

**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)

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

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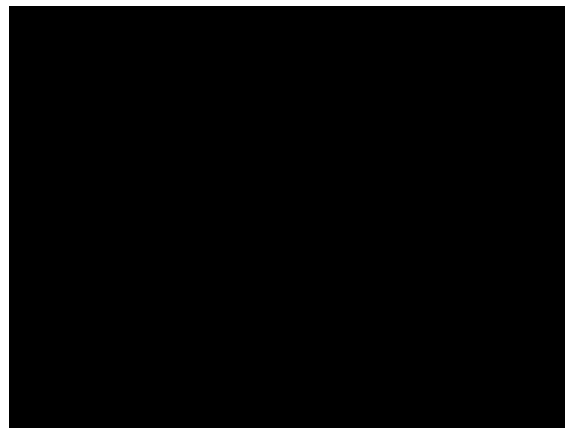
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**Part B – Please use a separate sheet for each representation**

Name or Organisation:

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

Paragraph  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"/>
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This policy includes onerous, complex and burdensome requirements relating to energy use, lifecycle carbon requirements, the payment of contributions to carbon offset funds and ongoing monitoring.

These are considered unnecessary in addition to building regulation requirement, contrary to national policy and should be omitted.

This is for the following reasons:

In the written ministerial statement (WMS) made on 13 December 2023, the housing minister emphasises the importance of making progress on improving the efficiency and performance of homes, while still ensuring that homes are built in sufficient numbers to support those who wish to own or rent their own home.

The Government's approach to achieving that objective is via the nationally prescribed and applied Building Regulations. The WMS explains that:

"Compared to varied local standards, these nationally applied standards provide much needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes."

These draft policies add an unnecessary and unwanted additional layer of local requirements to be met at the planning stage which impacts negatively on the burden imposed on housing developers and makes housebuilding relatively less attractive and viable which is inconsistent with national policy.

In line with national policy as expressed through the WMS, these policies are considered unnecessary, inconsistent with national policy and for that reason should be omitted. The WMS makes this point forcibly confirming that:

"In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)."

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

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The policy is not necessary in addition to the Building Regulations and should be omitted.

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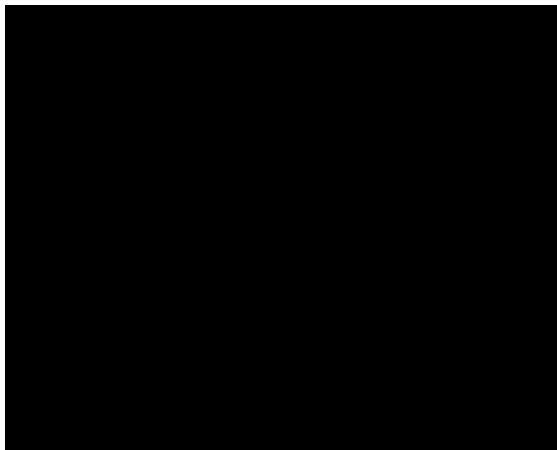
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We do not agree with this policy as currently worded. The allocation of the land for development per se is supported yet the limit proposed to be imposed that none of the allocated development site can come forward prior to 2038 is not justified, positively prepared or sound.

Gleeson Land is promoting land east of Vandyke Close, Woburn Sands (Site ID: 110530), which forms part of Policy GS15 East of Wavendon Strategic City Extension.

It sits peripheral to the remainder of the allocation, yet is nevertheless important in terms of its location to Woburn Sands station (less than 400 metres walking distance). It benefits from its own means of access and is capable of providing access to parcels further north, should this be deemed necessary. A modest development of circa 60 homes can clearly be delivered, along with the adequate infrastructure to access and service the site. On this basis, the policy

(GS15) which seeks to prohibit approval of development here until 2038 is neither positively prepared, justified or sound.

Such an approach is unduly restrictive and undermines the ability of the site to make a meaningful and important contribution towards future market and affordable housing needs quickly. Housing which can be provided for at the site will be located in a highly sustainable location, very well related to the existing settlement edge and capable of being accessed as a single self-contained parcel via the extension of the existing well established road network.

The Council's justification for the 2038 restriction, in part, is as follows:

*"Equally, greater clarity on potential growth areas immediately adjoining the allocation eastward beyond Milton Keynes City will have been reached through the preparation of the next Central Bedfordshire Local Plan, which may potentially offer a different context for considering and agreeing detailed design and layout matters within allocation. While the allocation is not directly dependent on these wider strategic matters, they may have implications for the distribution, layout and/or design of the site. For these reasons, delivery of this allocation is planned for 2038 onwards."*

We consider the Council is assuming an over-cautious approach on this, particularly considering Central Bedfordshire is at a very early stage of its Draft Local Plan and has not even commenced a Regulation 18 consultation. It is therefore greatly premature and unreasonable to assume the extent of growth, if any at all, at or around Aspley Guise. This further supports the unsoundness of the 2038 restriction.

It is notable in this regard that the government has recently confirmed that the Duty to Cooperate has not been saved (SoS Pennycook letter to Chief Executive of PINS dated 27 November 2025), removing this requirement for plans in the current system. This is part of the onus the government is placing on driving forward local plans to adoption as quickly as possible. Another strand in their strategy to fulfil their pledge of buildings 1.5million homes this parliament (by 2029) and realising the benefits from the homes this country needs sooner. Imposing unjustified restrictions on when homes can be built on suitable sites such as this one is the antithesis of this approach.

In the recently published planned change to national planning policy, as expressed through the consultation draft NPPF (December 2025), the government has provided details of its plans to support housing and mixed-use development within reasonable walking distance of well-connected train stations (policy S5: Principle of developing outside settlements). The qualifying criteria to benefit from the presumption in favour of approval for this type of development, as they relate to the subject site, are considered below:

1. The site at Vandyke Close, Woburn Sands (Site ID: 110530) is located in a top 60 Travel to Work Area (Milton Keynes);
2. East West Rail planned upgrades to the line are expected to provide (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) a frequency of four trains per hour or two trains per hour in any one direction (draft NPPF footnote 26). The East West Rail Autumn Update (November

2025) indicates that as part of the upgrade works frequency of passenger rail services is to be increased to up to a maximum of five trains per hour, in accordance with the draft requirements for a 'well-connected rail station';

3. It is well related to Woburn Sands train station (400metres walking distance away);
4. The site and proposed development would be of a scale that could be accommodated taking account of existing infrastructure; and
5. The development of the site would not prejudice longer term comprehensive development in the same location. It is notable that land further north within the proposed East of Wavendon allocation would necessarily be further from the Woburn Sands rail station.

On introduction of this new policy the development of the subject site will benefit from the presumption in favour of development such that a policy restricting development on this part of the East of Wavendon allocation would serve no useful purpose.

Instead the Council should be seeking to facilitate the delivery of homes at the subject site which has a willing landowner and promoter on board capable of delivering high quality new homes on this site early on in the plan period to enable the benefits of the development to be realised sooner. We consider the policy needs amendment. This is particularly justified in relation to parts B & E of the policy which we recommend be amended as set out below.

Notwithstanding this even if the 2038 restriction were to be considered sound, then at the very least it should include an early release trigger. This would support the approval of proposals before 2038 in circumstances where, for example, other allocations are not sufficiently delivering or the housing land supply position falls below 5 years.

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*B. Commencement of residential development within the East of Wavendon Strategic City Extension will not be permitted to occur prior to 2038. **Development within East of Wavendon Strategic City Extension will be required to provide a comprehensive infrastructure assessment. This would need to account for both the proposed development's individual demands upon infrastructure and identify any contributions considered necessary to be made towards any reasonable shared infrastructure costs for the wider masterplanned area on an equitable, pro rata basis.***

*E. Development proposals will be required to meet the following criteria:*

*1. Delivery of around ~~2,250~~ **3,000** new homes through a comprehensive masterplan approach providing a range of house size, type and tenure, including affordable, older persons, and specific and specialist needs housing;*

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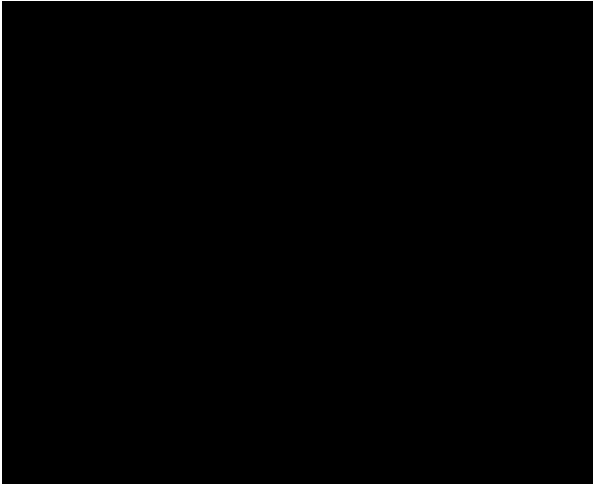
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The Regulation 19 version of the Plan compared to the Regulation 18 version anticipates the relatively constrained and ill-defined sources of supply of Central MK and Metro Corridors will deliver 16,000 and 2,500 homes respectively. In the case of Central MK this is a 5,000 dwelling uplift on the projected yield in the Regulation 18 version of the plan.

In contrast the projected yield from the East of Wavendon Strategic City Extension has been reduced from 3,000no. dwellings in the Regulation 18 version to 2,250no. dwellings in the Regulation 19 version.

The changes are not justified by reference to clear, robust evidence which could undermine the effectiveness of the plan.

In particular the Central MK and Metro Corridor sources of supply appear to be dependent on developable land coming forward within these general areas. In the absence of more detailed information on whether suitable, available, achievable and deliverable sites exist in these areas to achieve the housing numbers stated in the policy it lacks the requisite compelling evidence that they will provide a reliable source of supply.

Both Central MK and the Metro Corridor categories are likely to be subject of considerable constraints around ownership, site assembly, delivery costs, amenity impacts etc which could negatively impact on the yields stated.

By contrast the relatively unconstrained East of Wavendon Strategic City Extension should have the former projected yield of 3,000no. dwellings reinstated in the policy to counter balance the uncertainty which exists over the delivery of the quantum of houses anticipated from Central MK and the Transport corridors.

It is also considered that specific sites within the Central MK and Transport Corridor categories should be identified and allocated for homes to provide a greater degree of certainty and robustness to the projected yield figures.

Selecting sites in this way would have the added benefit of drawing from the Council's SHLAA, confirming the deliverability of the site for the number of homes proposed, and ensure the policy accords with national policy.

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Increase the projected yield of the East of Wavendon Strategic City Extension to around 3,000no. homes.

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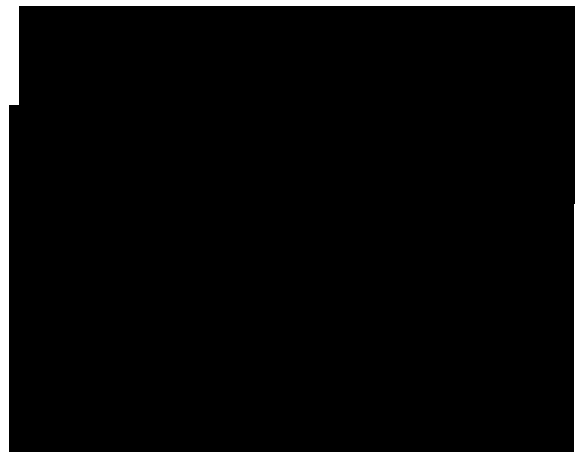
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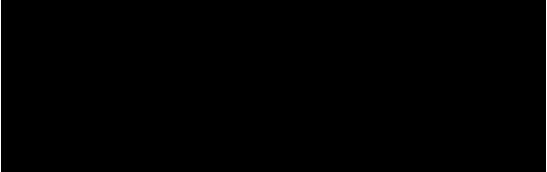
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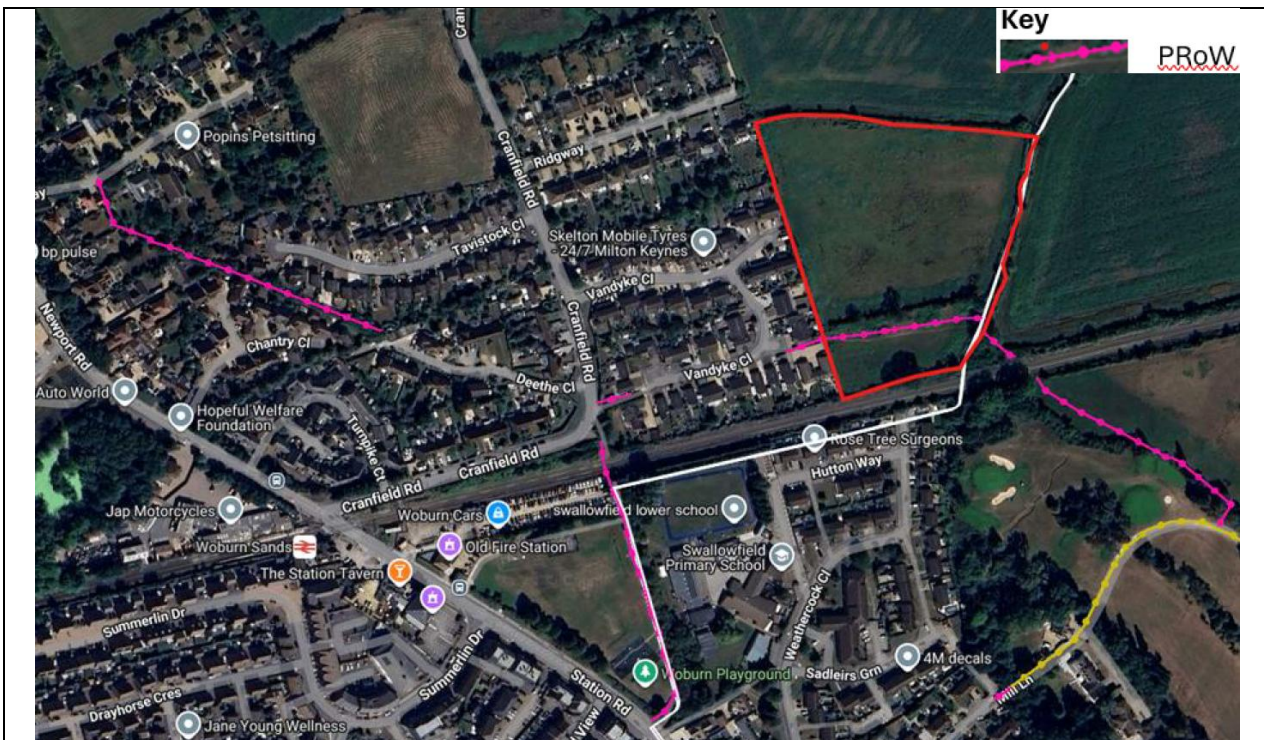
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The Metro Corridor should include land around Woburn Sands train station on the East West Rail Line. The East West Rail line is the subject of significant, investment and upgrade to improve connectivity and frequency of connections as it travels through the authority area via Bletchley station to the west which is included in a Metro Corridor and Woburn Sands which is not. This should be corrected to better realise the development potential of sites in these highly sustainable locations. This would include our clients land east of Vandyke Close, Woburn Sands (Site ID: 110530), which is located very close (less than 400metres walking distance) from Woburn Sands train station, as shown below:



The allocation of this discrete parcel of land as a Metro Corridor allocation which benefits from its own access would enable delivery of homes to come forward and realise the benefits sooner than the East of Wavendon Strategic City Extension allocation currently permits (not before 2038). Furthermore it would not prejudice the remainder of that strategic allocation.

Such an approach would be consistent with MK Council's policy to more fully realise the benefits of sustainable growth, including housing, on sites around train stations, which enable good access to public transport, employment opportunities and education.

It would also align with the government's planned change to national planning policy, as expressed through the consultation draft NPPF (December 2025), to support housing and mixed-use development within reasonable walking distance of well-connected train stations (policy S5: Principle of developing outside settlements). The qualifying criteria to benefit from the presumption in favour of approval for this type of development, as they relate to the subject site, are considered below:

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To align with our comments on Policy GS2 for Metro Corridors, we consider the policy and proposals map should be clearer on the sites expected to deliver major development proposals in these areas to achieve the projected yields. The policy should be amended (deletions shown struck through with additions shown in **bold**) as shown below:

*A. Major development proposals **on allocated sites shown on the policies map** within the Metro Corridors, and/or those associated with the regeneration of a residential estate(s), will be supported where they comply with the criteria below:*

These allocated sites shown include our clients land east of Van Dyke Close for the reasons stated above, which should be identified in a Metro Corridor designation around Woburn Sands train station.

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