



21 December 2025

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

Sent by Email

Dear Sir / Madam

Milton Keynes City Plan 2050 Regulation 19 Representation on behalf of Midsummer Place Ltd

This representation is submitted on behalf of Midsummer Place Ltd, owner of Midsummer Place in Central Milton Keynes ('CMK') in response to the Regulation 19 Milton Keynes City Plan 2050 consultation. It should be read alongside the enclosed Regulation 19 Representation Response Forms, which have been completed so officers can easily log them against policies and soundness tests. The Response Form sets out our representations against the relevant policies and supporting text in a structured manner, while this letter provides additional context and explanation of our position.

This representation should also be read alongside that previously submitted in response to the Regulation 18 Draft MK City Plan 2050 consultation, which remains material and relevant. This submission focuses on whether, and to what extent, the issues raised previously have been addressed in the Regulation 19 Plan and identifies where further clarification or minor modification is required to ensure the Plan is sound, effective and justified.

Preamble

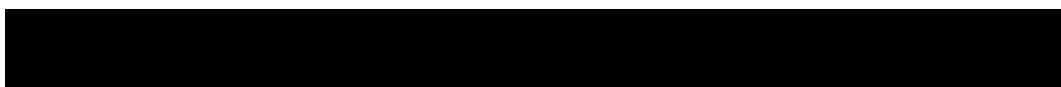
At the outset, we wish to make clear that we are generally supportive of the direction of travel of the Milton Keynes City Plan 2050, particularly in its ambition for CMK to continue to evolve as a successful, vibrant and competitive city centre. We recognise the significant work undertaken by the Council in progressing the Plan from Regulation 18 to Regulation 19 and welcome the increased clarity provided in a number of areas. Our representations are therefore intended to be constructive, focusing on ensuring that the Plan's objectives can be delivered in practice and that the policy framework is sufficiently clear, flexible and robust to support investment, vitality and viability throughout the Plan period.

We also acknowledge the Council's continued commitment to a strong, vibrant and thriving CMK, as articulated in the Vision, Objectives and Spatial Strategy of the Regulation 19 Plan. However, support for this strategic direction does not extend to all elements of the detailed policy framework, which in our view continues to lack a degree of clarity and flexibility to support delivery in practice.

Detailed Comments

Overall, we support the Vision for CMK 2050 (Page 85) insofar as it provides a long-term framework for growth and transformation. That said, the Vision and associated policies place significant emphasis on future restructuring, mass rapid transit ('MRT') and redevelopment aspirations without adequately addressing how existing, successful assets will be supported and safeguarded in the short to medium term. This imbalance risks undermining confidence and investment during the Plan period.

In this context, we acknowledge Objective 15 and the ambition to establish CMK as a thriving centre for innovation, learning and culture with a full mix of city centre uses. We also acknowledge the ambition to grow CMK's residential population and role as a focus for employment, leisure and higher education. However, the Plan does not sufficiently translate these objectives into a framework that positively supports *existing* economic drivers, including Midsummer Place, which makes a substantial contribution to the vitality and viability of CMK and will continue to do so for the foreseeable future.



We support the principle of Draft Policy GS1 (Our Spatial Strategy) in directing growth to Tier 1 CMK and agree that CMK is uniquely positioned to accommodate sustainable growth. Nevertheless, directing growth to CMK must be accompanied by policies that actively support its existing functioning and economic performance, rather than implicitly assuming wholesale transformation without adequate transitional mechanisms.

We also support Draft Policy GS5 (Our Retail Hierarchy) and the recognition that the Primary Shopping Area within Central Milton Keynes will function and develop as a regional shopping centre for comparison shopping. While this reflects CMK's established role, the supporting text does not sufficiently explain how this role will be maintained and managed over the full Plan period in light of changing retail formats, existing floorspace, vacancy rates and long-term redevelopment aspirations. Without greater clarity, the policy risks being insufficiently justified.

We welcome Draft Policy CMK1 (Central Milton Keynes Development Framework Area), particularly Criterion 3, which refers to enabling meanwhile uses. However, despite this welcome inclusion, the policy framework as a whole still does not go far enough in positively supporting interim and incremental investment, refurbishment and enhancement of existing buildings pending longer-term redevelopment. As raised at Regulation 18, there remains a real risk that the Development Framework could be interpreted in a way that discourages appropriate proposals that sustain economic activity and town / city centre vitality in the short to medium term.

It is also important to note that the Central Milton Keynes Growth Opportunity Study, which informs the Plan's approach to CMK, explicitly recognises the need for flexibility in the delivery of MRT. In particular, the Study acknowledges that while the longer-term vision includes re-routing MRT through Midsummer Place, a shorter-term solution could be devised which avoids this building pending agreement of a comprehensive masterplan for the area.

This pragmatic position reflects the operational reality that Midsummer Place is an established, successful and economically productive asset. However, this evidence-led caveat is not yet sufficiently embedded within the Plan's supporting text or policy framework. Without clearer policy wording, there is a risk that MRT proposals could prejudice existing operations, undermine investor confidence and constrain appropriate short to medium-term investment. The Plan should therefore be tweaked to explicitly incorporate this phased and flexible approach to MRT delivery in order to ensure it is effective, deliverable and consistent with its supporting evidence base.

We support Policy ECP2 (Supporting the Vitality and Viability of Centres), particularly the flexible approach to uses within Primary Shopping Frontages. This reflects the changing nature of town centres and is consistent with adopted and emerging national policy.

We also support the principle of an impact test threshold within Policy ECP3 (Sequential and Impact Tests). However, while the Retail and Commercial Leisure Study Update (July 2025) contains commentary on impact thresholds, it does not clearly or transparently explain how the specific 900 sqm gross floorspace threshold included in the Regulation 19 Plan has been derived. The Study refers in general terms to impact thresholds as a sensible starting point and to national guidance in the PPG, but it does not set out a clear rationale for selecting 900 sqm in preference to any other figure, nor does it explain how this threshold relates to the scale, role and function of different centres within the retail hierarchy, including CMK. The supporting text should be amended to explicitly explain how the 900 sqm threshold has been informed by the evidence base, the retail hierarchy and relevant national policy and guidance.

In relation to Policy PFHP4 (Delivering a Healthier Food Environment), this needs to make explicit that restrictions on hot food takeaways and fast-food outlets apply outside of town centres *and* CMK. Without this clarification, the policy risks unintended consequences for appropriate town centre uses coming forward in CMK that are integral to its vitality and evening economy.

Further clarification is also required in respect of Policy CEA1 (Sustainable Buildings), Criterion F, to confirm that it would not apply to changes of use involving existing buildings / town centre units. Applying lifecycle construction requirements to changes of use would be unreasonable, ineffective and contrary to the Plan's objectives of reuse, regeneration and town centre vitality.

Conclusion

In summary, while we acknowledge the positive direction of travel between Regulation 18 and Regulation 19, a number of important concerns remain unresolved.

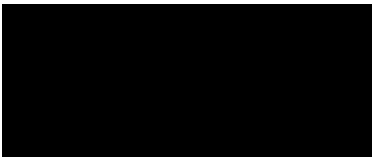
We agree with the Council's stated position that the future of CMK is fundamental to the success of the city as a whole and that the city centre will be one of the areas experiencing the most significant change over the coming decades. We also agree that well-planned new development and growth in CMK has the potential to attract further investment, benefit both existing and future residents and help address the challenges the city centre faces.

However, achieving these outcomes will depend on the Plan striking the right balance between long-term transformational ambition and the practical realities of delivery during the Plan period. In its current form, the Plan does not yet provide sufficient clarity or flexibility to ensure that existing, successful assets are fully supported, that confidence and investment are maintained in the short to medium term and that incremental and meanwhile development is positively encouraged alongside longer-term aspirations.

Without the clarifications and modifications identified above and in the accompanying Response Forms, there remains a risk that the Plan will be ineffective and insufficiently justified in its approach to CMK, potentially undermining the very objectives it seeks to achieve.

Subject to these matters being addressed, we are content that the Plan will deliver lasting, positive change that supports the continued economic success of CMK and ensures it is fit for the future.

Yours faithfully,



Heather Arnell
Williams Gallagher

Enc: Regulation 19 Representation Response Forms



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

Heather

Last Name

Arnell

Job Title

Company Director

Organisation

Midsummer Place Ltd

Williams Gallagher

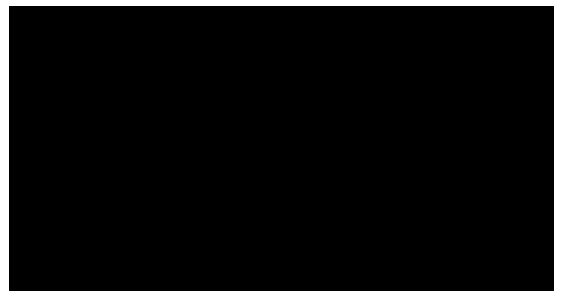
E-mail Address

C/o Agent

Address Line 1

C/o Agent

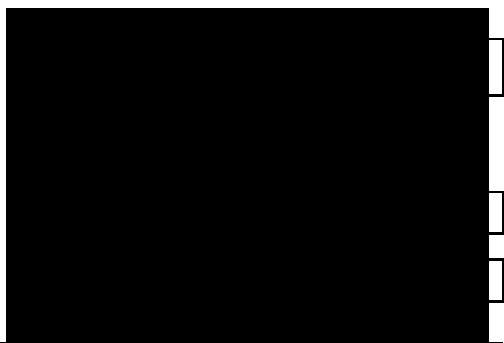
Line 2



Line 3

Post Code

Telephone Number



Part B – REPRESENTATION 1 OF 7

Name or Organisation: *Midsummer Place Ltd (c/o Williams Gallagher)*

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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

Draft Policy GS1 is supported in principle insofar as it directs growth to Tier 1 Central Milton Keynes (CMK), which is uniquely placed to accommodate sustainable development. However, the policy is not effective as it does not sufficiently recognise the need to support and safeguard the performance of existing, successful city centre assets during the Plan period. The policy implicitly assumes significant restructuring and redevelopment without adequately addressing how CMK will continue to function and attract investment in the short to medium term. This lack of balance risks undermining confidence and could discourage appropriate incremental investment, contrary to the Plan's stated objectives.

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.

Amend the supporting text to Draft Policy GS1 to explicitly acknowledge the importance of maintaining and supporting existing, successful city centre assets alongside longer-term growth and transformation. This clarification is necessary to ensure the policy is effective and deliverable throughout the Plan period.

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:

Participation in the hearing session is necessary to explain how the spatial strategy for CMK will operate in practice during the Plan period and how the balance between long-term transformational ambition and short to medium-term delivery can be achieved. Oral discussion will assist the Inspector in understanding the practical implications of the policy for existing, successful city centre assets and why explicit policy recognition of their ongoing role is required to ensure the strategy is effective, deliverable and capable of maintaining confidence and investment throughout the Plan period.

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

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Part B – REPRESENTATION 2 OF 7

Name or Organisation: Midsummer Place Ltd (c/o Williams Gallagher)

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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

Draft Policy GS5 appropriately identifies CMK as a regional shopping centre for comparison retail. However, the supporting text is insufficiently justified as it does not clearly explain how this role will be maintained and managed over the Plan period in light of changing retail formats, existing floorspace, vacancy rates and long-term redevelopment aspirations.

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.

Expand the supporting text to Draft Policy GS5 to explain how CMK's regional shopping role will be supported in practice throughout the Plan period, including how existing floorspace and assets will be managed alongside future redevelopment ambitions.

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:

Participation in the hearing session is necessary to clarify how the role of CMK as a regional shopping centre will be maintained and managed in practice over the Plan period. Oral evidence will assist the Inspector in understanding how retail hierarchy policy should respond to changing retail formats, existing floorspace and long-term redevelopment aspirations and why additional explanatory text is required to ensure the policy is justified, effective and capable of guiding decision-making consistently.

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.

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Part B – REPRESENTATION 3 OF 7

Name or Organisation: Midsummer Place Ltd (c/o Williams Gallagher)

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" value="X"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="X"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox" value="X"/>	No	<input type="checkbox"/>

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.

Draft Policy CMK1 is not effective as it does not sufficiently embed the phased and flexible approach to Mass Rapid Transit (MRT) delivery identified in the Central Milton Keynes Growth Opportunity Study. The evidence base recognises that interim solutions may be required to avoid prejudicing established, successful assets such as Midsummer Place, yet this is not clearly reflected in policy wording.

This omission risks MRT proposals constraining appropriate short to medium-term investment and undermining town centre vitality.

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.

Amend Policy CMK1 and / or its supporting text to explicitly confirm that MRT delivery will be phased and flexible, and that interim solutions which avoid prejudicing existing assets are acceptable pending comprehensive masterplanning.

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:

Participation in the hearing session is necessary to explain the relationship between the Central Milton Keynes Development Framework, the supporting evidence base and the practical realities of delivering mass rapid transit. Oral discussion will assist the Inspector in understanding why a phased and flexible approach to MRT delivery is essential to avoid prejudicing established city centre assets and constraining appropriate interim investment, and why this flexibility needs to be explicitly reflected in policy wording to ensure effectiveness and deliverability.

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.

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Part B – REPRESENTATION 4 OF 7

Name or Organisation: *Midsummer Place Ltd (c/o Williams Gallagher)*

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" value="X"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox" value="X"/>	No	<input type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox" value="X"/>	No	<input type="checkbox"/>

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.

Policy ECP2 is supported. The flexible approach to uses within Primary Shopping Frontages reflects the changing nature of town centres and aligns with national policy. The policy provides an appropriate framework for diversification and vitality within CMK.

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.

None.

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:

To ensure supported flexibility is carried forward in adopted 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.

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Part B – REPRESENTATION 5 OF 7

Name or Organisation: *Midsummer Place Ltd (c/o Williams Gallagher)*

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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

The 900 sqm gross impact test threshold in Policy ECP3 is not sufficiently justified. The Retail and Commercial Leisure Study Update (July 2025) does not clearly explain how this figure has been derived or how it relates to different centres within the retail hierarchy, including CMK.

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.

Amend the supporting text to Policy ECP3 to clearly explain the justification for the 900 sqm threshold, explicitly linking it to the evidence base, the retail hierarchy and national policy. If not already undertaken, commission supporting justification / evidence.

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:

To address evidence base interpretation and proportional application of impact testing.

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.

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Part B – REPRESENTATION 6 OF 7

Name or Organisation: *Midsummer Place Ltd (c/o Williams Gallagher)*

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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

Policy PFHP4 lacks clarity and risks unintended consequences by not explicitly excluding CMK from hot food takeaway restrictions (policy instead refers to town centres only). This could undermine vitality and the evening economy in CMK.

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.

*Amend Policy PFHP4 or its supporting text to make explicit that restrictions apply outside of town centres **and** CMK.*

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:

Participation in the hearing session is necessary to clarify the intended spatial application of Policy PFHP4 and to explain how, without explicit wording, the policy could have unintended and harmful consequences for Central Milton Keynes. Oral discussion will assist the Inspector in understanding how the policy should be applied in practice to ensure that it supports, rather than undermines, town centre vitality, evening economy uses and mixed-use objectives within CMK, while still achieving the Plan's public health aims.

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.

Part B – REPRESENTATION 7 OF 7

Name or Organisation: *Midsummer Place Ltd (c/o Williams Gallagher)*

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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

Criterion F of Policy CEA1 lacks clarity and could be interpreted as applying lifecycle construction requirements to changes of use within existing buildings. This would be unreasonable, ineffective and contrary to regeneration objectives.

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.

Amend Criterion F to explicitly confirm that it does not apply to changes of use involving existing buildings.

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:

Participation in the hearing session is necessary to explain the practical implications of applying lifecycle construction and whole-life carbon requirements to changes of use within existing buildings. Oral evidence will assist the Inspector in understanding why such an interpretation would be unreasonable, ineffective and contrary to national policy objectives relating to reuse, regeneration and town centre vitality, and why explicit clarification is required to ensure the policy is effective and deliverable in practice.

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