



**MILTON KEYNES CITY PLAN 2050  
LOCAL PLAN (REGULATION 19) CONSULTATION**

**Collective Site References: 110580, 110577, 110578**

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Land at Sherington, Milton Keynes

**December 2025**

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## 1.0 Introduction

- 1.1.1 This submission has been prepared by Storey Homes and the Trustees of the JW Cook 1983 Settlement in respect of our land interests at Sherington, within Milton Keynes Council's administrative area.
- 1.1.2 These representations are submitted in response to the Regulation 19 Consultation Draft of the MK City Plan 2050, which has been published by Milton Keynes Council ("the LPA") for the purposes of public consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.1.3 This submission places emphasis on our landholdings at Sherington. Whilst it is not the intention to rehearse previous depositions, by Storey Homes, this document should be read in conjunction with our previous submissions, notably those submitted to the Call for Sites invitation in 2022 and the Milton Keynes City Plan (Regulation 18) consultation in 2024.
- 1.1.4 For clarity the three parcels, discussed collectively for the purposes of this submission are registered on the Council's database under the references:
- **Site Reference 110580** – Land South of Crofts End, Sherington
  - **Site Reference 110577** – Land East of Bedford Road, Sherington
  - **Site Reference 110578** – Land North of Perry Lane and East of School Lane, Sherington

### Location and Context

- 1.1.5 Sherington is a rural village and civil parish in the City of Milton Keynes, approximately 2 miles north east of Newport Pagnell and 5 miles north-east of Central Milton Keynes, immediately to the west of the A509. It is therefore well related to the services in the city whilst maintaining a distinct semi-rural character.
- 1.1.6 The village itself is a well provisioned settlement with a range of day-to-day services including the Sherington C of E School, The White Hart Public House, Sherington Pavilion and Sports Ground, Sherington Village Hall, children's play areas, allotments and various other small businesses.

### Site Ref 110580: Land South of Crofts End

- 1.1.7 The site comprises approximately 1.57 hectares and lies immediately to the south of Crofts End on the village's southern edge, presenting a logical rounding off of the settlement adjacent to existing residential development. A site Location Plan is included at Appendix A.
- 1.1.8 It can accommodate 15 dwellings in a manner that respects Sherington's urban grain and village fringe location. The attached Initial Sketch Framework (Appendix B) illustrates that the site could accommodate this capacity whilst delivering a series of benefits, including a new access off Crofts End, suitable buffer to the Scheduled Ancient Monument, landscape-led edge adjoining livestock field and suitable areas of public open space, amongst other benefits.

## Site Ref 110577: Land East of Bedford Road

- 1.1.9 The site comprises approximately 6.84 hectares and is situated immediately to the east of Bedford Road on the south eastern approach to Sherington, this land adjoins the settlement edge and is visually read with the existing development in this part of the village. A site Location Plan is included at Appendix C.
- 1.1.10 The site could deliver a relatively modest expansion of between 40 and 70 units, which is well integrated with this part of the settlement, bounded on two sides by development and drawing the facilities associated with Sherington Pavilion into the heart of the village. The attached Initial Sketch Framework (Appendix D) shows approximately 40 units, with the potential for further development to the east.
- 1.1.11 The proposals maintain village-edge densities and have sufficient space to accommodate extensive areas of green and blue infrastructure. This demonstrates the flexibility of this specific site to deliver a range of accommodation, including the scope for a small local employment component at the frontage and closest point to the A509, in addition to large areas of open space, provision of footpaths, landscaping etc.

## Site Ref 110578: Land North of Perry Lane and East of School Lane

- 1.1.12 The site comprises approximately 12.6 hectares and lies to the north of Perry lane and to the east of School Lane and would comprise a large extension to the east of the village between the existing settlement boundary and the A509. A site Location Plan is included at Appendix E.
- 1.1.13 The site can accommodate up to 194 dwellings and given its location could potentially provide synergies between the existing primary school within the village, with an access from School Lane facilitating on-site benefits including playing fields and parking. The attached Initial Skecth Framework (Appendix F) demonstrates the opportunity to provide significant green and blue infrastructure, with an enhanced biodiversity buffer along the western boundary, expanding upon the existing offering along the A509, in addition to a range of further benefits associated with the scale of development.

## Collective Case for Sherington

- 1.1.14 Taken together, the three parcels provide a flexible portfolio of small-to-large sites that could accommodate a full range of potential housing requirements within the village until 2050, once this has been established. Each of the sites are well related to the built-up area, close to everyday amenities and can accommodate layouts with densities that are reflective of the existing character of the village.

## 2.0 Contact Details

**Respondent:**

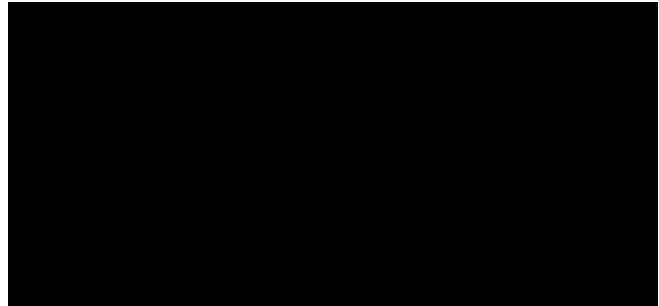
Storey Homes



**Contact:**

Hayden Seed

Planning Manager



- 2.1.1 The remainder of this document sets out Storey Homes representations. The highlighted sections provide a summary of the key points.
- 2.1.2 We wish to be notified of the following:
- ✓ When the Plan is submitted for independent examination
  - ✓ When the Inspector's Report is published
  - ✓ When the document is adopted

## 3.0 Milton Keynes Local Plan 2050 Policies

3.1.1 These representations address the tests of soundness and are supported by references to the Proposed Submission plan. They are constructive and focused on policy refinements to improve delivery and consistency with national policy without detracting from the Plan's strategic city-focussed growth strategy.

### 3.2 The Growth Strategy

Do you consider the Local Plan is:

- Legally Compliant – YES
- Sound – NO
- Complies with Duty to Cooperate – YES

#### Comments

3.2.1 Whilst the Growth Strategy mentions Olney and the villages (including Sherington), the spatial strategy directs almost all growth to the city, with no strategic allocations in rural areas and an expectation that villages address growth "that responds to their own ambitions" through Neighbourhood Plans.

3.2.2 We appreciate the encouragement provided for local groups within areas and villages around the administrative area to fully understand their specific local housing needs and plan accordingly. However, there is no prescribed way for these areas to determine the quantum of housing that is required.

3.2.3 As such, the complete absence of a modest rural component and the reliance on an unquantified neighbourhood plan contribution (minimum of 1 unit) risks an absence of delivery in the villages, which will only continue to perpetuate the stagnation in services and facilities, such as local schools, shops etc. The policy position, as it stands, is likely to result in a steady and continued decline as there is no incentive to deliver housing at a rate which meets the needs of the villages.

#### Modifications Necessary

3.2.4 The proposed modifications are detailed further in relation to Policies GS1 and GS2 below, however, they can be consolidated to the following:

- Insert a clear and quantified role for Tier 2 settlements (Olney & villages). To do this, the Council will need to publish indicative neighbourhood area housing figures to support plan-making in-line with Paragraph 69 of the NPPF (2024).
- Add text confirming the principle of limited allocations or a criteria based policy for sites adjacent to defined settlement boundaries where sites demonstrably meet local need and pass other tests set out within the Local Plan on matters of design, landscape, sustainability etc.

## Participation

If your representation is suggesting a modification, do you wish to participate at the oral hearing part of the examination?

Yes  No

### 3.3 Policy GS1 – Our Spatial Strategy

Do you consider the Local Plan is:

- Legally Compliant – YES
- Sound – NO
- Complies with Duty to Cooperate – YES

#### Comments

- 3.3.1 Policy GS1 identifies Tier 2 settlements and states that development should focus on meeting local needs, including locations identified in relevant Neighbourhood Plans. Whilst we support the general direction of the policy, we feel that the language could be tightened to help ensure that this aspiration is actually achieved.
- 3.3.2 Paragraph 69 of the NPPF (2024) requires strategic policies to set out a housing requirement for designated neighbourhood areas or provide indicative figures if a specific requirement cannot be set in order to guide neighbourhood planning. The draft MK City Plan does not currently attribute a neighbourhood area requirement or indicative figure for villages such as Sherington and therefore risks being ineffective.

#### Modifications Necessary

- 3.3.3 Policy GS1 should be modified to state that within Tier 2 settlements (Olney and the villages), the Council will publish indicative neighbourhood area housing figures to support plan making in-line with Paragraph 69 of the NPPF (2024).

## Participation

If your representation is suggesting a modification, do you wish to participate at the oral hearing part of the examination?

Yes  No

### 3.4 Policy GS2 – Strategy for Homes

Do you consider the Local Plan is:

- Legally Compliant – YES
- Sound – NO

- Complies with Duty to Cooperate – YES

## Comments

- 3.4.1 We acknowledge and support the Plan's minimum requirement (50,372) and total supply (59,779), and the 19% buffer to manage risk. However, the concern is that almost all of the supply is city-focused; villages are reliant on an unquantified NP contribution and a windfall allowance constrained by a threshold of fewer than 10 homes.
- 3.4.2 Regarding the windfall allowance, given there is limited policy provision for any development at scale within the villages, the likelihood that development which meets the housing needs of the general population being delivered through this mechanism will be extremely limited.
- 3.4.3 Consequently, it is clear that there is an absence of any specific strategy for the delivery of homes within Olney and the villages, essentially leaving it to local groups to determine whether they would like to deliver housing.
- 3.4.4 Whilst we agree that local people should have a significant sway in the type and location of housing, leaving housing to be allocated through Neighbourhood Plans is a fundamentally flawed approach, given the complexities associated with establishing housing need and the preparation of Neighbourhood Plans.
- 3.4.5 Furthermore, as quoted within the Sustainability Appraisal (Nov 2025), the national funding for neighbourhood planning has reduced, making the task even more challenging than it was before. As such, the likelihood will be that no development will be allocated in Sherington, nor any other villages for the next 25 years.
- 3.4.6 As stated above, it is clear that a housing requirement for the villages needs to be outlined by the Council in-line with specific housing requirement. This could be based on the approach taken by the standard method, utilising existing housing stock and affordability calculations to determine and advise local people on the numbers that are required in order for an area to continue to meet demand over the plan period.
- 3.4.7 The Housing Strategy as it currently stands relies very heavily on complex and aspirational housing numbers (circa 16,000) expected to be found within Central Milton Keynes (CMK). Whilst this is commendable, it is overly ambitious since the majority of homes are to be delivered on unidentified sites and will rely on the redevelopment of existing buildings / brownfield sites. These are not the same as site specific allocations, which have been extensively tested to ensure capacity for delivery and there is no certainty that the number of houses slated for CMK can and will be delivered.
- 3.4.8 This mix risks delivery shortfalls, particularly in the first 10 years and also beyond as there is no certainty of supply. It is also opposed to Paragraphs 69 – 70 of the NPPF on setting (or providing) neighbourhood housing requirements / indicative figures. As such, it is suggested that a small, plan-led rural component (allocated or contingency) would make the plan more effective and resilient whilst maintaining consistent with its urban focus
- 3.4.9 In order to create room for these additional allocations, the overall housing requirement should

be increased to cater for this. Or, alternatively, the numbers which are expected to be found within Central Milton Keynes could be reduced slightly in favour of a rural contingent, creating more balanced spread of development and ensuring the plan benefits the residents of both the City itself and the rural hinterland beyond.

3.4.10 Whilst we support managing scale in rural areas, the current approach to the Tier 2 settlements is unnecessarily restrictive and limits numerous sustainable village opportunities that can deliver early, address local needs and potentially address the lack or deterioration of the local infrastructure / services such as schools, shops etc.

3.4.11 These issues are compounded by a national ageing population and declining birth rate, therefore new homes are a vital component in the villages to support facilities, a vibrant housing market and village life in general. As such, the policy would be more effective and justified if it provided a clear route for non-strategic allocations in these areas.

### **Modifications Necessary**

3.4.12 Amend Policy GS2 and supporting text to introduce a non-strategic allocations programme to identify a limited number of small / medium sites (e.g. 10 – 50 dwellings) within or adjoining Tier 2 settlements (including Sherington) to deliver in years 1–10, equivalent to c. 3 – 5 % of the total supply (1,800 – 3,000 homes) without reducing strategic allocations.

### **Participation**

**If your representation is suggesting a modification, do you wish to participate at the oral hearing part of the examination?**

Yes    No

## **3.5 Policy HQH2 – Affordable Housing**

Do you consider the Local Plan is:

- Legally Compliant – YES
- Sound – NO
- Complies with Duty to Cooperate – YES

### **Comments**

3.5.1 Part A1 of Policy HQH2 sets the affordable housing percentage at 40% for Housing Viability Area 1, which covers the entirety of the rural area, including Sherington.

3.5.2 This needs to be carefully considered, not least in light of those significant infrastructure targets the Council wish to achieve. An ambitious approach to securing affordable housing is to be commended. However, it must be balanced against the practical implications for scheme viability and delivery.

3.5.3 At 40%, our site would have to provide an additional 10% affordable housing over and above the

current situation and such an approach would adversely impact funds available for infrastructure delivery and would increase the land take for housing delivery to ensure that the site can be viably delivered.

### **Modifications Necessary**

- 3.5.4 It is therefore suggested that the Policy HQH2 Part A.1(a) for Housing Viability Area 1 is modified to reflect the existing affordable housing percentage (i.e. 30%).

### **Participation**

**If your representation is suggesting a modification, do you wish to participate at the oral hearing part of the examination?**

Yes     No

### **3.6 Policy HQH8 – Exception Sites**

Do you consider the Local Plan is:

- Legally Compliant – YES
- Sound – NO
- Complies with Duty to Cooperate – YES

### **Comments**

- 3.6.1 At Part A1 of Policy HQH8, it is set out that affordable homes on rural exceptions sites will only be supported where the site does not exceed 0.5 hectares or 10 homes, or in the case of community-led developments, 1ha or 5% of the size of the existing settlement.
- 3.6.2 A fixed cap on development prevents the plan from responding to objectively assessed local needs over the plan period. The NPPF requires plans to meet as much needs as possible and to be flexible – a fixed cap is the opposite of this and reduces the ability of the plan to adapt and change to meet different circumstances.
- 3.6.3 The Planning Practice Guidance is clear that a housing need should be established through empirical assessments, either through a Housing and Economic Development Needs Assessment (HEDNA) or a Housing Needs Survey. A numeric ceiling applied uniformly across villages is not a proportionate substitute for settlement-specific evidence on the quantity and type required to meet local needs.
- 3.6.4 Furthermore, given the cost to build affordable developments are typically similar to a traditional private / affordable housing scheme, economies of scale are required to make certain schemes viable.
- 3.6.5 As such, a 10-unit ceiling would perpetuate viability risks and could render most housing sought through this policy undeliverable and therefore any delivery of affordable housing would

effectively default to Neighbourhood Plan routes only, further highlighting the issue that this is effectively the only mechanism for the delivery of any housing of a medium scale within the rural part of the plan area.

### **Modifications Necessary**

- 3.6.6 It is suggested that HQH8 Part A1 is removed.
- 3.6.7 Parts 2 – 5 are sufficient to control the delivery of suitable rural exception schemes alone, as Part 4 requires developments to be supported by an up-to-date housing needs assessment which is consistent with National Policy.

### **Participation**

**If your representation is suggesting a modification, do you wish to participate at the oral hearing part of the examination?**

Yes    No

## **4.0 Evidence Base**

### **4.1 Sustainability Appraisal**

Do you consider the Local Plan is:

Legally Compliant – YES

Sound – NO

Complies with Duty to Cooperate – YES

### **Comments**

- 4.1.1 The following representation responds to the Sustainability Appraisal (SA) accompanying the Regulation 19 proposed submission MK City Plan 2050 (November 2025). The SA is effectively required to appraise the plan and reasonable alternatives and supersedes the Regulation 18 SA published in 2024.
- 4.1.2 Storey Homes provided extensive commentary during the Reg 18 consultation, however, the current version has an expanded SA framework to include 13 objectives, which is a material change from the original 9 objective framework. Storey Homes commends the inclusion of additional metrics for consideration, however, fundamentally, the SA still fails to fully appraise the rural areas and it is therefore considered to be incomplete.
- 4.1.3 We recognise and support the principle that larger strategic allocations adjacent to / within Milton Keynes will be needed. The Regulation 19 SA explains that Scenario 5 (preferred option) performs best on a series of metrics. However, the urban-led strategy must not come at the cost of proportionate rural growth, whose role in vitality / viability of services is not adequately captured by the SA metrics.

- 4.1.4 The Reg 19 SA maintains the Reg 18 position of no strategic village allocations, expecting rural growth to be left to neighbourhood plans / windfall and not counted in the plan's overall supply / affordable totals. This approach risks under-appraising long-term sustainability implications of little to no growth in the villages, including the decline of services.
- 4.1.5 The SA's expanded objective set is welcome but it still does not directly assess the consequences of constrained rural growth for local services (schools, shops and pubs) and affordability for rural workers and carbon from commuting.
- 4.1.6 At Regulation 19, "Expansion of villages" was included in the long list but scored poorly and was ruled out as a Reasonable Alternative, citing poor public transport, rural road constraints, landscape sensitivity, insufficient scale and risks to village character.
- 4.1.7 At Regulation 19, the Council maintains this stance, with no strategic rural allocations and growth to be determined via neighbourhood plans / windfall and a continued vision-led focus on Central Milton Keynes (CMK), Metro corridors and strategic extensions. The six RA scenarios test various permutations of these sites, in addition to a scenario including West of Olney, but do not introduce a rural expansion scenario.
- 4.1.8 We agree that many rural scenarios would require network upgrades. However, a blanket appraisal risks masking location-specific advantages. As set out in prior evidence, Sherington benefits from existing bus links and proximity to the A509 and these circumstances are not captured by treating the expansion of villages as a single category. The SA should therefore re-test individual villages against the 13 objectives, which would address a clear gap in the evidence for the examination of the plan.
- 4.1.9 A proportionate rural requirement (whether centrally allocated or prescribed targets for neighbourhood plans) would help to mitigate long-term service viability. This complements rather than competes with strategic city growth.
- 4.1.10 Within the SA, it is also acknowledged that national funding for neighbourhood planning has reduced, making the task even more challenging than it was previously. Without a clear rural housing figure or an indicative distribution by parish, there is a risk of under-delivery and speculative appeals outside the allocated sites.

### **Modifications Necessary**

- 4.1.11 As such, it is requested that the SA is updated to re-test 'Expansion of villages' not as a single typology but as a site specific option, using the 13-objective framework.
- 4.1.12 Add a new reasonable alternative to include selected villages, with the quantum set to secure rural service viability without undermining Metro focused decarbonisation.

### **Participation**

**If your representation is suggesting a modification, do you wish to participate at the oral hearing part of the examination?**

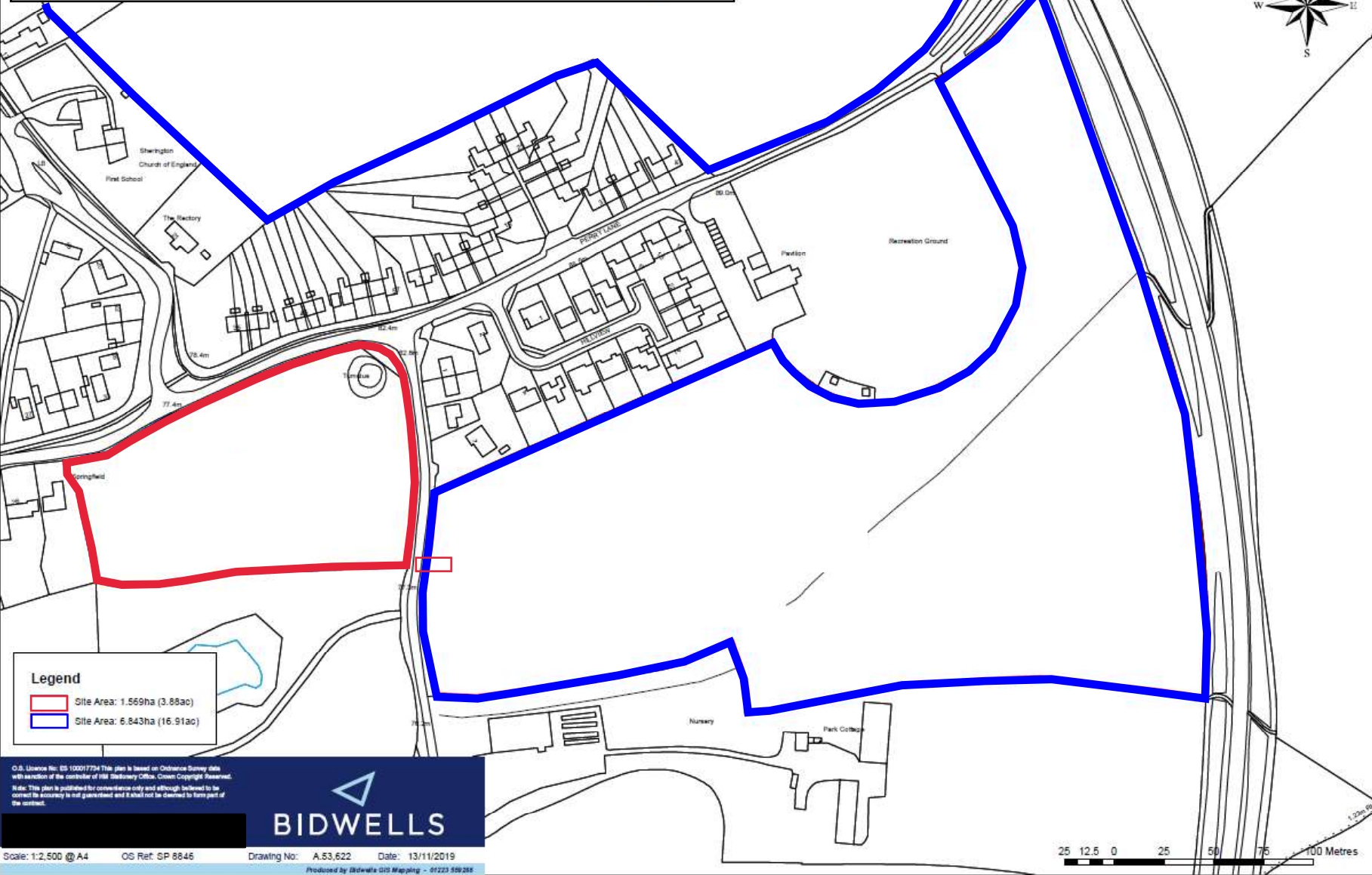
Yes    No

**Storey Homes**

December 2025

**Appendix A - Site Location Plan (Land South of Crofts End)**

# Land south of Crofts End, Sherington



**Legend**

- Red outline: Site Area: 1.569ha (3.88ac)
- Blue outline: Site Area: 6.843ha (16.91ac)

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Scale: 1:2,500 @A4    OS Ref: SP 8846    Drawing No: A.53.622    Date: 13/11/2019  
Produced by Bidwells GIS Mapping - 01223 559288

Image 1

**Appendix B – Illustrative Framework Plan (Land South of Crofts End)**



  
*architecture*  
*planning*  
*project management*  
*interior design*  
*graphics*  
[www.colesarchitects.co.uk](http://www.colesarchitects.co.uk)

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REV:	BY:	DATE:	DETAILS:
C	JB	10.09.24	Drawing updated following client review.
B	JB	13.07.21	Drawing updated.
A	JB	22.06.21	Drawing updated.

PROJECT: **Land off Crofts End Sherington**

CLIENT: \_\_\_\_\_

ISSUE STATUS: \_\_\_\_\_

DESIGN  B of Q  CONSTRUCTION  RECORD

DRAWING TITLE: **Initial Sketch Framework Lot 1**

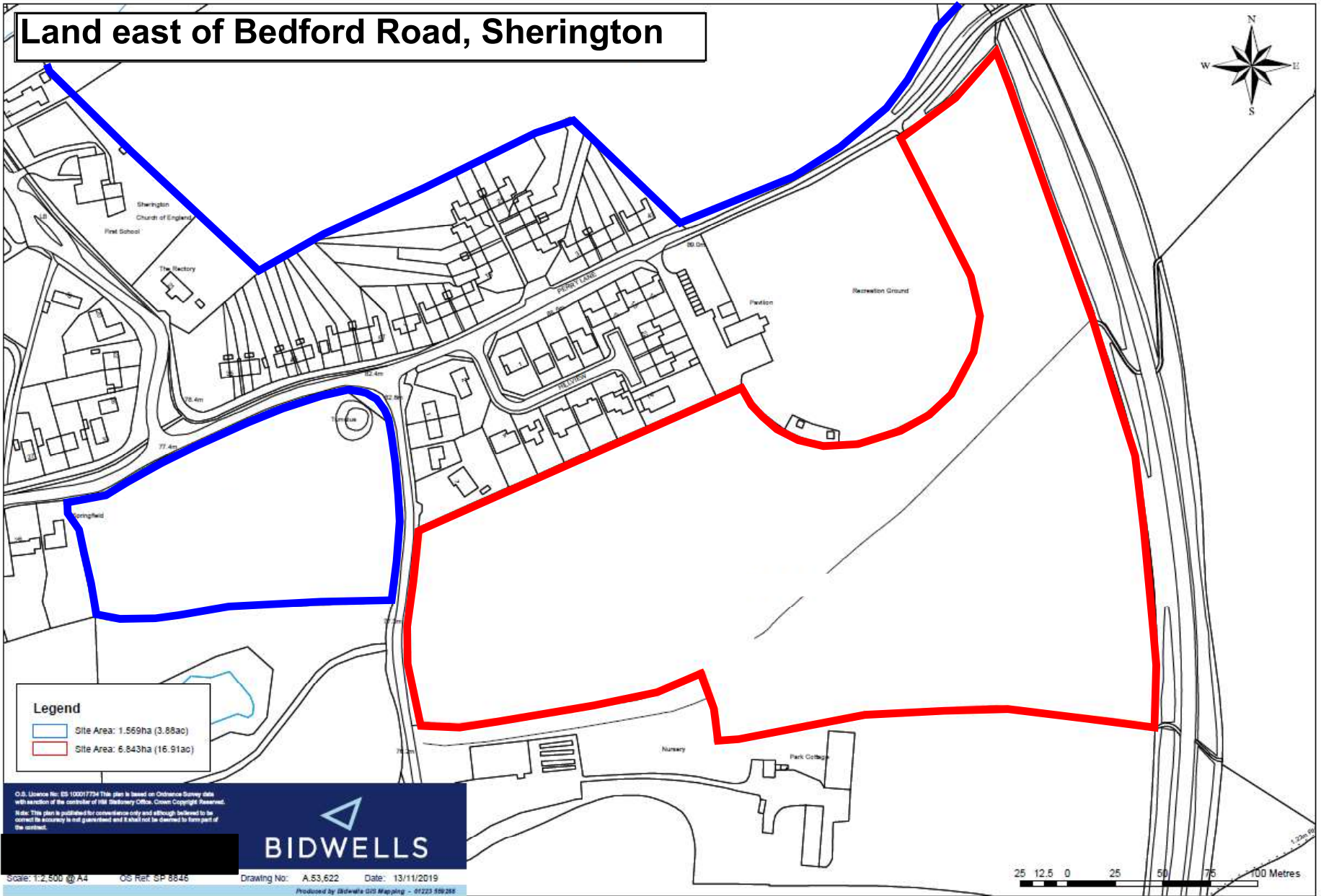
SCALE: **1:1000 (A3)** DATE: **June 2021** BY: **JB**

DRAWING NO.: \_\_\_\_\_ REVISION: \_\_\_\_\_

**21040 (B) 102 C**

**Appendix C - Site Location Plan (Land East of Bedford Road)**

# Land east of Bedford Road, Sherington



**Legend**  
Site Area: 1.569ha (3.88ac)  
Site Area: 6.843ha (16.91ac)

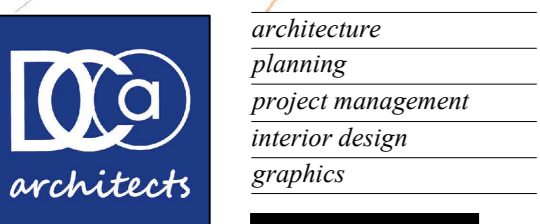
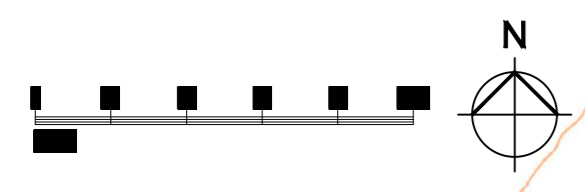
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Scale: 1:2,500 @ A4 OS REF: SP 8848 Drawing No: A.53.622 Date: 13/11/2019  
Produced by Bidwells GIS Mapping - 01223 559288

25 12.5 0 25 50 75 100 Metres

Appendix D – Illustrative Framework Plan (Land East of Bedford Road)



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C	JB	10.09.24	Drawing updated following client review.
B	JB	23.06.21	Drawing updated.
A	JB	22.06.21	Drawing updated.

REV: BY: DATE: DETAILS:

Land off Crofts End  
 Sherington

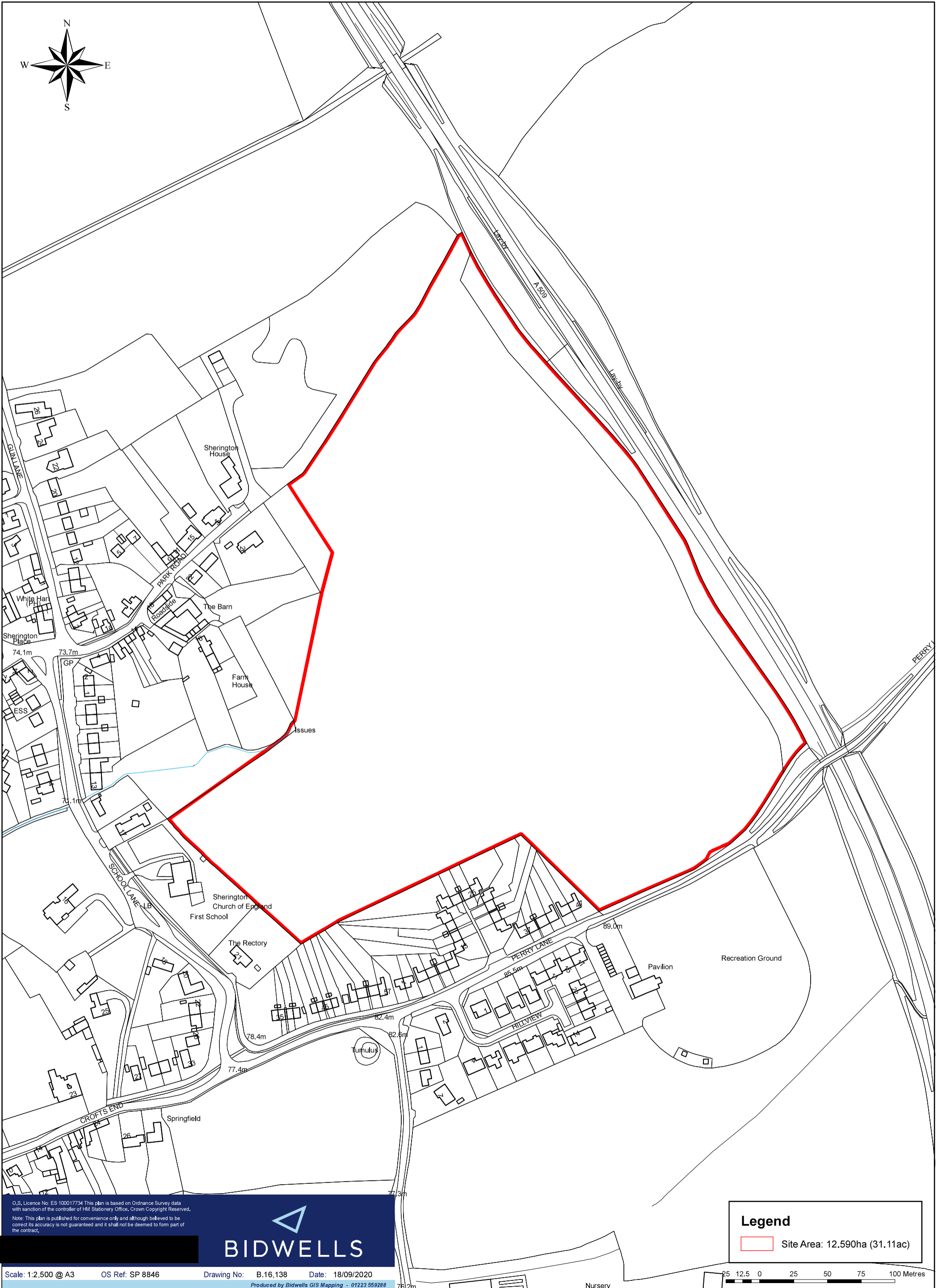
Initial Sketch Framework  
 Lot 2

1:1000 (A2) June 2021 JB

21040 (B) 202 C

**Appendix E - Site Location Plan (Land North of Perry Lane and East of School Lane)**

# Land to the north of Perry Lane, Sherington



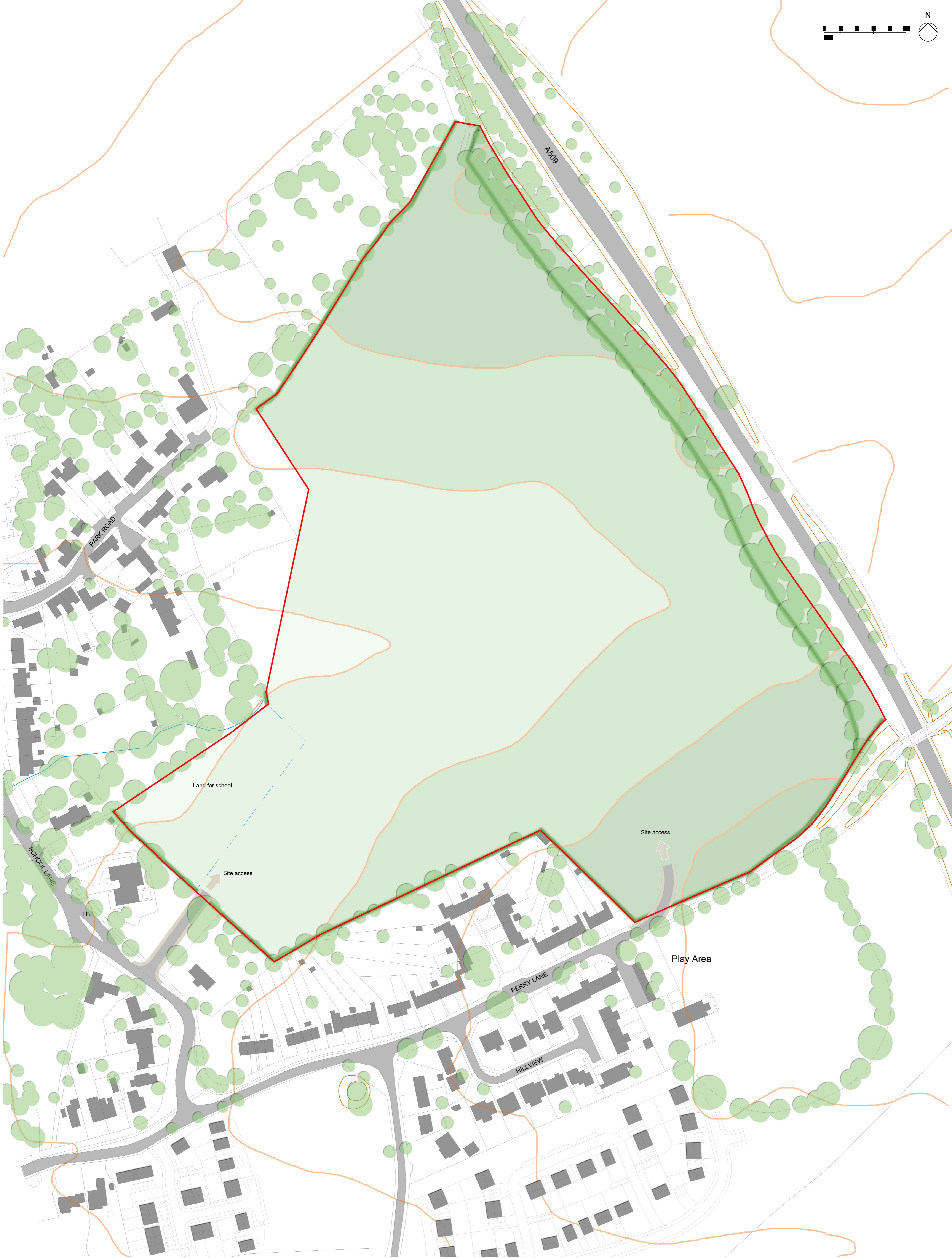
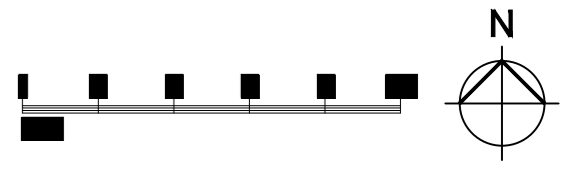
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**Legend**

Site Area: 12.590ha (31.11ac)

Appendix F – Illustrative Framework Plan (Land North of Perry Lane and East of School Lane)



architecture  
 planning  
 project management  
 interior design  
 graphics

NOTE: NO DIMENSIONS TO BE SCALED FOR CONSTRUCTION. DRAWINGS MAY BE SCALED FOR PLANNING PURPOSES ONLY. ALL DIMENSIONS TO BE CHECKED ON SITE. COPYRIGHT RESERVED.

D	JB	10.09.24	Drawing updated following client review.
C	JB	23.06.21	Drawing updated.
B	JB	23.06.21	Drawing updated.
A	JB	22.06.21	Drawing updated.

REV: BY: DATE: DETAILS:

Land off School Lane  
 Sherington

Initial Sketch Framework  
 Lot 3

1:1000 (A1) June 2021 JB

21040 (B) 302 D