



Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

Ref:
(For official use only)

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)

**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

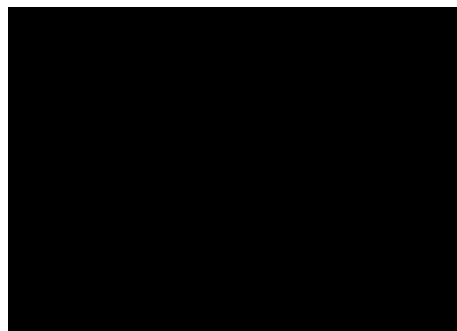
First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

E-mail Address

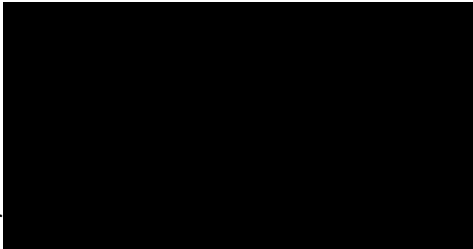


Address Line 1

Line 2

Line 3

Line 4



Post Code

Telephone Number

Part B – Please use a separate sheet for each representation

Name or Organisation: ReformUK Milton Keynes Branch

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

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

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.

Please see attached document, sections
Policy GS2 Strategy for Homes
Policy GS4 Strategy for people-friendly and healthy places
Policy GS5 Our retail hierarchy
Policy GS7 Wind and solar development spatial strategy
Policy GS9 Supporting transit-oriented development and estate regeneration
Policy GS11 Adjacent and cross-boundary growth
Policy GS14 Eastern Strategic City Extension
Policy CMK2 Central Milton Keynes placemaking principles
Policy CEA5 Water efficiency

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.

Please see attached document which contains suggestions as to what modifications for each point are needed for the Plan to be made Sound

Apologies if this information should have been presented earlier, but without their being addressed the Plan is arguably not sound

(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

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:

Wish to present information and willing to be challenged on any of the points

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.

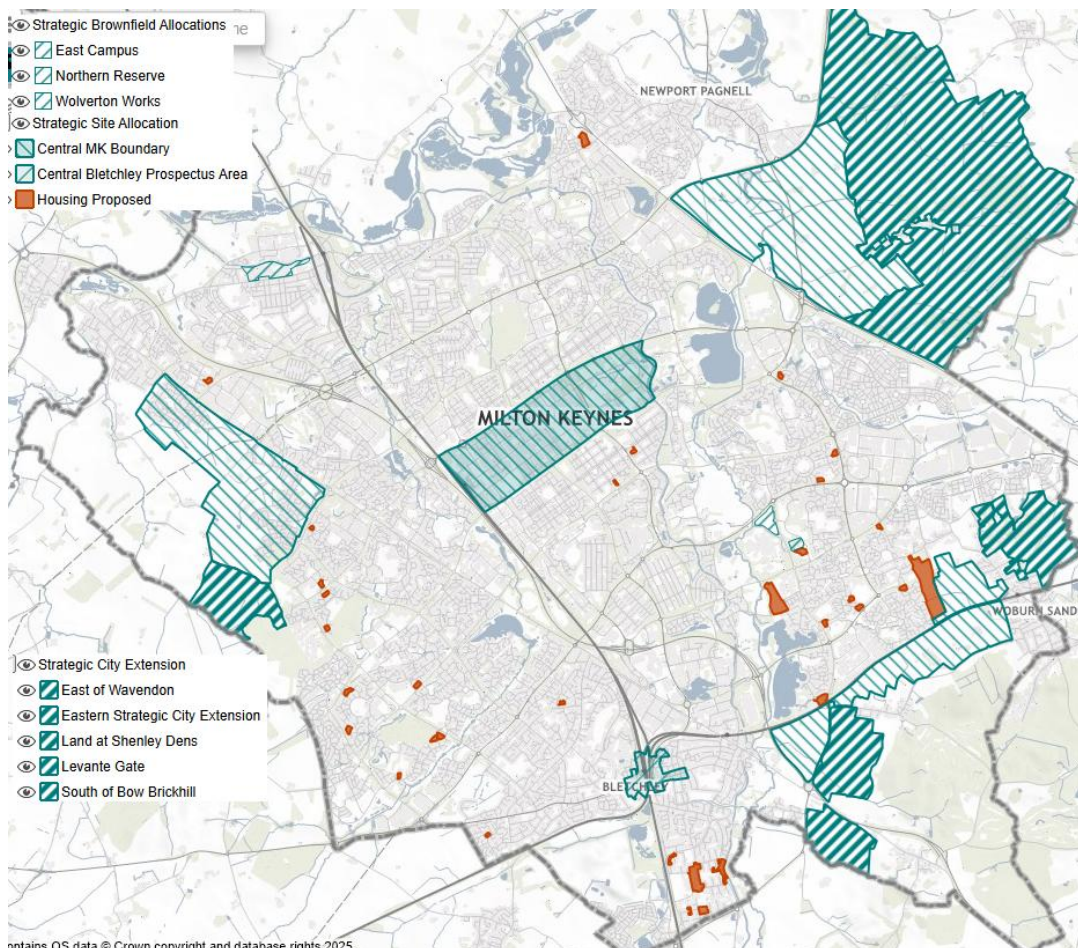
For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

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.*

Policy GS2 Strategy for Homes

A total of 59,779 homes are planned to provide an adequate buffer on meeting the minimum housing requirement and to support the growth ambitions set out within the Strategy for 2050.

Source of supply	No. of homes to be delivered 2022-2050
Completions and Commitments 2022–2050 (as of 1 April 2024)	22,705
Central Milton Keynes and Campbell Park	16,000
Central Bletchley	1,184
Metro Corridors (growth along Metro routes within the existing built-up area of the city)	2,500
Walton Campus Strategic Brownfield Site	450
Wolverton Railway Works Strategic Brownfield Site	400
Eastern Strategic City Extension	7,750
East of Wavendon Strategic City Extension	2,250
South of Bow Brickhill Strategic City Extension	1,300
Levante Gate Strategic City Extension	1,250
Shenley Dens Strategic City Extension	1,000
Other small opportunity sites (Windfall)	2,999
Total housing supply	59,779

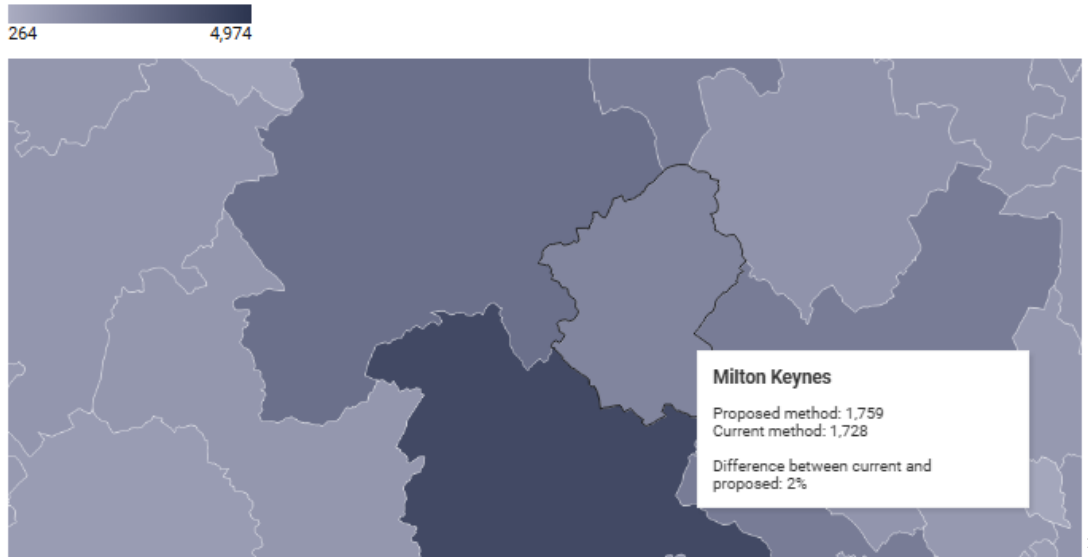


The government dictated formula as defined in the 2025 NPPF is for 1,799 dwellings per annum which totals 50,372 in the Plan period.

This is almost unchanged from the previous method – meaning there is no pressure or reason to plan for more housing than before - making the choice for a higher number (59,779) arbitrary and un-sound and unsustainable given the MK area has no water source within its boundary.

Housing targets under new method

The housing targets for each local authority under the proposed new method



OBJECTION GS2.1

There is no scenario that equates to Local Housing Need (LHN) of 50,372 dwellings.

² Making the choice from comparison not sound.

Table 5.1: The RA growth scenarios (with constants greyed-out)

Source of supply	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Completions/commitments	22,705	22,705	22,705	22,705	22,705	22,705
Windfall	2,990	2,990	2,990	2,990	2,990	2,990
Urban supply inc. CMK	20,534	20,534	20,534	20,534	20,534	20,534
ESCE	7,750	7,750	7,750	7,750	7,750	7,750
East of Wavendon	2,250	-	2,250	-	2,250	2,250
South of Bow Brickhill	-	1,300	-	1,300	1,300	1,300
Levante Gate	-	1,250	-	1,250	1,250	1,250
Shenley Dens	-	1,000	-	1,000	1,000	1,000
West of Olney	-	-	1,000	1,000	-	1,000
Total supply 2022-2050	56,229	57,529	57,229	58,529	59,779	60,779
% over LHN (50,372)	12%	14%	14%	16%	19%	21%

¹ <https://www.lgcplus.com/services/regeneration-and-planning/mapped-housing-targets-for-each-council-under-proposed-method-31-07-2024/>

² <https://www.milton-keynes.gov.uk/sites/default/files/2025-11/MK%20City%20Plan%20SA%20-%20SA%20Report%20251105%202.pdf>

OBJECTION GS2.2

Sustainability Appraisal (SA) doesn't consider the Local Housing Need (LHN) scenario of 50,372 dwellings³

Table A: The reasonable growth scenarios – summary appraisal findings

	1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
Accessibility	3	3	3	3	1★	2
Air / env quality	3	4	2	2	2	1★
Biodiversity	=	=	=	=	=	=
CC adaptation	=	=	=	=	=	=
CC mitigation	=	=	=	=	=	=
Communities and health	1★	1★	1★	1★	2	2
Economy & employment	=	=	=	=	=	=
Historic env	4	2	3	1★	4	3
Homes	6	5	4	3	2	1★
Landscape	1★	3	2	3	3	3
Resources	=	=	=	=	=	=
Transport	2	3	2	3	1★	2
Water	=	=	=	=	=	=

When comparing several scenarios of differing numbers of dwellings, a UK council's Local Plan must show the climate effects related to both climate change mitigation (greenhouse gas emissions) and climate change adaptation.

Adaptation: Climate Risks and Resilience

The scenarios must also be assessed for their impact on, and vulnerability to, the inevitable physical effects of climate change. This involves comparing the scenarios' resilience to:

- Flood risk and coastal change: Different scenarios must be assessed for how they avoid or manage current and future flood risks from all sources (river, surface water, etc.), considering climate change allowances for increased rainfall.
- Overheating: The design and location of dwellings must consider the risk of overheating in hotter summers, ensuring appropriate ventilation and cooling measures are viable for each scenario.
- Water management: The scenarios' impact on water availability and the capacity of water infrastructure for the development's lifetime must be assessed, promoting water efficiency measures.
- Urban Heat Island effect: The differing number and spatial patterns of development can influence the local temperature (urban heat island effect), which should be a consideration, potentially mitigated by green infrastructure.

Mitigation: Greenhouse Gas (GHG) Emissions

The primary quantitative effect to be compared is the amount of greenhouse gas emissions, particularly carbon dioxide (CO₂).

- Total Emissions: The plan should estimate and compare the total potential GHG emissions resulting from each development scenario over the plan's lifetime. This is a key metric for demonstrating alignment with national and local net-zero targets.
- Emissions from Transport: A major component of this analysis is transport-related emissions. The location, density, and connectivity (e.g., proximity to public transport, walkability/cycle paths) of different dwelling numbers/locations significantly affect car reliance and, therefore, emissions.
- Emissions from Buildings: While national building regulations set minimum standards, the plan must consider the overall energy consumption and potential for on-site renewable energy generation or connection to low-carbon heating systems across the different scales of development.

³<https://www.milton-keynes.gov.uk/sites/default/files/2025-11/MK%20City%20Plan%20SA%20-%20SA%20Report%20251105%202.pdf>

OBJECTION GS2.3

- (A) It is not possible that all 6 scenarios have equal mitigation making the choices un-sound
- (B) It is not possible that all 6 scenarios have equal Climate Risk and Resilience making the choices un-sound
- (C) There is no Scenario for Local Housing Need (LHN) scenario of 50,372 dwellings to compare against so making the choices un-sound

OBJECTION GS2.4

- (A) There is no data for the biodiversity net loss relative to 0 extra dwellings for any of the scenarios. The legal requirement is to show the effect of any development on biodiversity ie the before & after comparison is missing making the Plan un-sound
- (B) The analysis that biodiversity net loss is equal for all scenarios is flawed. It is also impossible, making the Plan un-sound

6.4. Biodiversity

1) PO minus S. Bow Brickhill, L. Gate, S. Dens	2) PO minus E. Wavendon	3) PO minus S. Bow Brickhill, L. Gate, S. Dens plus W. Olney	4) PO minus E. Wavendon plus W. Olney	5) Preferred option (PO)	6) PO plus W. Olney
=	=	=	=	=	=

- (C) There is a legal requirement to provide **biodiversity net gain** for any development but this analysis is missing making the Plan un-sound
- (D) There is no analysis of **biodiversity net gain/loss** between Local Housing Need (LHN) scenario of 50,372 dwellings and Scenarios 1-6 making the Plan un-sound
- (E) The Plan doesn't attach due weight to biodiversity obligations Section 6.4.4. of the SA Report:
"6.4.4. In conclusion, it is not possible to differentiate between the growth scenarios with any confidence, nor to predict significant effects. The new emphasis on a high urban growth strategy is supported (albeit there are also some tensions with biodiversity objectives in respect of the Metro Corridors), and it is recognised that there will be much potential for the proposed greenfield strategic growth locations to deliver targeted green / blue infrastructure in line with an established strategy (a Local Nature Recovery Strategy is in preparation), but there is uncertainty regarding the significance of what can be achieved"
thereby making the Plan un-sound.

Policy GS4 Strategy for people-friendly and healthy places

Increasing the accessibility of places provides opportunities for fun, work and access to essential services in the local area. It can help reduce dependence on travelling by private car, while recognising that people will want to travel beyond their neighbourhood for work, leisure, cultural and other activities, and that people with disabilities may need a private car to get around.

We have proposed policies that are based on the design principles of safe and slow residential streets; high-quality walking, wheeling, cycling and scooting networks; abundant green planting; meeting people's needs at all stages of life; mixed-use building patterns; frequent and accessible public transport; and public spaces for all. These principles will apply to all new **developments in Milton Keynes, including new housing, employment and local centres.**

There are also ways in which the MK City Plan 2050 can shape people's options to eat healthily, by promoting access to healthy food options, limiting access to less-healthy options (e.g. takeaway food outlets) or preventing 'food deserts' – neighbourhoods without any local shops or supermarkets selling groceries.

Developments including 10 or more dwellings will be required to improve physical and mental health by providing or contributing to an appropriate mix and distribution of social and cultural infrastructure and community facilities

Community facility	Catchment distance from facility for majority of new homes (metres)
Bus stop and active travel stands	400 m
Open space	Various based on type (see Open Space Standards in Annex C)
Grocery shop	800 m
Primary health care facility/pharmacy	800 m
Nursery/Pre-school/Primary school	800 m
Allotments or other community food growing area	800 m
Community meeting places/multi-functional buildings (including meeting places/halls, cultural buildings, places of worship, libraries)	1,000 m
Indoor/outdoor recreation centre	1,000 m
Cafe	1,000 m
Public House	1,000 m
Local services (such as hairdressers, barbers, salon, launderette, post office).	1,000 m

The catchment distances are based on a literature review of good practice and guidance on creating neighbourhoods that are people-friendly, walkable and healthy.

Objection GS4.1

Public Houses are going out of business everywhere else in the country with churches, post offices, cafes & libraries also closing.

Barbers and nail parlours are thriving, however.

There is no mention or plan of how such economic realities are to be overcome thereby making the Plan unsound

Policy GS5 Our retail hierarchy

The City of Milton Keynes is a major regional centre for retail and leisure, drawing people in from the Midlands, east and south-east regions. At the heart of this are the Centre:MK Shopping Building and the Midsummer Place Shopping Centre within Central Milton Keynes, but our other centres around the city are equally vital to this success.

The retail hierarchy for Milton Keynes City is shown in Table 8 below. To maintain and enhance the vitality and viability of centres in the retail hierarchy, proposals for additional retail development within the primary shopping area of existing town centres will be supported. Proposals for other appropriate main town centre uses within the centres identified in the retail hierarchy will also be supported.

Table 8. Milton Keynes City retail hierarchy

Level	Role	Centres
1. City Centre	The Primary Shopping Area within Central Milton Keynes will function and develop as a regional shopping centre for comparison shopping.	The Primary Shopping Area of Central Milton Keynes
	The remainder of the City Centre will cater for other main town centre uses. The City Centre will provide significant leisure functions, as well as important clusters of civic and public buildings.	City Centre outside the Primary Shopping Area
2. Town Centres	These will cater for the daily and weekly convenience and comparison shopping and service needs of their catchment populations.	Bletchley, Kingston, Westcroft and Wolverton
3. District Centres	These will function primarily as local shopping destinations catering for the shopping and service needs of their local catchment populations and surrounding rural hinterlands.	Newport Pagnell, Olney, Stony Stratford, Woburn Sands
4. Local Centres	These will provide convenience shopping and service facilities to reduce car dependence and to ensure ready access by non-car-owning households and other people with limited or impaired mobility.	Various existing Local Centres and newly delivered Local Centres within Strategic Urban and City Extensions

The City of Milton Keynes is a major regional centre for retail and leisure, drawing people in from the Midlands, east and south-east regions. At the heart of this are the Centre:MK Shopping Building and the Midsummer Place Shopping Centre within Central Milton Keynes, but our other centres around the city are equally vital to this success.

Diminishing district and local centres through the loss of shops can lead to increased isolation, particularly for rural residents with limited travel options or technological access. Additionally, their absence may negatively impact physical and mental well-being, as routine visits encourage exercise and social interaction. Class F2(a) of the Use Classes Order, protects a shop of not more than 280 square metres, and which mostly sells essential goods including food, and where there is no other such facility within a 1,000-metre radius, from a change of use.

Objection GS5.1

Yes, small “corner shops” are vital and it’s laudable to remove temptation to change use - but its financial viability depends on being profitable, the costs being less than the income and central government influences that through business rates, employment legislation, minimum wages, cost of electricity, price inflation, loan/mortgage interest rates, etc

Table 6. Projections for new convenience floorspace across Milton Keynes City, including Central Milton Keynes, in square metres (net)

Year	Scenario A	Scenario B
2031	4,341 to 5,563	6,265 to 8,028
2036	6,351 to 8,139	9,589 to 12,288
2041	8,949 to 11,468	12,703 to 16,280
2050	13,126 to 16,821	17,706 to 22,690

It is un-sound to just wish small shops to be viable so to base the plan around them is un-sound.

Objection GS5.2

The Retail and Commercial Leisure Study is out of step with the Spatial study and several Scenarios 1-5 Scenario A uses LHN of 1.799 dwellings per annum (dpa) which equates to 50,372 dwellings over the 28years of the Plan Scenario B uses 2,265 dpa which equated to 63,420 dwellings over the 28years of the Plan The presented Plan options are

Table 5.1: The RA growth scenarios (with constants greyed-out)

Source of supply	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Completions/commitments	22,705	22,705	22,705	22,705	22,705	22,705
Windfall	2,990	2,990	2,990	2,990	2,990	2,990
Urban supply inc. CMK	20,534	20,534	20,534	20,534	20,534	20,534
ESCE	7,750	7,750	7,750	7,750	7,750	7,750
East of Wavendon	2,250	-	2,250	-	2,250	2,250
South of Bow Brickhill	-	1,300	-	1,300	1,300	1,300
Levante Gate	-	1,250	-	1,250	1,250	1,250
Shenley Dens	-	1,000	-	1,000	1,000	1,000
West of Olney	-	-	1,000	1,000	-	1,000
Total supply 2022-2050	56,229	57,529	57,229	58,529	59,779	60,779
% over LHN (50,372)	12%	14%	14%	16%	19%	21%

Objection GS5.3

- (a) Both Table 5.1 and Table 7 should show the same Scenarios instead of Scenarios 1-6 in one table and Scenarios A & B in another. Comparing two differing datasets is misleading making the Plan un-sound
- (b) Also, one of the Scenarios MUST be LHN of 1,799 dpa equating to 50,372 dwellings over the 28years of the Plan

Table 7. Projections for new comparison floorspace across Milton Keynes City, including Central Milton Keynes, in square metres (net)

Year	Scenario A	Scenario B
2031	7,210 to 11,331	8,700 to 13,671
2036	19,062 to 29,954	26,574 to 41,759
2041	28,986 to 45,549	38,811 to 60,989
2050	45,176 to 70,990	58,607 to 92,097

Objection GS5.4

To put into context, the main Centre:MK building is approximately 133,416 sq m (net) so the Retail and Commercial Leisure Study is advocating an extra 50% - 70% to what currently exists in the main Centre:MK building This is so unrealistic (due to economy & change in shopping habits) as to make the Plan un-sound

Objection GS5.5

The demand for comparison floorspace for goods like clothing, furniture, electronics, cars is notoriously volatile. It is reckless to predict such a high need especially as the council's previous official retail study "**Milton Keynes Retail Capacity and Leisure Study 2018**" forecast a total need for only around **33,490 sq m of additional comparison floorspace** for the entire borough area over a 10-15 year period making the Plan un-sound.

Objection GS5.6

Previous studies undertaken for the council have shown a downward trend, which again challenges the latest predictions making the Plan un-sound.

Examination in public⁴ referring to 2011 130,000 sq m

2.25 As highlighted within our December 2017 representations, Paragraph 4.51 of the Proposed Submission Plan notes that the capacity for additional comparison goods floorspace in Milton Keynes (including MK Central) has fallen significantly since the Council's earlier studies undertaken in 2010 and 2011. It notes: 'Although there is capacity for additional comparison (non -food) floorspace this is only in the period after 2026 up to 2031. The quantity of comparison floorspace forecast at 39,689 sq. m. net of floorspace by 2031, around 40,000 sq. m., is significantly down on the capacity of **82,000-130,000** sq. m. up to 2026 identified in the Council's previous Retail Capacity Update (RCU) in 2011.

Draft 2018 Plan:MK 2016-2031 39,689

Final 2018 Plan:MK 2016-2031 33,490⁵

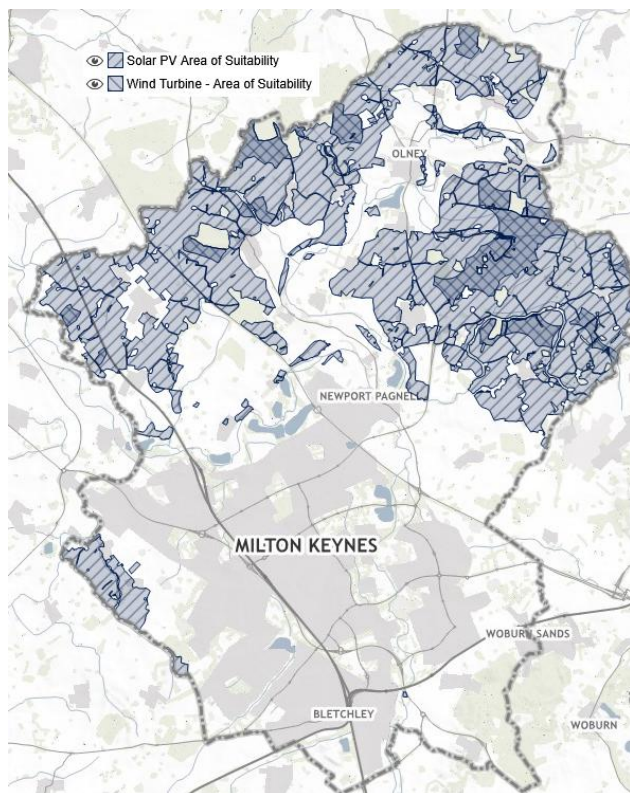
Table 16.3 Milton Keynes Council Wide Comparison Capacity (sqm net) – 'Baseline' Scenario

	2022	2027	2031
Central Milton Keynes	-26,036	-7,850	14,290
Kingston District Centre	678	1,675	2,891
Westcroft District Centre	184	480	842
Bletchley District Centre	708	1,913	3,416
Wolverton District Centre	126	416	740
Newport Pagnell	32	227	415
Olney	64	199	356
Stony Stratford	59	185	326
Woburn Sands	23	60	106
Local Centres	106	261	450
Out of Centre	-204	4,235	9,657
TOTAL COUNCIL COMPARISON GOODS CAPACITY	-24,260	1,801	33,490

⁴ <https://www.milton-keynes.gov.uk/sites/default/files/2022-01/Matter%206%20Written%20Statement%20-%20Turley%20for%20Hermes.pdf>

⁵ <https://www.milton-keynes.gov.uk/sites/default/files/2022-08/Milton%20Keynes%20-%20Final%20Report%20-%209%20March%202018%20Retail%20Capacity%20Study.pdf>

Policy GS7 Wind and solar development spatial strategy



Objection GS7.1

Almost 50% of Open Countryside as defined under Policy GS6 is proposed for Wind or Solar development. This is not sustainable. If solar/wind developments come forward in these areas, they will be impossible to refuse and almost 50% of Open Countryside will be lost by 2050

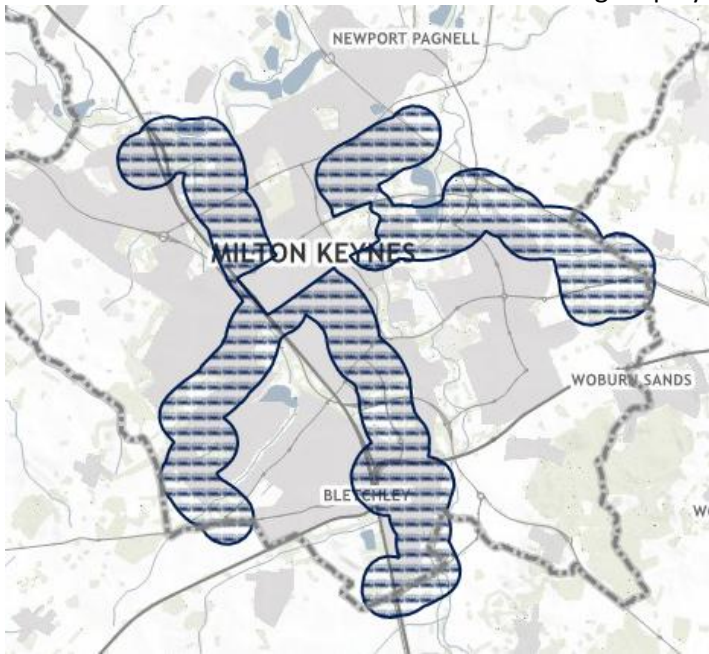
Objection GS7.2



In addition to the carbon footprint of the turbines themselves, plus their transport, Greenhouse Gas Emissions related to wind-turbine foundations have not been computed for sustainability thereby making the Plan un-sound.

Policy GS9 Supporting transit-oriented development and estate regeneration

The new Metro will operate along a limited number of corridors within the existing built-up area of the City of Milton Keynes. These routes and associated buffer corridors along them are shown on the Policies Map. Growth within these corridors would benefit from access to this new public transport service and the other benefits this would bring, such as more affordable and convenient means of accessing employment and learning opportunities across the city.



Major development proposals within 600 meters of existing or proposed interchange hubs within the Metro Corridors will only be supported where they:

1. Make efficient use of land within these highly accessible locations through higher-density development of up to 80 dwellings per hectare; and
2. Make provision for improvements to Metro infrastructure.

Objection GS9.1

It's ok to say developers should "Make provision for improvements" but

- (a) who will design, fund and develop this new metro system
- (b) what comes first – the new metro or the dwellings ? What are the timescales ?

Objection GS9.2

Conforming to "20-minute neighbourhood" design the preference for "low, medium or high rise" should be stated for achieving 80 dwellings per hectare



Objection GS9.3

Density calculations which include an area's wider infrastructure such as roads, schools, parks etc, is sometimes referred to as 'gross density'. Measurement which excludes these, encompassing only the residential plot areas, is 'net density'.

Policy GS9 does not state which – gross or net is intended, and whether green/blue spaces are included or excluded

Policy GS11 Adjacent and cross-boundary growth

The preparation of, and any joint working upon, proposed allocations or development proposals on the edge of Milton Keynes City administrative area, that are either wholly or partly within the administrative boundary of a neighbouring authority, will be expected to follow the principles below:

2. The local authorities and their partner organisations should produce an agreement on appropriate mechanisms to secure developer contributions towards improvement and provision of infrastructure to support the development, including facilities in the city that will be used by residents of the development area;

Objection GS11.1

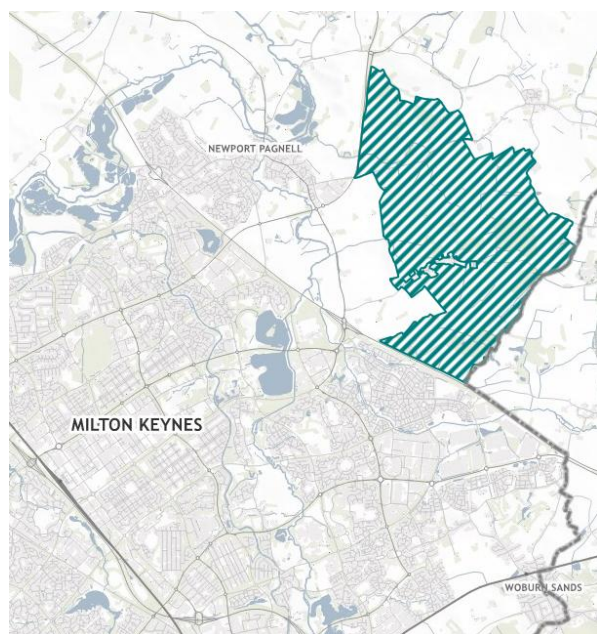
In the case of Northern Buckinghamshire, there is no CIL levy at the moment, nor on large developments anywhere in the county so there is no mechanism for contributions to cross-border use of facilities, making this policy un-sound.

Objection GS11.2

Flood zones in North Bucks and Milton Keynes (MK) are primarily found along major watercourses, especially the **River Great Ouse and its tributaries**, including the River Ouzel, Loughton Brook, and Bear Brook. Areas most notably affected are parts of Wolverton, Stony Stratford, Newport Pagnell, Buckingham, and surrounding villages. The plan does not detail how flooding on these cross-border watercourses will be prevented / minimised as both areas are developed on during the Plan period. Take one example in 2020..

“Group Commander Steve Hawkins said: “Many of the challenges encountered by both the public as well as BFRS during this entire period were due to flooding of roads that made getting to the locations difficult. A number of small communities and houses that were completely isolated and for a period during the early evening the A422 and the A421 were impassable between Milton Keynes and Buckingham.”⁶

Policy GS14 Eastern Strategic City Extension



Delivery of around 16,000 homes, with around 7,750 homes within the plan period,

Around 40 hectares of land for employment use primarily in the form of small to medium scale business premises to support SMEs and start-ups associated with research and development and professional services, and a limited element of warehousing and distribution to be located adjacent to similar uses within the Milton Keynes East Strategic Urban Extension;

Objection GS14.1

Who is to provide the necessary infrastructure of roads, schools, health centres & what is the timing considering the Council policy of “Infrastructure first”. The Plan is un-sound until this is defined in detail.

⁶ <https://bucksfire.gov.uk/flooding-in-north-buckinghamshire-and-milton-keynes/>

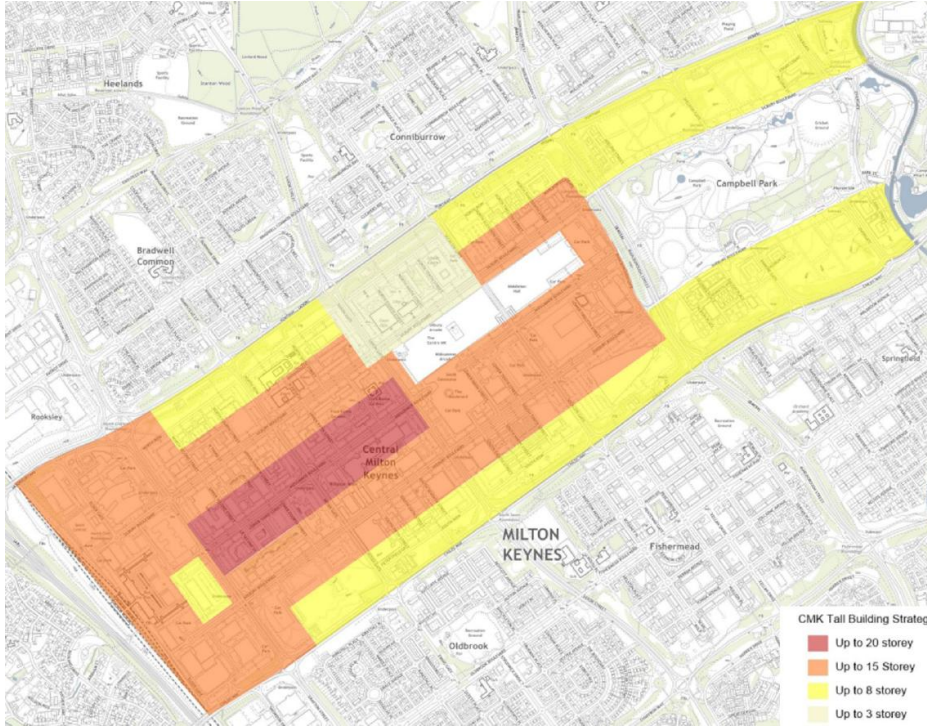
Policy CMK2 Central Milton Keynes placemaking principles

residential development would be within the following density ranges

Around 425 dwellings per hectare within Blocks B2/3, C2/3, D2/3 and E2/3.

Around 135 dwellings per hectare within the Parkside Quarter.

Around 350 dwellings per hectare elsewhere in the city centre



Parking

Development proposals must manage the level of parking needed to support a vibrant city centre while maintaining high levels of convenience, through: Coordinating the **phased reduction** of ‘front of house’ surface car parking areas in tandem with improvements to public transport provision and satisfactory re-provision of parking to other appropriate locations in the city centre; and

Managing retained and re-provided parking areas to allow flexible usage to meet different demand profiles.

Objection CMK2.1

Reducing or restricting parking is incompatible with business occupancy. A significant % of employees need to be mobile during business hours. If the goal is to entice new business occupancy and the workforce back into the office, then more and more convenient parking provision is needed, not less.

Objection CMK2.2

What does “Managing retained and re-provided parking areas to allow flexible usage to meet different demand profiles” actually mean? The Plan is un-sound without a clear definition.

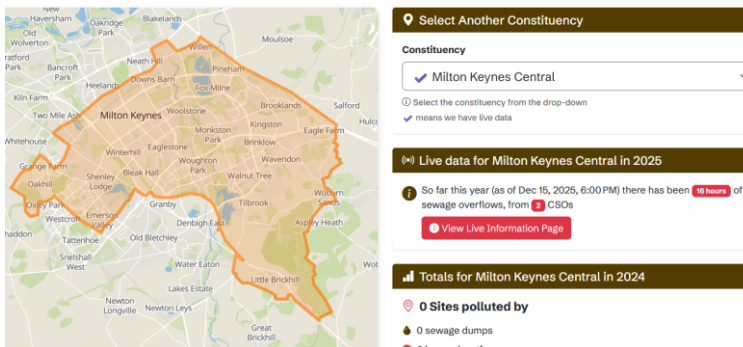
Policy CEA5 Water efficiency

The whole of Milton Keynes is the Anglian Water (AW) supply area, within the Ruthamford Central Water Resource Zone (WRZ). This WRZ has no internal water sources and imports its water from Ruthamford North and Ruthamford South⁷

Milton Keynes forms 80% of the water demand within Anglian Water's Ruthamford Central Water Resource Zone (WRZ). This zone is entirely supplied from external sources at present, and all wastewater is discharged to watercourses and flows out of the zone.

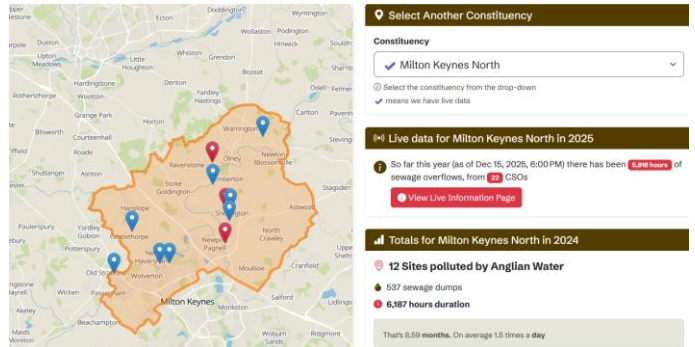
Milton Keynes Central

Polluted by sewage 0 times in 2024 lasting 0 hours



Milton Keynes North

Polluted by sewage 537 times in 2024 lasting 6,187 hours



Buckingham and Bletchley

Polluted by sewage 1,200 times in 2024 lasting 17,835 hours - That's 2.06 years!



Wastewater from Milton Keynes is primarily treated at **Anglian Water's Cotton Valley Water Recycling Centre (WRC)** before the cleaned water (effluent) is safely discharged into the local river system, specifically the **River Great Ouse** and its tributaries like the **River Ouzel** and **Loughton Brook**

2.3.4 Water Resources

All the RGOs are covered by Ruthamford Central WRZ which has no internal water resources and relies on imports from neighbouring WRZs (Ruthamford South and Ruthamford North). From a water resources perspective, it is the overall level of growth and consequently water demand that is important, and not the location. It is not therefore possible to assess the site individually.

While producing their latest Water Resource Management Plan (WRMP24) Anglian Water have accounted for 26,244 dwellings up to 2035, and approximately 58,800 up to 2050.

Up to 2035 this is broadly in line with the growth planned by Milton Keynes based on existing commitments and the current Local Plan covering the period up to 2031. Beyond 2035, RGOs developed using the 35DPH scenario would result in a level of growth in line with AW's WRMP24.8

The Environment Agency defines a water stressed area as where:

"The current household demand for water is a high proportion of the current effective rainfall which is available to meet that demand; or

The future household demand for water is likely to be a high proportion of the effective rainfall available to meet that demand."

The EA define the Anglian Water region as under Serious water stress.

⁷ https://www.milton-keynes.gov.uk/sites/default/files/2024-07/Integrated%20Water%20Management%20Study%20Part%201_0.pdf

⁸ https://www.milton-keynes.gov.uk/sites/default/files/2024-07/Integrated%20Water%20Management%20Study%20Part%201_0.pdf

Milton Keynes is in the Ruthamford South Water Resource Zone, which is described as an area of the Anglian region that is most water stressed ... demonstrates the need to adopt a higher water efficiency standard of 85 litres per person per day in major developments, and 100 litres per person per day in smaller developments.

A range of rainwater harvesting systems can help to reduce the water deficit and should be incorporated into new developments where feasible and viable. If viability and/or feasibility is an issue, then we will require robust and transparent evidence as to why any or all of these requirements have not been included within the proposal. Where water-intensive, non-residential development is proposed, a Water Resources Plan shall be required to demonstrate no adverse impacts on water availability. – but note *“there are also trade-offs between resilience and carbon. For example, desalination and greywater recycling can have higher carbon costs than water abstracted from the environment or demand management measures”*.⁹

Objection CEA5.1

Anglian Water’s report states *“all wastewater is discharged to watercourses and flows out of the zone”*. No evidence is presented of discussions / agreements concluded with neighbouring authorities agreeing to accept the increased amount of wastewater generated by the Council’s growth plans making it un-sound and un-sustainable

Objection CEA5.2

Anglian Water’s Water Resource Management Plan is broadly in line with the Council’s housing growth in the existing Local Plan to 2031. After that, however it assumes density growth of **only** 35 dwellings per hectare whereas the Council’s Plan has a wide range between 36, 80, 135, 150-250, 350 and 425 dwellings per hectare. The Plan is un-sound until Anglian Water can accept the 10x greater quantity.

Objection CEA5.3

By the Council’s laudable policy of *“Infrastructure-first”*, supply and discharge must be in synchronism with first residents moving in. The Plan is un-sound until such timing has been assessed and agreed.

Objection CEA5.4

The Plan incorrectly states that *“Milton Keynes is in the Ruthamford South Water Resource Zone”*, whereas it should be Ruthamford Central Water Resource Zone (WRZ)

⁹ https://www.milton-keynes.gov.uk/sites/default/files/2024-07/Integrated%20Water%20Management%20Study%20Part%201_0.pdf

Glossary

Local Housing Need (LHN)	The minimum number of new homes an area requires, calculated using the UK government's "standard method" by projecting household growth, adjusting for affordability (house prices vs. earnings), and applying caps/urban uplifts, forming the baseline for local planning to meet demand, though the final housing requirement can vary due to constraints or growth opportunities.
Housing and Economic Development Needs Assessment (HEDNA)	Sets out the overall need for affordable homes based on local needs. It also indicates how many of these affordable homes should be provided to rent (including both social rent and affordable rent) and how many should be provided to buy.
dpa	Dwellings per Annum
dph	Dwellings per hectare
NPPF	National Planning Policy Framework
EA	Environment Agency
Gigafactory	gigafactory is a large-scale facility (120+ hectares) dedicated to producing batteries for electric vehicles and other high demand uses. These plants operate continuously and consume massive amounts of energy
Water Stress	is a measure of the level of demand for water compared to the available freshwater resources, whether surface or groundwater.
SuDS	sustainable drainage systems
CDC	Critical Drainage Catchment
CDA	Critical Drainage Area
WRZ	Water Resource Zone
IWM	Integrated Water Management

Sustainability Headings

Accessibility	support walkable neighbourhoods in existing and new areas by 2050, by improving access to health, community and leisure facilities for all people
Biodiversity	protect and enhance biodiversity and the natural environment.
Climate change adaptation	avoid issues including flood risk and overheating risk and supports communities that can 'bounce-back' from environmental challenges helping to protect human and environmental health and account for fuel poverty
Climate change mitigation	support reduction of greenhouse gas emissions from the built environment and support reductions in fuel poverty.
Communities and health	support improvements to physical and mental health through well designed places and by improving availability of and access to health facilities, good quality green and blue infrastructure and cultural assets for all people
Economy and employment	support a prosperous, diverse, inclusive, and resilient economy enabled by a high skilled workforce
Historic environment	protect and enhance designated and non-designated archaeological and wider cultural assets
Homes	over the plan period provide a supply and mix of market and affordable good quality housing, that meets our calculated needs and aspirations
Resources	minimise loss of productive agricultural land and support creation of a zero-waste economy in MK by 2050
Landscape	protect and enhance valued landscapes and wider landscape character
Transport	provide and improve accessibility for communities in line with our modal shift targets, promote active travel, and minimise car dependent communities
Water	increase water efficiency, including through water reuse and recycling measures, and take wider steps to contribute to improved water quality and well managed water resources including by supporting good wastewater management