

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 16th February 2026** 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

Mrs

First Name

Emily

Last Name

Warner

Job Title
(where relevant)

Associate Director

Organisation
(where relevant)

Mr N Brown, Ms P Brown, Mr C Brown and Mr J Brown

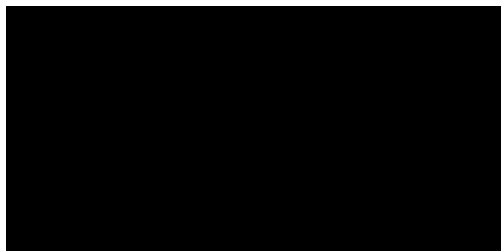
Smith Jenkins Planning & Heritage

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?

Paragraph

Policy

GS2

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 refer to accompanying letter for full details.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying letter for full details.

(Continue on a separate sheet /expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local Plan.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

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

Representations cannot be treated as confidential and will be published on our website alongside your name. *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*

12 February 2026

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

By email: ncp.engagement@milton-keynes.gov.uk

Our Ref: 404

Dear Sir or Madam

Milton Keynes City Plan Regulation 19 consultation
Land at Upper Weald, Milton Keynes
On behalf of Mr N Brown, Ms P Brown, Mr C Brown and Mr J Brown

This submission is made by Smith Jenkins Planning & Heritage on behalf of the landowners, Mr N Brown, Ms P Brown, Mr C Brown and Mr J Brown, in response to the Milton Keynes City Plan Regulation 19 consultation.

Representations were previously submitted to the Regulation 18 consultation (October 2024). A copy of those representations is attached to this letter for the Inspector's consideration. As part of the Regulation 18 consultation, the Brown family promoted the allocation of land at Upper Weald, Milton Keynes, for residential development, as illustrated in **Figure 1** below.



Figure 1 – Site Location

The Regulation 18 response focused on Policy GS2 Strategy for Homes and set out, in summary, that:

- The Brown family support the Council's overall ambitions and objectives for growth, particularly the delivery of new homes.
- In order to realise these ambitions and objectives, respond to the Government's clear direction to significantly boost the supply of housing, and meet needs that cannot be accommodated within neighbouring authorities, the Council should plan to deliver towards the upper end of the identified housing requirement over the Plan period.
- The Council must allocate sufficient land to meet the housing requirement, ensuring a range of site types and sizes to support flexibility, resilience and delivery.
- The draft Local Plan is heavily focused on development within the urban area of Milton Keynes, with rural areas subject to very limited growth. The Plan should not marginalise rural settlements or place undue reliance on neighbourhood plans to deliver housing in villages.
- Land at Upper Weald represents an immediately available, suitable and achievable opportunity for residential development. The site is free from physical, legal or environmental constraints and is therefore fully deliverable.
- The site could be delivered alongside other sites as part of a wider, comprehensive allocation on the western side of Milton Keynes as part of the Western Expansion Area (WEA).

In light of the above, the Brown family maintain that the concerns raised at Regulation 18 have not been adequately addressed within the Regulation 19 version of the Plan and the representations made are still valid.

These representations are submitted to assist the Inspector in examining whether the Plan satisfies the statutory requirements and the tests of soundness set out in Paragraph 36 of the National Planning Policy Framework, namely whether the Plan is positively prepared, justified, effective and consistent with national policy.

In particular, it is considered that the Plan, as currently drafted is unsound as it:

- Is not **positively prepared**, as it does not maximise opportunities to meet housing needs in full, nor does it sufficiently respond to the Government's objective of significantly boosting the supply of homes;
- Is not **justified**, as the spatial strategy overly concentrates growth within the urban area of Milton Keynes and strategic sites without robust evidence to demonstrate that represents the most appropriate strategy when considered against reasonable alternatives, such as a more balanced distribution of housing across a range of site sizes and locations;
- Is not **effective**, given the reliance on a limited number of large strategic allocations and neighbourhood plans, which will constrain flexibility and delivery across the Plan period; and

- Is inconsistent with **national policy**, which requires local planning authorities to identify and update annually a supply of specific, deliverable sites sufficient to provide five years' worth of housing against their housing requirement, together with an appropriate buffer.

Requested Modifications

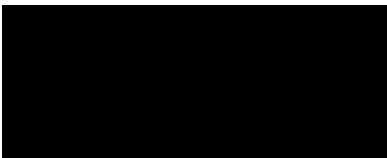
Policy GS2 should be amended to provide a more balanced and flexible housing strategy, incorporating a wider range of site sizes and locations. The Plan should allocate smaller, deliverable sites capable of making an early contribution to housing supply in order to diversify delivery sources, reduce reliance on a limited number of large strategic allocations, and increase flexibility across the Plan period.

In the context of emerging changes to national planning policy aimed at boosting housing delivery, an increasing housing requirement (both within Milton Keynes and in neighbouring authorities), and the historically slower build-out rates associated with large strategic allocations, Land at Upper Weald should be allocated for residential development in the New City Local Plan as part of an extension to the Western Expansion Area (WEA).

The allocation of deliverable sites such as this would enable housing to come forward within a shorter timeframe compared to much larger strategic sites, thereby assisting in maintaining supply, diversifying the housing market, and enhancing the overall effectiveness and resilience of the Plan.

We trust that these representations will assist the Inspector in the examination of the Plan and would welcome the opportunity to participate further in the process.

Yours faithfully



Emily Warner MRTPI
Associate Director
Smith Jenkins Ltd

Enc. Regulation 18 Representations (October 2024)

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

Land at Upper Weald, Calverton
Milton Keynes

On behalf of Mr N Brown, Ms P Brown, Mr C
Brown, and Mr J Brown

October 2024

Ref: 404

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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 Mr N Brown, Ms P Brown, Mr C Brown, and Mr J Brown (the Brown Family) who own the proposed site known as ‘Land at Upper Weald, Calverton.’
- 1.3 In summary these representations set out that:
- Our client 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 direction in 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 Council need to allocate sufficient land to meet the housing target, and these should be across a range of types of sites;
 - 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;
 - Land at Upper Weald, Calverton represents an immediately available, suitable, achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints. The site can be delivered alongside other sites as part of an extended land allocation on the west side of Milton Keynes.
- 1.4 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 17th July 2024. On 30th 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 24th 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^[1] 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

^[1] (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 at Upper Weald, Calverton, Milton Keynes.

3 The Promoted Site

Site Description

- 3.1 The site is an irregularly shaped open parcel of land in agricultural use located off Calverton Road in the hamlet of Upper Weald. The extent of the promoted site measures approximately 1.5ha and is shown edged red in **Figure 1** below.



Figure 1 – Aerial View of the Site

- 3.2 The Local Plan (Plan:MK) places the site outside of any defined settlement boundary, allocating it in 'Open Countryside'. Plan:MK designates land immediately to the east of Upper Weald as part of the Milton Keynes Western Expansion Area ('WEA'), which benefits from planning permission for a Sustainable Urban Extension ('SUE'). The Site is not located in a Neighbourhood Plan area. The Milton Keynes Landscape Character Assessment ('LCA') (adopted 2022) places the Site in the Undulating Clay Plateaux Landscape Character Type ('LCT').
- 3.3 The land is accessed via a gated entrance in the centre of Upper Weald. It is narrow in width until around 50m north from the road whereupon it opens up into a typical agricultural field that extends to the rear and side of neighbouring properties.

- 3.4 There is a public footpath within the neighbouring field to the north, 'Calverton FP 47,' which runs adjacently along the site's northern boundary.
- 3.5 The site is not affected by any environmental constraints, landscape or statutory or non-statutory ecological designations.
- 3.6 While the site is not located within a designated conservation area, there are 4 Grade II listed buildings located within the immediate vicinity of the site.
- 3.7 The site is located within Flood Zone 1. There is a small amount of flood risk from surface water along the northern boundary of the site, although this is not considered significant.

Planning History

- 3.8 There is no recent planning history associated with the site.

SHLAA Assessment

- 3.9 The site is identified in the SHLAA (reference 110003), called Land North of Calverton Lane, Upper Weald. The site is agreed as being suitable and available for development for residential purposes. Under 'suitability' the reported conclusion is that the site could come forward as part of an expanded WEA. The landowner agrees that the site can come forward as part of an expanded WEA, and that this should be considered further in respect of the strategic approach to site identification and allocation in the New City Plan.

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 Our client welcomes the publication of the MK City Plan 2050 Regulation 18 Consultation and the opportunity to comment. Our client believes 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 our client feels 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 our client supports 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 strategic sites within and adjacent to the existing City of MK. Sites need to be made available for a range of developers, to ensure the full housing target can be met, including the need for specialist housing, which is largely focused on delivery within the largest strategic sites. A wider range of sites can be made available through the opportunity to build on sites in and adjacent to villages but also as part of extensions to existing land allocations.

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 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). There is no reference within the strategy about how the strategic sites are considered within the hierarchy. There is also no reference or explanation as to the status of the strategic sites for ‘meanwhile’ land uses post adoption of the Plan.

Question 2(c) – Policy GS1 Our spatial strategy

Do you have any other comments or suggestions for this topic

4.10 No.

Question 3(a) – Policy GS2 Strategy for homes

Do you agree with the draft policy?

4.11 No

Question 3(b) – Policy GS2 Strategy for homes

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

4.12 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.

4.13 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.

4.14 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.

- 4.15 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.
- 4.16 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.
- 4.17 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.

Maintaining Supply

- 4.18 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.
- 4.19 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.’
- 4.20 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. An extension to the WEA, which is already connected to the City transport network and has provided facilities to meet the needs of residents, would be a sensible approach to delivering development within the next 5 years.

Meeting the Needs of Neighbouring Areas

- 4.21 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.
- 4.22 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.
- 4.23 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, which are discussed in more detail below.
- 4.24 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.
- 4.25 In terms of the other 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 26th 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.
- 4.26 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.

- 4.27 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.
- 4.28 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?

- 4.29 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.
- 4.30 For this reason, the Brown family considers that the site at Upper Weald, as part of the WEA expansion, would enable a choice in the range of sites available, with multiple sites across the City delivering housing to meet the identified need.

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

Do you agree with the draft policy?

- 4.31 Yes

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

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

- 4.32 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 our client. 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?

- 4.33 No

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 our client, the Brown family, who own the land identified in SHLAA site 110003.
- 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.
- 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 Land at Upper Weald should be allocated for residential development in the New City Local Plan as part of the extension to the WEA. Allocating deliverable sites in sustainable locations such as this will contribute to meeting housing needs within a shorter time period when compared to the much larger strategic sites to diversify supply and increase flexibility.
- 5.4 We trust that these comments will be duly considered as the preparation of the Plan progresses.