

MILTON KEYNES CITY PLAN Reg 19

Objections from Milton Keynes Green Party

Prepared by Alan Francis on behalf of MK Green Party.

GS1 Our spatial strategy

This policy is unsound because it has too large a buffer specified. The plan seeks to provide 59,779 homes, including a 19% buffer. No justification is provided for such a large buffer. Consequently this is unsound. We suggest that a buffer of about 4-5% is more reasonable.

Even if we were to accept the 'Local Housing Need' figures (though see our response to GS2), there is no need for a buffer of 19%. This will just allow developers to pick and choose which sites to develop and in what order from a larger number, which will make sustainable coordinated development more difficult. That is unsound.

In particular the Eastern Strategic City Extension (ESCE) around Moulsoe could thereby come forward before the sites between it and urban MK have been developed. This would make it extremely difficult for the site to be served by sustainable transport. It is too far from CMK for active travel modes to be used by all but the most committed cyclists, with the added complication of hills and very few safe places to get across the M1. So transport would be dependent upon cars and public transport; and it is not near any rail line so public transport would have to be bus or MRT. Serving such an isolated development by bus or MRT would not be viable.

The Transport and Movement Topic Paper, but not the plan itself, only suggests that it might be served by the emerging MK Metro MRT service. There is no firm commitment that MK Metro will happen or that it will serve ESCE. MKCC has a poor record of delivering public transport projects and services.

What is likely to be provided is a slow and token service that would be unattractive and so used by few people. That would mean that the development would be mainly car-based. That would be unsustainable and incompatible with climate change policies of both the government and MKCC. It would be contrary to the key objective of the plan, to reduce cumulative carbon emissions from growth and create new communities that are resilient to a changing climate. It is thus unsound.

Housing and Economic Development Needs Assessment (HEDNA) identifies the minimum annual local housing need figure for Milton Keynes of 1,799 homes per year, or 50,372 homes for the MK City Plan 2050 period (2022-2050).

We suggest that a buffer of about 4-5% is more reasonable. That requires the plan to provide 52,000-52,500 homes. This is 7,000-7,500 fewer than proposed in the Reg 19 plan. The ESCE is planned for 7,750 homes in the plan period. Thus if a smaller buffer is used there is no need for ESCE during the plan period. The remaining 250-750 homes could come from new build and densification around rail stations and transport hubs, as recommended in the Planning and Infrastructure Act. We therefore propose that the smaller buffer should be used and the ESCE site be removed from the plan.

Reducing the numbers of houses, and thus the number of residents, will also help with many of the other policies. For example, it will reduce the pressure on energy and water resources and transport requirements, it will retain more fields for agriculture and provide more space for nature.

GS2: Strategy for homes

This policy is unsound because the City Plan proposes an unrealistically high number of houses and fails to minimise the amount of greenfield land outside the existing urban areas that is taken for development. This greenfield land should be retained to protect the green spaces and habitats and prevent unsustainable urban sprawl.

Housing growth & regeneration

We have two major concerns about the 'Local Housing Need' being raised to 50,372 new homes over the period across Milton Keynes (Policy GS2, p. 21).

First, we believe this number of new homes to be unrealistically high. It derives from the arbitrary 'Strategic Ambition' reported in the MK2050 *Demographic Modelling Analysis Technical Summary January 2020*, for 'half a million residents by 2050' in Greater MK, including 410,000 within the MKCC area, for which no clear rationale has ever been given. Indeed, the latter figure contrasts sharply with the ONS demographic projection of 339,162 for this same area by the slightly earlier date of mid-2047 (data downloaded on 05/02/2026 from: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2022based>).

Whereas the above ONS projection predicts 15.9% population growth in MK (from 292517 to 339162) over the 25-year period of 2022-2047, the MK2050 'Strategic Ambition' to reach 410,000 would implicate 40.2% growth. Given the ONS projection of only 14.5% growth of population for England as a whole, this means that achieving the MK2050 ambition for growth above would rely upon sustained high net immigration from outside MK – likely including other areas of the UK less privileged with funding for development of infrastructure and provision of jobs and services. The probability of such a disproportionate net transfer of population into MK continuing over the next two and a half decades is questionable and thus an unsound assumption. In any case it would also run counter to the equitable provision of residential and employment opportunity across the UK – such that the main beneficiaries would just be developers profiting from the resulting over-heated inflation of land and house prices here.

Secondly, maintaining an ambition for such an unrealistically high 'Local Housing Need' figure, with the consequentially enforced release of ever more land for development, risks playing into the hands of speculative developers who would cherry pick the most profitable (especially open countryside) sites for building out, at the expense of supplying the affordable housing where and when it is really needed – alongside their habitual over-charging for new homes (see < <https://theconversation.com/builders-are-making-thumping-profits-by-over-charging-for-new-homes-new-findings-200750> >). (It's worth noting, theoretically, that if the target of 50,327 new homes were to be achieved, but with only the net increase of population actually predicted by the ONS, the resulting mean number of occupants per new household would be only 0.9!)

We therefore consider the proposed number of new houses, 1,902 – 2,250 homes per annum over the plan period, to be too high. The number should be reduced to around 1400 dw pa, as per the baseline in the HEDNA report without the uplifts.

This would be sufficient to satisfy indigenous demand and still provide for some growth from outside MK. The existing infrastructure, roads, hospital, etc., would not be able to cope with the higher number. It would also require a lot of greenfield land outside the existing urban area of MK to be developed – an undesirable outcome.

If the target were reduced to 1400 pa then only about 35,000 dwellings would be required during the plan period. MK already has unbuilt planning permissions for about 20,000 dwellings. That just leaves sites for another 15,000 to be allocated, which could be accommodated by the 11,000 planned in CMK plus development on some other undeveloped small sites and densification around transport hubs. Therefore no new major expansion areas on greenfield sites would be required.

MKCC made a rod for its own back by setting a figure of 1750 dw pa in the Core Strategy. It hasn't achieved that level, and typically 1300 dw pa has been delivered, but because of the NPPF and the 5 year land supply criteria developers have been given permission for many inappropriate developments, e.g., Eaton Leys. If the Core Strategy target had been 1250 dw pa, as we advocated at the time, then the 5 year land supply criteria would have been much lower and could have been met, so MKCC would not have had to grant permission for Eaton Leys, etc. MKCC seems set upon repeating this mistake and giving developers free reign again by adopting an unachievable and undesirable housing target of 1,902 – 2,250 homes per annum.

We support some densification of development within the existing urban area, because this would help with the viability of public transport and local shops, especially near to locations well served by public transport. However this should only happen with the consent of residents of the affected areas.

We question whether MKCC's aspiration for 'ambitious growth' ('Our Ambition', p.1) can be described as 'Well-planned'. We have criticised the inflated 'Local Housing Need' figure in our answer to GS2, above. We would further instance the way developers have already started to contravene some of the basic stipulations of the SEMK SPD (e.g., need for coherent application and west-to-east development) – a cavalier way of operating by developers that we have also seen repeated locally with some smaller-scale developments. At times, MKCC Development Control seems almost supine before the demands of developers, for fear of losing appeals against refusal of their applications. A 'Well-planned' Local Plan ought surely to be so robust as to be unassailable, even by the sliest developers' barristers: so far, it seems ours is not.

Moreover, laudable though the objectives of the Climate and Environmental Action Theme are – and we certainly do endorse them – some aspects of the transport plan, for example, which can only result in yet more polluting road transport hardly seem designed to help achieve them. As in the fable of the Emperor with no clothes, MKCC should beware of its Green ambitions revealing themselves to be just so much 'Greenwash'.

Some large car parking areas at Local and District Centres could be used for housing. If half of the car park at, say Westcroft, were to be decked over, the same number of parking spaces could be provided and the other half used for housing. Alternatively there could be parking on the ground floor with housing above. This would contribute to densification near transport hubs.

Simply allocating more land for housing will not necessarily increase building rates. Major private housing developers will only build sufficient housing to maximise their profits, not to reduce homelessness or property prices.

There should also be more emphasis on facilities such as schools, health centres, shops, etc., being provided locally so that people would be more likely to walk or cycle to them rather than travelling the longer distances to more centralised facilities by car. The design of housing estates should be more permeable for pedestrians and cyclists with, for example, footpaths linking the closed ends of cul-de-sacs so that people can walk or cycle more directly without having to make large detours from the "crow-flies" route.

Residential developments near public transport hubs should have the option for reduced or zero amounts of car parking. Covenants could be used to enforce this.

GS4 Strategy for People Friendly and Healthy Places

This policy is unsound because it is not consistent with government policy.

Catchment distance should be specified as the *walking distance* from a facility, not the crow-flies distance. DfT, for example recommends that housing should be within 400m *walking distance* from the nearest bus stop.

This should apply to bus stops that actually have a bus service. There are many houses that are within 400m of a bus stop but that stop has no service, so residents are not within 400m of a place where they can catch a bus. Bus services in new areas need to be guaranteed to continue running after the initial Tariff/CIL/S106 payments have finished.

GS9 Supporting Growth with Infrastructure

This policy is unsound because it fails to guarantee that public transport will be available for residents. While we welcome many of the proposals in Policy GS9 Supporting transit-oriented development and estate regeneration and GS10 Movement and access we believe that they are unsound because there is no commitment that the required public transport, be that MRT or buses, will be delivered. The policies are totally dependent upon that delivery, which is not guaranteed. Our fear is that the housing development will be delivered but not the accompanying public transport services. That would lead to yet more car-based developments, like those that have been built in MK over the last few decades.

There should be denser development around transport hubs, especially around the three rail stations on the WCML at Wolverton, MK Central and Bletchley and around District Centres including Kingston and Westcroft. Also around Local Centres and main public transport corridors, especially MRT corridors.

Key infrastructure that will be used by sustainable travel modes, such as Redways for cyclists and spine roads for buses and MRT should be built at the beginning of the development, say, before 100th occupation, not at the end as has often been the case in recent developments. For example, EEA and Glebe Farm/Eagle Farm where the spine roads, used by bus services, did not open until the developments were almost complete and most residents had already moved in before any bus services could start operating.

GS10 Movement and access

This policy is unsound because it fails to ensure that movement will be sustainable. Movement and access should be a whole section of the Local Plan, not just a single policy. So much of planning depends upon transport networks and how people move around.

We welcome the publication of the Transport and Movement Topic Paper. However this is not a formal part of the Reg 19 plan and so carries little weight.

The draft LTP5 is still not available, despite many assurances that it would be available this autumn, ie before this City Plan consultation..

The draft LTP5 should have been published during the consultation period on this plan. However, at the end of the consultation period it still has not been published.

Many of the policies proposed here might be more appropriate for the LTP but because even a draft has not been published we cannot be certain that they will be in the LTP. We are therefore having to propose their inclusion in this plan to ensure that they are in a council policy document.

Movement

The way that we move around MK will change considerably over the plan period. The plan should include flexibility to incorporate new transport modes. These might include fixed systems such as light rail and flexible systems such as demand responsive transport. All new buses should be required to be powered by sources that are not fossil fuels. This might be electric buses, hydrogen or other non-fossil fuels which have zero carbon emissions.

We support the aspiration for a 'Mass Rapid Transit' network, but note that a 'Plan B' is needed in case of significant delay in construction, or should funding for it not materialise: what alternative measures will be implemented meanwhile to 'allow residents and visitors to move quickly and easily around the city without needing to drive their own car', given the currently limited provision of a regular bus service in

some areas? DRT (MK Connect) is not an adequately reliable alternative for certain journeys, such as travelling to work, school and hospital appointments.

We also support MKCC's 'greater focus on walking/cycling through our Local Cycling and Walking Infrastructure Plans', We welcome the publication of the LCWIP report. We support the focus on the old towns because they are the places most in need of improved cycling and walking facilities.

The background papers indicate that:

- The number of car movements throughout Milton Keynes is predicted to rise by 24% from the base (2019) year to 2050;
- The percentage of trips made by car (mode split) is predicted to rise throughout the Plan period to 2050;
- Public transport mode split is predicted to stay at a similar level throughout the Plan period, but active travel movements are predicted to fall.
- The delivery of the MRT is only anticipated to generate a 1.8% mode share of all trips, with a maximum of around 3,000 journeys made on the MRT in the AM and PM peak hours.
- The delivery of the MRT will increase vehicle congestion on and around the routes of the MRT as its delivery repurposes available carriageway, reducing the number of lanes available for car use.
- Increased congestion and delay is predicted throughout Milton Keynes in all scenarios tested.
- Vehicle journey times will increase throughout Milton Keynes in all scenarios tested. There are forecast to be significant increases in journey times on routes 4 and 5, which pass through CMK. -Route 4 experiences a journey time increase of between 32% and 37% in the AM and PM peaks, whilst Route 5 shows an increase between 35% and 57% in the AM and PM peaks.

These outcomes are not desirable and would not contribute to a reduction in carbon emissions from transport. So more policy initiatives are required.

Proposed policy initiatives

Speed limits

Grid road speed limits should be reduced from 60/70 mph to 40/50 mph or all 50mph to improve safety and reduce pollution and CO2 emissions and improve bus punctuality. Most estates and residential areas should have 20mph speed limits to improve safety. As well as improving road safety and reducing CO2 emissions it would encourage more journeys by walking and cycling.

Reducing grid road speed limits would also reduce grid road traffic noise, mostly from tyres on tarmac, in neighbouring residential areas. This has an impact on planning. Higher speeds means more noise, which means wider grid road corridors, which means less land available for housing.

15 minute neighbourhoods

This principle of 15 minute neighbourhoods should be included in the New City Plan. This ensures that most local facilities such as shops, schools, health centres, play and sports facilities, open spaces, etc are within a 15 minute walk of all houses. This cuts down on car use and makes places more liveable.

Car parking

Car parking in residential areas should be designed so that it can be repurposed when it is no longer needed for storing cars. If MK is to achieve the council's goal of carbon neutrality by 2030 and becoming the Greenest city in the world then its citizens will travel very differently to the way that people have travelled since the inception of the new town in 1967. People will own far fewer cars and so less space will be required to park them in, both "at home" and at work, shops, etc. The surplus car parking spaces should be designed so that they are capable of being turned into cycle storage, gardens, allotments, small parks or play areas or having more housing built on them.

Car parking in non-residential areas should be designed so that it can be repurposed when it is no longer needed for storing cars. This might be more employment buildings or leisure facilities.

Consideration should be given to introducing a Work Place Parking Levy in CMK and some other areas of MK. This would both act as a deterrent to car use and provide funds to implement more sustainable alternatives.

MRT and Buses

MRT routes in Reg18 Fig 1 are slightly different to those in SOBC. Need to clarify which is proposed.

MRT seems to have been reduced to fancy buses with a few bus lanes on some grid roads. This is disappointing but not surprising.

MRT has 5 arms. For efficient operation should go edge-CMK-opposite edge. That requires an even number of arms. Biggest omission is Kingston/Woburn Sands/SEMK corridor so that should probably be a 6th arm.

Also needs another arm to serve WEA and Stony Stratford or extend Wolverton arm to Stony Stratford (as in SOBC but not in Fig 1).

MRT is shown as running through middle of Midsummer Place. We welcome that. There is a legal agreement that electric vehicles (actually anything not powered by an ICE, so horse-drawn coach and bicycle rickshaw allowed too) can pass through Midsummer Place but no-one has tried to use it yet.

There seems to be some confusion about where MRT lanes will be on grid roads outside CMK. Some reports seem to imply that one side of dual carriageway will be used for MRT, one lane in each direction, and the other side for general traffic, one lane in each direction. However other reports imply that each side of dual carriageway

will have an MRT lane and a general traffic lane in the same direction. This needs to be clarified.

MRT is shown as crossing M1 on a continuation of H4 Danstead Way. This is what we advocated when it was being planned several years ago. However what was approved and appears to be under construction is a skew bridge about 600m to the south. If that is indeed the case then Fig 1 should be changed to reflect that.

Buses should stay on Midsummer Blvd between Saxon Gate and Grafton Gate, not be shifted onto Silbury and Avebury Blvd. Instead in order to reduce walking distances to bus stops consider relocating bus stops on Midsummer Blvd between Saxon gate and Grafton Gate so that there are 4 sets of stops instead of 2. (see CMK1)

Carbon

This section fails to take into account the changes that are necessary to reduce CO2 emissions in order to avoid catastrophic climate change. However, it is largely 'business as usual' rather than tackling the changes that are necessary.

There is little attempt to tackle road transport's increasing contribution towards climate change. A previous government chief scientist has described climate change as the biggest threat to our society. The Climate Change Act requires a reduction of CO2 emissions of 80% by 2050. To achieve that, a reduction of about 50% will be required by 2031. The transport section of the plan should have policies to reduce CO2 emissions from the transport sector by 50% over the plan period.

The Centre for Cities report, *Cities Outlook 2011*, ranked MK poorly, 53rd out of 64 cities, where the lowest was number 1 when comparing CO2 emissions per capita. The Campaign for Better Transport in its 2014 Car Dependency Scorecard ranked MK as the 27th most car dependent city out of the 29 cities it considered. If MK is to be a genuinely Sustainable Community, where all citizens have good access to facilities, the economy is not damaged by traffic congestion and the Global environment is not damaged by climate change and pollution, then we will need a much larger shift to sustainable transport modes.

There should also be more emphasis on facilities such as schools, health centres, shops, etc being provided locally so that people are more likely to walk or cycle to them rather than travelling the longer distances to more centralised facilities by car.

The design of housing estates should be more permeable for active travel modes with, for example, footpaths linking the closed ends of cul-de-sacs so that people can walk or cycle more directly to neighbouring streets, shops, schools, bus stops, etc., without having to make large detours from the "crow-flies" route.

There needs to be more emphasis in the plan on modal shift, both for existing residents and those in new developments. The report rightly notes that CMK has a large amount of low cost car parking, compared to other towns and that bus use in MK is lower than in comparable towns. What the report does not make clear is which is the cause and which the effect. We believe that the large amount of low cost car parking causes the low bus use. A previous consultant supported that view.

More than a decade ago in LTPTV1, Faber Maunsell said:

“Without measures to discourage car use, the public transport system would have to be of fantastic quality to persuade car users to leave their car at home.”

“Restraint on parking and other measures can bring the quality requirement to within more reasonable limits.”

There should be more incentives for car sharing in order to reduce the number of cars being driven in the peaks which causes congestion on the grid roads and high demand for car park spaces in CMK.

A car occupancy of just 1.1 (Transport Strategy Review, MKC, 2008) is an appalling waste of the scarce resources of both parking spaces and highway capacity. One bus can carry 44 passengers and requires 12m of lane space with a similar amount between vehicles. With an occupancy of just 1.1 44 people require 40 cars, each requires 5m of lane space with 10m between vehicles, requiring a total of 600m. So the bus needs just 24m of lane space but the cars to carry the same number of people need 600m of lane space, i.e., 600m of single carriageway or 300m of dual carriageway, 25 times as much as the bus. The bus does not require any parking space in CMK because it either passes through or waits just a few minutes before returning to its point of origin.

Bus use in MK has been declining slightly over recent years (this was evident even before Covid pandemic). It starts from a low base, typically a third of comparable cities. Bus use in MK needs to be at least doubled as a proportion of journeys.

Road congestion within MK has got much worse over the last decade. This is not just on the roads around CMK, there are many other locations with considerable congestion, for example around M1 J14, along and across both A421 and A422. This is leading to buses being delayed because they are stuck in the congestion.

Poor punctuality is cited by passengers as the worst aspect of the bus services in MK. Buses need to be given priority at junctions where they are currently delayed. This would make the bus services more reliable which would attract more passengers to use them. This might take the form of bus lanes, HOV lanes, bus gates, smart traffic lights triggered by buses, etc.

As noted above, the speed limit on grid roads should be reduced to 50 mph. As well as improving road safety and reducing CO2 emissions it would make it easier for buses to pull out of bus stop lay-bys - much easier for a bus to join a stream of traffic travelling at 50mph than one travelling at 70mph - and easier for buses to cross traffic when turning into or out of estates.

MK is not a 9 to 5 city. Buses also need to operate longer hours to suit the varied work and leisure times of residents.

Key locations in MK should have high quality bus interchanges. Currently only Station Square, Coachway and Bletchley satisfy this criterion. The following key locations should be upgraded to high quality bus interchanges: The Point/CMK, Hospital,

Westcroft, Kingston, Wolverton, Stadium:mk/MK1, Newport Pagnell. This may require more land being made available for the bus interchanges.

Add "ensure provision of public transport services to the sites throughout their period of use, i.e., not just while being developed."

Add "However the high speed grid roads encourage car use and increase emissions. The high speeds make it difficult and dangerous for vehicles turning into and out of estate roads. The high speeds also make it difficult for buses to exit the bus stop lay-bys because they have to join a 70mph stream of traffic from a standing start. To improve road safety and public transport grids road speed limits should be reduced to 50 mph."

Add "there should be more priority for buses and multiple occupant cars on the grid road network by creating more bus/MOV lanes"

There should be policies for E-bikes, e-scooters, hired/private, robot delivery vehicles (Starship).

Basically Encourage, but with Facilities for parking these out of way of pedestrians

Home Deliveries for food and smaller packages should be encouraged to be made by Starship robots/ Cargo bikes, etc., rather than diesel vans.

Shift to EVs should be encouraged, with Charging points in new developments.

Consolidation depots near CMK and other centres for local delivery by Cargo bikes, electric vans, Starship robots, etc.

Unload small parcels at MKC or Bletchley stations for local deliveries to shops, offices, homes, etc.

East West Rail

We fully support the re-instatement of the rail line between Cambridge and Oxford via MK (EWRL).

The largest town in the corridor is MK, considerably larger than Cambridge and Oxford. This intermediate town is where most of the housing growth and jobs growth will be in the future. Consequently the rail line should serve the centre of this intermediate town, from both the east and the west, as well as link Cambridge and Oxford.

We are concerned about the delays to EWRL. The western section, Oxford to MKC, was scheduled to be completed and operational in December 2017. This has slipped considerably and was scheduled to be open sometime before December 2025. This date has passed and there is no service due a dispute between the government and trade unions about staffing of the trains. The Central section, MK to Cambridge, was scheduled to be complete in CP6 (2019-2024) but the latest forecasts are for some unspecified time around 2035.

Trains from the Cambridge direction should be able to reach MK Central station. Currently this can only be done by a reversal at Bletchley platform 5. The new high level platforms should also have the ability to reverse trains so that they can travel between MK Central and Bedford/Cambridge. This should also be possible by a reversal at Bletchley platform 6. This only requires a few extra points and signals.

In the longer term there should be a direct route that does not involve trains reversing. This might be by constructing a North facing chord from Fenny Stratford to the flyover line. This would involve the demolition of some industrial units on James Way.

Network Rail (NR) published its West Coast South Strategic Advice (WCSSA) report last year. This calls for extra infrastructure between Bletchley and Milton Keynes Central (MKC) to enable more East West Rail (EWR) services, from both Oxford and Cambridge, to reach MKC. The report looks at how to make use of capacity on the West Coast Main Line (WCML) released when some fast trains between London and Birmingham and Manchester transfer to HS2.

The key part of the proposal is extending some EWR services from Cambridge, Bedford and some Marston Vale stations to MK Central. This could be via reversal in Bletchley station or a new east to north chord at Bletchley. The Local plan should allocate land that may be required for an extra 2 tracks on the East side of WCML from Denbigh Hall South Jn (where the Flyover lines join the Slow lines just before crossing over Watling St) to MKC station, about 3 km, and 2 extra platforms at MKC with connection to the slow lines at the north end of the station and a east to north chord at Bletchley, as recommended in WCSSA report.

Universal

This proposed Theme Park just outside MKCC boundary will have an impact on MK, particularly with regard to travel patterns. It should be served by direct trains from MK Central.

Active Travel

There should be more commitment to Active Travel and provision for it. Active Travel England in its Local Authority Active Travel Capability Ratings 2024 recently ranked councils on their commitment to Active Travel. With rankings from level 0, no commitment, to level 4, excellent provision. MKCC is ranked "Level 1: Some local leadership and support with developing plans and isolated interventions." This needs to be improved and requires more commitment to Active Travel facilities in the Local Plan.

<https://assets.publishing.service.gov.uk/media/66d959112bc43c72b08264a0/local-authority-active-travel-capability-ratings-2024.pdf>

We also support MKCC's 'greater focus on walking/cycling through our Local Cycling and Walking Infrastructure Plans', We welcome the publication of the LCWIP report. We support the focus on the old towns because they are the places most in need of improved cycling and walking facilities.

However, where we do take issue is with the delivery and funding. There is a long list of 300 schemes of which the top 100 are shown in table 5.2 of LCWIP. this is whittled

down to a short list of 28 in Table 7.1. but of those just one scheme is to be delivered in the first year and just 4 in the following 2 years. At that rate it would take 150 years to deliver all 300 schemes. Years 4-10 have another 23 schemes - at that delivery rate it would still take 100 years to deliver them all.

So the council really needs to speed up the delivery rate. It should be doing at least 5 schemes per year but preferably 10.

There should be grade separated Redway crossings every 500m or less on grid roads and other major roads.

Permeability

More journeys must be made by walking and cycling. This should be encouraged by providing better facilities for those modes.

There must be permeability for pedestrians and cyclists so that they can use the shortest possible route rather than having to make long detours. It was there many decades ago in the design of, for example, West Bletchley and Lakes Estate, but not in more recent developments of last 30 years, eg Monkston and Middleton.

The design of housing estates should be more permeable for pedestrians and cyclists with, for example, footpaths linking the closed ends of cul de sacs so that people can walk or cycle more directly without having to make large detours from the "crow-flies" route.

There should also be frequent pedestrian/cycle links from the streets within a grid square to the Redways alongside the surrounding grid roads and the bus stops on the grid roads.

GS14 Eastern Strategic City Extension

The inclusion of this site is unsound. Remove this site, retain as countryside and farmland. See below and comment under GS1 for reasons.

the Eastern Strategic City Extension (ESCE) around Moulsoe could come forward before the sites between it and urban MK have been developed. This would make it extremely difficult for the site to be served by sustainable transport. It is too far from CMK for active travel modes to be used by all but the most committed cyclists, with the added complication of hills and very few safe crossing places of the M1. So it would be dependant upon cars and public transport. But it is not near any rail line so public transport would have to be bus or MRT. Serving such an isolated development by bus or MRT would not be viable.

The Transport and Movement Topic Paper, but not the plan itself, only suggests that it might be served by the emerging MK Metro MRT service. There is no firm commitment that MK Metro will happen or that it will serve ESCE. MKCC has a poor record of delivering public transport projects and services.

What is likely to be provided is a slow and token service that would be unattractive and so used by few people. That would mean that the development would be mainly car-based. That would be unsustainable and incompatible with climate change policies of both the government and MKCC. It would be contrary to the key objective of the plan to reduce cumulative carbon emissions from growth and create new communities that are resilient to a changing climate. It is thus unsound.

It won't be sustainable because too far from CMK and severed from CMK by M1. Too far for active travel, eg cycling, and no guarantee that there would be frequent fast public transport.

It would completely surround Moulsoe village. It would almost coalesce Cranfield with MK, just one field separating them.

CMK1 Central Milton Keynes Placemaking Principles

This policy is unsound because it fails to prioritise access to the station by sustainable travel modes. It should include dedicated parking areas for hire bikes, e-bikes and e-scooters. MRT and buses must have priority over private cars and not be held up by them.

CMK2/CMK3 Central Milton Keynes Development Framework Area

CMK2 A1 is unsound because it fails to specify that the Metro should also serve Station Square. Solution: include Station Square in the policy.

Station Square

CMK2 E2 is unsound because it fails to specify that Station Square should be mainly for transport purposes, and with priority for public transport and active travel modes. The CMK Development Framework indicates 2 potential buildings within Station Square. These should be deleted.

“Supporting improvements to Station Square to enhance this gateway into Central Milton Keynes as a place of arrival” is weak and needs to be strengthened.

CEA1

The Plan is unsound and inconsistent because it fails to include targets and dates for carbon emission reductions from Milton Keynes as a whole. Without targets and dates there is no way to measure the success or failure of the Plan. The solution is to include targets and dates for carbon emission reductions in the Plan.

Plan has targets for rates of housebuilding even though that is not entirely within the council's control. Likewise it should have targets for carbon emissions reductions even

though that is not entirely within the council's control. Failing to do so would be inconsistent.

The New City Plan should include interim carbon reduction targets. These might be annual or bi-annual targets for carbon reduction in each sector so that progress can be monitored.

The target should be to reduce all CO2 emissions from MK to net zero by 2030, not just those from MKCC activities which represent less than 2% of emissions from MK.

Many residents were motivated by the Council's commitment in 2019 to reduction of 'carbon' emissions and were discouraged to find that this did not cover the much wider requirements to reduce emissions from all vehicles in the City and emissions related to the much wider impacts from heating and use of power in all buildings, for which the MK City Plan should be seen as a main driver.

The plan should encourage and support local community energy schemes. This should include criteria to enable siting of energy storage and distribution systems, in parallel with local energy generation schemes.

Although the need to reduce net greenhouse gas emissions is addressed, there is no specific mention in this list of the need to plan for mitigation of the effects of extreme weather events (heat-waves, droughts, storms, heavy rainfalls, etc.) such as are predicted to become increasingly frequent and intense with global climate warming – unless this is covered in the vague reference to "bounce-back' from environmental challenges 'in objective 5.

Decide first what measures are needed to prepare for the environmental challenges that MK communities are likely to face over the next few decades and then procure whatever funding is needed to do the job, by all available means (including progressive 'taxation 'via Council charging, as needed), rather than being constrained by an arbitrary priority of 'available funding'. The eventual cost of not acting will far outweigh that of taking appropriate action now.

In 2019 MKCC made a Declaration of a Climate Emergency and since then has developed a wide range of proposals for reducing our carbon footprint and promoting a healthier local environment, both for people and for wildlife. Hence we naturally endorse MKCC's 'Green City 'aspirations but they need to go much further.

The plan should include all of the 12 policies in TCPA's Healthy Homes Principles <https://www.tcpa.org.uk/resources/healthy-homes-principles/>

Some of these would be in Healthy Homes section and some in Climate and environmental action section.

The plan should also incorporate many of the objectives and policies in Bristol City Council's Climate Change Strategy. Although Bristol is not the same as MK it has a population similar to that which MKCC aspires to for Greater MK (ie MKCC area plus the bolt-ons from neighbouring LAs) by 2050.

<https://www.bristol.gov.uk/council/policies-plans-and-strategies/our-action-on-climate-and-ecology/mission-net-zero>

CEA3 Resilient Design

Climate Adaptation

This policy is unsound because it does not cover the issue of Climate Adaptation. It should do so. And this should cover not just adaptation to the 1.3 deg global temp rise that we have seen so far but should include adaptation to higher temp increases, 2 or 3 deg, which seem likely to occur over the next few decades unless there are major reductions in global CO2 emissions in the immediate future.

This will include, for example, policies for cooling dwellings as well as heating them and infrastructure that can tolerate more extreme weather events of heat, cold, rainfall, drought and storms. The adoption of Passivhaus standards for dwelling would help with this.

CEA4 Retrofitting

This policy is unsound because it does not cover the issue of Climate Adaptation (see CEA 3 above). It should do so.

CEA5 Water Efficiency

This policy is unsound because there are already water shortages in the SE, with chalk streams drying up, aquifers and reservoirs dangerously low. More large scale development should not go ahead until these issues have been sorted out and any development should ensure that it does not impose increased demands on the very limited water supplies.

The policy should stipulate that credible and funded means of closing this gap must be in place before large-scale developments proceed, including requirements for much enhanced water conservation measures on all new developments.

CEA6 Low and Zero Carbon Energy Provision

This policy is unsound because it does not cover the issue of Data centres. Data centres consume large amounts of energy and require water to cool them. The waste heat from these could be used to heat homes, offices, swimming pools, etc as part of energy networks. The Plan should include Data centres in this policy.

The City Centre has a seriously neglected combined heat and power (CHP) network which supplies locally generated heat and electricity to significant buildings such as The Quadrant, occupied by Network Rail. This holds a key to local energy generation for CMK. The City Council must avoid this becoming a wasted asset and enable its rejuvenation, by installation of 21st century power sources and a programme of CMK-wide development of this as a rejuvenated heating and cooling network producing locally generated electricity.

The capability of this as a CMK-wide energy network service requires a policy to extend the network by protecting its existing and potential routes throughout the CMK underpass system, alongside other measures to enhance at-grade crossings of CMK boulevards and other roads for walkers and riders. The underpass network can enable lower-cost extensions to this CHP network.

CEA7 Mitigating wider environmental pollution

This policy is unsound because it does not specify any measurable criteria for limiting light pollution.

Needs stronger measures on the issue of light pollution, the deleterious effects of which on both people and wildlife have become better understood in recent years (see, for example, < <https://www.darksky.org/light-pollution/wildlife/> >; < <https://www.rhs.org.uk/wildlife/garden-lighting-effects-on-wildlife> >). Recent 'citizen-science' records collated by CPRE (< <https://www.nightblight.cpre.org.uk/> >), for example, show the night sky of MK to be severely light-polluted.

We suggest that the success of MK City Councils' programme of Redway lighting upgrade and use of night-time streetlight dimming needs to be followed by setting criteria-based planning standards to limit glare from outdoor lighting installations.

Milton Keynes lacks the kinds of criteria-based noise policies appropriate for dense urban areas city, which will become increasingly important as more intensive development takes place. We suggest that Westminster City Council's policies can provide a useful basis for some appropriate planning policies for Milton Keynes, as from their Noise Technical Guidance Note 2020:

https://www.westminster.gov.uk/sites/default/files/ev_env_005_v2_noise_technical_standards_wcc_september_2020.pdf

https://eburybridge.org/assets/Documents/Planning-Proposals/Volume-3-ES-/58e5d5f4c3/EBR-13_Appendix-K_Noise.pdf

CEA8 Provision and protecting of accessible open space

This policy is unsound because it does not mention the benefits towards the conservation of significant habitats and species provided by open spaces.

We suggest that part of para 308 should be re-worded to explain that: "Open spaces may provide benefits towards the conservation of significant habitats and species, as well as contributing to protection of landscapes, surface water management, and sequestration of carbon dioxide in trees, permanent pastures and their soil".

The second part of Para 308 is an important statement of intent. The heading above para 207 ("Providing and protecting our valued green spaces") WHAT DOES THIS MEAN because it implies a conditional commitment, depending on whether particular

open spaces are “valued” or not. It needs to make clear which open spaces are valued. If any are not valued, the criteria on which this is based must be made clear.

We suggest “**providing active travel networks that connect to open spaces**” rather than “integrating with active travel routes and recreation routes” which suggests that parklands and open spaces should be bisected by more Redways.

CEA9 Biodiversity and Habitats Network

This policy is unsound because it does not adequately address the biodiversity crisis.

Much more is required on Biodiversity. There is more to it than just biodiversity net-gain. We already have a biodiversity crisis, with many species endangered or lost. The New City Plan should address this and include policies to improve biodiversity.

We suggest that “*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. The main, nationally recognised designation is Local Wildlife Sites (LWS) of which there are over 20 in Milton Keynes. These are decided through an expert ecology committee set up by the Bucks & MK Natural Environment Partnership through the Bucks & MK Environmental Records Centre, supported by Buckinghamshire Council and MK Council, and using objective ecological data.

The Buckinghamshire Council website says: “*Biological Notification Sites, a previous and similar designation of locally important wildlife sites, are reviewed and assessed by Local Wildlife Site Officers to see if they are of reasonable quality to meet the LWS wildlife site criteria.*” In effect Biological Notification Sites (BNS) are sites awaiting full assessment, in prospect of becoming Local Wildlife Sites with provisional acceptance of that potential future status. This should be made clear in Policy CEA9 and its supporting text.

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. The only one in Milton Keynes local authority area is the Blue Lagoon. Although no other site in MK has this designation there are other sites known as and managed as nature reserves. Most County Wildlife Trusts and other such bodies such as the RSPB and Plantlife have their own nature reserves. In MK, the BBOWT wildlife trust own and manage Little Linford Wood as a nature reserve, but it is not a designated Local Nature Reserve. The Parks Trust manages six local nature reserves: these are at Elfield Park, Stony Stratford, Floodplain Forest (Old Wolverton), Linford Lakes Nature Reserve, Pineham, and Walton Lake. Some, but not all of these are designated by the Bucks & MK Natural Environment Partnership as Local Wildlife Sites.

There have been two recent examples in Milton Keynes of known Priority Habitat Lowland Meadow sites which have been included in Planning Consents for part of their area to be built on: one at Caldecotte South, another at MK East to the west of the River Ouzel.

These are not habitats that should have been given consent. Biodiversity Net-Gain is unlikely to enable them to be replicated. We therefore suggest that Priority Habitats in Milton Keynes should be shown on the Policies Map to alert developers to so that they avoid including them in any proposals for development.

Footnote 10 refers to “MK Wildlife Sites” which appear to be the same thing as Biological Notification Sites, which are potential Local Wildlife Sites (LWS) awaiting assessment, or that term is being used instead of Local Wildlife Site. We 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.

CEA10 Protection and enhancement of environmental infrastructure network,

This policy is unsound because it allows too many exceptions which will be exploited by developers. We are concerned about the get-out clauses in B, C and D. We fear they will be seen as an invitation by developers. Either remove them or make them more onerous for developers.

CEA11 Urban greening, trees and woodland

This policy is unsound because it does not provide adequate protection for existing trees and hedges. All mature trees should be retained and protected. Most existing hedges should be retained and joined together with new planting to act as wildlife corridors.

	<p>Milton Keynes City Plan 2050 Proposed Submission Stage Representation Form</p>	<p>Ref: (For official use only)</p>
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Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at ncp.engagement@milton-keynes.gov.uk

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*	2. Agent’s Details (if applicable)		
<p><i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i></p>			
Title	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">Mr</td> <td style="width: 70%;"></td> </tr> </table>	Mr	
Mr			
First Name	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">Alan</td> <td style="width: 70%;"></td> </tr> </table>	Alan	
Alan			
Last Name	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">Francis</td> <td style="width: 70%;"></td> </tr> </table>	Francis	
Francis			
Job Title	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">Policy Officer</td> <td style="width: 70%;"></td> </tr> </table>	Policy Officer	
Policy Officer			
(where relevant)			
Organisation	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">MK Green Party</td> <td style="width: 70%;"></td> </tr> </table>	MK Green Party	
MK Green Party			
(where relevant)			

E-mail Address		<input type="text"/>
Address Line 1		<input type="text"/>
Line 2		<input type="text"/>
Line 3		<input type="text"/>
Line 4		<input type="text"/>
Post Code		<input type="text"/>
Telephone Number		<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: MK Green Party

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="Multiple"/>	Policy	<input type="text" value="Multiple"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to co-operate	Yes		No	
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5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached doc

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached doc

(Continue on a separate sheet /expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I wish to speak in the discussion of policies GS1, GS2, GS10, GS14, CEA1-11
To present our case to the Inspector and participate in the debate at the hearing.

***Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

Representations cannot be treated as confidential and will be published on our website alongside your name. *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*

