

**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

Mrs

First Name

Emily

Last Name

Warner

Job Title  
(where relevant)

Associate Director

Organisation  
(where relevant)

David Wilson Homes

Smith Jenkins Planning & Heritage

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? – General comments**

Paragraph  Policy  Policies Map

**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"/>

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.

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**No**, I do not wish to participate in hearing session(s)

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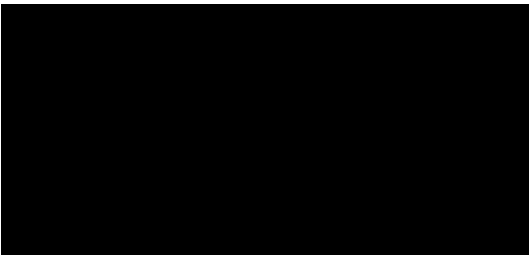
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Paragraph

Policy

GS2

Policies Map

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Yes

No

4.(2) Sound

Yes

No

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

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**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

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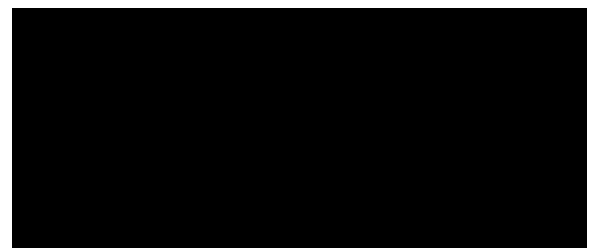
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**Representations to the  
MK City Plan 2050  
Regulation 19 Draft**

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Land off Eastfield Drive, Hanslope,  
Milton Keynes

On behalf of David Wilson Homes

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December 2025

Ref: 4202

Smith Jenkins Ltd



## 1 Introduction

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage on behalf of David Wilson Homes (DWH) in response to the Milton Keynes City Plan Regulation 19 consultation.
- 1.2 The representations should be read alongside, and in continuation of, the detailed Regulation 18 representations (October 2024), which accompany this submission as **Appendix 1**.
- 1.3 In responding to the Regulation 18 consultation, DWH promoted the allocation of Land off Eastfield Drive, Hanslope for a residential development of circa 300 dwellings, likely to comprise of a mix of 2, 3, 4 and 5 bedroom units including affordable housing and a significant area of open space, landscaping and attenuation. The Regulation 18 representations set out full details of the site, how it is deliverable and available now and how development on it would deliver a number of significant social, economic and environmental benefits, fully aligned with the three key dimensions of planning in achieving sustainable development as defined in the National Planning Policy Framework.
- 1.4 The extent of the promoted site at Land off Eastfield Drive, Hanslope is shown edged red on the Site Location Plan in **Figure 1** below:



**Figure 1** - Site Location Plan

1.5 The Regulation 18 response set out, in summary:

- DWH supports the Council's overall ambitions and objectives for growth, in particular by the delivery of new homes;
- In order to deliver the ambitions and objectives, address the Government's clear drive of significantly boosting the supply of homes and meet needs that cannot be met within neighbouring areas, the Council should seek to deliver the upper range of the housing target over the Plan period;
- The Open Countryside policy is considered overly restrictive and not consistent with the NPPF;
- The policies in the draft Local Plan are almost entirely focused on the urban area of Milton Keynes with the rural areas of Milton Keynes restricted to very limited development. The Plan must not neglect rural areas or rely on neighbourhood plans to deliver housing in the villages;
- The Plan must seek to meet the growth needs of villages and quantify this need into a housing target for rural areas;
- The Plan will need to optimise all potential sources of housing land supply. The Plan should be focussed on the sites which are available now and that will contribute to supply in the short-term and make up any shortfall if strategic sites don't deliver.
- The plan should allocate smaller sized deliverable sites in sustainable village locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility; and
- Land off Eastfield Drive, Hanslope represents an immediately available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints. It is in a sustainable location on the edge of existing residential development such that it could benefit from existing infrastructure

1.6 One of the key purposes of the Regulation 19 stage is to assess whether the draft City Plan is sound, as defined by Paragraph 36 of the National Planning Policy Framework (2024). Accordingly, our representations are structured to address the four tests of soundness:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

1.7 These representations:

- Identify whether the Regulation 19 draft addresses the matters raised at Regulation 18;
- Assess whether the Plan is sound against the tests in Paragraph 36 of the NPPF; and
- Set out the modifications needed to make the Plan sound where deficiencies remain.

1.8 We trust that these representations will assist the Council in finalising the Plan and ensuring that it proceeds to examination in a sound form. We would welcome continued dialogue with officers on any of the matters raised.

## 2 Representations

### Policy GS1 Our Spatial Strategy

#### Soundness

- 2.1 The spatial strategy set out in draft Policy GS1 is based on a two-tiered settlement hierarchy. This approach sees the majority of development focused within the designated urban area of the City of Milton Keynes (Tier 1) and limited development elsewhere, i.e., in rural areas, villages with settlement boundaries and locations identified via made Neighbourhood Plans (Tier 2). The Plan does not allocate any housing growth to villages and instead places reliance on Neighbourhood Plans to bring forward development in such locations. The following commentary sets out below why this approach is **unsound**.

#### ***a) The Plan is not Positively Prepared***

- 2.2 Policy GS1 is not positively prepared as it does not provide a clear, plan-led strategy for meeting housing needs in full. By excluding villages from housing allocations, the Plan places a substantial reliance on Tier 1 to accommodate growth. Furthermore, the Plan's reliance on Neighbourhood Plans to deliver housing in villages is flawed. Neighbourhood Plans are not mandatory, take considerable time to prepare and frequently do not allocate housing sites. As such, they cannot be relied upon to deliver strategic housing growth. This approach risks leaving a substantial proportion of housing need unmet over the Plan period and does not reflect a strategy that seeks to maximise sustainable opportunities across the City.
- 2.3 Whilst Hanslope has progressed a Neighbourhood Plan, with a Review being 'made' in March 2025, the housing allocations within it are limited, amounting to only 16 dwellings in total. Both allocations are small-scale sites located within the existing settlement boundary on previously developed land and therefore represent sites that could reasonably be expected to come forward regardless of their allocation status under existing planning policies. Importantly, both sites were also allocated in the previous (2019) Neighbourhood Plan and, despite this, have failed to deliver any housing to date.
- 2.4 Villages such as Hanslope have existing services, employment opportunities, public transport links, and community infrastructure. A blanket approach that prevents housing allocations in the MK City Plan in such settlements fails to positively plan for development needs and ignores the potential contribution villages can make to overall housing supply.

#### ***b) The Plan is not Justified***

- 2.5 Policy GS1 is not justified as it is not supported by robust evidence demonstrating why villages such as Hanslope should be excluded from housing allocations in the Local Plan. The Plan does not assess the capacity or sustainability of individual villages, nor does it provide any clear rationale for deferring housing delivery solely to Neighbourhood Plans.
- 2.6 Relying on Neighbourhood Plans only to deliver housing in villages introduces uncertainty, as there is no guarantee that plans will be prepared, progressed to be made, or allocate sufficient land. This does

not represent the most appropriate strategy when reasonable alternatives, such as modest, evidence based Local Plan village allocations, have not been adequately considered.

***c) The Plan is not Effective***

- 2.7 Policy GS1 is not effective because it is unlikely to deliver sufficient housing in villages over the Plan period. It provides no alternative route for housing delivery in Hanslope, other than in the settlement boundary where available land is limited.

***d) The Plan is not Consistent with National Policy***

- 2.8 Policy GS1 is not consistent with the National Planning Policy Framework (NPPF), which supports sustainable development in rural areas at Paragraph 83 recognising that housing in villages can play a vital role in supporting rural communities, sustaining local services, and enhancing vitality. By failing to allocate housing in villages, the Plan risks undermining rural sustainability and affordability, exacerbating demographic imbalance, and limiting opportunities for households to remain in their communities. The policy does not sufficiently support the creation of balanced and mixed communities as required by national policy (Paragraph 64).

**Requested Modifications**

- 2.9 The spatial strategy should be amended to allow for appropriate, proportionate and evidence-based housing allocations in villages in the Local Plan. Without such amendments, the Plan fails the tests of soundness.

**Policy GS2 Strategy for Homes**

**Soundness**

- 2.10 Draft Local Plan Policy GS2 Strategy for Homes seeks to ensure the housing requirement is met by providing for a minimum of 50,372 (net) new homes over the period 2022– 2050. This will need to be maintained as a deliverable supply over the Plan period. As drafted, the policy places significant reliance on a number of large strategic housing sites to meet housing needs and fails to adequately take into account unmet housing needs arising from neighbouring authorities. The following commentary sets out below why this approach is **unsound**.

***a) The Plan is not Positively Prepared***

- 2.11 Policy GS2 is not positively prepared because it assumes that MKCC's identified housing requirement can largely met through a number of large strategic allocations, without sufficient contingency should these sites fail to deliver at the anticipated rates.
- 2.12 Whilst it is acknowledged that strategic sites are important for the diversity in sources of supply, there is a need to ensure that 'deliverability' has been thoroughly assessed. A large proportion of the capacity for the sites expected to be delivered in the Plan period may not meet the definition of deliverable and there is a risk that supply will not be maintained consistently over the Plan period. A

more balanced supply is required, and this could be achieved by the inclusion of smaller, deliverable sites in the short term.

- 2.13 This has been demonstrated in the current development plan. An outline application for 1,920 houses on the Milton Keynes South East Strategic Urban Extension (Policy SD11) which was validated in March 2022 is still not permitted (planning application reference 22/00524/OUTEIS). According to the Council's Housing Trajectory (Appendix 1 of the Assessment of Five Year Housing Land Supply 2024-2029 report), there were expected to be 655 'start commissions' in the South East Milton Keynes allocation in 2025/26 (and 38 completions) and 620 'start commissions' in 2026/27 (and 90 completions).
- 2.14 The delay in the delivery of housing in the South East Milton Keynes allocation could not have been foreseen at the time Plan:MK was adopted (in 2019). In light of the delays to the delivery of housing in other allocations, and due to the scale and complexity of development on large strategic city extensions, a more prudent approach to ensuring a robust housing land supply position across the plan period is to allocate smaller sites to provide flexibility in the event that allocated sites do not deliver at the rates expected or do not come forward during the Plan period.
- 2.15 In addition, the policy fails to demonstrate how unmet housing needs from neighbouring authorities have been taken into account. In this regard in terms of Bedford Borough, since the Regulation 18 stage, Bedford Borough Council has withdrawn its emerging Local Plan following the identification of land proposed for the Universal Studios development. Housing growth that had previously been identified on or associated with this land can no longer be assumed to come forward as planned. This creates uncertainty regarding how Bedford Borough's housing needs will be met and increases the likelihood that unmet need will need to be addressed elsewhere within the wider housing market area.
- 2.16 Buckinghamshire also continues to experience significant and sustained housing pressure. The Buckinghamshire Local Plan is emerging but the absence of an up-to-date, comprehensive spatial strategy covering the whole of Buckinghamshire has increased uncertainty around how housing needs are to be distributed and met in a co-ordinated manner. Where Local Plans are emerging or being reviewed, there is a heightened risk that housing delivery will fall behind identified needs, particularly in the early years of plan periods. This places greater importance on neighbouring authorities ensuring that their own Local Plans are sufficiently robust, flexible, and responsive to wider housing market pressures.
- 2.17 Milton Keynes, with its ambitions for long-term growth, is an ideal location to accommodate unmet need from its neighbouring auth. Despite this significant and material change in circumstances, Policy GS2 does not demonstrate how MKCC has responded to, or allowed flexibility for, potential redistribution of housing requirements arising from neighbouring authorities.
- 2.18 There is no clear evidence that cross-boundary housing pressures have been fully considered or that the Plan provides flexibility to respond to such needs. This results in a strategy that does not adequately address the full scale of housing requirements affecting the area.

***b) The Plan is not Justified***

- 2.19 Policy GS2 is not justified because it is not supported by robust evidence demonstrating that reliance on large strategic sites represents the most appropriate strategy when considered against reasonable alternatives. Large sites are inherently complex, often constrained by infrastructure requirements, land assembly issues, viability challenges and long lead-in times.
- 2.20 The Plan does not sufficiently explore alternative approaches, such as a more balanced distribution of housing across a range of site sizes and locations, including smaller and medium-sized sites in villages. It does not justify why such sites have been discounted in favour of a strategy heavily weighted towards strategic allocations.
- 2.21 Furthermore, the Plan does not provide a clear explanation of how housing needs arising from neighbouring authorities have been assessed or potentially accommodated. The absence of this evidence undermines the justification for the chosen strategy.

***c) The Plan is not Effective***

- 2.22 Policy GS2 is not effective because it relies on delivery assumptions that are highly optimistic and lack resilience. Large strategic sites typically deliver housing slowly, particularly in the early years of a Plan period. Any delay in infrastructure funding or market delivery would have a significant and disproportionate impact on overall housing supply.
- 2.23 The policy also lacks flexibility to respond to delivery shortfalls or changes in housing need, including those arising from neighbouring authorities. Without a diversified portfolio of sites and a clear mechanism for addressing cross-boundary needs, the strategy is vulnerable to under-delivery and fails to provide a realistic prospect of meeting housing requirements over the Plan period.

***d) The Plan is not Consistent with National Policy***

- 2.24 Policy GS2 is not consistent with national policy. The NPPF requires Local Plans to significantly boost the supply of homes in an appropriate mix (Paragraph 61) and address unmet development needs from neighbouring areas (Paragraph 27), including through effective cross-boundary cooperation (Paragraph 24). Paragraph 69 requires strategic policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The NPPF also recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes and are often built-out relatively quickly (Paragraph 73).
- 2.25 A strategy that relies predominantly on a number of large strategic sites does not align with this objective and increases the risk of stalled or delayed delivery. In addition, the failure to clearly demonstrate how neighbouring authority housing needs have been taken into account is inconsistent with the requirement for effective strategic planning and cooperation on cross-boundary matters.

**Requested Modifications**

- 2.26 Policy GS2 is unsound because it places reliance on large strategic housing sites and fails to adequately consider or respond to housing needs arising from neighbouring authorities. The policy

should be amended to include a more balanced and flexible housing strategy, incorporating a wider range of site sizes and locations and clearly demonstrating how cross-boundary housing needs have been addressed. The Plan should allocate smaller sized deliverable sites in sustainable village locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility.

## **Policy GS6 Open Countryside**

### **Soundness**

2.27 Draft Local Plan Policy GS6 sets out the limited types of development which will be permissible in Open Countryside. Whilst it is acknowledged that some changes have been made to the policy wording from the Regulation 18 stage, the policy continues to apply an overly restrictive approach to housing development in such areas which significantly limits the ability of the Plan to meet identified housing needs and undermines the delivery of sustainable development over the Plan period. The following commentary sets out below why this approach is **unsound**.

#### ***a) The Plan is not Positively Prepared***

- 2.28 Policy GS6 is not positively prepared because it unnecessarily constrains the supply of housing land. By applying a presumption against housing development in the Open Countryside, the policy removes potentially suitable and sustainable sites from consideration, regardless of their proximity to settlements, access to services or ability to deliver much needed housing.
- 2.29 In the context of ongoing housing pressures and reliance on a limited number of large strategic sites, the restrictive nature of Policy GS6 reduces flexibility within the housing strategy and increases the risk that housing needs will not be met in full.

#### ***b) The Plan is not Justified***

- 2.30 Policy GS6 is not justified as it adopts a blanket restrictive approach without sufficient evidence to demonstrate that all forms of housing development in the open countryside are inappropriate. The policy does not adequately distinguish between isolated, unsustainable development and well-located sites that could deliver sustainable housing, including small- and medium-sized schemes adjacent to existing settlements.
- 2.31 The Plan fails to demonstrate that reasonable alternatives, such as allowing limited, criteria-based housing development in the open countryside, have been fully considered. As such, the policy does not represent the most appropriate strategy when assessed against reasonable alternatives.

#### ***c) The Plan is not Effective***

- 2.32 Policy GS6 is not effective because it undermines housing delivery and reduces the resilience of the Local Plan. By preventing housing development outside defined settlement boundaries, the policy places pressure on allocated sites within settlements, many of which are constrained or reliant on significant infrastructure investment.

- 2.33 Should delivery on these sites stall or fall behind anticipated trajectories, Policy GS6 provides no flexibility or contingency to respond. This lack of adaptability means the policy is unlikely to support the delivery of housing over the Plan period, particularly the early years.

***d) The Plan is not Consistent with National Policy***

- 2.34 Policy GS6 is not consistent with national policy. The NPPF does not seek to prevent housing development in the countryside outright, restricting only the provision of ‘isolated’ homes unless specific circumstances apply (Paragraph 84). Instead, national policy expressly supports sustainable development in rural areas where it will enhance or maintain the vitality of rural communities (NPPF Paragraph 83).
- 2.35 Policy GS6 applies a series of highly restrictive criteria, including a requirement that development should re-use redundant or disused buildings and be limited to a similar footprint and volume to the existing buildings, alongside enhancement of their immediate setting. This approach goes beyond what is required by national policy and effectively precludes new housing development, even where it could be sustainably located and contribute to rural vitality.
- 2.36 Furthermore, the level of restriction imposed by Policy GS6 is more onerous than that applied to development within the Green Belt under national policy, where limited new development and replacement buildings may be acceptable subject to defined criteria. As such, Policy GS6 applies a stricter test to open countryside than is required for nationally designated Green Belt land, rendering it inconsistent with the NPPF.

**Requested Modifications**

- 2.37 Policy GS6 is unsound because it applies an overly restrictive approach to housing development in the open countryside and thereby limiting housing supply, reducing flexibility, and increasing the risk of under-delivery. The policy should be amended to allow for appropriate, criteria-based housing development where it can be demonstrated to be sustainable and capable of meeting identified needs. Without such amendments, Policy GS6 fails the tests of soundness and should not be found sound.

### **3 Conclusion**

- 3.1 These representations have been prepared by Smith Jenkins Planning & Heritage on behalf of David Wilson Homes (DWH) in respect of Land off Eastfield Drive, Hanslope, Milton Keynes in response to the Milton Keynes City Plan Regulation 19 consultation.
- 3.2 The representation set out that the policies in the draft Local Plan are almost entirely focused on the urban area of Milton Keynes with the rural areas of Milton Keynes restricted to very limited development. The Plan must not neglect rural areas or rely on Neighbourhood Plans to deliver housing in the villages. It should seek to meet the growth needs of villages and quantify this need into a housing target for rural areas.
- 3.3 In the context of the emerging national planning policy changes which seek to boost housing delivery, the need for housing (both in Milton Keynes and its neighbouring areas), historic past delivery of strategic allocations, and the need to deliver sustainable housing in rural areas, Land off Eastfield Road, Hanslope should be allocated for residential development in the New City Local Plan. Allocating smaller sized deliverable sites in sustainable locations such as this will contribute to meeting housing needs within a shorter time period to diversify supply and increase flexibility.
- 3.4 Land off Eastfield Drive, Hanslope site represents an immediately available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints. It is in a sustainable rural location on the edge of existing residential development such that it could benefit from existing infrastructure and thus be delivered early on in the Local Plan period.
- 3.5 We therefore urge MKCC to revise the draft Plan accordingly before submission to ensure that it is sound.
- 3.6 We trust that these comments will be duly considered as the preparation of the Plan progresses.

**Appendix 1**

**Representations to the  
MK City Plan 2050  
Regulation 18 Draft**

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Land off Eastfield Drive, Hanslope,  
Milton Keynes

On behalf of David Wilson Homes

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October 2024

Ref: 4202

## **1 Introduction**

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage in response to the current MK City Plan 2050 Regulation 18 Consultation.
- 1.2 The representations are made on behalf of David Wilson Homes (DWH) who have a longstanding Option Agreement in respect of Land off Eastfield Drive, Hanslope, Milton Keynes.
- 1.3 The representations follow a submission to the Call for Sites Consultation in March 2022 made in support of the allocation of the site for a residential of circa 300 dwellings, likely to comprise of a mix of 2, 3, 4 and 5 bedroom units including affordable housing and a significant area of open space, landscaping and attenuation.
- 1.4 In summary these representations set out that:
  - DWH supports the Council’s overall ambitions and objectives for growth, in particular by the delivery of new homes;
  - In order to deliver the ambitions and objectives, address the Government’s clear drive of significantly boosting the supply of homes and meet needs that cannot be met within neighbouring areas, the Council should seek to deliver the upper range of the housing target over the Plan period;
  - The Open Countryside policy is considered overly restrictive and not consistent with the NPPF;
  - The policies in the draft Local Plan are almost entirely focused on the urban area of Milton Keynes with the rural areas of Milton Keynes restricted to very limited development. The Plan must not neglect rural areas or rely on neighbourhood plans to deliver housing in the villages;
  - The Plan must seek to meet the growth needs of villages and quantify this need into a housing target for rural areas;
  - The Plan will need to optimise all potential sources of housing land supply. The Plan should be focussed on the sites which are available now and that will contribute to supply in the short-term and make up any shortfall if strategic sites don’t deliver.
  - The plan should allocate smaller sized deliverable sites in sustainable village locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility; and
  - Land off Eastfield Drive, Hanslope represents an immediately available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints. It is in a sustainable location on the edge of existing residential development such that it could benefit from existing infrastructure
- 1.5 We trust that these representations will be duly considered and would welcome the opportunity to discuss the site with officers further as the preparation of the new Local Plan continues.

## 2 The Emerging Planning Context

### Overview

- 2.1 The Regulation 18 version of MKCC’s draft City Plan was published for consultation on 17<sup>th</sup> July 2024. On 30<sup>th</sup> July 2024 the Government published a Written Ministerial Statement (WMS) ‘Building the Homes We Need’ by Angela Rayner MP – Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government setting out the objective of delivering more housing over the life of the current parliament alongside, a new draft National Planning Policy Framework (NPPF) for consultation until 24<sup>th</sup> September 2024.
- 2.2 As detailed below, following the publication of the draft NPPF and WMS, the planning policy context has dramatically changed. MKCC’s City Plan must be reviewed and prepared in light of the emerging NPPF and the WMS, which is a material consideration in planning decisions as confirmed by Case Law<sup>[1]</sup> as it represents the strong prospect of a change in planning policy.

### Housing Need and Delivery

- 2.3 There are important points raised in both the revised NPPF and WMS which demonstrate the Government’s intention to increase the emphasis on the benefits of housing delivery in plan and decision making. The WMS states:

*“We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home. That is why today I have set out reforms to fix the foundations of our housing and planning system – taking the tough choices needed to improve affordability, turbocharge growth and build the 1.5 million homes we have committed to deliver over the next five years.”*

- 2.4 The consultation website for the draft NPPF changes states:

*“We are clear that local planning authorities should identify opportunities for maximising the efficient use of land, especially in areas well served by transport and other infrastructure. By restricting density, the existing policy is likely to have longer term negative impacts on achieving sustainable patterns of development and on meeting expectations on future housing supply. Alongside this reversal, we propose strengthening expectations that plans should promote an uplift in density in urban areas.”*

- 2.5 To support the Government’s ambition to boost housing delivery to 1.5 million new homes over the next five years, provide more stable and predictable housing numbers and distribute homes across

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<sup>[1]</sup> (Cala Homes (South) Ltd, R (on the application of) v Secretary of State for Communities and Local Government & Anor [2011] EWCA Civ 639 (27 May 2011))

the country where they are most needed, one of the proposed changes is the introduction of a new mandatory Standard Method of calculating housing need. This will set a baseline at a percentage (0.8%) of existing housing stocks, apply stronger affordability multipliers to relieve price pressures and remove certain caps/additions.

- 2.6 Notably, the revised draft NPPF also restores at Paragraph 76 the requirements for LPAs to demonstrate a five year housing land supply even when the adopted plan is less than five years old. This reflects the need for LPAs to adapt and respond to changes in delivery (or lack thereof) after the adoption of a plan, to ensure that needs are continued to be met.

### **Cross-Boundary Working**

- 2.7 The Government has also confirmed its intention to introduce a universal system of strategic planning across England in this Parliament *with the objective 'to promote a more strategic approach to planning, by strengthening cross-boundary collaboration, ahead of legislation to introduce mandatory mechanisms for strategic planning.'*
- 2.8 There are also new strategic powers proposed in the draft revised NPPF (Paragraph 24) which states 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.'*
- 2.9 Once matters requiring 'collaboration' have been identified, the proposed new Paragraph 27 sets out certain requirements for policy-making authorities to ensure their plan policies are consistent unless there is a clear justification to the contrary. Paragraph 27 encourages strategic policy-making on matters such as delivery of major infrastructure, unmet development needs from neighbouring areas and any allocation or designation which cuts across the boundary of plan areas.

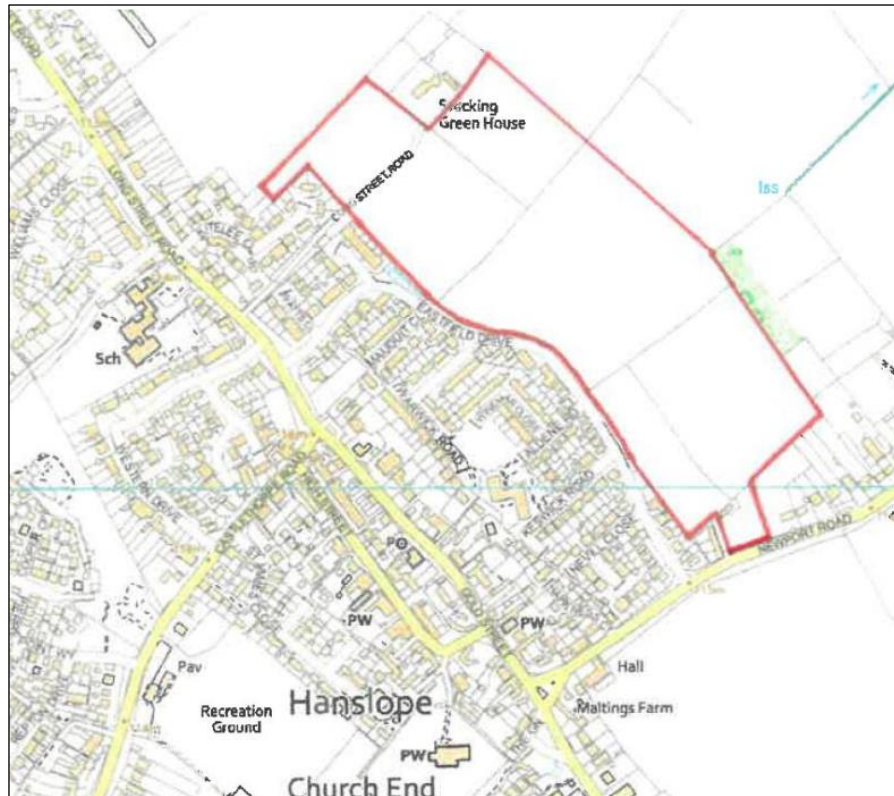
### **Summary**

- 2.10 The above demonstrates the clear recognition from Central Government that increasing the supply of housing, including by increasing densities on sites, will be essential to addressing the housing crisis and the importance of strategic cross boundary working between local authorities. The core message throughout the WMS and NPPF revision is that the Government will take a more pro-development approach to ensure the delivery of housing and will be updating policy to achieve this aim.
- 2.11 These representations refer throughout to the implications of the above emerging changes on the draft MK City Plan 2050 in support of the allocation of Land off Eastfield Drive, Hanslope, Milton Keynes.

### 3 The Promoted Site

#### Site Description

- 3.1 The extent of the promoted site at Land off Eastfield Drive, Hanslope is shown edged red on the Site Location Plan in **Figure 1** below.



**Figure 1** - Site Location Plan

- 3.2 The site is broadly rectangular in shape measuring approximately 11.8ha and is currently designated as open countryside in the adopted Plan:MK (2019) Policies Map. The site consists of agricultural use, primarily grazing and cultivated farming land. There are established hedgerows at the field boundaries within the site, one of which is subject to a Tree Preservation Order.
- 3.3 Access to the site is from Newport Road and an additional access can be formed off Eastfield Drive. There are two footpaths within the site. Footpath FP044 runs along the south western boundary adjacent to Eastfield Drive and footpath FP009 runs across the site away from Eastfield Drive.
- 3.4 The site is not affected by any environmental constraints, landscape or statutory or non-statutory ecological designations. There are no listed buildings, scheduled ancient monuments or conservation areas in the immediate vicinity of the site.
- 3.5 The site is within Flood Zone 1 and so has a low risk of flooding. There is an overhead power line running across the site and adjacent to Eastfield Drive there is a small Anglian Water compound.

- 3.6 To the south-west and south-east of the site is existing residential development. The properties fronting Newport Road are also outside of the village confines of Hanslope and located in open countryside. These dwellings comprise a mix of Victorian Terrace, detached modern and semi-detached dwellings, all 2 storey in height. Dwellings fronting Eastfield Drive comprise of 1970/1980's detached and semidetached bungalows. Beyond the bungalows is a 1970/1980's estate of 2 storey detached and semi-detached dwellings.
- 3.7 The site off Eastfield Drive is within a sustainable and accessible location, adjacent to established residential areas and within walking distance to a range of services within Hanslope. There are also regular bus services accessible from the village to Milton Keynes and Northampton.

### **Planning History**

- 3.8 An outline planning application (reference 17/00838/OUT) for the development of 200 dwellinghouses with all matters reserved was refused in March 2019 on the basis that at that time the Council could demonstrate a 5 year housing land supply and the proposal was considered harmful to the character of the area. The application followed a number of decisions in Hanslope which were approved before a 5 year housing land supply could be demonstrated. The decision was upheld at appeal (reference APP/Y0435/W/19/3236891) in March 2020. As detailed subsequently in these representations, none of the previous refusal reasons are considered insurmountable in the current context.

## 4 Representations

### Overview

- 4.1 The MK City Plan 2050 Regulation 18 Plan sets out the ambitions, objectives and overall policy framework for delivering growth aligned with the Council’s vision contained within the Strategy for 2050.
- 4.2 The 28 year plan period (2022-2050) is ambitious and well exceeds the minimum 15 year requirement to anticipate and respond to long-term requirements and opportunities and is aligned with the 30 year requirement to allow for long term strategic planning as set in Paragraph 22 of the current National Planning Policy Framework (NPPF) which remains unchanged in the revised draft NPPF.
- 4.3 David Wilson Homes (DWH) welcomes the publication of the MK City Plan 2050 Regulation 18 Consultation and the opportunity to comment. DWH believe that a planned approach is essential for those choosing to invest in the area and to provide certainty for local communities.
- 4.4 Having reviewed the draft Plan however, there are several elements which DWH feel should be reconsidered. Given that this is a Regulation 18 draft, we are confident that they can be addressed, building on the work undertaken to date, to provide a positive plan for the area.
- 4.5 The responses are set out in relation to the various policies are set out under the various topic areas below.

### **Question 1(a) – our ambition and objectives for growth**

#### ***Do you agree with our ambition and objectives for growth?***

- 4.6 Partly agree.

### **Question 1(b) – our ambition and objectives for growth**

#### ***Please say why you gave the answer to 1(a) above.***

- 4.7 While DWH support the objective to provide high quality homes, the Plan needs to make provision for a choice and range of homes that meets the needs of the community as a whole. This needs to include sites for housing in villages as well as within and adjacent to the existing City of MK. Sites need to be made available for a range of developers, not just through the provision of strategic sites. A wider range of sites can be made available through the opportunity to build on sites in and adjacent to villages. In order for the Plan to deliver the ambition, as detailed below, it should allocate smaller sized deliverable sites in sustainable locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility.

**Policy GS1 Our Spatial Strategy**

**Question 2(a) Do you agree with the draft policy?**

4.8 No.

**Question 2(b) – Policy GS1 Our spatial strategy**

***Please say why you gave the answer to 2(a) above***

4.9 Draft Policy GS1 sets out the strategic growth options in Milton Keynes over the proposed Plan period. The draft policy is given in full below:

*“The development of land for new homes and employment within Milton Keynes up to 2050 will be directed toward locations in accordance with the following settlement hierarchy.*

*Tier 1 – the designated urban area of Milton Keynes City, as shown on the Policies Map, will be where the considerable majority of development that meets our identified need for homes and jobs over the plan period will be provided.*

*Tier 2 – development in Olney and rural settlements should focus on meeting local needs and be located within defined settlement boundaries, including locations identified in relevant made neighbourhood plans”*

4.10 Paragraph 23 explains the ‘Role of Neighbourhood Plans and small sites’ and states:

*“As identified in Policies GS1 and GS2 below, we still expect local communities to plan for growth that responds to their own local ambitions and needs through Neighbourhood Plans. This includes communities within the city as well as those beyond, in Olney and villages within Tier 2 of the settlement hierarchy. Where groups want to prepare or review a Neighbourhood Plan, we intend to continue our current approach of recommending a nominal housing figure to plan for (currently, we advise at least one dwelling). We always encourage groups to gain a close understanding of their specific local housing and other development needs. This should be informed through conversations with the local community about how a Neighbourhood Plan can positively shape and deliver this growth. Through this route, we expect an additional, but unquantified, number of homes to come forward by 2050, complementing the growth locations set out in the MK City Plan 2050”.*

4.11 The spatial strategy sets out a two-tiered settlement hierarchy. This approach sees the majority of development focused within the designated urban area of Milton Keynes (Tier 1) and limited development elsewhere, i.e., in rural areas, villages with settlement boundaries and locations identified via Neighbourhood Plans (Tier 2).

4.12 With reference to the housing supply identified in Table 1 of the Plan, the vast majority of the identified supply, circa. 63,000 homes, is from locations in the urban area of Milton Keynes (Tier 1). Within Table 1, there are no allocations for homes to be delivered in rural areas (Tier 2 locations).

- 4.13 The spatial strategy is therefore binary, either development in the urban area of Milton Keynes (Tier 1) or no development elsewhere (Tier 2). This is not a sustainable approach. This approach effectively condemns locations within Tier 2 to ‘no development’ up to 2050.
- 4.14 If development is limited to villages or small settlements with existing settlement boundaries or development allocated via Neighbourhood Plans, growth in villages and smaller settlement will be stifled. Those villages will not benefit from new housing and therefore will not be able to deliver sustainable development. If no rural housing is provided there will be a number of negative consequences, for example: housing affordability issues will be exacerbated; younger people will be forced out due to a lack of housing options; local services and rural businesses will stagnate.
- 4.15 The two-tiered strategy is not justified. Housing should be distributed across the Borough in a proportionate and rational manner, underpinned by evidence of need. The settlement hierarchy should reflect the size and sustainability of settlements in Milton Keynes.
- 4.16 Whilst we agree development should be focussed in the urban area of Milton Keynes (Tier 1), we do not agree that this should be the only place which accommodates growth. A multi-tiered hierarchy should be established apportioning growth to the respective tiers based on their capacity to accommodate it.
- 4.17 While the Plan needs to be reviewed in light of the emerging 2024 NPPF, in respect of the current NPPF (2023), Paragraph 67 states that plan making authorities should establish a housing requirement for their whole area, and that strategic policies should set out a housing requirement for designated neighbourhood areas. The draft Policy does not specify a number of homes to be delivered through neighbourhood plans, and Paragraph 23 simply states that neighbourhood plans should deliver a nominal number of homes, with the Council advising that one dwelling per plan is acceptable.
- 4.18 This fails to identify the specific needs of villages and the rural areas. It prevents the potential for community-led housing coming forward, and is not consistent with Paragraph 83 of the Framework which states:

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*

#### *Neighbourhood Plans*

- 4.19 The Spatial Strategy indicates that development in rural areas will come from allocations in neighbourhood plans – this is very unlikely to happen. The expectation that local communities will plan for growth in the absence of any requirement to meet housing targets is misconceived and not a reflection on how neighbourhood planning has operated in Milton Keynes since its introduction.

- 4.20 To meet the requirements of the Framework and the ‘Basic Conditions’, Neighbourhood Plans should be prepared to conform to up-to-date strategic policy requirements set out in Local Plans. If no housing is required in rural areas via the Strategic Policies of the City Plan, then neighbourhood plans could provide zero housing and still be in conformity with those strategic policies. Removing any requirement for housing to be delivered in rural areas will inevitably result in neighbourhood plans becoming mechanisms to stop growth, i.e., if neighbourhood plans are not required to deliver housing, then Neighbourhood Plans will not to deliver housing.
- 4.21 Research undertaken by Smith Jenkins shows that of the 9 Neighbourhood Plans ‘made’ since the adoption of Plan:MK (2019), which are outside of the urban area or the ‘key settlements’ of Newport Pagnell, Olney and Woburn Sands (and excluding Hanslope, as the majority of the allocations in the Hanslope Neighbourhood Plan already had planning permission prior to 2019 due to a lack of 5YHLS in Milton Keynes and so were not ‘true’ allocations) these Neighbourhood Plans have allocated just 96 dwellings – this is just 0.3% of the housing target in the current Plan:MK (26,500 dwellings). If a similar number of allocations were in Neighbourhood Plans for the City Plan (96), then this would amount to just 0.1% of the housing target 53,256 dwellings. This will clearly not meet the housing requirement for rural areas.
- 4.22 The Plan must seek to meet the growth needs of villages and quantify this need into a housing target for rural areas. If the Plan identifies a housing requirement for rural areas, neighbourhood plan will need to accommodate this growth. If no number is provided, neighbourhood plans will deliver no growth.

*Justified*

- 4.23 The spatial strategy must be justified. The strategy must be based on proportionate evidence. In its current form, the spatial strategy is not justified.

The broad justification for the spatial strategy is summarised in paragraph 26 of the Plan:

*“This strategy seeks to protect the character of our villages and communities, which are principally located to the north of the city. In these locations the MK City Plan does not propose to allocate sites for strategic new developments. As noted above, we would expect the relevant Town and Parish Councils to identify opportunities to deliver the growth their communities need through a locally prepared Neighbourhood Plan.”*

- 4.24 The approach seeks to protect the ‘character’ of villages and communities. It follows that any new housing in these villages would be harmful to the character of the villages and the communities that live within them. This is simply not the case and plainly at odds with national planning policy. Paragraph 83.
- 4.25 The Sustainability Appraisal, which underpins the Spatial Strategy, considered ‘Expansion of Villages’ as a development option. It was considered that this was not a ‘Reasonable Alternative’ within the growth strategy due to number of reasons such poor public transport links and sensitivity to change.

- 4.26 Whilst we agree that it is reasonable to direct strategic growth to more sustainable locations, this does not mean that villages or other smaller settlements should not have any growth. Growth of villages should be proportionate to their size and their growth needs. Villages must be able to grow, the level of growth is subject to assessment, however, a blanket ‘no growth’ to all villages is not sustainable or justified.

**Question 2(c) – Policy GS1 Our spatial strategy**

**Do you have any other comments or suggestions for this topic**

- 4.27 No.

**Question 3(a) – Policy GS2 Strategy for homes**

***Do you agree with the draft policy?***

- 4.28 No

**Question 3(b) – Policy GS2 Strategy for homes**

***Please say why you gave the answer to 3(a) above***

- 4.29 The housing crisis is well documented. To support the Government’s objective of ‘significantly boosting’ the supply of homes, NPPF Paragraph 60 highlights the importance of a sufficient amount and variety of land coming forward where it is needed. As set out above, the new Government's latest consultation proposes reforms to the NPPF and other aspects of the planning system to further boost housing supply.
- 4.30 Draft Local Plan Policy GS2 Strategy for Homes seeks to ensure the housing requirement is met by delivering between 53,245 and 63,000 new homes over the Plan period (2022 – 2050) or (1,902 – 2,250 homes per annum) through a range of urban and brownfield sites and new Strategic City Extensions.
- 4.31 The identified lower range will meet both the identified local housing need of 53,245 dwellings (1,902 per annum) using the Government’s Standard Method and the emerging figure of 1,759 per annum as set out in the revised Standard Methodology. It should be noted however that providing only the ‘minimum’ housing requirement of 53,245 dwellings over the Plan period will not deliver the Government’s clear objective of significantly boosting the supply of homes.
- 4.32 The distribution of the homes is set out in Table 1. The total housing supply as per Table 1 is 62,825. The identified supply of 62,825 provides a substantial 18% buffer over the Local Housing Need of 53,245. Whilst this approach of exceeding the identified need is commendable, the components of the supply have to be achievable. Indeed, 63,000 homes will only be delivered if *every* component of the supply is forthcoming over the Plan period.

*Achievable Supply*

- 4.33 The housing supply in Table 1 is considered vague and overly reliant on longer-term ‘broad locations’ for growth. For example, the assertion that 2,500 units will come from Transport Hubs is not evidenced in the Plan and no land is allocated. These units are currently based on an assumption (as stated in Paragraph 13 of the Plan). This cannot be a component of the housing supply if the figure is assumed and there are no allocations in the Plan.
- 4.34 Additionally, provision is made for 11,000 homes in Central Milton Keynes (CMK), however, this is based on broad assumptions and no specific sites are allocated. This figure is taken from a Land Availability Assessment (LAA) for CMK which is included in the Strategic Housing Land Availability Assessment (SHLAA). The LAA is a broadbrush assessment of capacity for residential development based on various assumptions. It is not based on a capacity resulting from available and developable sites submitted to the Council.
- 4.35 Notably, of 90 rural sites submitted, 31 were considered deliverable with a combined estimated capacity of 3,267 additional homes. The housing supply for the rural areas is based on submitted sites which have been assessed and considered to be ‘deliverable’. The housing supply for CMK is based on assumptions of capacity, not deliverable sites.

*Maintaining Supply*

- 4.36 Local planning authorities are required to maintain a deliverable housing supply. As per Paragraph 69 of the NPPF, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Policies should identify a supply of (a) specific deliverable sites for five years from adoption, and (b), developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining Plan period. As defined in the NPPF Glossary, to be considered ‘deliverable’, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 4.37 The Plan does not comply with the above requirements. It does not identify a short-term supply (five years from adoption). Most of the supply is from much longer-term strategic allocations and ‘broad locations.’
- 4.38 Whilst strategic sites are important for the diversity in sources of supply, there is a need to ensure that ‘deliverability’ has been thoroughly assessed. A large proportion of the capacity for the sites expected to be delivered in the Plan period may not meet the definition of deliverable and there is a risk that supply will not be maintained consistently over the Plan period. A more balanced supply is required, and this could be achieved by the inclusion of deliverable sites in the short term.
- 4.39 This has been demonstrated by the existing allocations in Plan:MK, for example Land East of the M1 which is allocated for delivery of around 5,000 new homes and is expected to deliver 295 dwellings by 2026/2027 in the current Plan’s trajectory. However, to date no reserved matters applications have come forward for residential development on the site and as such there is likely to be a delay in the expected delivery of homes against the trajectory. In addition, the Milton Keynes South East

Strategic Urban Extension (Policy SD11) is allocated for the delivery of around 3,000 homes and was expected to deliver 50 dwellings in the monitoring year 2023/24, 250 dwellings in 2024/25, 350 dwellings in 2025/26 and 450 dwellings in 2026/27. As the site does not yet have planning permission, there is very likely to be a delay in the expected delivery of homes at this site against the trajectory.

- 4.40 Understanding the contribution of different sized sites is important. Land off Eastfield Drive, Hanslope provides an opportunity to allocate a smaller site to provide flexibility in the event that allocated sites do not deliver at the rates expected or do not come forward during the Plan period.

*Meeting the Needs of Neighbouring Areas*

- 4.41 NPPF Paragraph 11 requires that, as a minimum, strategic policies provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas unless:

- The application of policies protecting areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

- 4.42 Similarly, NPPF Paragraph 61 requires that any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing to be planned for. As identified previously, in revising the NPPF, the Government will require all areas to take a “cross-boundary strategic planning approach” in a bid to boost delivery of new homes.

- 4.43 Delivering the lower-range target of 53,245 dwellings over the Plan period, as set out in draft Policy GS2, will not address needs that cannot be met within neighbouring areas, such as Buckinghamshire and Bedford Borough, which are discussed in more detail below.

- 4.44 Whilst it is acknowledged that there are circumstances under which the needs of neighbouring areas do not need to be provided for, it is not considered that any of these apply to the site the subject of this representation (or to Milton Keynes as a whole). It is not within a protected area (and it does not comprise an asset of particular importance) and no adverse impacts (that would significantly and demonstrably outweigh the benefits) are anticipated.

- 4.45 In terms of Bedford Borough, although the examination of the Local Plan has been paused, the draft Policies Map allocates the land upon which Universal Studios is understood to be seeking to deliver a theme park for at least 4,000 homes (Policy HOU14 Kempston Hardwick New Settlement). If a proposal for a theme park is approved, it will be necessary for Bedford Borough to provide this housing to meet its needs elsewhere within its administrative area or if this is not possible, it will be required to look to neighbouring authorities to help meet this need. Milton Keynes, with its ambitions for long-term growth, is an ideal location to accommodate unmet need from Bedford Borough.

- 4.46 In terms of the other neighbouring authority, Buckinghamshire, it is noted that the revisions to the Standard Method would significantly increase Buckinghamshire’s housing need figure from 2,912

homes per year to 4,122 homes per year (an increase of 41.6%). Paragraph 2.11 of the NPPF Update report to Buckinghamshire Council’s Growth, Infrastructure and Housing Select Committee on 26<sup>th</sup> September 2024 confirms that over the time horizon of the Buckinghamshire Local Plan (2024-2045), this produces a total housing need of 86,562 dwellings. Taking into account the 25,650 homes which are already in the pipeline as a result of unimplemented planning permissions and existing local and neighbourhood plan site allocations, 60,912 homes will still need to be allocated through the new Buckinghamshire Local Plan.

- 4.47 Although Buckinghamshire Council’s most recently published Annual Monitoring Report shows that in the annual monitoring year 2022 – 2023, 3,751 dwellings were delivered, the table published alongside the Government’s consultation on revisions to the Standard Method shows that the average annual net additions in Buckinghamshire between 2020/21 and 2022/23 comprised only 2,789 dwellings. Clearly it will not be possible to deliver the 4,122 homes per year that the Government’s revised Standard Method, if adopted, will require.
- 4.48 As previously mentioned, Milton Keynes, with its ambitions for long-term growth, is an ideal location to accommodate unmet need from Buckinghamshire. Delivering the ‘minimum’ housing requirement over the Plan period, 53,245 dwellings, will not address needs that cannot be met within neighbouring areas.
- 4.49 There is no evidence to confirm that the needs of neighbouring authorities have been considered in the preparation of the Plan. It is considered that the ‘minimum’ housing requirement must be reviewed to take into account the unmet need of neighbouring areas and that the New City Plan should seek to allocate additional smaller housing sites which can assist in meeting these needs.

### **Question 3(c) – Policy GS2 Strategy for homes**

#### ***Do you have any other comments or suggestions for this topic?***

- 4.50 In summary, the Plan will need to maintain a deliverable supply of housing over the Plan period. At this stage, the Plan does not demonstrate that the housing supply is achievable and does not include allowance for meeting the needs of neighbouring authorities. A very large component of the existing supply is based on broad assumptions and strategic sites, both of which will be delivered in the longer-term. It appears that there is an over-reliance on the delivery of sites which are expected to come forward, rather than those which are deliverable now.
- 4.51 For this reason, DWH maintains that the Plan should allocate smaller sized deliverable sites in sustainable locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility.

### **Question 7(a) – Policy GS6 Open Countryside**

#### ***Do you agree with the draft policy?***

- 4.52 No.

**Question 7(b) – Policy GS6 Open Countryside**

*Please say why you gave the answer to 7(a) above.*

4.53 Draft Local Plan Policy GS6 is modelled on NPPF Paragraph 84 (Paragraph 82 in the draft NPPF) – although it should be noted that NPPF Paragraph 84 seeks to restrict *isolated* homes in the countryside, not *all* homes. Draft Policy DS6 goes further than the NPPF in restricting development in the open countryside and is therefore out of step with both adopted and emerging national planning policy, as well as the Government’s clear intention to ‘significantly boost’ the supply of housing and prioritise brownfield land.

4.54 Whilst the promoted land is not brownfield, it is worth noting that, with reference to brownfield land, the WMS published alongside the draft NPPF states:

*“The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes; expanding the current definition of brownfield land to include hardstanding and glasshouses...”*

4.55 In light of this, it is considered inappropriate and unnecessary for Draft Policy GS6 (criterion ‘d’) to restrict the redevelopment or reuse of brownfield land to *non-residential* brownfield land. In order to promote ‘an effective use of land in meeting the needs of homes and other uses’, NPPF Paragraph 123 requires strategic policies to set out a clear strategy for accommodating objectively assessed needs ‘in a way that makes as much use as possible of previously developed “brownfield” land’. Since draft Policy GS6 seeks to restrict the redevelopment of brownfield land to *non-residential* brownfield land, it is overly restrictive and does not accord with the NPPF (which seeks to make as much use as possible of *all* brownfield land – irrespective of its use class).

4.56 Although NPPF Paragraph 142 confirms that the Government attaches ‘great importance’ to Green Belts, the open countryside is not afforded the same level of protection. Despite this, Draft Policy GS6 is more restrictive of development in the open countryside than national policy is of development in the Green Belt.

4.57 Paragraph 2 of Draft Policy GS6, which introduces the concept of the impact of a proposal on the surrounding landscape, is also considered unnecessarily restrictive. Protection to the surrounding landscape is already addressed in draft Policy PFHP7(h), which requires that ‘important views and vistas from within the immediate area and wider surrounding area are protected, and the design of the proposal makes a positive contribution to the wider townscape, skyline and landscape’. It is therefore unnecessary for draft Policy GS6 to restrict proposals on the basis of their impact on the landscape.

**Question 7(c) – Policy GS6 Open Countryside**

*Do you have any other comments or suggestions for this topic?*

4.58 No.

**Question 12(a) – Policy GS11 Principles for extensions to the city**

***Do you agree with the draft policy?***

4.59 Yes

**Question 12(b) – Policy GS11 Principles for extensions to the city**

***Please say why you gave the answer to 12 (a) above.***

4.60 In light of the comments above on cross boundary working, draft Policy GS15, which sets out a series of cross-boundary principles for when, and if, development comes forward for an area on the edge of Milton Keynes is a sensible approach and is supported by DWH. However given the importance of this, it is clear that this policy should be a priority and be considered sooner in the Plan making process.

**Question 12(c) – Policy GS11 Principles for extensions to the city**

***Do you have any other comments or suggestions for this topic?***

4.61 No

**Allocation of Land off Eastfield Drive, Hanslope**

4.62 As detailed above, in the context of an increasing need for housing (both in Milton Keynes and its neighbouring areas, historic past delivery of strategic allocations and the need to allow sustainable growth in rural areas, Land off Newport Road Hanslope should be allocated for residential development in the New City Local Plan.

4.63 The site is promoted for residential development of circa 300 dwellings including affordable housing and a significant area of open space, landscaping and drainage attenuation.

4.64 The vision for Land off Eastfield Drive, Hanslope is to create a highly desirable development that secures an attractive public open space upon entering the site, keeping any built form away from Newport Road. This vision would be reinforced by additional public green spaces, with balancing lagoons to give the feeling of a spacious family development, thereby creating the ideal community and sense of place.

4.65 To achieve a well-designed place that is respectful to the surrounding landscape, any residential scheme could be appropriately mitigated through improved screening and structural landscaping at the peripheries of the site.

4.66 Development would be delivered predominantly in the form of detached houses with some semi-detached, generally two storeys in height but with occasional use of 2.5 storey dwellings at gateway/corner locations to aid legibility and add interest.

- 4.67 Development here can be delivered in a manner that respects surrounding built development and form a sympathetic and logical addition to the settlement edge in a sustainable area, to provide much needed housing at a scale and location that would complement the area.

**Benefits**

- 4.68 Development would deliver a number of significant social, economic and environmental benefits, fully aligned with the three key dimensions of planning in achieving sustainable development as defined in the National Planning Policy Framework as detailed below.

***Social Benefits***

- 4.69 The development of the site will support the creation of a strong, sustainable, vibrant and healthy community by increasing the supply of housing of a type and tenure to meet the needs of the area, including family homes and affordable housing. It would provide a high quality built environment and complement the character of the surroundings with substantial public open space for the use of existing and future residents.

***Economic Benefits***

- 4.70 Development of the site for housing would assist in building a strong, responsive and competitive economy by providing a suitable site in an appropriate location to support housing growth. The additional residents generated by a development on the site will result in increased demand for local goods and services which will enable sustained use of local shops and services, increasing their viability and bringing a boost to the local economy. It will also have the potential to deliver new job opportunities during the construction phase.

***Environmental Benefits***

- 4.71 The proposed development will involve the loss of greenfield (agricultural) land, however the site can be developed to provide numerous compensatory improvements, through the retention and enhancement of existing hedges and trees to ensure that the development on the site would provide ecological gain and would have a limited impact on the open countryside and landscape of the surrounding area. Public open space will provide attractive and accessible local greenspace for the development and wider community, and will increase opportunities for improving physical health and well-being.

**Deliverability of the Site**

- 4.72 Paragraph 69 of the NPPF requires Local Planning Authorities to have a clear understanding of the land available in their area to identify a sufficient supply and mix of housing sites. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Paragraph 70 states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

- 4.73 To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site within five years, as defined in the NPPF Glossary.
- 4.74 The following demonstrates that the promoted site represents an available, suitable, achievable and therefore entirely deliverable option for residential development which can be delivered in the new Local Plan period to make a notable contribution towards the need for market and affordable housing and the delivery of sustainable development.

***Available***

- 4.75 The landowners are fully supportive of this submission and the development of the site in the short term and within the early plan period.
- 4.76 There are no known legal or ownership issues or covenants and no technical constraints which would prevent the site from being developed for housing upon receipt of requisite consents and no reasons which would cause delays or render the site unavailable.

***Suitable***

- 4.77 The suitability of the site has been considered as part of a previously refused planning application and appeal. This was progressed at a time where Milton Keynes Council could demonstrate a 5 Year Housing Land Supply (albeit marginal).
- 4.78 Whilst the site was considered to be in a sustainable location within walking distance of basic services, the harm caused by the visual impacts of any development was not considered to outweigh the harm of any proposed residential development. However, it is maintained that the site is suitable by virtue of its sustainable location and any visual impacts of proposed residential development can be mitigated.

***Achievable***

- 4.79 The landowners have an Option Agreement with DWH, who are actively developing sites elsewhere in the Milton Keynes area and are fully committed to delivering the site in a prompt and timely manner to make a valuable contribution to housing land supply in the early part of the plan period. DWH are proud of their delivery record and the high quality housing product they provide.
- 4.80 The size of the site is such that it has the ability to start contributing towards housing supply within a shorter time period when compared to larger strategic sites in the Local Planning Authority area.
- 4.81 Technical and environmental work has been undertaken to establish any constraints that will impede development on this site and none have been identified.

***Viability***

- 4.82 A scheme of the nature proposed is considered to be viable taking into consideration likely Section 106 payments, policy requirements and infrastructure costs. There are not expected to be any abnormal site costs associated with a development on the site.

**Response to Strategic Housing Land Availability Assessment (SHLAA)**

4.83 The site has been assessed in the Strategic Housing Land Availability Assessment (SHLAA) (July 2024) under reference 110602 as suitable, available and achievable site for housing. A response to the SHLAA ‘Constraints Summary’ commentary in relation to the site is provided below:

Comments	Response
<p>Depending on layout may require footway improvements on Eastfield Drive. Concerns regarding wider sustainability of Hanslope for significant growth - if multiple sites were to come forward the local highway infrastructure including walking, cycling and local facilities would not be suitable to accommodate this level of development. The site also has some potential surface water flood risk which would need to be reviewed and considered.</p>	<p>Footway improvements on Eastfield Drive and surface water drainage can be considered as part of a planning application. In terms of the wider sustainability, Hanslope is a sustainable village, and due to its size considerably more sustainable than a number of other rural settlements in the borough. This is confirmed in Milton Keynes Council Hanslope Cumulative Impacts Study – September 2018 prepared by AECOM, which considered the impacts of planned growth for the village at that time which have now been completed in conjunction with a development on Land off Eastfield Drive. The Study concluded that the area safeguarded for school expansion is more than sufficient to allow for the new primary-school age pupils that will be generated new developments at Hanslope. In terms of open space there was considered to be an opportunity to secure an uplift in the spatial provision of playing fields through committed and forthcoming financial contributions. Furthermore, there was also deemed the opportunity to secure financial contributions, as was the case with the permitted housing developments in Hanslope, towards expansion and improvements of the GP surgery. As such Hanslope is suited to accommodating additional growth.</p>

## **5 Conclusion**

- 5.1 These representations have been prepared by Smith Jenkins Planning & Heritage to the current MK City Plan 2050 Regulation 18 Plan on behalf of David Wilson Homes (DWH) who have a longstanding Option Agreement in respect of Land off Eastfield Drive, Hanslope, Milton Keynes.
- 5.2 The representation set out that the policies in the draft Local Plan are almost entirely focused on the urban area of Milton Keynes with the rural areas of Milton Keynes restricted to very limited development. The Plan must not neglect rural areas or rely on neighbourhood plans to deliver housing in the villages. It should seek to meet the growth needs of villages and quantify this need into a housing target for rural areas.
- 5.3 In the context of the emerging national planning policy changes which seek to boost housing delivery, an increasing need for housing (both in Milton Keynes and its neighbouring areas), historic past delivery of strategic allocations, and the need to deliver sustainable housing in rural areas, Land off Eastfield Road, Hanslope should be allocated for residential development in the New City Local Plan. Allocating smaller sized deliverable sites in sustainable locations such as this will contribute to meeting housing needs within a shorter time period to diversify supply and increase flexibility.
- 5.4 Land off Eastfield Drive, Hanslope site represents an immediately available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints. It is in a sustainable rural location on the edge of existing residential development such that it could benefit from existing infrastructure and thus be delivered early on in the New City Local Plan period.
- 5.5 We trust that these comments will be duly considered as the preparation of the Plan progresses.