



Milton Keynes City Plan 2050

Regulation 19 Consultation

December 2025



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1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments Ltd. (Gladman) welcome the opportunity to comment on the Milton Keynes City Plan 2050 Regulation 19 Consultation and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman has been involved throughout the plan preparation process of the emerging Milton Keynes City Plan 2050.

1.1.3 Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

1.1.4 This submission also has been produced largely utilising the 2024 NPPF (National Planning Policy Framework) regulations recognising that the Council are seeking to submit their Local Plan before the December 2026 deadline. We note that a revised NPPF consultation has very recently been announced (on 16th December 2025), and therefore the council will need to carefully consider any potential implications for the emerging Local Plan.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1 The Duty to Co-operate requires local authorities to cooperate with neighbouring authorities on strategic planning matters. Engagement with prescribed bodies on relevant strategic and cross boundary matters is an important part of the plan-making process. While the Duty to Cooperate is no longer defined in law and is not a legal requirement of the local plan making process, the NPPF and planning guidance still require Local Authorities to maintain effective cooperation to ensure effective strategic planning.
- 2.1.2 It will be important for Milton Keynes to demonstrate how it has engaged constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of preparing the Local Plan.
- 2.1.3 NPPF paragraphs 24–28 emphasise the need for local planning authorities to maintain effective cooperation during the plan-making process. It provides that this is integral to the production of a sound plan, one that is positively prepared and with a justified strategy for managing growth and meeting identified needs for development, including infrastructure. Cooperation can help to inform considerations as to whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 2.1.4 Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 Milton Keynes City Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Milton Keynes Local Plan's decision-making and scoring should be robust, justified and transparent.

3 MILTON KEYNES CITY PLAN 2050 – REGULATION 19

3.1 Background

3.1.1 Milton Keynes City Council is preparing a new Local Plan that will set out a vision for the authority up to 2050. The Council began preparation of a new Local Plan in 2020 with the key milestone in July 2024, when they opened a consultation on the regulation 18 draft plan. The council are now requesting responses on the regulation 19 draft of the Local Plan.

3.1.2 Gladman wish to be kept informed as the plan progresses through the milestones.

3.1.3 The sections that follow below include specific comments from Gladman on the Council’s preferred options covering a range of the topics and questions that have been posed.

3.2 Spatial Strategy

Policy GS2 – Strategy for Homes

3.2.1 Policy GS2 outlines that the housing requirement for Milton Keynes District to be a minimum of 1,799 dwellings per annum, totalling 50,372 new homes between the plan period, 2022 and 2050. Gladman supports the Council highlighting the housing requirement to be a minimum figure, as it allows for the Council to continuously work towards demonstrating a housing supply.

3.2.2 The council have calculated their housing requirement by using the new government standard method. While Gladman support the use of this method, the timeframe used in the calculation has resulted in the housing requirement of Milton Keynes not aligning with national policy. Gladman recommend 2025/2026 is used as a starting point and the plan modified and consequently the associated impact on requirement and supply be addressed through additional allocations to deliver deficit.

Policy GS4 - Strategy for people-friendly and healthy places

3.2.3 Gladman support the proposal for developments of over 10 dwellings to improve physical and mental health by providing or contributing to infrastructure and

facilities. While acknowledging the role infrastructure and facilities play for the overall health of current and future residents, Gladman would also note that implementing this policy would allow for settlements to increase in sustainability, therefore enabling growth in previously less sustainable locations.

Policy GS6 – Open Countryside

- 3.2.4 While Gladman acknowledges the importance of the open countryside, overreliance on residential development solely directed towards brownfield sites could result in the Council being unable to meet housing need due to their constraints, with viability and delivery timescales delaying their progress. The Council should then be prepared to release sites from the open countryside. Policy GS6 sets out the type of development that would be considered to the council as appropriate release. Gladman recommend the policy is reviewed as brownfield sites are disproportionately relied upon and should create a policy more flexible to ensure a robust housing supply.

Policy GS11 Adjacent and cross-boundary growth

- 3.2.5 Gladman support the overarching objectives set out within the strategic policy seeking to provide well designed and coordinated growth for Milton Keynes and neighbouring authorities, with a focus on infrastructure, sustainable transport and green infrastructure. However, recommend the policy is reviewed to have greater flexibility to ensure that it is effective by allowing for enough sites to come forward within the Local Plan timeframe due to the volume of expectations set for a site to meet.

3.3 Infrastructure First

Policy INF1 Infrastructure first principles

- 3.3.1 Gladman agree with the importance of addressing infrastructure concerns when a new development is proposed. While agreeing with the overarching policy Gladman believe the policy contradicts itself in point A and point C, with the Council first stating it is a requirement for all developments above 10 dwellings must address the

infrastructure requirements from Annex F to then in point C stating determination is on a case-by-case basis. The Council should therefore review this policy before processing with the Local Plan process.

3.4 Central Milton Keynes

Policy CMK2 Central Milton Keynes placemaking principles

3.4.1 The Council acknowledges the importance of creating well connected and sustainable settlements, aligning with the National Planning Policy Framework (NPPF) which paragraph 135 which states developments should be sustainable, keeping with the local character, promote active travel and optimise a sites potential.

3.4.2 Gladman believe the Councils placemaking principles can all be achieved through well designed residential development and can be showcased through a developmental framework plan.

3.5 Central Bletchly

Policy CB1 Supporting investment in Central Bletchley

3.5.1 Gladman support the investment directed towards Central Bletchley, allowing the area to benefit from increased facilities and services while also providing residential development. Gladman would strongly encourage the Council not to have an over reliance on the provision of 1,000 homes due to the brownfield status of Central Bletchley.

3.6 People Friendly & Health Places

Policy PFHP2 Provision and protection of community facilities

3.6.1 Gladman support Policy PFHP2 within the emerging plan, as ensuring new development does not result in the loss of services or facilities is crucial in maintaining a settlements sustainability. This policy should align with the Town and Country Planning Act (1990) by entering an agreement when a new development is proposed, securing a financial contribution that can go towards the necessary services and facilities, helping maintain the sustainability of a settlement.

3.7 High Quality Homes

Policy HQH2 (Affordable Homes)

- 3.7.1 Policy HQH2 determines that all developments of 10 or more are expected to provide a proportion of affordable housing determined by the viability area, using an adjusted affordable housing percentage based on an areas value. Gladman recommend that to ensure the necessary level of affordable housing is provided the housing requirement must aim to meet their housing requirement in full.

3.8 Climate & Environmental Action

Policy CEA9 Biodiversity and habitats network

- 3.8.1 Ensuring new development does not have an adverse impact on the environment is an important consideration when creating a new Local Plan. The 10% biodiversity net gain set out within Policy CEA9, aligns with The Environmental Act (2021) which mandates biodiversity net gain for new development. This act ensures new development not only offsets environmental impacts but guarantees a positive effect.
- 3.8.2 Gladman do not support the Councils proposal for development to provide over 10% biodiversity net gain, and do not consider this proportionate. A higher BNG requirement is likely to require extensive areas of land to be removed from the potential developable area of sites. Impacting allocated land and therefore the achievability of its housing requirement.

Policy CEA12 Conserving and enhancing landscape character/Special Landscape Areas

- 3.8.3 Gladman support the principle of conserving landscape character, however, consider this policy to be overly restrictive. The NPPF paragraph 188 states that land of least environmental value should be allocated within plans, therefore Milton Keynes should consider supporting residential development, within a Special Landscape Area, where lack of environmental value is demonstrated by a robust Landscape and Visual Impact Assessment (LVIA).

3.9 Heritage

Policy HE1 Heritage

- 3.9.1 Gladman acknowledge the importance of heritage assets and their role in shaping the local character and should therefore be a consideration in regards to residential developments. However, Gladman stress that the weight in which consideration is given to residential development because of a heritage asset should be proportionate to the classification of the asset, as per paragraphs 202 to 214 of the NPPF. Therefore, a grade one listed building should hold more weight than a grade two listed building in plan making decisions.

4 CONCLUSIONS

4.1 Summary

- 4.1.1 Gladman welcomes the opportunity to comment on the draft Local Plan that is currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2023) and the associated updates that were made to Planning Practice Guidance.
- 4.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan, with a key issue being the year which the plan period started, due to the impact on the housing requirement figure.
- 4.1.3 We hope you have found these representations informative and useful towards the preparation of the Milton Keynes City Plan 2050 and Gladman welcome any future engagement with the Council to discuss the considerations within forwarded documents.



