

Part B – Please use a separate sheet for each representation

Name or Organisation: Planning Prospects on behalf of Persimmon Homes

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="checked" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="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 City Plan is clearly going to be a key document that will shape the future of the City to 2050.

The new Plan sets out a Spatial Vision. The Spatial Vision is supported. Particularly so where it focuses on the need to provide more good quality, energy efficient homes including affordable homes. The delivery of new homes will positively contribute to the economic objectives of the vision, where new homes will also support economic growth and jobs. Persimmon also support the Vision where it aims to improve high quality transportation around the City as well as providing quality open and green space, schools and services in the right places.

The Plan's objectives are also supported, where positive planning for growth within the plan can deliver on these objectives, not least supporting climate change objectives, the need to provide a range of new homes including for those most in need including affordable homes, as well as meeting wider market demand for housing.

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

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No change.

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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:

N/A

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Part B – Please use a separate sheet for each representation

Name or Organisation: Planning Prospects on behalf of Persimmon Homes

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

Paragraph	<input type="text"/>	Policy	Policy GS20 Western Expansion Area	Policies Map	<input type="text"/>
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4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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We note the proposals in the plan are also seeking to retain certain strategic allocations made in previous local plans to ensure their continued delivery. This includes this land forming the previously allocated Western Expansion Area. To appropriately integrate these policies into the MK City Plan 2050, some small changes have been made to these, principally relating to policy cross referencing. However for the Western Expansion Area it may also be appropriate for it to now recognise that land to the south is also allocated for development at Shenley Dens. The Shenley Dens Strategic City Expansion seeks to promote linkages and active travel routes to the wider City including the Western Expansion Area. It would co-ordinate policy if such was also reflected in the policy for the Western Expansion Area, where a reference to the need to support and allow for active travel connections from the newly allocated Shenley Dens Strategic City Expansion would align policy requirements.

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

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Add an additional policy reference which would actively support and encourage and accommodated active travel connections from the newly allocated Shenley Dens Strategic City Expansion.

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Part B – Please use a separate sheet for each representation

Name or Organisation: Planning Prospects on behalf of Persimmon Homes

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

Paragraph	<input type="text"/>	Policy	Policy GS2 Strategy for New Homes	Policies Map	<input type="text"/>
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The Plan is clearly one which embraces a strategy and ambition for growth and this is supported. It has evolved through the MK Futures 2050 Commission and aims to reach a population of 410k people within Milton Keynes by 2050, principally through sustainable and transformational growth of the city supported by significant investment in infrastructure.

Context here must recognise a fundamental aspect of government planning policy and other initiatives which are seeking to boost the supply of housing and support the Government’s stated commitment to delivering 300,000 homes a year over this 5 year parliament. Successive governments have been clear for many years, that housebuilding is critical to boosting the country’s economic growth with policies and initiatives which strongly support the necessity for more house building. A national housing crisis has seen nowhere near enough homes being built where people want to live and work especially in those places where the need for new homes is the highest. The result of long-term and persisting undersupply is that housing is becoming increasingly expensive, affordable homes are not being provided and the economic benefits are being missed. The message that this Country needs more homes, with everyone, everywhere across the Country to play its part in order to bring about economic growth, could rarely have been more strongly put.

This context is a fundamental backdrop to these representations. It is therefore essential that the new Plan provides for an appropriate level of housing where Government policy is advocating a step change in the delivery of new housing and it is welcomed in this regard that the Plan steps up in the level of

housing it intends to deliver with growth planned greater than the minimum calculation of Local Housing Need in order to support the growth ambition.

Reaching a population of 410k however equates to around 63,000 homes between 2022-2050. This is higher than the identified Local Housing Need of 50,372 new homes established using the Government's Standard Method for calculating housing need. The Plan states that its housing requirement for the MK City Plan 2050 is 50,372 being its annual LHN of 1799 over the 28 year plan period.

However the Policy also goes on to state that in line with the spatial strategy within Policy GS1, a total of 59,779 homes are planned to provide an adequate buffer on meeting the minimum housing requirement and to support the growth ambitions set out within the Strategy for 2050. The housing requirement will be used to calculate the five-year housing land supply and Housing Delivery Test. However if the higher figure is one which is being proposed to support the growth strategy, not just a buffer to deliver the lower housing requirement, then there is clearly some lack of clarity here as to what the plan requirement actually is.

The calculation of LHN as a minimum starting point for the housing requirement is set out in national policy. Catesby support the growth ambitions for the City and the increased level of growth within the plan beyond the minimum LHN. If the full ambition and growth strategy is to be met however it is important that the trajectory is robust and that the use of well used checks on progress are used and calculated against the full requirement, including 5 year land supply and housing delivery tests.

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The plan should clarify the requirement for the purpose 5 year land supply and Housing Delivery Test. If the plan is to meet its growth ambitions, then the delivery of the plan should be measured against the total 59,779 new homes planned for.

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Part B – Please use a separate sheet for each representation

Name or Organisation: Planning Prospects on behalf of Persimmon Homes

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

Paragraph		Policy	Policy GS19 Shenley Dens Strategic City Extension	Policies Map	
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4. Do you consider the Local Plan is: (Please tick as appropriate)

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

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Persimmon Homes, a national housebuilder with a strong track record in the delivery of high quality, sustainable development across the Country, own the land allocated for the Shenley Dens Strategic City Extension. The site is immediately available, suitable and deliverable for the development proposed. In submissions to the Council through earlier consultations, including the Call for Sites, a Vision for the development of the site and the contribution it could positively make to the growth of the City was presented. Already to date the proposals are supported by detailed analysis in respect of transport and sustainable accessibility, landscape, ecology, heritage, topography and drainage. A landscape led concept masterplan for the site has been developed, siting alongside other technical strategies on transport infrastructure and sustainable access proposals

The Shenley Dens Strategic City Extension is a new mixed use residential-led strategic development allocated to the west of Grange Farm and south of the Western Expansion Area. The extent of the site is shown on the Policies Map and the area identified is supported. The development will provide a comprehensive mixed-use development that will make an important contribution toward meeting the identified need for homes and the Council’s ambition for long-term growth of the city.

Whilst the detailed development proposals within the Strategic City Extension will follow a future Framework Masterplan and site based Design Code as required by Policy and which Persimmon would

be keen to work with the Council in the production of, the policy sets out headline key requirements for the allocation, all of which are deliverable including;

- Delivery of around 1,000 new homes
- A comprehensive masterplanned approach providing a range of house size, type and tenure, including affordable, older persons and specific needs housing.
- A sensitive landscape-led approach to the distribution, layout and design of development that satisfactorily mitigates impacts upon the valued characteristics of the Calverton Special Landscape Area;
- Due consideration of heritage, although it should be noted in the Plan that the Shenley Farmhouse has been subject to a fire
- Provision of early years, primary education facilities, SEND provision and contributions to secondary education facilities, appropriate to the scale and nature of the development proposal;
- Provision for primary healthcare facilities and wider health and social care infrastructure appropriate to the scale and nature of the development proposal;
- Provision of a local centre appropriate to the scale and nature of development proposals;
- Layout and designs that meet people-friendly and healthy places principles.
- Provision of new community amenities and services, including open and play spaces, convenience and service retail units, and active travel and public transport stops and hubs.
- Strategic green and blue infrastructure framework and open space strategy to meet strategic and local requirements.
- Provision of low and zero carbon energy infrastructure
- Required transport infrastructure and routes for active travel and public transport.
- Primary access taken from Portway with appropriate retention and segregation of the MK Boundary Walk route, and active travel routes with the Western Expansion Area as well as other active travel routes
- All informed by appropriate surveys of archaeology, built heritage and ecology with appropriate mitigation of impact.

All of the above align to the principles for the development set out in policy.

We also support the Indicative Concept Plan and propose to continue to work with the Council in further details as the Framework Masterplan evolves and Design Codes are prepared. This is noting the Concept Plan refers to areas of low, medium and high density for different parts of the site, when, in reality, this location is unlikely to see very high density development which is more appropriate to the City Centre for example. Likewise the concept plan shows routes and linkage locations into the Western Expansion Area and these need some degree of flexibility as the Western Expansion Area is already well advanced and development is already either delivered or consented to be delivered on adjoining land and will need to be reflected in final points of connection and their type.

That said the scheme will be a high quality, well located, sensitively designed and sustainable development which has every potential to contribute to housing needs early in the plan period.

Annex A to the Plan includes the expected housing delivery trajectory. For Shenley Dens it sees delivery from 2029/30. Persimmon are the sole owner of this site with a strong track record in delivery. Working with the Council in terms of wider transport connections and access arrangements through the reserved Portway route, the site has every potential for earlier and quicker delivery.

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No fundamental changes but some refinement to policy and the concept plan suggested.

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Name or Organisation: Planning Prospects on behalf of Persimmon Homes

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

Paragraph	<input type="text"/>	Policy	Policy CMK1 Central Milton Keynes	Policies Map	<input type="text"/>
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4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Proposals in the Plan for Central Milton Keynes seek to ensure the city centre maintains and develops its position as a regional centre and remains the driver of the city's economy.

Central Milton Keynes is proposed to be promoted as the focus for retail, office, residential, cultural and leisure activity as part of making the city centre a more people- friendly and healthy place for a range of users.

In terms of housing, CMK1 states provision of 16,000 additional new homes in central MK with the potential a 'skyline cluster' of taller buildings in the central area, and close to the station with opportunities up to 30 stories and numerous opportunities for buildings of at least 15 stories at densities of 425 dwellings per ha.

There is nothing objectional about the focus on Central Milton Keynes and its opportunities for growth in principle. The aspirations and opportunities presented represent sustainable development, promoting the key role the City Centre will have in the growth of the City overall, presenting a varied range of expanded land uses, retail, services and jobs, alongside new homes which can benefit from the obvious sustainability of the location.

However, the proposals need to be carefully tested to ensure they are realistic and achievable and indeed will deliver the types and range of new homes where many people want to live. It is positive that Centre Milton Keynes is part of the overall delivery of new homes for the City, although reliance upon it is significant which is of some concern. It is likely that the scale and type of development envisaged will present new challenges, where viability may compromise the ability to deliver essential infrastructure and affordable homes. The extent of market demand at this scale in this location is currently untested and again this creates some degree of caution in the over reliance of the proposals.

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

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The reliance on delivery from Central Milton Keynes should be further assessed and/or a mechanism added to the plan which reviews delivery and provides for contingencies to delivery should Central Milton Keynes fall below its expected levels of housing delivery.

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Name or Organisation: Planning Prospects on behalf of Persimmon Homes

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

Paragraph	<input type="text"/>	Policy	CEA12 – Conserving and Enhancing Landscape Character/Special Landscape Areas	Policies Map	<input type="text"/>
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The Milton Keynes Landscape Character Assessment (LCA) seeks to identify the distinctive characteristics of the landscapes in Milton Keynes. It provides the basis for their protection and enhancement, plus guidance for future policies on development, restoration and management in the MK City Plan 2050. The Plan states that development proposals will need to take account of the Milton Keynes LCA when preparing their proposals.

Three new Special Landscape Areas (SLA) are shown on the Policies Maps. The Plan states these were established following a review of former Areas of Attractive Landscape in Milton Keynes and were informed by the findings of the LCA. Where landscape has been designated as an SLA, it states it is in recognition of the 'special' qualities of that landscape which make it of higher sensitivity and value. The policy requires new developments to conserve and, where possible, enhance the special character and key landscape qualities of the SLAs in addition to conserving and enhancing landscape character in wider areas.

Within the policy it states that development demonstrate that they conserve and, where possible, enhance the landscape character through sensitive design, mitigation and enhancement measures.

For Special Landscape Areas Development proposals will only be permitted where they: Conserve and, where possible, enhance the special character and key landscape qualities of the area; Protect important views, features, landmarks and historic layout and setting of villages and hamlets; Preserve the tranquility of the area

and the need to protect against intrusion from light pollution, noise and motion; and Maintain and, where feasible, improve public access to the countryside.

It is the case however that two of the Strategic City Expansion Areas are located in areas which are also designated as Special Landscape Areas. This includes the land south of Bow Brickhill but also the proposals for Shenley Dens. The Policy GS19 for Shenley Dens fully recognises this however and includes a specific policy criterion which requires the development to “Adopt a sensitive landscape-led approach to the distribution, layout and design of development that satisfactorily mitigates impacts upon the valued characteristics of the Calverton Special Landscape Area”

The two designations are clearly in this context not mutually incompatible and the Shenley Dens concept masterplan is heavily landscape led reflective of the key characteristic and landscape qualities of the area. Policy CEA12 however would benefit from at least some recognition and cross reference to the fact that two of the Strategic City Expansion Areas are located within proposed designated SLA’s, this is not prohibitive of development in these locations but clearly, as reflected in the Expansion Area policies requires an additional sensitive landscape-led approach to the distribution, layout and design of development that satisfactorily mitigates impacts upon Special Landscape Area.

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

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To ensure mutual compatibility between policies, this policy should provide at least some recognition and cross reference to the fact that two of the Strategic City Expansion Areas are located within proposed designated SLA’s, and confirm this is not prohibitive of development in these locations but clearly, as reflected in the Expansion Area policies requires an additional sensitive landscape-led approach to the distribution, layout and design of development that satisfactorily mitigates impacts upon Special Landscape Area.

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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-notices/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.*

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	<input type="text"/>	Mr
First Name	<input type="text"/>	Jason
Last Name	<input type="text"/>	Tait
Job Title (where relevant)	<input type="text"/>	Director
Organisation (where relevant)	Persimmon Homes	Planning Prospects Ltd
E-mail Address	<input type="text"/>	
Address Line 1	<input type="text"/>	
Line 2	<input type="text"/>	
Line 3	<input type="text"/>	
Line 4	<input type="text"/>	<input type="text"/>

Post Code

Telephone
Number

