while ensuring their long-term maintenance and retention. They stress that requiring an average green cover of 40% in residential neighbourhoods, particularly on small brownfield sites, is unrealistic and could hinder sustainable development, conflicting with the NPPF.
- McCarthy Stone's response recommends that the council reconsider this requirement, introduce more flexibility, or delete it, and ensure any such policy is fully evidenced and included in the viability study.
- Suggestion to expand the supporting text to emphasise the importance of planting to Milton Keynes' character and growth.
- Suggestion of the importance of considering planting timeframes, formality, and the impact of senescence, pests, diseases, and succession. Suggestion to consider the Council's New Town Register Statement of Significance for further details on planting.
- Concern that the 19% urban tree canopy cover target will be suitable for all sites, as some sites may benefit from alternative green infrastructure and/or greater/lesser degrees of openness. The policy should be made subject to site-specific design characteristics.
- Suggestion that it is not clear if the UGF targets for individual developments and the 40% average target for residential neighbourhoods will be mutually achievable. It is not necessarily the case that the 40% target will be achieved on all sites. Suggestion that the 40% target should be referred to separately from the UGF sections to make this clear.
- Concern for the long-term maintenance of trees. Concern regarding the adverse impact poor maintenance of greenspaces has on residents' wellbeing. Question the

ability to maintain the plantings and suggest withholding this until a sustainable maintenance plan is in place.

- Storey Homes believe that the issues addressed by this policy are already covered by the Biodiversity Net Gain Calculations. Storey Homes suggest either removing this policy or incorporating it into Policy CEA8 to avoid confusion.
- Suggestion for policy protection for existing mature street trees
- Some concern that a rigid matrix might be inappropriate in certain contexts.
- Haversham Parish Council suggests that the policy should support establishing rural woodlands both within and away from developments to mitigate habitat loss, emphasizing that this is a city-wide and national issue.

Amendments to Draft Policy CEA11:

- Additional supporting text outlining the requirement for the submission of Urban Greening Factor Assessment Plans to be used in the assessment of development proposals and whether a site has met the required target scoring
- Additional supporting text setting out that the enhancement of habitats onsite, or offsite, for BNG may result in the increased provision of accessible woodland, and that in such instances the decision maker would assess whether the enhanced woodland is accessible (as defined in the supporting text) and whether it meets the required size and proximity parameters.
- Additional supporting text setting out that off-site contributions sought to meet the Woodland Trust's Access to Woodland Standard will be considered distinctly from contributions for BNG.
- Additional supporting text setting out the importance of landscaping and tree planting as part of the legacy of Milton Keynes, as set out in the Statement of Significance from the Milton Keynes New Town Heritage Register.
- Reference added to the Council's tree management and conservation framework the 'City of Trees' in the supporting text.
- Amendment to Part C of Policy CEA11 wherein the 19% Urban Tree Canopy standard now applies to major development proposals
- Removed the requirement in Part A of Policy CEA11
- Additional supporting text providing guidance on Natural England's Urban Greening Factor Standard, including a link to a User Guide which sets out the scoring matrix for green cover and provides worked examples of the necessary calculation

- Additional supporting text setting out where the creation of habitats as part of achieving BNG, or for example the provision of urban food growing areas, may also in some instances positively contribute to achieving the required Urban Greening Factor score required by Policy CEA11.
- Amended Part B of Policy CEA11 to set out that where feasible and viable all major development proposals must meet the core Urban Greening Factor Target Score from the Urban Greening Factor Standard
- Amended Part B of Policy CEA11 to clarify the specific Urban Greening Factor target score for mixed-use development
- Additional requirement in Part F of Policy CEA15 setting out that where criteria F.1 and F.2 cannot be met, development proposals must contribute to the authority wide provision of woodland
- Additional supporting text referencing national guidance on the definition of woodland
- Additional supporting text setting out the value of off-site contributions expected in relation to meeting the Woodland Trust's Access to Woodland standard

Draft Policy CEA12 Conserving and Enhancing Landscape Character / Special Landscape Areas

Main Issues in Relation to Draft Policy CEA12:

- Suggestion that greater protection and enhancement of all landscaped areas is required.
- Respondents request to see how criterion C interacts with policy GS7 in support of wind and solar energy.
- Concern as to where 'special landscaped area' designation has come from as it seems to treat all sites the same despite existing land uses. Suggestion that a more nuanced approach is taken recognising site-specific impacts.
- Suggestion for heritage to be incorporated into landscape impacts: Historic Landscape assessment.
- Suggestion that part Cii of policy is removed as they deem the safeguarding of tranquillity difficult to quantify and could stifle economic development in the areas concerned.
- Suggestion to give land to parks trust to maintain.

Amendments to Draft Policy CEA12:

- Reference added to heritage in the supporting text

- Additional wording providing guidance on the significance of tranquillity and how tranquillity is to be quantified

Draft Policy CEA13 Sustainable drainage systems (SuDS) and integrated flood risk management

Main Issues in Relation to Draft Policy CEA13:

- Concern that flood risk policies do not conform with the NPPF
- Concern that the Integrated Water Management Study (IWMS – Phase1) (June 2024) is not directly referenced in the draft MKCP 2050. The outputs from the Strategic Flood Risk Assessment (SFRA) and IWMS coupled with Climate Change studies and Local Nature Recovery Strategy (LNRS) priorities and measures either reflected in policy, to support action to resolve the obstacles to addressing flooding, and/ or set out as an action for the Council and/ or partners as part of the Infrastructure Delivery Plan (IDP)
- Suggestion that the next stages of the SFRA and IWMS should conclude whether in applying the sequential approach settlements with a higher risk of flooding should be excluded from parts A.2, A.3 and E of policy GS2
- Concerns about capacity of existing surface water management network within the city (particularly the lakes)
- Some respondents agree with the draft Policy
- Some suggest a review of flood risk areas
- Some request to stop building on flood plain land
- Some suggest more balancing lakes
- Concern raised regarding the limited capacity of Sustainable Drainage Systems (SuDS), and the need for more extensive solutions in the long-term
- Some suggest that the policy previously states that development would not normally be permitted in Flood Zone 3, this should be repeated
- Suggestion that the hierarchy should be referenced
- Some question whether the Plan state a preference for publicly owned drainage assets
- Some request a review of the impact of recent development
- Concern raised that Bletchley and West Bletchley are at risk of fluvial and surface water flooding – flood mitigation needed (including better culvert protection)
- Suggestion that the maintenance of ditches as well as the design of water removal both important

- Suggestion to enforce downstream management
- Concern that existing flooding is exacerbated by climate change and inadequate maintenance – this needs to be addressed in conjunction with new development to avoid creating a two-tier system
- Suggestion that areas adjacent to sites should be considered when addressing impact, and development should not be approved if there would be adverse impacts to adjacent sites or infrastructure
- Concern that new development will increase run-off – strategic storage should be considered to reduce flood risk
- Suggestion that assessments should be broad enough to consider related impacts down-stream (e.g. Hanslope-Newport Pagnell)
- Suggestion that information should be provided to indicate that there would be no flood risk or sustainable drainage issues that cannot be managed within a site
- Some responses highlight issues with overly complex multi-functional green spaces in areas like Oxley Park and Tattenhoe Park
- Concern that combining SuDS features with other uses, such as ecological mitigation and children's play areas, can lead to conflicts due to differing maintenance needs and safety concerns – suggests ensuring these spaces are large enough to accommodate each function separately
- Recommendation to add a statement to B.4. to strengthen the policy. “B.4. SuDS will be designed as multi-purpose green infrastructure and open space, to maximise complementary environmental, biodiversity, social and amenity value. Proposed designs must be supported by a maintenance plan which demonstrates how the SuDS can be practically and effectively maintained compatible with the designed purposes of the surrounding green space;”
- Suggestion to include wildlife enhancements to sustainable urban drainage systems
- Suggest that the Environment Agency guidance on SuDS - adding advice about the kinds of water that should go in SuDS and about avoiding their utilisation on contaminated ground
- Welcome the inclusion of nature-based solutions for flood risk management and would like this referenced specifically within CEA13.
- Acknowledges that the flood risk mitigations in MK Plan 2050 conform to the Environment Agency's models and recommendations but argues that the plan should go further to address flood risks occurring more frequently than once in 30 or 100 years

- Highlight that Milton Keynes East (MKE) and the proposed Eastern Strategic City Extension are prone to flooding and express concern that urbanizing these rural areas could lead to unforeseen flooding problems
- Support Policy CEA 13, B 10 and requirements to restore culverted watercourses for the benefits to local communities and biodiversity
- Suggest that this should be applied in particular to Brooks such as: the Abbey Hill Brook; Shenley Brook; Kingsmead Brook; Tathall Brook; Water Eaton Brook
- Supports Policy CEA13 and in particular the need to include climate change allowances in drainage design and for the lifetime of the development

Amendments to Draft Policy CEA13:

- Reference added to the Council's Integrated Water Management Study as part of the evidence base informing the Milton Keynes City Plan (2050).
- Additional footnote added linking to national guidance on the drainage hierarchy
- Grammatical and formatting amendments to improve overall readability

Draft Policy CEA14 Protecting and Enhancing Water Courses

Main Issues in Relation to Draft Policy CEA14:

- The Canal and River Trust do not advocate a set buffer width preventing development alongside a canal – preferring a case-by-case assessment through the DM process.
- Concern about how the measurement of flood risk is calculated
- Some suggest that 8m is not a large enough buffer.
- Haversham PC requests that the Policy refuses development, especially employment-related, that could contaminate the water course (noting that Part C only addresses its functioning and course).
- BBOWT suggest a 20m buffer.
- The Parks Trust suggest the following addition to Section A: Protecting and enhancing watercourses The Parks Trust support the objectives of the policy by suggest the following addition to Section A: “A. Development proposals must be set back at a distance of at least 8 metres from any main river, at least 9 metres from all other ordinary watercourses, or at an appropriate width as agreed by the Environment Agency, Lead Local Flood Authority or Internal Drainage Board, in order to provide an adequate undeveloped buffer zone. Development proposals must include a landscaping treatment for watercourse buffer zones subject to the relevant authorities’ acceptance.”

- BBOWT suggest the addition of "development that is within or adjacent to river corridors and their tributaries will be required to protect and enhance the watercourse including its biodiversity, ecological connectivity, marginal vegetation, aquatic and riparian vegetation, and associated species."
- EA suggest that consideration is given to opportunities for re-naturalisation of watercourses, protection and enhancement of water quality of watercourses
- Gallagher Developments and Chicheley Farms Limited consider that Policy CEA14 relating to watercourses includes set back distances which are not evidenced
- Gallagher Developments and Chicheley Farms Limited are concerned that it is unclear how the policy would apply to what is defined as 'development'.

Amendments to Draft Policy CEA14:

- Additional policy requirement in Part A that provided buffer zones should not form part of private gardens
- Additional requirement for development proposals adjacent to or containing a watercourse to protect and enhance the watercourse's biodiversity, ecological connectivity, marginal vegetation and aquatic and riparian vegetation as well as their associated species

Draft Policy CEA15 Managing Flood Risk

Main Issues in Relation to Draft Policy CEA15:

- Concern that flood risk policies do not conform with the NPPF
- Comment that the Integrated Water Management Study (IWMS – Phase1) (June 2024) is not directly referenced in the draft MKCP 2050. The outputs from the Strategic Flood Risk Assessment (SFRA) and IWMS coupled with Climate Change studies and Local Nature Recovery Strategy (LNRS) priorities and measures either reflected in policy, to support action to resolve the obstacles to addressing flooding, and/ or set out as an action for the Council and/ or partners as part of the Infrastructure Delivery Plan (IDP).
- Suggestion that the next stages of the SFRA and IWMS should conclude whether in applying the sequential approach settlements with a higher risk of flooding should be excluded from parts A.2, A.3 and E of policy GS2
- Concerns about capacity of existing surface water management network within the city (particularly the lakes).
- Some respondents agree with the draft Policy
- Suggestion that development must prevent development on known flood plains

- Suggest that through climate change, severe rainfall events are frequently occurring and causing flooding in urban areas.
- Suggests more control of development to retain and control the flow of water is required through ponds and balancing lakes.
- Suggestion for the plan's supporting text to acknowledge impact of flooding on the historic environment and acknowledge both the importance of flood mitigation measures to protect heritage significance, and the need to avoid harm to the setting of heritage assets by those measures.
- Suggestion that the policy wording needs strengthening
- Some question the extent to which flood risk is currently being managed
- Some note that the SFRA identifies that Bletchley and West Bletchley are at risk of fluvial and surface water flooding
- Suggestion that flood mitigation measures are needed, including better protection of existing culverts to handle surface water flooding
- Some feel that flood risks are extremely important to be assessed with any new development
- Concerns that Newport Pagnell will face high levels of flooding as a result of development
- Highlight worsening flooding issues due to climate change and poor maintenance, stressing the need to address these alongside new developments to avoid a two-tier system
- Concern that the policy is too narrow, urging comprehensive flood risk mitigation for all new developments, including impacts on adjacent sites and infrastructure
- Suggest that drainage assessments should cover both the development site and nearby areas
- Some believe that flood risk management, using sustainable drainage systems and wetland restoration, benefits natural habitats and ecosystems and promotes biodiversity
- Concern that the policy does not meet the National Planning Policy Framework or Planning Practice Guidance requirements
- Amend section D to better define the functional floodplain. This includes: Include all relevant flood risk scenarios (from all sources) and; Require that even when detailed modelling is available, the FRA must ensure that it is fit for purpose for the proposal. All Environment Agency modelling is scoped to inform the indicative flood map and is

undertaken at a large scale. This means it is not normally fit for purpose for a site-specific assessment.

- Suggestion to outline when change of use applications are acceptable
- Suggestion to ensure that flood risk is addressed when sites are regenerated
- Suggestion that clarity is provided about how to model sites
- Suggestion that foul water flows may need to be restricted in certain instances
- Suggestion that there should be clarity on the Council's position around reducing flood risk
- Suggestion that the sequential approach to site layouts should be clearer
- Suggestion that the concepts of uncertainty and freeboard should be introduced
- Recommendation that the wider benefits of development against flood risk should be explained
- Recommendation that greater reference should be made to critical drainage catchments
- Suggestion that land should be allocated for flood storage
- Recommendation that the definition of functional floodplain should be clarified
- Suggestion that foul sewerage should be addressed in all new developments
- Suggestion that the policy should include reference that developments must include the use of nature-based solutions to manage flood risk where possible
- Suggestion that recent floods have shown that even with SuDS many areas of MK are subject to flooding due to increased rainfall resulting from climate change. This applies to roads, Redways, etc. as well as houses and other buildings
- Suggest action will be required in existing developed areas, not just in the new developments, to address this
- Some note that high rainfall has highlighted the limited capacity of Loughton Brook to handle additional runoff
- Suggestion for the need for rigorous flood assessments for developments in the Loughton Brook catchment area, considering the increased risk of heavy rainfall due to climate change
- Clarity sought on whether the proposed Shenley Dens area falls within this catchment

Amendments to Draft Policy CEA15:

- Reference added to the Council's Integrated Water Management Study as part of the evidence base for the Milton Keynes City Plan (2050)
- Reference added to the Council's Level 2 Strategic Flood Risk Assessment as part of the evidence base for the Milton Keynes City Plan (2050)
- Additional wording in supporting text reflecting on the impact of flooding on the historic environment
- Add definition of 'measurable change to drainage characteristics' in the Plan's glossary
- Amendments to Part D of Policy CEA15 to ensure it includes all relevant flood risk scenarios from all sources
- Removed reference to 'sensitive locations'
- Amended Part F of Policy CEA15 to include requirement that sites which have been through the sequential test at Local Plan stage may need to still undertake the sequential test if a) the evidence on flood risk has changed or b) the proposal differs significantly from the allocation proposal
- Amendment to Part G of Policy CEA15 setting out that long-term funding of flood defences should be considered and that development behind existing defences should be relied upon for their safety
- Included references to 'high', 'medium' and 'low' in relation to flood risk where relevant
- Amendment to Part H of Policy CEA15, to include minor development and proposals for changes of use
- Reference added to national guidance on modelling for flood risk assessments in the supporting text
- Additional requirement added for finished floor levels to increase the freeboard from 300mm to 600mm unless the Flood Risk Assessment demonstrates an alternative freeboard is appropriate
- Reference added to Critical Drainage Catchments and the importance of developments within the upstream catchment of these
- Reference added to the Flood Risk Management Hierarchy
- Amendments to Part D of Policy CEA15 to include all relevant flood risk scenarios (from all sources) and a requirement that even when detailed modelling is available, the Flood Risk Assessment must ensure that it is fit for purpose for the proposal. All Environment Agency modelling is scoped to inform the indicative flood map and is undertaken at a large scale. This means it is not normally fit for purpose for a site-specific assessment.

- Additional supporting text added outlining that private sewage networks must only be allowed where a public connection is not reasonable

Economic and Cultural Prosperity

Draft Policy ECP1 Protecting Employment Land and Buildings

Main Issues in Relation to Draft Policy ECP1:

- Suggestion that it is not clear why marketing evidence requirements have become more stringent. The evidence base (Office Base Study in Central Milton Keynes, Bidwells) does not identify a meaningful increase in demand for office space and identifies a reduction for large office space since 2020. As such, the market requirements should not apply to office use and/or should only apply within the Downtown Business Quarter, where E(g) uses are to be prioritised in line with draft Policy CMK1.
- Some note that Policy ECP1 A.3.: suggests that it would be better to say that the proposal should satisfy the transport, parking, access, active travel, etc. conditions normally required of development of that type. They suggest access to facilities needs to be required where residential uses are proposed.
- Bletchley and Fenny Stratford Town Council suggest that this draft Policy should be shown on the Policies Map and should state that Neighbourhood Plans may modify those sites shown where it can be justified as a non-strategic policy action.
- Some concern that Policy ECP1 which protects employment land could be seen to conflict with Policy CMK2. Requiring 12 months of marketing before proposing residential use is seen by the Pegasus Group on behalf of Euro Property Investment Ltd as overly burdensome given the priority for housing in this area. The Pegasus Group on behalf of Euro Property Investment Ltd feel it would be more reasonable to demonstrate that there is no reasonable prospect for future employment use instead. Red Bull Technology are supportive of the broad approach to economic growth but disagree with Policy ECP1 which they consider to be too rigid.
- Suggestion that the policy should ensure that even if office and employment buildings are unmarketable, the land should remain designated as employment land.
- Some question what action is being taken regarding permitted development rights for commercial to residential buildings. While Policy ECP1 protects against loss of commercial land, some question the use of permitted development rights to convert commercial areas to residential, such as at Caldecotte Business Park.
- Galliford Try and AW James & Red Bull note that the period of marketing has been extended to 12 months and consider this is inflexible and creates an unnecessary burden on site owners.
- Some note that transport assessments should inform the consideration of acceptability.

- MK Forum suggest that the wording of A(1) should be amended to include additional wording as follows “...for a minimum period prior to the submission of the proposal at a price and on such terms as represent a realistic appraisal and valuation of the property in its current use”.
- Urban&Civic, Taylor Wimpey Strategic Land, and The Society of Merchant Venturers support the intentions of Policy ECP1 on protecting employment land and buildings, but note it is unclear how this approach can coexist with other policies in the plan, notably for CMK.
- Red Bull consider that the policy as drafted fails to adequately recognise the delivery of R&D uses in areas outside of Central Milton Keynes
- Some disagreement with ECP1 as the policy does not allow redevelopment proposals that may provide employment floorspace that is a better quality than existing. Some feel part 5 is overly restrictive, especially if Part 1 is met.
- Gallagher Developments and Chicheley Farms Limited consider that Policy ECP1 relating to the protection of employment uses should be made clearer in relation to the specific use classes that it relates to.
- Respondent suggests the requirement for dedicated lorry parks for any future warehouse sites, to reduce unauthorised parking

Amendments to Draft Policy ECP1:

- Amended the required marketing evidence to a period of 6 months
- Removal of ECP1 (3) & ECP4 (4) where these issues will be assessed in accordance with Policy CEA7 (Mitigating Wider Environmental Pollution) & Policy GS10 (Movement and Access) of the Milton Keynes City Plan 2050
- Additional wording added to Policy ECP1 regarding the redevelopment of employment uses

Draft Policy ECP2 Supporting the Vitality and Viability of Centres

Main Issues in Relation to Draft Policy ECP2:

- Suggestion that all permitted development rights are removed, not just from commercial but from residential properties too.
- Some mixed views as to whether it strikes the correct balance between protecting the shopping functions of centres and allowing for the diversification of them.
- Some request clarification on the draft policies map for CMK, specifically the extent of the PSA and Primary and Secondary Shopping Frontages.

- Some mixed views on the effectiveness of Article 4 Directions.
- Suggestion that District centres should be grouped with local centres.
- Future Wolverton Limited note that Wolverton was chosen as a pilot Community Improvement District. This work has highlighted: - Community Involvement: actively explore community involvement in high street regeneration. - New Initiatives: A monthly street market and town centre events have been established to activate the town centre. - Support for Micro Businesses: The Shop on The Square has supported over 30 micro businesses. Future Wolverton Limited state that the city plan needs to include a commitment to ensure community involvement as this is central to the future of high streets.
- Some disagree with ECP2, as other than the maximum comparison goods capacity figure in CMK2, the draft retail policies do not reflect the Retail Study. Nexus clarifies the definitions of Town Centre and Primary Shopping Area and their use in plan-making. However, some feel it is unclear how this advice transfers to the draft Plan, particularly the retail boundaries in CMK. The Retail Study clarifies that Town Centre and PSA boundaries help developers and decision-makers apply sequential and impact tests for planning applications. PSA boundaries define edge-of-centre sites as those within 300 meters of a PSA boundary, while out-of-centre sites are beyond this distance. Local authorities use PSA definitions to designate frontages for retail prosperity, but national policy no longer requires identifying Primary and Secondary Frontages. Despite this, Nexus believes there is still a policy basis for identifying these areas in Central Milton Keynes (CMK) due to their core retail function, although, the justification for this is unclear.
- Some note that the report lacks justification for including the Xscape building, a leisure destination, as part of the Secondary Shopping Frontage. Noting that the Draft Plan's glossary attempts to clarify these terms, defining Primary Shopping Areas as concentrated retail areas and distinguishing Primary and Secondary Shopping Frontages by their retail and diverse use opportunities, respectively. Policy GS5 supports additional retail development within the PSA, identifying CMK's PSA as the regional shopping centre for comparison goods. Policy ECP2 addresses retail boundaries in CMK, but it is confusing as policy suggests the Secondary Shopping Frontage in the Xscape building is in the PSA, whereas the policies map suggests otherwise.
- Suggestion that to reflect the Retail Study (which has Xscape outside the PSA), it is recommended to delete references to Primary and Secondary Frontages in Policy ECP2 and revise the Inset Map to define the PSA for CMK only; strengthening the PSA's retail offer and align it with national policy and MKCP definitions. Proposals for other main town centre uses in the Xscape building would still be supported, but significant retail proposals (over 900m²) would require impact and sequential testing as per ECP3 to protect the PSA's core retail function

Amendments to Draft Policy ECP2:

- Wording amended from 'normally be permitted' to 'will be supported'
- Part H.1 additional wording setting out that proposals would enhance the provision of local floorspace for main town centre uses proportionate to the local population
- Additional policy wording added in Part B, setting out that the Xscape building is outside the Primary Shopping Area.

Draft Policy ECP3 Sequential Impact Tests

Main Issues in Relation to Draft Policy ECP3:

- Haversham PC requests clarification on the implications of removing the sequential test for rural sites
- Some support for the policy to protect the viability and vitality of town centres.
- Suggestion that the 350 sqm referred to in ECP3 C.2. is too large for outside the district and local centres.

Amendments to Draft Policy ECP3:

- Reference added to Policies Maps
- Wording 'unidentified centre' amended to 'defined Town Centre',
- Overall grammatical and formatting amendments to improve readability

Draft Policy ECP4 (This policy has changed and is now the hotel accommodation policy)

Main Issues in Relation to Draft Policy ECP4:

- Some feel that the sites should be marketed for 12 months, that development in the open countryside should not be made easier, and that a proposal should only be supported if the necessary infrastructure is in place (like transport).
- Hanslope Parish Council object to the reduction in the marketing period from 12 to 6 months before an applicant can market a shop, pub & community facility as residential. Period should remain at 12 months.
- Some would like additional measures added to protect pubs from closure
- Storey Homes generally agree with the inclusion of the policy but suggest expanding it to better accommodate different types of rural businesses and schemes.

- Some suggest that too many villages are dormitories, they need growth to provide sufficient local populations to support clubs in absence of a pub / shop or church.
- Some object to prioritizing business growth in rural areas over the preservation of open countryside and the well-being of rural residents.
- Gayhurst Parish suggest that the rural tourism and leisure developments should be clearly subject to other relevant policies (e.g. protecting landscape, light and noise pollution, traffic/road safety etc)
- Haversham PC suggests implementing a business viability test for new or expanding businesses. They also propose that any community facility deemed non-viable, such as a pub or hall, should be offered for sale to residents at a fair commercial value, not as a development site, with a preference for community purchase.
- Suggestion that new developments within Linear Parks or Special Landscape Areas should be refused unless they are essential for an existing and viable business.

Amendments to Draft Policy ECP4:

- Amendments to Policy Part A.2. to the “diversification of rural businesses” and Part A (3) also includes mention of tourism and countryside recreation uses.
- Retitled as ECP5 due to new policies being added
- Amendments to policy wording in Part A.5. clarifying support for the use of previously developed land, and sites that are physically well-related to existing settlements, where suitable opportunities exist.

Draft Policy ECP5 (Now HE1) Heritage

Main Issues in Relation to Draft Policy ECP5:

- Support for continuing and expanding the commissioning of high-quality public art to enhance urban design
- Support for maintaining high-quality soft landscaping to effectively frame views into and out of heritage asset sites and areas
- Some advocate for the recording and preserving of archives related to the towns and villages within Milton Keynes
- Suggestion to improve local signage to highlight heritage assets and publishing information online
- Support for the policy
- Suggestion for schemes to be equal to but not necessarily higher than the quality of buildings to be replaced

- Support for retaining the classic infrastructure in CMK
- Suggestion for the policy to be stronger
- Suggestion to promote MK's New Town Heritage as a reason to visit MK
- Some feel that protection of 20th century buildings is as important as more historic buildings
- Historic England suggest adding more detail on heritage at risk both nationally and locally
- Historic England suggest the policy references the MK Historic Environment Record, the Council's Heritage at Risk Register and Conservation Area Reviews, to support decision-making
- Historic England suggest amendments to the supporting text to include publications beyond books and journals.
- Historic England stresses that the Council should commit to preserving non-designated heritage assets and recognising that the heritage value of these assets extends beyond their architectural significance
- Historic England recommend embedding heritage in the Council's emerging Cultural Infrastructure Plan
- Support for supporting MK City Discovery Centre and MK Museum
- Disagreement with the combination of economic and cultural prosperity, suggestions that cultural prosperity deserves a distinct section
- Suggestions to strengthen the wording of Part B and Part K
- Suggestion for a new policy seeking to secure the long-term viability of Heritage Assets
- Suggestion that the policy should be supportive of the reuse of heritage assets
- Suggestion to add green and blue infrastructure as heritage assets
- Storey Homes are concerned that the policy is overly onerous, not accounting for the unique circumstances of each site. They suggest there may be fiscal and practical reasons why replacing a non-designated asset with a higher architectural value isn't feasible. Concern that the policy may hinder development and lead to further decline of buildings.
- Support for preserving New Town heritage for future generations
- Suggestion to minimise height of new development

- Suggestion to amend 'sustain' to 'preserve' to reflect the statutory duty
- Suggestion that the policy clearly differentiate between designated and non-designated assets
- Suggestion that the full New Town Heritage Register needs to be published and adopted to be fully considered in proposals
- Concern that the policy is repetitive
- Smith Jenkins suggest that Parts B3, B5 and B6 should be updated and possibly moved to remove the impression that such information should be contained within heritage reports
- Concern that the policy is too prescriptive
- Smith Jenkins suggest amendments are required to align with the NPPF
- Suggestion to amend policy to clarify what applies to designated assets and non-designated assets
- Suggestion to expand the scope of the New Town Heritage Register
- Suggestion to designate Conservation Areas for areas important to the development of Milton Keynes
- The MK Green Party consider that the policy should make reference to measure, protect and enhance local culture
- Responses emphasise the importance of heritage and cultural infrastructure in the success of Milton Keynes which the Plan should recognise
- Urban&Civic, Taylor Wimpey Strategic Land and The Society of Merchant Venturers question the purpose of Policy ECP5 where they consider it to duplicate the wording in the NPPF
- Stony Stratford Town Council is supportive of the requirements in draft Policy ECP5
- CMK Town Council object to draft Policy ECP5 as they consider it does not provide sufficient protection or recognition of CMK's New Town Heritage. They suggest the Council develops a 'CMK Heritage Management Plan'

Amendments to Draft Policy ECP5:

- Renamed to Policy HE1 Heritage and relocated to new chapter on heritage
- Removed Part A of the policy which listed the relevant heritage assets
- Additional text added to clarify that limited and localised alterations to an unlisted building in a conservation area need not be supported by the level of detail required

to convey the impact on significance caused by development in the setting of a listed building or by proposed alterations to its fabric

- Additional text added to the policy requiring that where technical knowledge and expertise is required, a qualified heritage should be commissioned to complete the heritage assessment
- Amendments to wording to clarify that development proposals for the conversion of listed buildings to an alternative use, or which involve structural works to their historic fabric, must be accompanied by a structural engineer's report.
- Additional requirement added that the required structural engineer's report sets out how the design of the structural works have sought to minimise the impact upon the significance of the asset
- Removal of Part D, part E, Part F, Part G, Part H, Part L of Reg 18 version of Policy (ECP5).
- Additional requirement that development proposals that result in the loss of a non-designated heritage asset, including those on the New Town Heritage Register or local list, must be accompanied by evidence to demonstrate that all feasible solutions to avoid and minimise its loss have been fully evaluated.
- Additional requirement that where New Town Heritage Register assets meet the Design Quality or Group or Townscape Quality criteria, the replacement scheme must be of demonstrably equal or greater architectural quality than the asset to be lost
- Policy wording amended from 'heritage deficit' to 'conservation deficit'
- Additional policy wording setting out that applicants, for proposals for enabling development, are expected to adhere to the advice provided in Historic England's Enabling Development and Heritage Assets; Historic Environment Good Practice Advice in Planning, Note 4 or its replacement
- Amended policy wording in relation to Part G of Policy HE1 to reflect wording in the NPPF (2024)
- Additional policy requirement added (Part C of HE1) requiring that development proposals for conversion or subdivision of a listed building must include the full scope of works required (including those that are required by Building Regulations, the Fire Authority, Environmental Health)

Voices of Milton Keynes - Regulation 18 Representations

The following summary is based on feedback received from the Voices of Milton Keynes group during creative workshops and interviews as part of the regulation 18 consultation period for the Milton Keynes City Plan (MKCP) 2050. Voice of Milton Keynes is an initiative designed to engage people to express views about Milton Keynes and their desired changes in a creative, diverse and inclusive way.

The primary objective was to examine factors presented by the MKCP 2050 that could impact individuals' health and wellbeing and help create healthier communities, and this was done through participatory theatre.

Participants of the workshop spanned a wide range of ages, and represented a range of community groups, ethnic groups, sexual orientation and a range of abilities.

The summaries have been categorised and derived from verbatim quotes from the workshops, meetings and interviews.

GS1

Respondents express a desire to see the original character of Milton Keynes maintained, particularly through the construction of new builds whilst others are opposed to growth and change. Acknowledgement was made around a requirement to increase housing density; however concern was also expressed surrounding capacity the city's road infrastructure can handle, particularly on weekdays. Positive sentiments towards growth were also expressed.

GS4

Social infrastructure and community amenities

Respondents desired more inclusive and accessible public spaces and infrastructure. There were calls for additional walking paths crossings and improved public transport, better accessibility for wheelchair users, and more benches, litter bins, and cafes.

Participants also highlighted a lack of youth-focused amenities, particularly in residential areas, which contributes to social isolation. The centralisation of services and events was seen as limiting, with suggestions to decentralise and make them more disability-friendly. Cultural and community groups expressed frustration over limited support from the Council, despite their positive impact on mental health and social inclusion. Individuals with learning disabilities voiced a need for more socially aware and inclusive spaces to reduce isolation and improve confidence.

Transport and movement solutions

Respondents emphasised the need for a more integrated, reliable, and accessible public transport system in Milton Keynes. Bus and train connections were seen as inadequate, infrequent and inefficient, with gaps in service—namely in areas like Bletchley, especially for people with learning disabilities.

Respondents expressed strong support for expanding e-bike and e-scooter options. However, transport across the city was described as confusing, and footpaths were noted as not always accessible. Suggestions included estate-level transport solutions to reduce car dependency, while maintaining the city's grid layout. Safety and comfort on public transport were also raised.

Accessibility

Respondents raised significant concerns about the safety and accessibility of the Redway network. Poor lighting, overgrown vegetation, and the presence of fast-moving bikes and scooters contribute to a sense of vulnerability, particularly at night. Specific safety fears were linked to recent hate crimes, with calls for improved lighting and visibility at crossings. The lack of inclusive and accessible public events and amenities was also noted, with suggestions to decentralise activities beyond the city centre. Public transport was seen as essential but unreliable, though affordable fare options like the £2 ticket were appreciated.

Public realm

Respondents highlighted the need for enhanced amenities in public spaces, particularly Campbell Park, suggesting more cafés, seating, and services to support social interaction and rest. While Milton Keynes was generally viewed as a friendly and welcoming city, concerns were raised about youth-related crime in certain areas. The city's extensive green infrastructure was praised, especially for walking groups and recreational use, but the lack of refreshment facilities along walking routes was seen as a gap in provision. Improving these elements would support inclusivity, accessibility, and community wellbeing.

Resilience and improving air quality

Respondents highlighted the health and environmental benefits of walking and using public transport, noting improvements in personal wellbeing and reduced pollution. Walking was seen as a valuable form of daily exercise, and Milton Keynes was praised for its pleasant walking routes. Concerns were also raised about the impact of urban development on climate and air quality, with comparisons made to more built-up areas like Luton.

GS5 – Retail

Respondents praised the shopping centre for its clean, open spaces, seating, and variety of shops, making it an enjoyable place to visit. Visitors from nearby towns, such as Leighton Buzzard, highlighted the appeal of Milton Keynes' shopping, leisure facilities, and green spaces. Public transport was generally seen as accessible and affordable, with buses offering good coverage, though some noted limitations in specific areas.

GS10 – Movement and Access

Movement and Grid roads

Some respondents described Milton Keynes as car-centric, with fast roads seen as part of its appeal. Concerns were raised about aggressive driving, frequent traffic light violations, and accidents, particularly on the A6. Accessibility issues were noted, including footpaths that are not always usable and public transport options that can be unreliable or costly. MK

Connect was appreciated for its convenience and affordability, though limitations in coverage—such as at Shenley Leisure Centre—were highlighted.

Parking

Respondents raised concerns about speeding vehicles and cars parked on pavements, which pose challenges for people with disabilities. Additionally, a visitor to the shopping centre highlighted that parking costs are too high and that affordable parking options are limited.

General walkability

Respondents expressed concerns about the safety and quality of public transport and walking alternatives, particularly underground walkways and underpasses, which were seen as unsafe at night due to risks of crime and frequent flooding. New developments such as Eaton Leys were criticised for lacking walkable access to shops and community spaces, leaving residents reliant on cars. Additionally, poor pavement conditions were highlighted as a serious issue, especially for older people and those with mobility challenges.

Redways

Some respondents stated redway creation and maintenance should be a priority for development in Milton Keynes to increase accessibility. Multiple raised concerns about poor lighting on Redways, especially in parks and secluded areas, making them feel unsafe—particularly for young people and women at night. Some avoid using Redways after dark, even in groups. Suggestions included better lighting and increased CCTV coverage. Additional concerns were raised about conflicts between pedestrians and fast-moving bikes and scooters.

GS9

Transport

Public transport was a recurring theme with respondents stating improved public transport links were required. Whilst commentary around the capacity of the city's road network was highlighted with concern. Respondents highlighted a need for transport options for individuals with special needs and are unable to use public transport.

Education

Respondents feel more support is required within the education system for both students and teachers, noting student absence due to mental health increasing and a rise in extremely poor student classroom behaviour.

Health and social care

The vast majority of respondents stated that an increase in the capacity of medical service provision was required, through an additional hospital and local centres. Support from social care services were also deemed inadequate. Concern was therefore expressed around the impact growth would have on existing services.

Community facilities

Many comments highlighted concern around an increasing move away from the original grid-based design principles of Milton Keynes, specifically around the requirement for each

neighbourhood to have a walkable centre with shops and both formal and informal community spaces, however respondents noted that newer estates like Eaton Leys lack these features, while other areas were lacking services such as healthcare and pharmacies.

Respondents highlighted the role community centres have played in fostering social cohesion in areas like Coffee Hall and community groups were praised for their role in fostering social cohesion, supporting youth, and providing cultural and religious spaces, particularly for Muslim and Somali communities.

There is also a strong call for more youth facilities, cultural venues, and localised events to support wellbeing and engagement across all age groups.

Green and blue infrastructure

Respondents felt a strong attachment to Milton Keynes' green infrastructure and open space network. Residents conveyed they valued the abundance of parks, lakes, fields, and playgrounds, as well as the connectivity provided by the Redways. Clear concern about the potential loss of green spaces due to development was expressed. Long-term residents, highlight the transformation of Milton Keynes from a sparsely developed landscape to a fully built-up urban area, and they emphasise the importance of maintaining access to nature and well-maintained public spaces as the city continues to grow.

Waste management

Respondents wish to see better management of litter.

Management and maintenance of infrastructure

Using the example of the Lakes Estate, respondents express concern about the replacement and maintenance of local social infrastructure and community amenities, stating that deteriorating building conditions encouraged businesses to relocate.

HQH1 – Affordable Homes & HQH2 – Housing for people with specific needs

Respondents expressed the need for more lifetime housing and affordable housing. Wet rooms for housing for vulnerable people was also mentioned.

HQH3 Mixed sustainable community & HQH4 – Regeneration and Renewal

Respondents raised concerns about housing affordability and social cohesion in Milton Keynes. The increase of high-rise, build-to-rent developments targeting commuters was stated as contributing to pricing out existing residents. Social isolation was highlighted, particularly among older people, carers, and those without access to community support or spaces for interaction. A decline in neighbourly connections and informal social networks was mentioned, with calls for accessible local amenities and social infrastructure to foster inclusive, connected communities and support mental wellbeing.

ECP1 – Protecting employment land

Respondents highlighted the need to strengthen Milton Keynes' economic and cultural offer. Some younger respondents felt job opportunities were accessible, but others called for broader economic development and better employment prospects. There was concern that cultural provision has declined despite economic growth, with calls for more youth centres, music venues, and affordable arts events to support community engagement and cultural vitality.

ECP2 – Town centre vitality and viability

Respondents expressed a clear need for greater investment in cultural infrastructure and community amenities. While facilities like libraries and galleries were appreciated, there was a desire for more accessible and affordable arts and theatre events, especially for young people.

Concerns were also raised about the lack of activity in areas like The Hub, with suggestions to better support local businesses and revitalise underused spaces. Parking fees around the shopping centre were viewed as a barrier to access, with calls for free parking to encourage greater footfall. There was a strong emphasis on rebalancing Milton Keynes' commercial focus with inclusive cultural and social spaces.

Environment

Respondents expressed desires to retain green space and prioritise green issues, indicating it was a key aspect of Milton Keynes' character. Other respondents highlighted concerns about the climate crisis, relating the impact of development to increased pollution and geographical warming. One respondent referred to the requirement for new vehicles for taxi drivers as unsustainable.

Summary of observations:

Due to external circumstances, including the 2024 General Election, there were changes to the delivery timeline, which reduced opportunities to build relationships with individuals and community groups, and limited repeat workshops. Facilitators observed that some participants were hesitant to engage, however the majority participated enthusiastically and overall community support was strong. The key concerns that emerged were social isolation and mental health, and scepticism was expressed regarding genuine change and implementation.