

**Name of the Local Plan to which this representation relates:**

Milton Keynes City Plan 2050

Please return by **5.30pm on Monday 22<sup>nd</sup> 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](mailto: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)**

*\*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.*

Title

First Name

Last Name

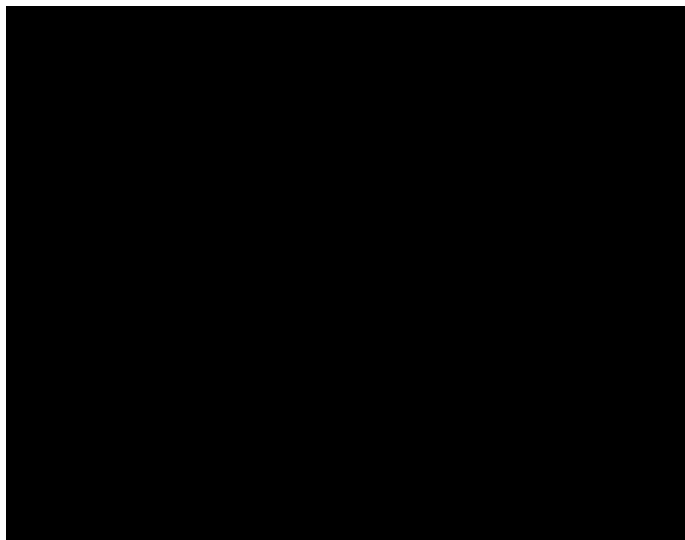
Job Title

(where relevant)

Organisation

(where relevant)

E-mail Address



Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

**Part B – Please use a separate sheet for each representation**

Name or Organisation:

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

Paragraph

303

Policy

CEA6

Policies Map

4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant

Yes

X

No

4.(2) Sound

Yes

No

X

4.(3) Complies with the Duty to co-operate

Yes

X

No

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.

Policy CEA6 does not fully meet the NPPF criteria of positively prepared, effective or consistent with national policy.

- It does not identify or commit to Strategic Heat Network Zones, despite the imminent introduction of the national Heat Network Zoning framework and MKCC's own Heat Networks Programme.
- It does not establish a clear approach for effectively preparing for Heat Network Zoning and 'heat network-ready development' which is essential for future-proofing buildings where immediate connection is not feasible.
- It does not fully reflect the Milton Keynes decarbonisation strategy on heat networks, as identified in 'Heat Networks – Pathway to Net Zero'.

Therefore it doesn't meet local energy and climate objectives and does not create the conditions needed for strategic infrastructure delivery.

Previous Milton Keynes planning policy has been supportive of Heat Networks as an energy strategy and low carbon energy solution for Central Milton Keynes. This position is reinforced

in the Council's supporting evidence base, such as the 'Heat Networks – Pathway to Net Zero Programme Plan', which identifies heat networks as a core mechanism for delivering the city's decarbonisation objectives, managing electricity network constraints and supporting growth.

However, the approach to heat networks in the draft City Plan 2050 and the current drafting of Policy CEA6, appears weaker and less directive than earlier policy, despite stronger evidence. This represents a missed opportunity to translate strategic intent into effective delivery. Whilst previous policy was supportive in principle, it was not consistently or effectively applied in planning decisions. As a result, a number of significant developments within Central Milton Keynes were permitted in recent years without connection to the existing heat network. Examples include large schemes such as Bowback House (20/00185/FUL), Westminster House (24/01299/FUL), Saxon Court (21/02246/FULEIS) and Campbell Park View (24/00036/FUL) where alternatives to heat network connection were accepted without robust, transparent testing of technical or economic feasibility.

Both earlier policies and the current draft of Policy CEA6 allow exemptions from heat network connection where it can be justified. In practice, however, these justifications have not always been subject to sufficient assessment. This has led to outcomes that are sub-optimal in the context of Central Milton Keynes' strategic energy objectives, including increased peak electricity demand, higher system costs over the long term, and less efficient use of existing heat network infrastructure. Such outcomes also risk higher energy consumption and cost for building occupiers over the lifetime of developments.

Policy CEA6 is also not consistent with emerging national policy including the Heat Network Zoning framework. This will require local authorities to

- Identify priority areas for heat networks
- Require connection feasibility assessments
- Ensure developments are designed to be heat network ready
- Support the decarbonisation and expansion of existing networks.

As drafted CEA6 does not adequately address these requirements, and risks being misaligned with national policy during the Plan period.

(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.

For Policy CEA6, we suggest adding new clauses:

1) Strategic Heat Network Zones:

*'The Council will identify Strategic Heat Network Zones, informed by heat demand density, existing and planned heat network infrastructure and forthcoming Heat Network Zoning framework.'*

*'The existing heat network in Central Milton Keynes is recognised as strategic city infrastructure and plays a critical role in delivering net-zero heat, improving energy resilience and reducing pressure on the local electricity network.'* (Include maps if possible).

*'Within Heat Network Zones, or where developments are located within reasonable proximity to existing or planned heat network infrastructure, connection to a heat network will be the default or preferred heating solution, unless it can be robustly demonstrated that connection is not technically or economically feasible'*

2) Connection Feasibility Assessments: *'All major developments within Heat Network Zones are required undertake a heat network connection feasibility assessment at the planning application. The assessment must consider technical feasibility, whole-life cost and carbon performance and must be prepared in consultation with the relevant heat network operator.'* For suggested methodology for such assessments see the UKDEA Heat Revenues & Connection Changes Counterfactuals Study which assumes a counterfactual for a low-carbon heat supply is a ASHP and covers variables such as power supply upgrade, system operating temperatures, noise emissions, cold air plumbing, structural reinforcement and retrofit works.

3) Heat Network-Ready Development: *'Where immediate connection to a heat network is not viable, developments must be designed to be heat network-ready. This includes: allocation of suitable internal plant space, low-temperature distribution systems, safeguarded pipe routes to site boundaries and designed to enable future conversion.'*

4) Aligning with National Policy: *'The Council anticipates changes in national policy, including the introduction of Heat Network Zoning and regulation. These requirements will be reflected in local policy and applied over the Plan period.'*

(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:

**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.*

