

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

Mr

First Name

David

Last Name

Bainbridge

Job Title
(where relevant)

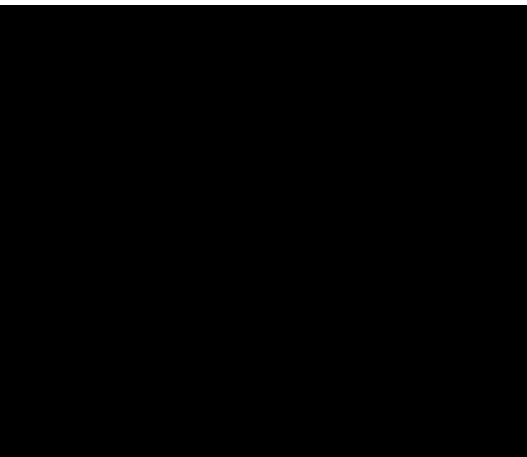
Planning Director

Organisation
(where relevant)

Savills

E-mail Address

Address Line 1



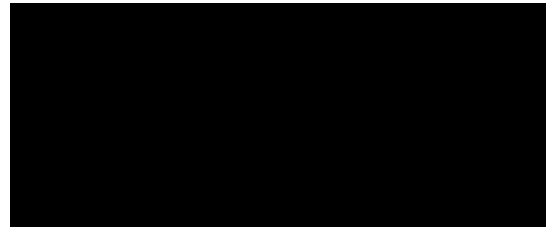
Line 2

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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

Policy

Policy GS1 Our Spatial Strategy

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 letter from Savills, dated 22 December 2025.

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.

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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:

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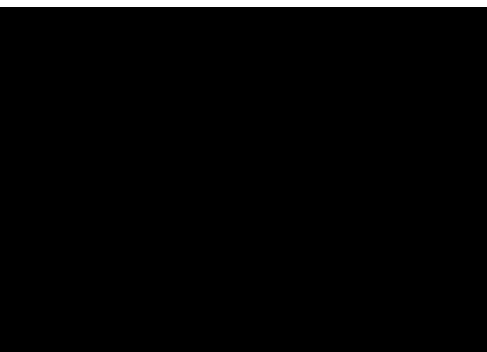
Planning Director

Organisation
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Savills

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Line 2

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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	<input type="text"/>	Policy	Policy GS10 Movement and Access	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	<input type="checkbox"/>	No	<input type="checkbox"/>

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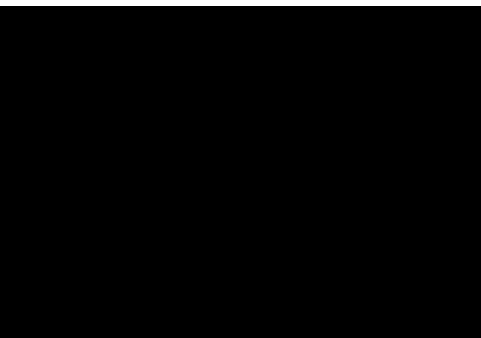
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Savills

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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	<input type="text"/>	Policy	Policy GS11 Adjacent and Cross-boundary Growth	Policies Map	<input type="text"/>
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4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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(where relevant)

Organisation

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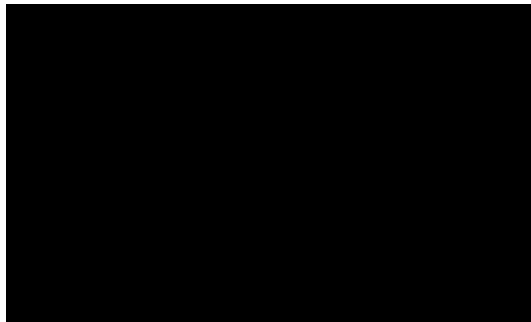
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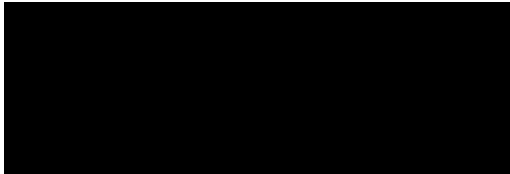
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Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	Policy GS17 South of Bow Brickhill Strategic City Extension	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"/>
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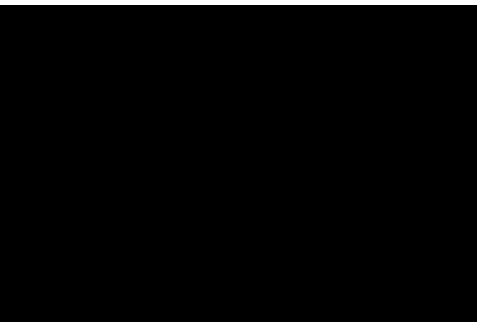
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Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	Policy GS18 Levante Gate Strategic City Extension	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"/>
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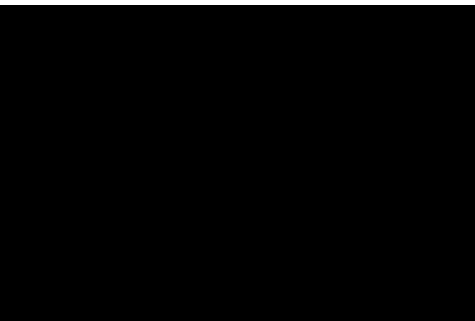
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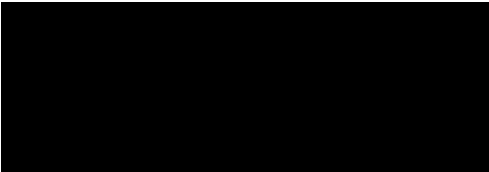
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Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	Policy GS2 Strategy for Homes	Policies Map	<input type="text"/>
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Part A

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Title

Mr

First Name

David

Last Name

Bainbridge

Job Title

Planning Director

(where relevant)

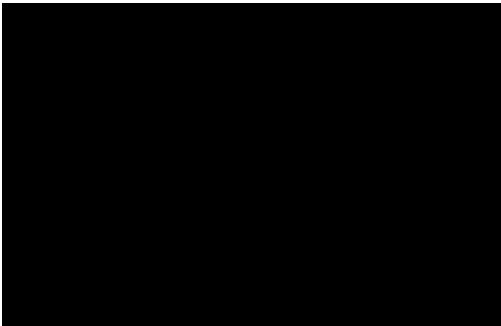
Organisation

Savills

(where relevant)

E-mail Address

Address Line 1



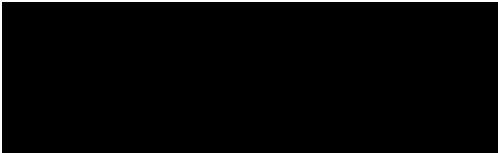
Line 2

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	<input type="text"/>	Policy	Policy GS3 Strategy for Economic Prosperity	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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
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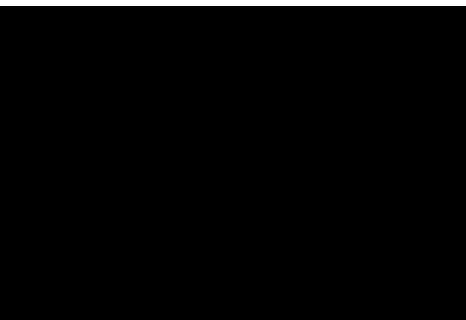
Planning Director

Organisation
(where relevant)

Savills

E-mail Address

Address Line 1



Line 2

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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	Policy	Policies Map
<input type="text"/>	Policy GS4 Strategy for People Friendly and Healthy Places	<input type="text"/>

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

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4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
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Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

Ref:
(For official use only)

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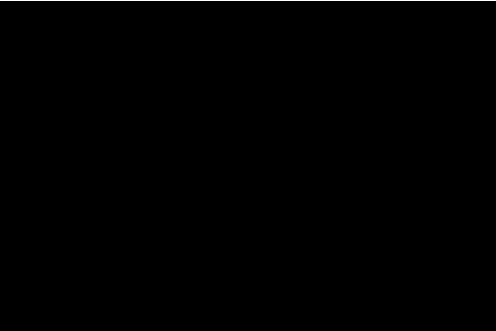
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Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	Policy INF1 Infrastructure First Principles	Policies Map	<input type="text"/>
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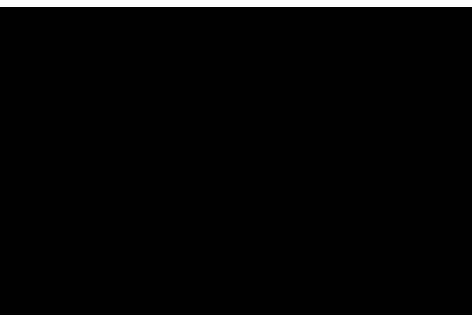
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Part B – Please use a separate sheet for each representation

Name or Organisation:

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Paragraph	Policy	Policies Map
<input type="text"/>	Policy INF2 Infrastructure Planning and Delivery Principles for Strategic Allocations	<input type="text"/>

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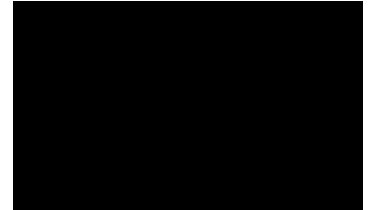
22 December 2025



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

David Bainbridge MRTPI

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



Dear Sir / Madam

**Proposed Submission Milton Keynes City Plan 2050
Regulation 19 Plan for Consultation, October 2025
Response on Behalf of Bedford Estates in Respect of South of Bow Brickhill Strategic City Extension**

Savills is instructed by Bedford Estates to submit representations to Milton Keynes City Council (the Council) on the above consultation. This submission comprises this letter and a completed representations form.

1. Introduction

Bedford Estates holds an interest in an approximately 58 hectares site to the south of Bow Brickhill village and to the east of the Brickhill Road.

The site has been promoted for residential development through the emerging local plan process and has been included within the designation of the South of Bow Brickhill Strategic City Extension (SBBSCCE).

The site has been assessed under reference: 110360, in the MK Strategic Housing Land Availability Assessment (SHLAA).

The Site has been promoted for development for a number of years and we have worked collaboratively with the adjacent promoters of the wider land area so that the development can be brought forward with consideration of the same issues. This reflects the assessment in the SHLAA accompanying the consultation that these sites should come forward as part of a wider assessment of the sites in the locality.

We provided a response to the Regulation 18 consultation in 2024 and provided the following documentation at the time:

- Appendix 1 – Site Boundary Plan
- Appendix 2 – Land Holdings Plan
- Appendix 3 – Vision Document
- Appendix 4 – Concept Masterplan
- Appendix 6 – Technical Note – Transport Vision
- Appendix 7 – Landscape and Visual Appraisal and appendices
- Appendix 8 – Preliminary Flood Risk Assessment and Drainage Strategy

This work demonstrates that a sensitive landscape-led approach has driven the development of a comprehensive concept masterplan for the proposed allocation. The Bedford Estate and Catesby have engaged with the Council in preparing the concept masterplan within the draft plan however further comments are provided below.



We do not support the suggestion that there are additional links from/to the proposed allocation and the Greendsand Ridge. This would be over private land, which is not available or needed for additional links. There are public rights of way already established in the area.

2. The Site

The Site is approximately 58 hectares. The Site currently comprises a number of fields under agricultural use, with hedges along the majority of field boundaries and ditches.

There is a gentle rise in the landform from west to east which steepens towards the far east of the Site when becoming in close proximity to the woods which form the boundary to the west of the Site.

The west and south of the site form boundaries, in part at least, with the Brickhill Road and the A5 respectively. Access can be achieved to the site by a leg of the recently constructed roundabout serving the employment development to the west of the Brickhill Road. Brickhill Road continues north and becomes the Grid Road Brickhill Street (V10), just beyond the railway, where Brickhill Station is located.

The north of the site forms a boundary with the Land east of Brickhill Street site and to the south east with the land at Glebe Farm (ref 110512).

3. National Planning Reform

In our response to the consultation in 2024, we explained the position then in respect of emerging reform of the planning system at a national level.

On 12 December 2024, Government published an update on National planning reform, following consultation held in 2024.

The changes are part of the Government's aims to deliver a universal, ambitious Local Plan coverage, which is seen as being vital to deliver the Government's commitments to achieve economic growth and build 1.5 million new homes.

The Government changes, include the following:

- Making the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard constraints and that they have exhausted all other options
- Reversing other changes to the NPPF made in December 2023 which were detrimental to housing supply
- Implementing a new standard method and calculation to ensure local plans are ambitious enough to support the Government's manifesto commitment of 1.5 million new homes in this Parliament
- Broaden the existing definition of brownfield land, set a strengthened expectation that applications on brownfield land will be approved and that plans should promote an uplift in density in urban areas
- Identify grey belt land within the Green Belt, to be brought forward into the planning system through both plan and decision-making to meet development needs
- Improve the operation of 'the presumption' in favour of sustainable development, to ensure it acts an effective failsafe to support housing supply, by clarifying the circumstances in which it applies; and, introducing new safeguards, to make clear that its application cannot justify poor quality development;
- Deliver affordable, well-designed homes, with new "golden rules" for land released in the Green Belt to ensure it delivers in the public interest

- Make wider changes to ensure that local planning authorities are able to prioritise the types of affordable homes their communities need on all housing development and that the planning system supports a more diverse housebuilding sector
- Support economic growth in key sectors, aligned with the Government's industrial strategy and future local growth plans, including laboratories, gigafactories, datacentres, digital economies and freight and logistics – given their importance to our economic future
- Deliver community needs to support society and the creation of healthy place
- Support clean energy and the environment, including through support for onshore wind and renewables

This is a very clear summary of the objectives of Government when it comes to the planning system and delivery of economic development and growth.

It is encouraging to see acknowledgement and recognition of this direction of travel within the emerging Local Plan. We would request that the Council continues to factor in changes to the planning system at the national level, including for example the potential for changes to the NPPF, the Planning Practice Guidance and the potential for new National Development Management Policies.

On 16 December 2025, Government published proposed reforms to the National Planning Policy Framework and other changes to the planning system. This includes consultation with deadline of 10 March 2026 for comments. The publications and announcements by Government are too recent to be captured sufficiently in response to this consultation, which has a deadline of 22 December 2025.

The publication by Government represents a comprehensive reform of the NPPF; in the Minister's words it is a "fuller and more definitive update" to the planning system. Building on the December 2024 NPPF (which restored mandatory housing targets and introduced the Grey Belt concept), this consultation proposes fundamental structural and policy changes to deliver the Government's target of 1.5 million new homes by the end of this Parliament.

The Government has decided not to proceed with statutory National Development Management Policies at this stage, despite provisions in the Levelling Up and Regeneration Act 2023. Instead, the Framework incorporates a series of policies that will have non-statutory status, which means in effect that they do not override the policies contained in adopted Local Plans but are a material consideration in the determination of planning applications. These policies will take immediate effect when the final version of the NPPF is published; most likely in the summer 2026.

We suggest that the Council considers the implications of the proposed reforms to the NPPF and to the planning system ahead of progressing to the next consultation on the emerging Local Plan.

4. Local Government Reorganisation and Devolution

Whilst Milton Keynes is already unitary, and hence there is little potential for local government reorganisation, there is pending devolution across the Oxford to Cambridge Growth Area, which will become increasingly relevant for plan-making going forward.

Government has said that plan-making must continue on and not wait on pending changes but it would be useful for resource planning and governance matters to be considered now in this pending new context.

5. The Evidence Base

We welcome publication of the evidence base alongside this Regulation 19 consultation, under the Evidence Library.

We consider this is good practice, but is not necessarily common-practice by plan-making authorities and hence we consider it is important to applaud this.

The extent of matters covered in the published evidence base looks to be quite extensive.

There is mention that the Council will update the evidence base as new documents become available. Our request is for consideration of, and communication on, the means by which to identify publication of new evidence base documents to relevant stakeholders, including the Bedford Estate.

6. Plan Period

It is encouraging to see the mention that the Local Plan's timeframe is 2046 and that it is recognised that individual large scale sites, such as major extensions to existing towns or new communities, will in all probability take longer than this to reach completion. Local plans are required by government to be reviewed and if necessary updated every five years so such sites may need to continue to be reflected in later local plans for the area.

7. Strategic and Non-Strategic Policies

We note mention that strategic policies are those which are essential to the delivery of the Local Plan strategy.

We request publication of a list of those emerging Local Plan policies which the Council considers to be strategic policies within the emerging Local Plan. Typically, local plans include a list of policies, but they often do not identify strategic, or non-strategic policies. Our request is for the Council to clearly identify the relevant strategic policies.

Paragraph 21 in the NPPF states that Development Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non- strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.

The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

8. Responses to Relevant Draft Policies in the Emerging Local Plan

The following are our responses to relevant draft policies in the emerging Local Plan. Please note that we have not provided a response to each and every draft policy.

Policy GS1 Our Spatial Strategy

Sites in or around the City of Milton Keynes are the most sustainable in the authority area and we agree that they should take precedence in the spatial strategy.

Policy GS2 Strategy for Homes

This draft Policy seeks a minimum of 50,372 (net) new homes over the period 2022–2050. In line with the spatial strategy within Policy GS1, 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.

We support this proposal as a draft policy. We would just question the start of the plan period and whether this should be brought closer to the projected year of adoption of the emerging Local Plan.

In Table 1. Housing land supply 2022-2050, we have to question the deliverability of a projected 16,000 dwellings in Central Milton Keynes and Campbell Park. This is a level never seen before and there is no obvious evidential basis to consider this will be deliverable.

We request a review of aspects of the housing land supply over the proposed plan period and where delivery is uncertain, consider additional sources of land for housing, following the proposed spatial strategy.

We request that the column which is 'No. of homes to be delivered 2022- 2050', is changed to include the word 'minimum', such that it is clear that the proposed number of homes is a minimum.

Whilst supportive of the policy overall, we consider on balance that this policy is not justified because it is not an appropriate strategy, taking into account the reasonable alternative, of the plan-period and projected delivery from sites.

Policy GS3 Strategy for Economic Prosperity

The distributed proposals for employment land appears to be a comprehensive and inclusive strategy for delivery. There should be consideration of a buffer and/or flexibility to allow for changing circumstances in economic activity.

Policy GS4 Strategy for People Friendly and Healthy Places

The proposed text and supporting table of distances (Table 5) provides clear guidance on the required catchment distances that the LPA expects amenities to be provided. However, such stringent requirements can negatively impact upon urban design principles occasionally and it would be prudent to include a clause in the policy text or the supporting text that provides for such situations, whereby part of the site might fall out of the specified distances but that the solution can be more harmful to the overall layout of the scheme.

We suggest that a phrase such as '*any deviation from these standards must be evidence based*'.

This is especially relevant because our client's site is part of South of Bow Brickhill Strategic City Extension, where the draft Policy GS17, limb 7C, states that the location, scale and phased delivery of social infrastructure, services and community facilities is planned to ensure they are in place to support new communities from the early phases of development in line with Policies GS4 and PFHP1.

Policy GS5 Our Retail Hierarchy

No comment on the proposed policy text

Policy GS6 Open Countryside

No comment on the proposed policy text

Policy GS7 Wind and solar development spatial strategy

No comment on the proposed policy text

Policy GS8 Hanslope Park

No comment on the proposed policy text

Policy GS9 Supporting transit-oriented development and estate regeneration

No comment on the proposed policy text

Policy GS10 Movement and Access

This draft policy is not consistent with national planning policy in the form of the NPPF.

Limb A of the draft policy should exactly mirror what is contained in the NPPF, for example paragraph 116, which states:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

Limb B.8 states that development should provide on-site parking in accordance with the parking standards set out in Annex D. We consider that parking standards should not be set-out in an annex to the emerging Local Plan. The plan is intended to cover a period in excess of 20 years and hence inclusion of such standards could become inflexible. We suggest this is a matter for a separate Supplementary Planning Document.

Policy GS11 Adjacent and Cross-boundary Growth

Having a set of cross-boundary principles is 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 result in areas across the boundary being more sustainable places for development by the adjacent authorities, over the plan period and beyond. Having a clear set of principles will enable better and more integrated developments in these areas. This should not however replace active cooperation with the adjacent authorities, and this is recognised in the draft text at limb A1. and A2. which advocates close joint working, which our client supports.

Policy GS12 Redevelopment of Wolverton Railway Works

No comment on the proposed policy text

Policy GS13 Redevelopment of Walton Campus

No comment on the proposed policy text

Policy GS14 Eastern Strategic City Extension

No comment on the proposed policy text

Policy GS15 East of Wavendon Strategic City Extension

No comment on the proposed policy text

Policy GS16 Wavendon Strategic Buffers.

No comment on the proposed policy text

Policy GS17 South of Bow Brickhill Strategic City Extension

This draft policy includes the land south of Bow Brickhill controlled by our client. A concept Masterplan and vision document were submitted alongside our Regulation 18 response.

This demonstrated how the Site and the neighbouring land east of Brickhill Street can be jointly delivered, whilst making provision for the guidance within the draft policy text. Unfortunately, this has not been followed by the draft Local Plan.

Whilst we support the proposed allocation of the strategic city extension in this location, there are points of detail that we consider should be changed.

The scheme, as drafted, has been mindful of the character of the land and the emerging designation as a Special Landscape Area – characterised by the important Greensand Ridge feature further to the east of the

site. The open upper slopes of the Greensand Ridge would be retained as parkland in the scheme, and this would act as a natural and visual buffer to the Brickhill Woods bordering the east of the Site. Equally the site makes positive use of the lowland area along the far west of the site, bordering Brickhill Street, for sustainable drainage (SuDs) which has the benefit of creating a soft boundary of green and blue land from this vantage.

Development parcels are based, where possible, around existing field boundaries in order to retained mature hedgerows which currently criss-cross the site. A significant proportion of the site will be given over to green parkland and blue lowland features and this will contribute to biodiversity on the site. Alongside the proposed residential development, a range of additional uses are proposed, including retail, café, local centre – which will contribute to the mixed nature of the SCE as a whole. A school site has also been identified, in line with the draft policy.

Suggested locations for segregated active travel corridors, including extension of the Redway network have been shown on the plans submitted previously. These would link the site to the existing urban fabric of Milton Keynes and the Bow Brickhill Station to the north and continue down through the site and beyond to allocations to the south too.

Note – limbs C2 & C3 should either be combined or limb C2 needs to be completed.

Table 1 – Assessment of Policy GS17 South of Bow Brickhill Strategic City Extension

Limb of Policy	Text Within the Policy Limb	Our Comments	Change Required (yes / no)
A,	The South of Bow Brickhill Strategic City Extension is allocated for a new, mixed-use, residential-led strategic development to the south of Bow Brickhill and east of Brickhill Road.	We support this	No
B.	Development proposals within the South of Bow Brickhill Strategic City Extension should be in accordance with a Framework Masterplan and site-based area Design Code that are consistent with the criteria below and wider plan policies and approved by the Council prior to planning permission being granted.	Noted	Yes – see below
C.	Development proposals within the South of Bow Brickhill Strategic City Extension will be required to meet the following criteria:	Noted	Yes – see below
C1	Delivery of around 1,300 new homes through a comprehensive masterplan approach providing a range of house size, type and tenure, including affordable, older persons and specific needs housing;	We suggest that the draft policy is changed to be a minimum of 1,300 dwellings, to be consistent with Policy GS2 Strategy for homes.	Yes
C2	Adopt a sensitive, landscape-led approach to the distribution, layout and design of development that satisfactorily mitigates impacts upon the valued characteristics of the Brickhills Special Landscape Area	Noted	No

Limb of Policy	Text Within the Policy Limb	Our Comments	Change Required (yes / no)
C3	Provision of early years and primary education facilities, and SEND provision appropriate to the scale and nature of the development proposal	Noted	No
C4	Provision of secondary education facilities appropriate to the scale and nature of the development proposal and which accommodate demand for secondary education arising from the Levante Gate Strategic City Extension	Object to the lack of clarity of need, testing of development viability and absence of mechanism for delivery	Yes
C5	Provision of primary healthcare facilities within the site appropriate to the scale and nature of the development proposal and which accommodate demand for primary healthcare arising from the Levante Gate Strategic City Extension, together with contributions to wider health and social care infrastructure	Object to the lack of clarity of need, testing of development viability and absence of mechanism for delivery	Yes
C6	Provision of local centres, as appropriate to the scale and nature of development proposals	Noted	No
C7	The location, scale and phased delivery of social infrastructure, services and community facilities is planned to ensure they are in place to support new communities from the early phases of development in line with Policies GS4 and PFHP1	Noted – see our separate comments on Policies GS4 and PFHP1	No
C8	Provision of green and blue infrastructure and open space, in line with an approved Strategic Green and Blue Infrastructure and Open Space Strategy for the Strategic City Extension in accordance with the Infrastructure Delivery Plan, the Council’s Nature, Green and Blue Infrastructure Strategy, and open space standards	Noted	No
C9	An integrated network of low- and zero-carbon energy infrastructure from building scale to neighbourhood or district scale	Noted	No
10a	The phased introduction of a comprehensive transport network and infrastructure that follows the movement hierarchy set out in Policy GS4, and to specifically include:	Noted	No
10b	The phased introduction of a comprehensive transport network and infrastructure that follows the movement hierarchy set out in Policy GS4, and to specifically include:	Noted	No

Limb of Policy	Text Within the Policy Limb	Our Comments	Change Required (yes / no)
11	Be informed by appropriate surveys and assessments of built heritage and ecology with appropriate mitigation of impact	Noted	No
12	Pre-determination archaeological evaluation has been undertaken and provided in support of development proposals	Noted	No

The proposed allocation is located within the 'South East' Sub-Area alongside Levante Gate and is discussed from pages 126 – 134 of the Infrastructure Delivery Plan.

Part 3 on page 132 identifies a series of theoretical infrastructure implications based on the strategic allocations. As per paragraph 1.17 of the IDP, the resultant implications are assumed to be the results of applying appropriate standard benchmarks of infrastructure provision to the project increase in population.

Chapter 6 of the IDP disseminates the infrastructure requirements by strategic allocations for growth which are also set out in Chapter 7 – Project Schedule.

A review of Chapter 6 and 7 of the IDP identifies 42 infrastructure requirements for this proposed allocation within Chapter 6, however only 25 in Chapter 7. The difference is noted to be due to 17 of the requirements being 'city wide' projects where details will be assessed further at a site-specific level.

We consider this is not a robust piece of evidence when it comes to infrastructure provision and that it does not inform a robust proposed site allocation, for this reason.

Overall, whilst we are supportive of the proposed allocation, we consider the policy as currently drafted is not sound for the following reasons:

- Not justified – because the current policy wording is not an appropriate strategy, taking into account the reasonable alternative that we have identified
- Not consistent with national policy – because the current policy wording would not enable the delivery of sustainable development in accordance with the NPPF

Figure 3. Indicative Concept Plan for the South of Bow Brickhill Strategic City Extension

Whilst we support the principle of the proposed allocation, we have identified some changes required to the policy wording, as explained above.

We have previously submitted masterplanning work but have noted that the indicative concept plan for this allocation does not follow this. We therefore have to object to the indicative concept plan for the following reasons:

- The movement strategy is overly complicated and it is not clear
- It would appear that an active travel grade separate crossing (desirable / aspirational) is identified in two locations over the A5 but there is no evidence of need, some of the land is not controlled or proposed for allocation, there is no assessment of development viability and no mechanism for delivery, should there be a need for such crossings

- It would appear that there are aspirational connections, described as ‘active travel aspirational links’ to the east of the proposal, which are not supported by our client. These are not justified through evidence or needed for the development
- The proposed residential density is too inflexible and should allow for a range, to be decided through masterplanning and future planning application(s)
- Education is not based on evidence of need, especially for secondary education, and there is no indication as to where, how and when any such need might be met

We request engagement with us and relevant promoters of this strategic city extension to get the indicative concept plan correct for the location, based on evidence. This should result in change to the draft Policy wording and to the indicative concept plan for this site. We expect that this engagement might include preparation of a statement of common ground between the main promoters of the proposed allocation and the Council.

Policy GS18 Levante Gate Strategic City Extension

We object to the proposed policy wording in respect of education and healthcare provision where this seeks to rely on the proposal at South of Bow Brickhill Strategic City Extension. This is not justified, tested in development viability terms and it is not demonstrated to be deliverable. Please refer to our response in respect of South of Bow Brickhill Strategic City Extension for more detail.

Policy GS19 Shenley Dens Strategic City Extension

No comment on the proposed policy text

Policy GS20 Western Expansion Area

No comment on the proposed policy text

Policy GS21 Milton Keynes East Strategic Urban Extension

No comment on the proposed policy text

Policy GS22 South East Milton Keynes Strategic Urban Extension

No comment on the proposed policy text

Policy INF1 Infrastructure First Principles

It should be noted that the Infrastructure Delivery Plan and the benchmarks set out in Annex F are a ‘snapshot’ and hence a moment in time. We wish to engage with the Council and relevant stakeholders about the approach to complying and interrogated the evidence.

There is mention in the draft Policy about Tariff and Section 106 Agreements. It would be useful for the Policy to state whether the tariff approach is historical only and hence new tariffs are not proposed?

Policy INF2 Infrastructure Planning and Delivery Principles for Strategic Allocations

We looked forward to engaging with the Council in respect of Section 106 Agreement across South of Bow Brickhill Strategic City Extension. There is mention of a proposed overarching Framework Agreement and allocation-wide Infrastructure Delivery Plan. The timing and resourcing of these, relevant to emerging planning applications, should be discussed now.

Central Milton Keynes

We have no comments to make on Central Milton Keynes other than our comment under draft Policy GS2 Strategy for homes. In Table 1. Housing land supply 2022-2050, we have to question the deliverability of a projected 16,000 dwellings in Central Milton Keynes and Campbell Park. This is a level never seen before and there is no obvious evidential basis to consider this will be deliverable.

Remaining Proposed Policies

We have no further comments to make in respect of the remaining proposed policies.

9. Other considerations

Universal studios - Bedfordshire

The recent announcements have been made by Universal Studios that they have purchased a significant site of around 400 acres with an option to expand to build a new theme park around 15 km to the east of the Site. This will target in the order of 2-3 million visitors per annum and could employ several thousand local people. This development will put significant additional pressure on housing in the area, both during construction and once opened. With southern Milton Keynes being just 20 minutes from the site there will be increased pressure on housing need if this theme park scheme does come forward.

We suggest that the emerging housing needs are reviewed in light of this development as the plan progresses and the likelihood of it coming forwards also progresses.

Cross Boundary development

The Government has strengthened the 'duty to cooperate' in the draft NPPF consultation and state in the draft text that "*effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed*". Elsewhere in the government's supporting text for the NPPF consultation they state that they intend to bring about universal strategic planning within the next five years.

It is clear from these announcements that the Government focus on cross-boundary coordination that increases delivery of homes and the accompanying infrastructure is set to become more important in the coming years and Milton Keynes should therefore look to work with Central Bedfordshire Council and Buckinghamshire Council to plan strategically to deliver housing in the sustainable locations they have respectively identified. It is recognised that draft policy GS11 seeks to qualify and guide development beyond the edge of the authority.

During the course of the consultation Milton Keynes along with neighbouring boroughs to the east and west of the City, have announced the intention to submit to central government for permission to form a devolution area known as the South Midlands Authorities. Hopefully this close working is indicative of more targeted infrastructure planning and delivery to support new development in the future across the region. It is understood that the devolution agreement is not seeking planning control across the region at this time.

Collaborative Working

We are working closely with Urban&Civic in the promotion of the joint site, as it is clear that development of the two parcels will be greatly enhanced by collaboration and the urban design benefits this brings. This is reflected in the assessment of both the sites in the SHLAA which recommends that they can only come forward as part of the wider Strategic City Extension.

A joint concept Masterplan has been drawn up to demonstrate how the site could be developed, this plan is submitted alongside this response to the consultation. The plan shows how the development could tie into both existing road network along the Brickhill Road and the future Bow Brickhill Relief Road (part of the infrastructure planned in support of the SEMK scheme). The scheme can deliver on the draft policies contained within the policy and would respect the proposed Special Landscape designation for the site with a wide buffer of parkland

running north to south along the highest and most prominent part of the site, which most closely aligns with the special character of the Greensand Ridge.

Active routes, including a dedicated Redway, are shown with links north to the existing Redway network and the city beyond and also to the south to the surrounding development sites. Delivery of a primary school, transport hub and local centre and small retail scheme fronting the Kelly Kitchen roundabout are some of the benefits of the draft scheme. A wide green boulevard is proposed running through the centre of the site promoting active travel and a green corridor too.

The draft scheme shows how the SUDS would be naturally focussed on a north/south corridor following the line of the Brickhill Road, helping to soften the edge of the proposed development and reduce the impact upon the sensitive landscape from this direction.

10. Request to Participate in the Pending Local Plan Examination Hearings

Please accept this request to participate in the pending Local Plan examination hearings on behalf of the Bedford Estate.

We have responded at this Regulation 19 stage identifying our objections against the tests of soundness within the National Planning Policy Framework.

We consider it is essential to participate in the examination hearings to be able to discuss the Matters, Issues and Questions, to be provided by Planning Inspectors in respect of Policy GS17 South of Bow Brickhill Strategic City Extension and other draft Local Plan policies.

11. Conclusion

The Bedford Estate is grateful for the opportunity to comment on this Regulation 19 version of the Milton Keynes City Plan 2050. We are supportive of plan-making and fully engage in the plan-making process.

Whilst we are pleased to see the continued inclusion of South of Bow Brickhill Strategic City Extension within the emerging Local Plan, we are disappointed with aspects of the proposed policy which we consider do not meet the tests of soundness.

We request consideration of this response in assessment by the Council of changes to the emerging Milton Keynes City Plan 2050, prior to submission for examination.

We are available to discuss any aspect of this submission with the Council and we look forward to receiving confirmation of receipt of this submission.

Yours faithfully



**David Bainbridge MRTPI
Planning Director**

Copy: Clients, M Horton, J Gale - Savills

Encl: As listed above.