

H

HAYFIELD

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

22nd December 2025

Sent by email to: ncp.engagement@milton-keynes.gov.uk

Dear Sir/Madam,

RE: HAYFIELD REPRESENTATIONS TO THE MILTON KEYNES CITY PLAN 2050 REGULATION 19 LOCAL PLAN

This document comprises Hayfield's representations to the Regulation 19 ("Reg 19") Plan Making Stage version of the Milton Keynes Local Plan consultation. These have been prepared in relation to our land interest at Castlethorpe, identified as Land off Station Road, Castlethorpe. We therefore submit the following representations to the Milton Keynes Authorities, December 2025.

I. The Site and Planning History – Land off Station Road, Castlethorpe

- I.1 Hayfield control Land at Castlethorpe Road, an agricultural field to the south of Castlethorpe, with an existing farm gate access from Station Road along its western boundary. The site is well screened from Station Road by an existing hedgerow and greenbelt. The northern boundary comprises residential development associated with Sheppterton Close, which backs onto the site and represents the southern extent of Castlethorpe. The eastern and southern boundaries are bounded by a post-and-rail fence, beyond which lies open countryside and further agricultural fields.
- I.2 The site is not subject to onerous planning constraints. It is not within a Conservation Area, has no impact on Listed Buildings, has no Public Rights of Way through or around it, and it is not at risk of flooding due to its location wholly within Flood Zone I.
- I.3 Figure I below shows the site location plan in reference to the settlement of Castlethorpe.

Figure I. Site Location Plan



H

HAYFIELD

2. Settlement Context – Castlethorpe

- 2.1 Castlethorpe is located to the north of the Milton Keynes, approximately 5 miles to the northwest of the city centre.
- 2.2 Castlethorpe is seen as a sustainable settlement with a range of day-to-day facilities to serve the local population, including a First School, Village Shop and Post Office, Village Hall, Parish Church, Public Open Space, Allotments, and a Sports ground with tennis court, football pitch and a cricket pitch.
- 2.3 The settlement also consists of a local bus service, providing access to further surrounding settlements such as Milton Keynes and Northampton. Given the sustainable transport links that are provided within the settlement, as well as the variety of facilities that are available for local residents, Castlethorpe can be identified as a sustainable settlement.

RESPONSE TO DRAFT LOCAL PLAN

3. Draft Policy GS2 – Strategy for Homes

- 3.1 Hayfield do not support the plan period over which total housing need is derived from. The Council have started the plan period from April 2022, which is four years prior to the submission of the plan for examination. When using the standard method, Councils should be looking forward from the point at which the assessment is made, with past supply wrapped up in the affordability adjustment. As such the approach being taken by the Council does not align with national policy.
- 3.2 The starting point for the housing requirement should be 2025/26. Based on the outcome of the current standard method of 1,799 dwelling per annum (dpa) this will require the Council to identify sufficient land to deliver a minimum of 44,975 homes by 2045/46. Therefore, Hayfield suggests that GS2 should be amended accordingly.
- 3.3 In addition to amending the period over which housing needs are considered, the Council should also include the annual housing requirement of 1,799 dwellings per annum as well as the total figure over the whole plan period.
- 3.4 Over the plan period 2022 – 2050, the Council expects to deliver 59,250 homes – roughly 9,000 homes more than the requirement over that period. However, 7,161 of the proposed supply is in the period 2022/23 to 2024/25 and which should, in Hayfields opinion, not form part of the supply of homes for this plan. Therefore, over what Hayfield consider to be a sound plan period (2025 to 2050) the Council have identified land to deliver 52,648 homes, which is around 7,600 homes above the housing requirement over the period. Draft Policy GS2 should be altered in order to reflect these changes.
- 3.5 As outlined in Policy GS1 Our spatial strategy, the City of Milton Keynes will be where the majority of development to meet our identified needs will be provided, with limited growth identified in Tier 2 smaller settlements and no draft allocated sites identified for Castlethorpe. As this currently stands, whilst the Council can demonstrate that they have an over supply of housing, there is limited development located in smaller villages and settlements, leading to an overreliance on large/strategic sites. This in turn places the majority of development needs on a few very large sites, which comes with risks relating to viability, in terms on the scale of infrastructure required and issues concerning delays in commencing these larger projects. In contrast, smaller sites in sustainable settlements can be delivered quickly and help the Council with the housing supply during the early years of the plans whilst larger schemes are coming forward. Therefore, Hayfield suggest that in order to have a proportional level of growth at all spatial levels, smaller sites should be allocated within the Local Plan for residential development.
- 3.6 The allocation of small sites should be recognised as a priority and supports small house builders to ensure that they benefit from having their sites identified for development. Allocations within a Local Plan take away some of the risk from a development by providing greater certainty of that site coming forward. The effect of this is that it allows the SME sector to grow, delivering homes to increase the range of new homes available. In turn, this would align with and follow the National guidance of the NPPF outlined in Paragraph 73, which states:
- 3.7 Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
 - a. Identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved

H

HAYFIELD

- b. Seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom build housing
- c. Use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;
- d. Support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes
- e. Work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

3.8 Therefore, in order for the plan to be consistent with National Policy, the Council should seek to promote the delivery of small sites through allocations within the Local Plan.

4. Policy GS4 Strategy for People-Friendly and Healthy Places

- 4.1 Hayfield supports the requirement for developments over 10 dwellings to provide or contribute to community facilities (provided they are CIL regs 122 compliant) and infrastructure, as well as prioritising active travel modes to create a space that is safe, attractive, and promotes social inclusivity via well-designed and affordable housing.
- 4.2 The site Hayfield are promoting would provide accessible and well-designed housing that would provide a policy compliant level of affordable housing.

5. Policy GS10 Movement and Access

- 5.1 Hayfield agrees with the provision of mitigation measures submitted via a Transport Statement or Travel Plan to be in place where a development causes a high impact on the highway network. The requirement for a development to provide safe and suitable access for all users is supported by Hayfield.
- 5.2 The site Hayfield are putting forward for allocation would take its access from Station Road located along its north-western boundary.

6. Policy PFHP5 Designing People-Friendly Places

- 6.1 Hayfield supports PFHP5's compliance with National guidance, as well as with Local Design Codes. The requirement for development to consider the local context and surrounding character is supported by Hayfield.
- 6.2 The site that Hayfield are promoting would respond positively to the characteristics of the local vernacular in order to fit into the Castlethorpe settlement and align with the local Design Codes, such as through the use of materials, house types, consideration of parking policies, and built form lines.

7. Policy PFHP9 Amenity for Healthy Buildings and Spaces

- 7.1 The requirement for all new residential developments to comply with NDSS standards is not supported by Hayfield. The requirement for NDSS compliance on all new dwellings lacks flexibility and does not comply with National Guidance. There is also a lack of evidence surrounding this compliance requirement. Therefore, it not been justified and should be removed from the Local Plan.

8. Policy HQHI Healthy Homes

- 8.1 This policy states that on housing sites of 10 or more homes, the mix of housing types and size must reflect with the Council's latest assessment of housing. This lack of flexibility to take into account other evidence that may suggest a more appropriate mix would better meet the need for homes in the specific area the site is being developed, is not supported by Hayfield.
- 8.2 Whilst it is understood that there is a need for a mix of house types, tenures and sizes, it is important that such a policy is flexible and ensures that delivery of housing is not stalled due to overly prescriptive requirements that do not consider the

H

HAYFIELD

scale and viability of sites. Hayfield politely request that the Council ensure that the Policy is flexibly applied to make allowance for home builders and developers to provide alternative housing mixes as required by the market.

8.3 Therefore, the policy should be reworded to allow for flexibility when it comes to mix of housing. Hayfield politely suggests that it should be altered to read as follows:

- A. *Development proposals resulting in the creation of 10 or more new homes must meet identified needs. The mix of tenure, size and type of homes must:*
- 1. Reflect the Council's latest assessment of need, as well as other recent evidence; and*
 - 2. Create and/or maintain mixed and balanced communities.*

8.4 This alteration will allow decision makers to take into account a wider range of evidence recognising that the council's assessment of housing need is just a snap shot in time and that there may be changes in need after its publication.

8.5 Hayfield agree with the requirement for 75% of housing to meet M4(2) Building Regulations in keeping with national technical standards. The requirement for accessible homes within developments is something which Hayfield support, in principle.

8.6 Policy HQH1 conforms to paragraph 135 (f) of the NPPF 2024, which states that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

8.7 5% minimum Market homes to meet M4(3) regulations and 10% minimum Affordable homes to meet M4(3) regulations within developments of over 10 dwellings is partially supported by Hayfield, in principle. However, the Council should be aware of National Building Regulation requirements and be conscious not to double count.

8.8 It should also be noted that if the Council are to implement such a policy in the way outlined within their draft plan, they should allow reflection of this within cost viability assessments. The implementation of such a policy may be a challenge from a viability and deliverability perspective, meaning that further flexibility would be favoured with regards to this policy in order to address these concerns. This is especially important given the mandatory delivery of 10% BNG throughout the UK affecting how viable and deliverable a scheme can be.

9. HQH2 Affordable Housing

9.1 Hayfield supports the use of adjusted rates of affordable housing provision based on different value areas.

9.2 The consideration of robust viability evidence for development proposals that cannot meet the required affordable housing requirement is supported by Hayfield. This is particularly important when it comes to smaller sites put forward for development by SME housebuilders. This is especially important given the mandatory delivery of 10% BNG throughout the UK affecting how viable and deliverable a scheme can be.

9.3 The site Hayfield are promoting would include a minimum of policy compliant 40% affordable housing which would reflect the local housing requirement acknowledged by the Council in Castlethorpe.

10. Policy HWH8 Exception Sites

10.1 Hayfield support the inclusion of rural exception sites to be considered as part of this Local Plan to facilitate additional affordable and market housing where there is a required local need.

11. Policy CEA2 Green Roof and Walls

11.1 Policy CEA2 states that where feasible green roofs should be provided on apartment and dwellings with flat roofs or gentle roof pitches. While the delivery of green roofs is becoming more common, there is still a significant way to go before there is wider public acceptance. The Council note some of the problems with regard to providing green roofs, including how green roofs will work alongside the provision of solar panels, which the Government have confirmed will be a requirement of the Future Homes Standard.

H

HAYFIELD

11.2 Given the difficulties presented by providing green roofs, Hayfield suggests that this policy is currently too prescriptive and should be altered to state that the provision of green roofs in appropriate situations will be encouraged and be viewed favourably in the decision-making process.

12. Policy CEA5 Water Efficiencies

12.1 The proposed restriction on water use to 93 litres per person per day is unduly onerous and is not consistent with national requirements. By Building Regulation standards, the current restriction is 125 litres per person per day (LPPPD) with an optional uplift / reduction to 110 litres per person per day. The 'Water Ready' report published earlier this year by the Future Homes Hub outlines a framework for new homes to achieve 90 LPPPD by 2035. A restriction to 93 LPPPD is considered unreasonable. The Policy should instead be written to reflect national regulations. Hayfield consider the Policy is reworded as follows:

- A. *Proposals for residential development must achieve using a fixtures and fittings approach, unless superseded by a more stringent national policy or Building Regulations requirement, a 110 litres per person per day water efficiency standard for mains supplied water/potable water.*
- B. *Where feasible and viable, non-residential development proposals must achieve full credits within the four water categories (WAT01, WAT02, WAT03 and WAT04) of the BREAAAM standard, with a minimum score of three credits within WAT01 Water Consumption category, or an equivalent standard set out in any future update to BREAAAM.*

13. Policy CEA9 Biodiversity and Habitat Networks

13.1 Hayfield would suggest that the Council give consideration as to whether a policy on BNG is required given that the process for considering and delivering BNG is set out in legislation and regulation.

13.2 If the Council do retain the policy, Hayfield would recommend that part C is removed as this effectively repeats the Biodiversity Gain Hierarchy which is already defined in legislation and National guidance. Therefore, it is unnecessary and should not form part of the decision-making process for a planning permission.

14. Policy CEAI5 Managing Flood Risk

14.1 Hayfield are concerned that this Policy does not reflect the updated Planning Practice Guidance ("PPG") (updated 17 09 2025) relating to sequential testing. Within Policy CEAI5, (E) states that Development proposals on land that has not been subject to a plan-making Sequential Test will be required to undertake a flood risk sequential test using the Council's latest published Strategic Flood Risk Assessment. However, this is not in compliance with the updated PPG, which states that a proportionate approach should be taken, applying NPPF Paragraph 175.

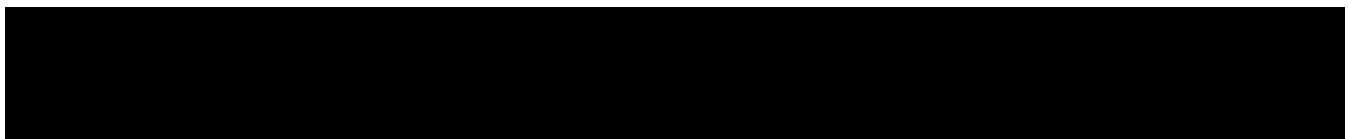
14.2 The PPG makes clear that where a site-specific flood risk assessment demonstrates clearly that the proposal would ensure that occupiers and users would remain safe from surface water flood risk for the lifetime of the development (without increasing flood risk elsewhere) a sequential test is not required. Hayfield therefore request that this Policy be amended to reflect the updated PPG.

15. Conclusion

15.1 Hayfield politely requests that these representations are taken into account. Land off Station Road, Castlethorpe is readily available and deliverable within the desired timeframe, and Hayfield recommend that the Council include the site within the emerging Plan as an allocation for residential development.

15.2 I trust that you will find the above acceptable.

Yours Sincerely,



H HAYFIELD

Lucy Taylor
Assistant Planning Manager

