

16 February 2026
MKC Reg 19 Response_Hayfield Consortium_17.12.25



Development Plans Team
Milton Keynes City Council
Civic Offices
1 Saxon Gate East
Milton Keynes
MK9 3EJ

By email only to
ncp.engagement@milton-keynes.gov.uk

Dear Sir/Madam

**MK City Plan 2050
Regulation 19 Draft Plan for Consultation
Response on Behalf of the Hayfield Consortium**

Savills is instructed by the Hayfield Consortium, which controls land at the Aspley Guise Triangle, to submit representations to the Milton Keynes City Council on the above consultation. The Consortium comprises Taylor Wimpey, Martin Grant Homes, Miller Homes Ltd and Harcourt (UK) Developments Ltd and has under its combined control the land shown on the attached plan (ref SEMK 7).

The Consortium has been promoting the wider Aspley Guise Triangle site for development for a number of years and was most recently included in the 2022 call for sites submission for Milton Keynes. The Aspley Guise Triangle site has previously been considered for development by Central Bedfordshire Council (CBC) but currently remains unallocated for development. Recent announcements from East West Rail (EWR) in December 2025, show there is now a favoured proposal to establish a new station at Aspley Guise, which will reinforce the sustainability of the location for future development.

The structure of these Regulation 19 comments is as follows: -

- Emerging Planning Policy
- Other considerations
- Conclusions

Emerging Planning Policy

The MK Plan 2050 is submitted in response to the Regulation 19 stage of consultation which proposes a plan period of 2022-2050. This period allows for long-term strategic planning in-line with the NPPF objectives set out in para 22 of the NPPF (December 2024) which states that strategic development should be planned for over a 30-year period. Given that the plan proposes a number sites of over 1,000 homes and that they range in size up to 7,750 at the Eastern Strategic City Extension (SCE) they can be considered strategic developments. The Consortium consider this to be an appropriate length of time given the scope of the plan.

Proposals are for delivery of 59,779 homes, against a need of 50,372 in the period up to 2050. This is welcome and the Consortium recognise the figures exceed the Standard Method, which is the minimum level required as set out by guidance from MHCLG¹.

Development is proposed to be largely directed to the east and south of the city with some more limited development to the west. The Consortium supports development to the east onto land which adjoins Central

¹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>



Bedfordshire. This land was identified in the Futures 2050² work as a sustainable location of future growth of the city.

Policy GS1 Our spatial strategy

This policy seeks to direct development across the two different geographies in the MK authority. Firstly and primarily within the settlement boundaries of Milton Keynes, then secondly to Olney and the villages beyond the city boundary to meet local needs of these smaller settlements.

Milton Keynes is a key economic growth area that is located centrally between the two important economic areas of Oxford and Cambridge, the economy was worth £16bn in 2022 and is one of the UK's Fast Growth Cities. Sites in or around Milton Keynes are the most sustainable in the authority area and the Consortium agree that they should take precedence in the spatial strategy.

A diversity of sites is needed to balance the strategy with different types of sites meeting the differing needs of current and future residents of the borough. Sites on the urban periphery are able to deliver more affordable housing and other benefits such as onsite BNG and open space (see below).

Policy GS2 Strategy for homes

Policy GS2 sets out the level of proposed housing and the strategy for allocation of those homes.

The Consortium supports the housing delivery of 59,779 to 2050, including the East of Wavendon allocation, which adjoins the boundary with CBC, and the Aspley Guise Triangle site. It is noted that the higher than need figure is largely driven by the objective to deliver a greater amount of affordable housing in the authority. This is also driving the high figure of 40% of affordable housing noted in most of the strategic extensions.

The viability report accompanying the consultation is clear that green field sites are best placed to supply higher levels of affordable housing, and that urban and brownfield are less likely to do so – reflected in the proposed lower levels of 10-20% in these areas (as set out in Policy HQH2). The Consortium supports development of these edge of urban green field sites in order to deliver the levels of identified need in the city, including the affordable housing need.

Policy GS4 Strategy for People Friendly and Healthy Places

The policy sets out the framework for the expected maximum catchment distances that the majority of new homes will be expected to fall within.

The proposed text and supporting table of distances (Table 3) provides clear guidance on the required catchment distances. The Consortium supports the guidance given the clarity it provides, but this should be dependent on detailed design decisions as indicated by paragraph 49 of the supporting text. Consideration should also be made for cross boundary services, and these should explicitly qualify within the catchment table.

We suggest that a phrase such as '*any deviation from these standards must be evidence based*' will help with justification when the guidance is not met.

Policy GS9 Supporting transit-oriented development and estate regeneration

This policy is clear and justified in the main. There is flexibility built into the text to allow for the right infrastructure to come forwards in various ways which can aid delivery. The evidence base in the Milton Keynes Infrastructure Study and Strategy (MKISS) suggests that connections through to the A421 and an extension of H10 through to Junction 13 of the M1 would be required to accommodate the estimated level of traffic generated by planned

²www.milton-keynes.gov.uk/sites/default/files/2025-02/Strategy%20for%202050%20FULL%20VERSION%20-%20Jan%202025_LR.pdf pp27, figure 3

growth to the east of the city. This requires cross-boundary liaison with CBC to deliver infrastructure efficiently and in a timely way to support the expansion of the city to 2050. The restriction delaying development before 2038 on the East of Wavendon SCE (as outlined in Policy GS15) will delay the planning and delivery of the essential infrastructure required – especially those which straddle the boundary with CBC including EWR and the H10 extension.

The Consortium believes that providing local facilities and services can minimise external trips, reducing the carbon footprint of neighbourhoods whilst maximising health outcomes. Carbon emissions can further be reduced by good access to public transport methods - minimising vehicular trips and carbon generation in accordance with the other draft policies in the plan.

Policy GS10 Movement and Access

The policy no longer makes direct reference to supporting future development of a Mass Rapid Transit (MRT) network, as it did in the earlier Regulation 18 draft of the local plan. It is not clear how the MK grid road system can accommodate the planned level of growth without significant investment in public transport, including the MRT. The Consortium supports the development of an MRT system and questions whether the plan has been positively prepared by not effectively planning for this eventuality in the detailed way that the previous version of the policy included.

Elsewhere, the wording of the policy prioritises walking and cycling connections, and reduces the emphasis on road networks, from the previous versions of the draft text at Regulation 18. The Consortium supports these changes to better target active travel.

Grid roads and redways are important for public transport and active travel respectively. The Consortium believes that a joined-up approach across allocations and across authority boundaries is necessary. Particularly the East of Wavendon allocation where development in CBC is essential to achieve completion of H10 and connections with the new station proposed at Aspley Guise.

The Consortium requests a more co-ordinated approach with EWR to ensure planned development is integrated with EWR both in the MK authority and into adjoining authorities.

Policy GS11 Principles for Extensions to the City

Policy GS11 seeks to ensure that development is sustainable and accords with key principles set out in the local plan.

The Consortium endorses having a set of cross-boundary principles as a sensible and forward-thinking approach, especially as the City proposes development in the south east and west of the authority that will take the urban edge of the City right up to the authority boundary. This will ensure co-ordination of infrastructure across adjacent authorities, minimising costs and maximising benefits over the plan period and beyond. A clear set of principles will enable better and more integrated developments in these areas. Co-operation with neighbouring authorities such as CBC should be proactive and meaningful. For the land East of Wavendon, this is an area that both Councils have considered for development in draft local plans, and therefore an area where both Council's should work together to deliver development.

The importance of coordinated cross-boundary work cannot be overstated.

Policy GS15 East of Wavendon Strategic City Extension

The new draft allocation for the East of Wavendon site under GS15, is an amalgamation of several sites to the east of the Lower End Road and includes the land adjoining the Consortium's land control in CBC. The East of Wavendon SCE draft text suggests that around 2,250 units could be accommodated on the land within the proposed allocation. This is down from 3,000 units in the Regulation 18 draft text and it is not clear whether the new total makes best use of land and would be a viable level of development.

There is a restriction imposed by the policy text that residential development will not be accepted to start before 2038 on this allocation. There is no evidence-based reason to delay delivery in this location, not least because it will deliver key infrastructure (such as the extension of H10) as well as linking with the proposed new station at Aspley Guise.

The Consortium believes that earlier delivery of an access from the A421 in CBC could aid delivery ahead of the completion of SEMK and that this is an unreasonable restriction imposed on future sustainable development.

This Aspley Guise Triangle site has been consistently recognised as both sustainable and deliverable in assessments over the last 15 years and recent development to the north at Eagle Farm has only made it more so. The 2038 date is not evidenced and is imposed only because there is an assumption that SEMK needs to come forwards and be largely built out before this site can be.

The 2038 restriction, far from making development in the east of the city more workable, would very likely make it far less likely for the development and infrastructure needed to come forwards in a timely fashion. Developing East of Wavendon and SEMK together will make the delivery of the grid road extension of H10 much more credible, whilst also supporting the delivery of EWR and the re-location of the Ridgmont Station in the area.

The Consortium objects to the policy text as drafted, and that it should be updated to remove the 2038 date as it simply acts as an unreasonable restriction on development of south eastern MK in the plan period. The Consortium welcomes that the draft policy recognises that a future layout should take account of the development of land in the adjacent Central Bedfordshire authority.

Policy CMK1 Central Milton Keynes Development Framework Area

The policy sets out the framework for the development of 16,000 new homes in the centre of MK.

Central Milton Keynes (CMK), is a sustainable location and an appropriate location for high rise development. However, there is uncertainty over the provision of as many as 16,000 new homes in the plan period in CMK. The viability report concludes that the level of development proposed in CMK still would not provide for a level of affordable housing that matches the rest of the authority area (10% vs 40% elsewhere). It is not clear how achievable this level of housing delivery is over the plan period without significant changes in the market for apartments in the central area.

If 16,000 homes cannot be delivered in CMK, then further land should be considered elsewhere to deliver the level of need identified by the Council.

Policy PFHP5 Designing People Friendly Places

The proposed policy text makes reference to both area-based and site-specific design codes. The Consortium would agree on this approach, as area-wide design codes can be used to guide large or strategic scale development whereas a site-specific design codes can be more targeted and better aids delivery. In combination the two can deliver development at different spatial scales.

The Consortium has consistently requested over a 20-year period that a framework is agreed cross-boundary for development at the Aspley Guise Triangle. This would facilitate a joined up and integrated scheme which will better respond to the future residents and their needs.

Policy PFHP6 Designing Healthy Streets

The proposed text is very prescriptive and could prove to be divisive for some schemes – especially if significant constraints dictate the layout of built development. This level of prescription can also lead to developments which are indistinguishable from one another. We suggest that the first sentence is re-drafted to say: -

'Development proposals will be permitted if they follow the guiding principles unless there is evidence available to justify departure from the prescribed approach'.

Policy HQH2 Affordable homes

The level of affordable requirement and mix has been informed by the whole plan viability study. Whilst some of the figures and assumptions made in the viability study are questionable it is understood that a benchmark has to be reached and that there will inevitably be some difference of opinion. The conclusions are considered to be in-line with the Consortium's expectations and there is scope within the text for some flexibility when viability is challenged, in line with national policy.

Policy HQH3 Supported and specialist homes

The Consortium is pleased to see that the requirement for 17.5% of total homes be specialist has been dropped from the policy text, that previously featured in the Regulation 18 version. The new text is sufficiently flexible to allow a proportion of supported and specialist homes to be delivered without impacting upon viability, as the inclusion of a target percentage would have done.

Policy CEA1 Sustainable Buildings

The draft text includes the phrase *'all new build dwellings and non-residential development must...include latest net zero energy generation technologies'*, such terms as 'latest technologies' are open to interpretation and can lead to uncertainty for developers, especially when coupled with the term 'must' as is the case here. We suggest this is removed from the text to aid deliverability, or that the word 'must' is replaced with 'should', which allows for greater flexibility when officers are making decisions.

The Consortium welcomes the redrafting of the target levels of energy use and limits on whole lifecycle carbon from those set out in the Regulation 18 draft policy. Whilst the limits proposed could still impact upon delivery it is recognised that limb D should allow for some flexibility where these targets cannot be achieved.

Policy CEA5 Water Efficiency

The proposed figure of 93 litres per person per day is a welcome change from the 80 litres proposed at Regulation 18 stage. However, this remains a low target from which it is not clear from the evidence provided whether it can be met. The Consortium suggests that developments of all sizes target 110 litres per person per day as a more realistic and achievable target.

Policy CEA9 Biodiversity and Habitats Network

It is not clear why section C on habitat creation is required – specific habitats form part of the national biodiversity net gain calculations/metric. There is flexibility built into the BNG metric that allows for habitats to be replaced either like for like or with more appropriate options (some with greater gains associated with them). Part C of the proposed policy would likely harm delivery and could lead to inferior outcomes and also conflicts with both part A of the policy and national legislation contained within the Environment Act 2021.

Other considerations

Universal studios - Bedfordshire

An announcement on the 16th December 2025 was made by Universal Studios that they have received planning permission for a significant site of around 400 acres to build a new theme park 15 km to the east of Milton Keynes and the Aspley Guise Triangle site. This will target in the order of 8-9 million visitors per annum and could employ several thousand local people when it opens in the early 2030s. This development will put significant additional pressure on housing in the area, both during construction and once opened. With southern and eastern Milton Keynes being just 20 minutes from the site, and is therefore well placed to respond to demand, there will be increased pressure on housing need if this theme park scheme does come forward as it is now expected to do.

The Consortium believes that the emerging housing needs should be reviewed in light of this development.

Cross Boundary development

The Government has, via the recent written ministerial statement from Matthew Pennycook (27th November 2025³), sought to de-emphasise the duty-to-cooperate across local authority boundaries in order to make the adoption of plans quicker and more streamlined. It states that *'to help drive local plans to adoption as quickly as possible and progress towards our objective of universal local plan coverage, we have decided not to 'save' the Duty [to cooperate], thereby removing this requirement for plans in the current system.'*

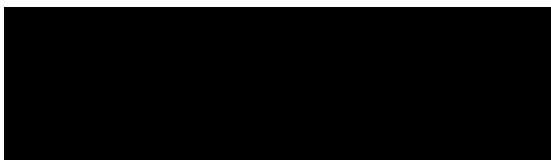
This should not mean that planning authorities stop having cross-boundary meetings in order to coordinate on development which impacts upon neighbouring authorities and vice-versa. This continues to place a requirement on the policy text in GS11, which seeks to coordinate joint working principles on development at the edge of the authority.

During the course of 2025 Milton Keynes, along with neighbouring boroughs to the east and west (including CBC), have submitted to central government a proposal to form a Strategic Mayoral Combined Authority known as Bedfordshire, Luton and Milton Keynes (BLMK). Hopefully this will facilitate a more targeted plan for infrastructure planning and delivery to support new development across the region in the future. It is understood that the agreement is not seeking planning control across the region at this time.

Collaborative Working

The Consortium meets regularly with the other parties in the adjoining allocation and has done for a number of years now. There is a recognition that the parties will have to work collaboratively in order to bring the allocation forwards.

Yours faithfully



Andrew Raven
Director – Urban Design

Copy: Clients

³ <https://questions-statements.parliament.uk/written-statements/detail/2025-11-27/hcws1104>

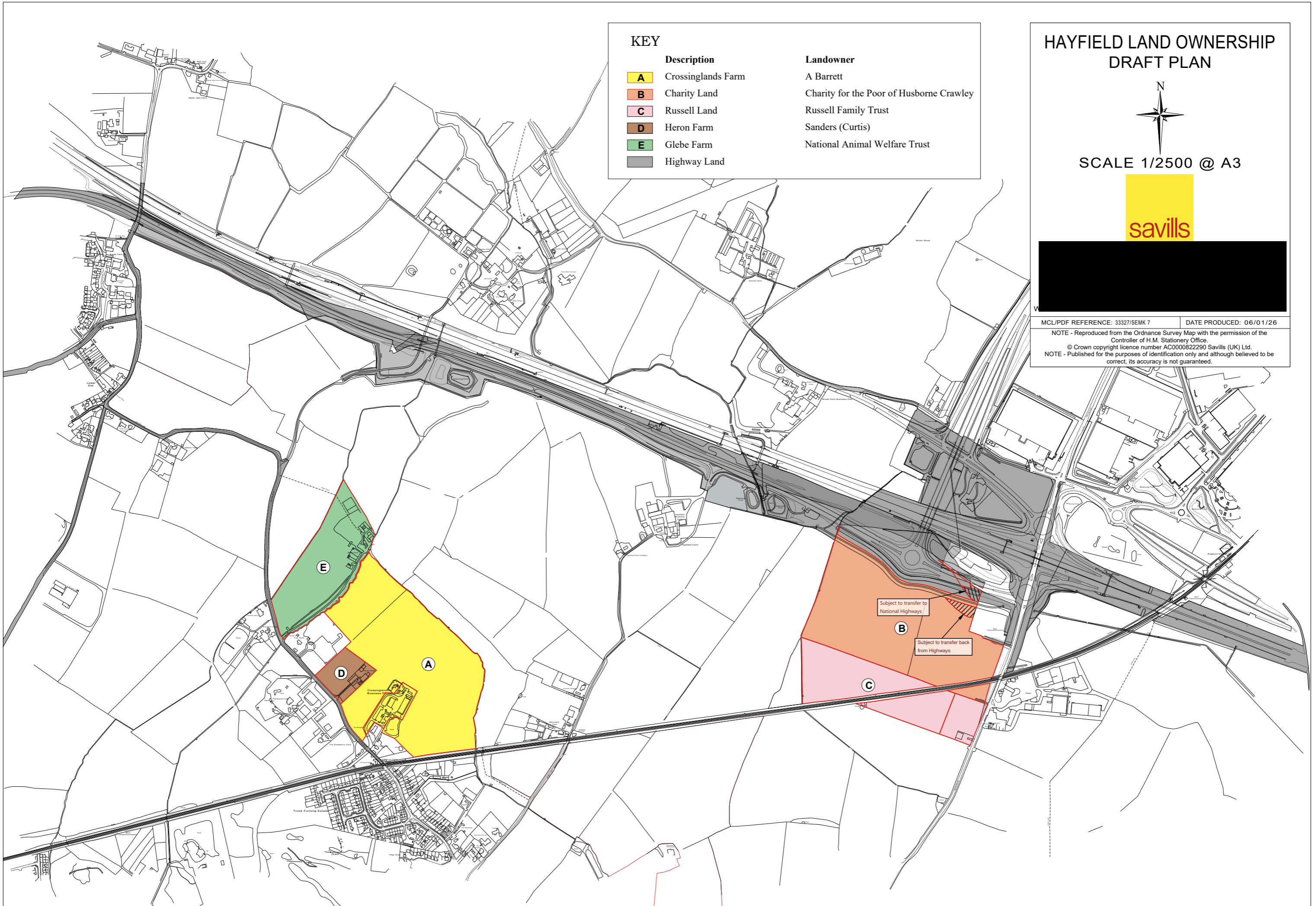
HAYFIELD LAND OWNERSHIP DRAFT PLAN



SCALE 1/2500 @ A3

savills

KEY		
	Description	Landowner
A	Crossinglands Farm	A Barrett
B	Charity Land	Charity for the Poor of Husborne Crawley
C	Russell Land	Russell Family Trust
D	Heron Farm	Sanders (Curtis)
E	Glebe Farm	National Animal Welfare Trust
	Highway Land	



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