



Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

Ref:
(For official use only)

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm on Monday 22nd December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at ncp.engagement@milton-keynes.gov.uk

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*

boxes below but complete the full contact details of the agent in 2.

Title

Ms

First Name

Gemma

Last Name

Drake

Job Title

Sustainability Lead (Council)

(where relevant)

Organisation

Milton Keynes City Council

(where relevant)

E-mail Address

Address Line 1

Line 2

Line 3

Line 4

Post Code



Telephone Number

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph

Policy

CEA6

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.

Within Section C, Local Energy Networks are restricted to new buildings which is not reflective of heat network zoning policy. This policy is expected to mandate connection for all non-residential buildings within a designated zone.

Whilst the policy identifies 4 different mechanisms by which developers/ building owners can seek to release their responsibilities to connect to a heat network, it is not clear how developers would justify what constitutes a 'better alternative' or how this would be challenged by the planning authority. This could lead to an undermining of the policy which has occurred under the existing Local Plan.

We would suggest having a clear methodology and standard for developers/ building owners to use to assess their requirements to connect.

Section 303 requires an update to ensure that metrics are in line with industry/ government.

(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.

To strengthen the Council's position and ability to more effectively audit compliance, we would like to suggest the following enhancements:

Low Carbon Heat Networks

C. As per the Energy Act 2023 and Heat Network Zoning policy requirements, all development (residential, commercial, and public sector buildings), redevelopments or significant refurbishment proposals within the same or adjacent parish as infrastructure associated with an existing or proposed heat and/or energy network, or within a heat network zone, must connect to the relevant network, unless it can be demonstrated that:

- A lower cost, low carbon heating option for decarbonisation of buildings can be achieved via a heat network viability assessment

Supplementary Information to support the policy

Heat Network viability assessment

In order to demonstrate that a lower cost, low carbon heating option is the most viable heating option for decarbonisation of buildings, developers will be required to undertake the following actions:

- Meet with existing heat network developers and providers to understand capacity and connection requirements/ costs
- Technical feasibility.
- Economic viability (using levelized cost of heat as a comparator).
- Justification report

Methodology for calculating the levelised cost of heat (LCOE/ LCOH)

Understanding the full cost of heating and cooling a building is an important step in assessing potential future connection to a district energy network.

The Department of Energy, Security and Net Zero (DESNZs') Whole Life Cost of Energy (WLCoE) calculator helps building owners and operators to understand the full financial cost of the energy their buildings use. This includes not only the cost of the fuel, but also the cost of operating, maintaining and replacing the plant that converts the fuel into usable energy.

The levelised cost is a metric that enables comparison between the relative costs of different heating or cooling methods, as well as allowing for a differentiation between heating types such as steam, domestic hot water, low temperature space heating etc. all of which will require different types of generating plant with different cost profiles.

Levelized Cost of Energy (LCOE)

Levelized Cost of Energy (LCOE) is the standard metric used for comparing the relative cost of alternative potential energy sources to an energy user. It is best understood as a long run average cost, in p/kWh, that takes into account the time value of money. When used in the context of heat supply, it is sometimes described as the Levelized Cost of Heat (LCOH).

LCOE is calculated as the Net Present Value of future energy costs over the relevant forecast period divided by the Net Present Value of future energy used over the same period. This calculation is normally performed in real (i.e. present day) terms, using a real discount rate (typically 3.5% pa). The costs used in the calculation therefore do not include the effect of future inflation.

The mathematical formula for LCOE is as set out below:

$$LCOE = \frac{\sum_{i=1}^n \frac{c_i e_i}{(1+r)^i}}{\sum_{i=1}^n \frac{e_i}{(1+r)^i}}$$

Where:

- There are n time periods, running from i=1 to i=n
- c_i is the unit energy cost in the ith period (in p/kWh)
- e_i is the energy used in the ith period (in kWh)
- r is the real discount rate (typically 3.5% pa)

For long-term heat supply 40 years of projected costs are generally used. Time periods can be annual, quarterly or monthly, using an appropriate real discount rate derived from the annual rate of 3.5%.

When LCOE is calculated from the perspective of a business supplying heat based upon a heat tariff, it is described as the Levelized Heat Tariff (LHT), and total heat charges rather than heat costs are used within the calculation.

Section 303

Remove the following:

‘By generating heat and/or power simultaneously, CHP and Local Energy Networks can reduce carbon emissions by up to 75% compared to conventional generation via a boiler and power station, and reduce dependence on the national electricity grid for energy and heating needs’.

Replace with:

‘By generating heat and power simultaneously from the same fuel, CHP can reduce carbon emissions by up to 30% compared to the separate generation of heat through a gas-fired boiler and an electricity power station. Where a demand for both heat and electricity exist in the same location, CHP can reduce energy costs whilst reducing carbon emissions and air pollution’. (Taken from [Combined Heat and Power: the route to 2050 - summary of responses to call for evidence](#))

(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)

 X – happy to participate if required

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

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

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

Sharing your personal details

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

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

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