

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	MR	
First Name	JOHN	
Last Name	McLAUGHLIN	
Job Title (where relevant)	BRANCH SECRETARY & PUB PROTECTION OFFICE	
Organisation (where relevant)	CAMRA (CAMPAIGN FOR REAL ALE)	
E-mail Address		
Address Line 1		
Line 2		
Line 3		

Line 4

Post Code



Telephone Number



Part B – Please use a separate sheet for each representation

Name or Organisation: CAMRA

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 Framework of catchment distances from community facilities (Table 5) is very helpful in respect of public houses (and, no doubt, other facilities) but – as written - it is too vague and unspecific, rather than a requirement. It could therefore be too easily avoided (ie, ignored) by developers. Even if MKCC planners try to insist, a developer would point to the ambiguity of the Plan’s drafting.

The evidence from estates currently being built (eg, Whitehouse/Whitehouse Park) where a public house is included in the overall planning design is that nothing has been suggested, designed or allocated, let alone built, yet there are now many people living in this community. Commercially-run community facilities are more difficult to mandate than, for example, schools or healthcare facilities, so the Council should acknowledge this and build this into their planning discussions.

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.

2nd sentence of Para A. 1. Should become:

~~“Where~~ Community facilities listed in Table 5 are to be provided, with the majority of new homes ~~should be~~ within the catchment distance set out in Table 5 unless there are justified and exceptional circumstances demonstrating this is not possible”

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:

CAMRA does not think MKCC has paid sufficient attention to the requirement on them to protect existing public houses and to promote new ones, where this is appropriate.

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.

Part B – Please use a separate sheet for each representation

Name or Organisation: CAMRA

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 Plan makes clear that Community amenities, as defined in relation to Policy GS4, make a fundamental contribution to people’s quality of life and create successful communities and neighbourhoods and play an important part in creating people-friendly and healthy places. However, the “Infrastructure First” section of the draft Plan includes no suggestion of how public houses (or other community facilities) will be built into infrastructure planning. Linked to this is the Infrastructure Priorities (Table 2 on pp273-5) and the Infrastructure Planning Benchmarks (276-289) which makes no mention of, for example, public houses even in Category D (“Making a better place to live”) – unless subsumed into “Community Space”, but that would seem a very small allocation for the wide range of community facilities covered in Policy GS4 that are not covered by the Infrastructure Priorities and Benchmarks. I would also note that public houses (and many other community facilities) are not addressed anywhere in the Infrastructure Study and Infrastructure Delivery Plan. While we would not argue public houses (along with other important community facilities) are the highest priority in building a new development, they should at the very least feature in Category C or D. They would then be considered and, where appropriate, planned for, so that space is allocated and they are built when it becomes appropriate.

As early in this draft Plan as Objectives 2 & 3 (on page 9) it is asserted that providing facilities and infrastructure in the right places at the right time will promote walkable neighbourhoods

and good physical and mental health, prioritising walking, cycling and wheeling for access to shops, services, community facilities.

Commercially-operated community facilities (eg, public houses, post offices, shops, etc) need to be planned for and their development managed in a different way to other important infrastructure, otherwise they might never appear (as in the development of the Whitehouse/Whitehouse Park estates). If they never even appear on the drawing board, such facilities are unlikely to be built.

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.

I cannot identify a particular amendment or form of words to propose, but the Council needs to have a re-think and consider how it can build into their infrastructure plans the community facility infrastructure they themselves identify within Policy GS4, in order to meet the assertion in para 191 that new communities will have “a mix of everyday community amenities and uses ... which are provided at the right time in the development process”.

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:

CAMRA does not think MKCC has paid sufficient attention to the requirement on them to promote new public houses (and other important community facility infrastructure) where this is appropriate.

Part B – Please use a separate sheet for each representation

Name or Organisation: CAMRA

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 paragraph looks reasonable on the face of it, requiring “development proposals that result in the loss of community facilities that are commercially run will not be permitted unless we are satisfied that every effort has been made to retain them robustly evidenced relating to the existing or last use of the facility [and] ... appropriately marketed for at least six months”.

However, it could appear to specifically refer to the “new developments” identified in para 204 and might not offer protection to existing public houses covered by current “Plan:MK” policy ER11.

It is also thin on detail of how potential developers might meet the criteria set out in the paragraph, yet para 350-353 set out much more detail of how they expect planning applicants to safeguard employment land and buildings from being lost to alternative uses – which is especially important with the much higher prices currently available for residential development compared to a public house. The evidence from consideration of planning applications and from Planning Inspectorate decisions is that, if the wording of Plans is not clear, specific and comprehensive, public houses cannot be effectively protected in line with the NPPF. It.s also our experience that marketing or building structural evidence is not always genuinely independent of the developer, yet Planning department staff will often not have the necessary skills to question what has been provided,.

Existing public houses have usually been in place for many decades or even hundreds of years, continuing to meet the community's day-to-day needs, supporting their health, social and cultural well-being and often part of the heritage of their local village, high street or community. Public houses therefore need to be given effective long-term protection, rather than be left to the immediate and short-term whims of commercial decisions. Marketing for a minimum of 6 months is insufficient for many businesses to find out about, investigate, carry out building and demand surveys, seek financing (when appropriate), negotiate prices and make decisions to proceed. It can take even longer for a community buy-out to be decided and put together. There is much practical evidence that many public houses are on the market for longer than 6 months before finally being taken on by new publicans. Hasty decisions can often mean bad decisions and fail to protect a public house in the long term.

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.

Para 205 should be amended to read:

“~~Development~~ **Any** proposals that result in the loss of community facilities that are commercially run will not be permitted ... Where the lack of commercial viability is a reason to justify the loss of a community facility, this will need to be robustly **and independently** evidenced with regards to financial and marketing evidence relating to the existing or last use of the facility **in line with the provisions of para 350-353**. It must be demonstrated that the business has been appropriately marketed for at least ~~six~~ **twelve** months.”

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:

CAMRA does not think MKCC has paid sufficient attention to the requirement on them to protect existing public houses and to promote new ones, where this is appropriate and we would like the opportunity to explain how all practical details need to be clarified.

Part B – Please use a separate sheet for each representation

Name or Organisation: CAMRA

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.

Growth along Metro routes and their associated buffer corridors makes good sense, both as major development proposals or smaller changes associated with the regeneration of residential estate(s). However, this should not be at the expense of public houses (nor other community facilities) that will be required even more with the higher population densities the policy anticipates. We also note that public houses should be planned to usually be within 1000 meters of people living in Milton Keynes (para 52, Table 5), so this protection for public houses should not be limited to those within only 600 meters of the transport corridor. While a few public houses are able to function with only the trade from their local community, most will benefit from trade from elsewhere; indeed, many people enjoy the variety offered by travelling to public houses (and other community facilities) beyond their own community. Locating (or protecting) public houses within these transport corridors will therefore encourage people to use public transport, rather than use their own cars.

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.

Under Policy GS9, in para A, add new sub-para after current sub-para 3:
“Major development proposals within the Metro Corridors, and/or those associated with the regeneration of a residential estate(s), will be supported where they comply with

3. They improve access to a healthy food environment through the on-site provision of, or contributions to nearby, allotments and communal, urban food-growing areas;

* They protect existing public houses and promote new ones, when appropriate; and

4. They protect, and where possible, enhance, the nature, green and blue infrastructure network through the conservation and enhancement of biodiversity and habitats networks.”

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

Part B – Please use a separate sheet for each representation

Name or Organisation: CAMRA

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.

It is sensible to ensure new local centres are established in strategic city extensions, to help create neighbourhoods that are people-friendly, walkable and healthy, but it makes no sense to restrict this provision only to general retail convenience stores. Indeed, it seems to us to contradict Policy PFHP2, immediately above and Policy GS4, which outline and promote a wide range of community facilities.

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 para b of the Policy to read:
 “Development proposals for general convenience stores **and other community facilities** to address lack of provision and support the criteria of Policy GS4 will be supported.”

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:

N/A

Part B – Please use a separate sheet for each representation

Name or Organisation: CAMRA

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

Pages 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 Glossary at the end of the draft Plan is helpful in ensuring clarity throughout the Plan itself and it correctly includes public houses as “community amenities” on page 214. Changes to the Planning categories a few years ago created two different sui generis categories for public house, without clearly distinguishing between them or a “restaurant”, which is in a different planning category. We think this Glossary should also include an entry for “public houses”, saying “Public house and public house/restaurant both enjoy sui generis Planning category use. Their unique feature is that they are open to and welcome the general public without requiring membership or residency and enable customers to purchase drinks for consumption on the premises without the need for them to purchase food or meals; this distinguishes them from restaurants, which are in Planning category E, necessitating permission for change of use from public house to restaurant.”

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.

This Glossary should include an additional entry for “Public Houses”, saying:

“Public house and public house/restaurant both enjoy sui generis Planning category use. Their unique feature is that they are open to and welcome the general public without requiring membership or residency and enable customers to purchase drinks for consumption on the premises without the need for them to purchase food or meals; this distinguishes them from restaurants, which are in Planning category E, necessitating permission for change of use from public house to restaurant.”

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:

N/A