

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	Miss	
First Name	Lucy	
Last Name	Taylor	
Job Title (where relevant)	Assistant Planning Manager	
Organisation (where relevant)	Terra Strategic	
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: TERRA STRATEGIC

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

Paragraph

Policy

GS2; GS4;GS10; PFHP5;
PFHP9; HQH1; HQH2;
HWH8;CEA5; CEA9;
CEA15

Policies Map

4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the Duty to co-operate

Yes

No

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.

Please refer to covering letter below.

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

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.

Please refer to covering letter below.

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

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:

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.*

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

19th December 2025

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

Dear Sir/Madam,

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

This document comprises Terra'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 Hanslope, identified as Land at Denton Drive, Hanslope.

1. The Site and Planning History – Land at Denton Drive, Hanslope

- I.1 Terra control Land at Denton Drive, which is to the south-west of the village of Hanslope. The site is adjacent to residential development to the North and East, with agricultural land to the South and West. The site would take access from Denton Drive.
- I.2 The site is unconstrained. It is not within a Conservation Area, has no impact on Listed Buildings, and is not at risk of flooding due to its location wholly within Flood Zone 1. Although outside the settlement boundary, it is contiguous with it.
- I.3 **Figure 1** below shows the site location plan in reference to the settlement of Hanslope.

Figure 1. Site Location Plan



2. Development Vision

2.1 It is considered that the site has a capacity of up to 150 dwellings (approximately). The developable area would be located within the Eastern half of the site, adjacent to existing development, whilst the western half of the site would be utilised for Green Infrastructure and Biodiversity Net Gain.

3. Settlement Context – Hanslope

3.1 Hanslope is a sustainable settlement with a range of day-to-day facilities to serve the local population, including a primary school, public houses, a doctor's surgery, post office and local shop, each of which is within walking distance of the application site. Within the Adopted Local Plan, Policy DS2 states that small to medium scale development within rural and key settlements, appropriate to the size, function and role of each settlement to be delivered through allocations in neighbourhood plans currently being prepared. This is still the case in the emerging plan. Within the last 10 years, three sites were allocated for development of circa. 300 dwellings in Hanslope, of which all of these have had successful planning applications against them and have now been built out. Given the level of growth that the village has already seen within the last 10 years and the facilities that are available within Hanslope, the settlement is sustainable and well-placed to support further growth.

RESPONSE TO DRAFT LOCAL PLAN

4. Draft Policy GS2 – Strategy for Homes

4.1 Terra 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.

4.2 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, Terra suggests that GS2 should be amended accordingly.

4.3 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.

4.4 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 Terra's opinion, not form part of the supply of homes for this plan. Therefore, over what Terra 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.

4.5 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 Hanslope. 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, Terra 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.

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

5.1 Terra 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.

5.2 The site Terra are promoting would provide accessible and well-designed housing that would provide a policy compliant level of affordable housing.

6 Policy PFHP9 Amenity for Healthy Buildings and Spaces

6.1 The requirement for all new residential developments to comply with NDSS standards is not supported by Terra. 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.

7 Policy HQH1 Healthy Homes

7.1 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 Terra.

7.2 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 scale and viability of sites. Terra 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.

7.3 Therefore, the policy should be reworded to allow for flexibility when it comes to mix of housing. Terra 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.*

7.4 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.

7.5 Terra 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 Terra support, in principle.

7.6 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.

7.7 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 Terra, in principle. However, the Council should be aware of National Building Regulation requirements and be conscious not to double count.

7.8 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.

8 HQH2 Affordable Housing

8.1 Terra supports the use of adjusted rates of affordable housing provision based on different value areas.

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

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

9 Policy CEA2 Green Roof and Walls

- 9.1 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.
- 9.2 Given the difficulties presented by providing green roofs, Terra 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 favorably in the decision making process.

10 Policy CEA5 Water Efficiencies

10.1 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. Terra 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.*

11 Policy CEA9 Biodiversity and Habitat Networks

- 11.1 Terra 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.
- 11.2 If the Council do retain the policy, Terra 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.

12 Policy CEA15 Managing Flood Risk

- 12.1 Terra are concerned that this Policy does not reflect the updated Planning Practice Guidance ("PPG") (updated 17 09 2025) relating to sequential testing. Within Policy CEA15, (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.
- 12.2 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. Terra therefore request that this Policy be amended to reflect the updated PPG.

13 Conclusion

- 13.1 Terra politely requests that these representations are taken into account. As identified above Terra consider that the housing requirement within the plan is too low and additional sites should therefore be identified. Land at Denton Drive, Hanslope is

readily available and deliverable within the desired timeframe. Terra therefore recommend that the Council include the site within the emerging Plan as an allocation for residential development.

I trust that you will find the above acceptable. However, should you require any further information, please do not hesitate to contact myself or my colleague Richard Pitt [REDACTED]

Yours Sincerely,

[REDACTED]

Lucy Taylor
Assistant Planning Manager

[REDACTED]