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19 December 2025

Sent via email to: ncp.engagement@milton-keynes.co.uk

Dear Sir/Madam,

MK CITY PLAN 2050 – PROPOSED SUBMISSION (REGULATION 19) REPRESENTATIONS

On behalf of Urban Splash Glenbrook, we submit representations to the Proposed Submission version of the MK City Plan 2050 in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Urban Splash and Glenbrook are joint venture development partners with Milton Keynes Development Partnership (MKDP) for Campbell Park Northside, a strategically important mixed-use site within Central Milton Keynes (CMK). These representations focus on the soundness of policies that directly affect the site, having regard to the National Planning Policy Framework (NPPF).

Policy CMK1 – Central Milton Keynes Development Framework Area

We support the overall approach to Policy CMK1, including the vision for Central Milton Keynes and the proposed mix of uses. We agree that the Parkside Quarter will be a residential-led area delivering a range of housing types and tenures.

However, the policy and accompanying Figure 7 should be updated to reflect the proposed new local centre at Campbell Park Northside. In addition, while Figure 7 is acknowledged to be indicative, the form illustrated for Phase 1 should more closely align with the proposals currently submitted to the Council for determination. These proposals are informed by a detailed understanding of site constraints, opportunities and topography, and provide a more accurate representation of deliverable development.

Policy CMK2 – Central Milton Keynes Placemaking Principles

Car Parking

Policy CMK2(B) appropriately recognises the need to manage parking levels to support a vibrant city centre. However, the policy would benefit from stronger support for reduced parking provision in the most accessible parts of CMK.

The NPPF is clear that development in locations with good access to public transport, services and employment should prioritise sustainable travel choices and make efficient use of land. Continued emphasis on re-provision and





management of parking risks reinforcing car dependency in locations where reduced parking is both realistic and desirable.

Suggested amendment in principle:

Policy CMK2 should explicitly support lower parking ratios, including car-free or car-lite development, in highly accessible parts of CMK where justified by public transport accessibility, walkability and proximity to services.

Active ground floor uses on Gates as well as Boulevards

Policy CMK2(D) prioritises active ground floor frontages along Boulevards while seeking to avoid or minimise inactive frontages along other routes, including Gates. While this distinction is understood, the policy is currently overly restrictive.

In practice, Gates function as key movement corridors and gateways into CMK and adjoining neighbourhoods. In appropriate locations, particularly where Gates interface with higher-density development or public transport routes, active ground floor uses can make an important contribution to placemaking, legibility, safety and vitality.

A more flexible approach would better align with:

- the NPPF's emphasis on active street frontages, mixed uses and safe, inclusive environments; and
- the delivery of viable higher-density development.

Suggested amendment in principle:

Policy CMK2(D) should allow and support active ground floor uses on Gates where appropriate, rather than seeking to avoid them as a default position.

Residential density at Campbell Park Northside

The draft policy proposes a density of around 135 dwellings per hectare (dph) for the Parkside Quarter, including Campbell Park Northside. This represents a significant reduction from the established 100–200 dph range set out in the CMK Alliance Plan and the Campbell Park Northside Development Brief.

This reduction is not supported by national policy or the site-specific evidence base. Campbell Park Northside:

- is located within Central Milton Keynes, close to the city core;
- benefits from excellent access to services, employment, public transport and open space; and
- has been subject to extensive masterplanning and design work demonstrating that densities within the 100–200 dph range are achievable, appropriate and deliverable.



The NPPF strongly supports higher-density development in accessible city centre locations to make efficient use of land and support sustainable growth patterns. A blanket reduction to 135 dph risks under-utilising this strategically important site.

Suggested amendment in principle:

Policy CMK2(F)(4)(b) should retain the established up to 200 dph density range for Campbell Park Northside, allowing flexibility within that range to respond to context, design quality and delivery considerations.

Policy CMK3 – Central Milton Keynes Skyline and Tall Buildings Strategy

We welcome the introduction of Policy CMK3 and the revised drafting of CMK Tall Building Policy, which represents a clear improvement on previous iterations. In particular, we support the more nuanced, design-led approach to skyline formation.

At Campbell Park Northside, Urban Splash Glenbrook and the wider consultant team have engaged constructively with design review processes, including a DSE review. This has supported a strategy of varied building heights up to nine stories to mark gateways, key routes and important locations within the masterplan.

However, we remain concerned that the proposed maximum height of eight storeys on park-side locations, including Campbell Park Northside, is overly restrictive. The site is highly accessible, centrally located and was originally conceived as capable of accommodating greater height. This position has been reinforced through extensive design work and stakeholder engagement.

The eight-storey cap is therefore inconsistent with:

- the proposed masterplan strategy;
- detailed design analysis already undertaken; and
- evidence emerging through live planning applications.

Requested modification:

Increase the maximum height parameter for Campbell Park Northside to allow buildings of up to nine storeys in appropriate and well-justified locations. Above nine storeys can be supported through a robust design review.

Policy HQH1 – Healthy Homes

Requiring developments of 100 dwellings or more (excluding flatted schemes) to provide a minimum of 5% serviced plots for custom or self-build places a disproportionate burden on medium-sized sites. Such schemes rely on tightly managed phasing, construction and cashflow models. Introducing serviced plots risks fragmenting delivery, delaying build-out and undermining viability.

Sites of this scale are poorly suited to accommodating the additional costs and risks associated with servicing, marketing and managing individual plots and coordinating multiple build programmes.





Custom and self-build provision is far more appropriately delivered on large or strategic sites where it can be planned as an integral part of the masterplan.

Requested modification:

Amend Policy HQH1 so that serviced plot requirements apply only to large or strategic sites (for example, schemes delivering 500 dwellings or more).

Policy HQH2 – Affordable Homes

We support Part B of the policy, which allows for a financial contribution in lieu of on-site affordable housing for Build to Rent schemes, subject to viability and review mechanisms. This reflects the distinct delivery model for Build to Rent and aligns with national policy and best practice.

However, Part C of the policy is not sufficiently positively worded and risks discouraging higher levels of affordable housing delivery.

In particular, proposals delivering more than 50% affordable housing are treated as exceptional, requiring additional justification even where they form part of a larger mixed-tenure community.

Policy HQH2 should explicitly recognise the role of 100% affordable housing phases within larger, multi-phased mixed-use developments, such as Campbell Park Northside, particularly where supported and funded by Registered Providers.

Requested clarification:

Amend Policy HQH2 to explicitly support proposals delivering up to 100% affordable housing where:

- *they form part of a comprehensive or multi-phased development delivering a mixed and sustainable community overall; and*
- *they are consistent with an approved masterplan or design code.*

Conclusion

Urban Splash Glenbrook supports the overall vision of the MK City Plan 2050. However, as currently drafted, several policies affecting Campbell Park Northside are unsound, particularly in relation to positive preparation, justification, effectiveness and consistency with national policy.

The modifications sought are necessary to ensure the Plan provides a flexible, deliverable and policy-compliant framework for Central Milton Keynes and for the successful delivery of Campbell Park Northside.

Yours faithfully





Andrew Johnston

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