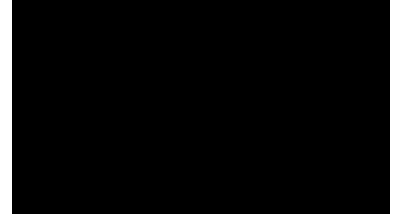


December 2025



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



Via email only: ncp.engagement@milton-keynes.gov.uk

Dear Sir/Madam,

MILTON KEYNES NEW DRAFT LOCAL PLAN 'MK CITY PLAN 2050' (REGULATION 19)

THE ADIL GROUP REPRESENTATIONS

Introduction

Thank you for consulting us on the new Draft Local Plan known as 'MK City Plan 2050' (Regulation 19). We write on behalf of our client, The Adil Group, who commend the Council progressing a new Local Plan in an effort to replace the out-of-date Plan:MK (2019).

The Adil Group is one of the largest family owned quick service restaurant operators in the UK, also owning and operating commercial and residential properties. The Adil Group are an experienced long-term landowner and investor in Milton Keynes and are committed to development within Milton Keynes. They have been active in Milton Keynes over the last c. 40 years, having recently completed the development of two drive-thru builds at Stadium MK. As such, the Adil Group is in full support of the dynamic evolution of Bletchley through long-term growth into a sustainable town centre.

As an active landowner within the Council, The Adil Group welcomes the opportunity to be involved in shaping the future of Milton Keynes City Council (hereafter 'MKCC') via the Regulation 19 consultation. This representation is submitted by Savills (UK) Limited (hereafter 'Savills') in response to the consultation.

This representation is written in regards to the Burger King in Bletchley (hereafter 'the Site') owned by The Adil Group. The Site is currently occupied by a Burger King drive thru and benefits from Resolution to Grant for a Full Planning Application (Planning Ref: 21/00725/FUL) for development of the Site to provide a residential-led scheme. Adopted policy signposts the suitability of this Site for development and the suitability of the principle of a residential-led development at scale, in this location. This is on the basis that neighbourly relationships, high quality design, and other requirements can be met.

The Adil Group supports the preparation of a New Local Plan for MKCC and wishes to emphasise the Site's potential to deliver a significant number of planning and public benefits. These benefits will be delivered through the reuse of a brownfield site in a highly sustainable location, in accordance with national and regional policy.



Legislative Framework

The Planning and Compulsory Purchase Act 2004 is the primary legislative act that provides the basis for the plan-led system in England. It is supported by other legislative instruments, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for a Local Planning Authority to prepare and adopt a Local Plan and other supporting documents.

National Policy Context

Paragraph 36 of the National Planning Policy Framework ('NPPF', 2024) states that for an emerging Local Plan to be found 'sound', it must satisfy the below four criteria:

1. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
2. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
3. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
4. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Any comments and suggestions made within this representation are cognisant of this legislative framework. It is hoped that MKCC finds the comments from The Adil Group of use in their ongoing preparation of the Draft Local Plan.

Main Representations on the Draft Local Plan 'MK City Plan 2050'

The Regulation 19 Draft Local Plan seeks to shape growth and change in Milton Keynes and Bletchley over the plan period of 2022-2050, as MKCC seeks to respond to the continued local need for residential and commercial growth, while protecting existing green spaces, rural areas and ensuring sustainable development.

Our substantive comments are set out within this representation and we draw your particular attention to our comments on the following:

- Draft Policy CB1 – Supporting Investment in Central Bletchley
- Draft Policy GS2 - Strategy for Homes
- Draft Policy HQH2 – Affordable Homes
- Draft Policy PFHP5 – Designing People Friendly Places
- Draft Policy PFHP6 – Designing Healthy Streets
- Draft Policy PFHP7 – Well-designed Buildings
- Draft Policy GS10 – Movement and Access
- Draft Policy HQH1 - Healthy Homes

All components of this representation must be read as one comprehensive submission.

Main Representation

In this section, we set out our detailed comments on the Draft Local Plan. Any suggestions to delete text are shown with a ~~strike through~~ and additional text is shown in **green**.

MKCC Strategic Ambition

MKCC planning strategy has been prepared in the context of the social, economic and environmental changes faced by MKCC, in turn leading to the ambition of creating prosperity for MKCC, Central Bletchley and associated suburban and rural areas through the promotion of healthy places that provide a better quality of life and wellbeing. Such ambition will lead to a city that is 'Better by Design' achieved through the following overarching objectives:

- People-Friendly and Healthy Places
- Climate and Environmental Action
- High Quality Homes
- Economic and Cultural Prosperity

The Adil Group support this strategic vision and objectives and seeks to contribute to this through the delivery of the proposed development at the Site.

Draft Policy CB1: Supporting Investment in Central Bletchley

MKCC seeks to further develop the Central Bletchley specific policy under Draft Policy CB1, which sets out clear growth targets for the area, such as the provision of around 1,000 new homes.

This draft policy builds upon existing Policy SD16: Central Bletchley Prospectus Area and the adopted Central Bletchley Urban Design Framework SPD (2022).

The Adil Group supports the principle of this policy and is in agreement that investment should be supported and directed towards Central Bletchley as an area identified as appropriate for growth. It is clear that when compared to other areas, Central Bletchley has been left behind and we are supportive of initiatives such as the Central Bletchley Urban Design Framework SPD (2022) for supporting growth and development in Central Bletchley.

In light of the socioeconomic benefits that are derived from the delivery of homes and the regeneration of Central Bletchley, it is critical to ensure the delivery of schemes. The Adil Group is committed to contribute towards this through the delivery of the proposed development at the Site.

The accompanying policy map 'Bletchley Town Centre Milton Keynes City Plan 2050' (Figure 1) indicates the boundary of the Central Bletchley Area, with the Site sitting within this, and The Adil Group welcomes the continued inclusion of the Site in the Central Bletchley Area.

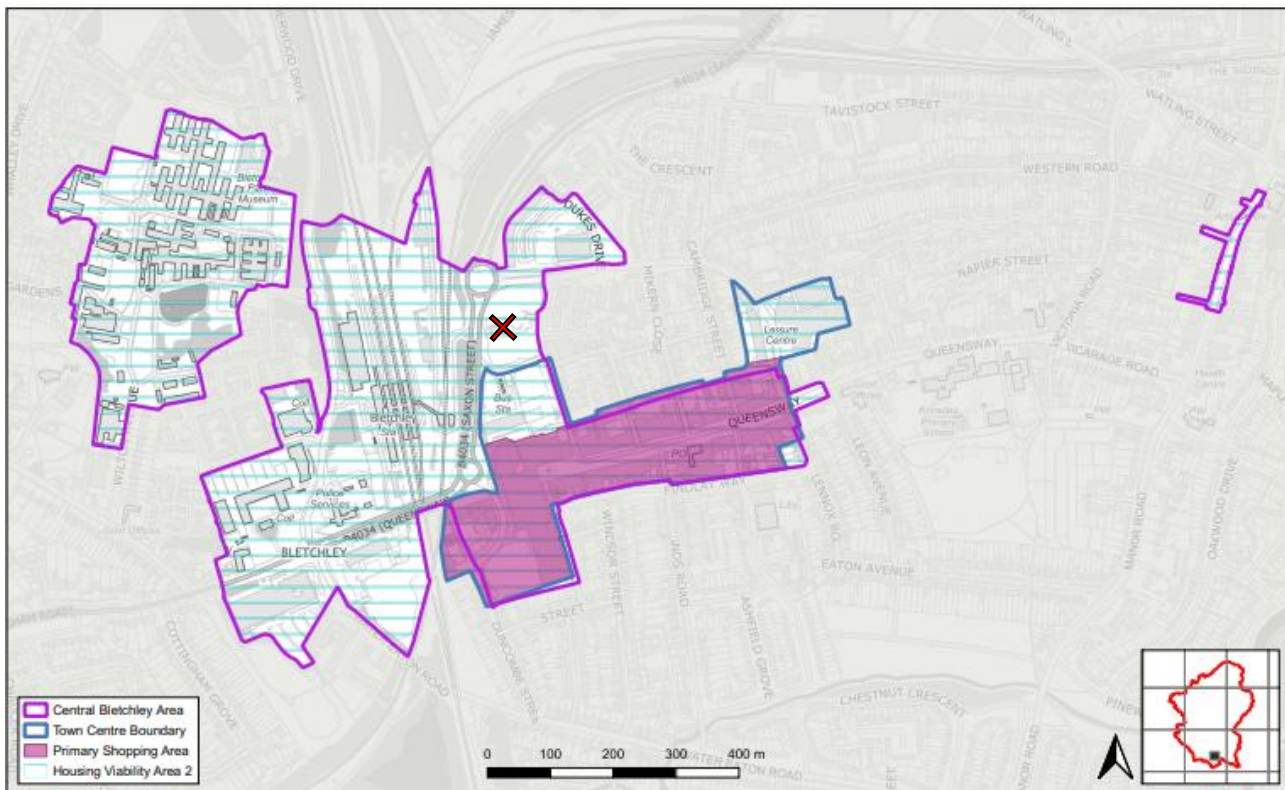


Figure 1: Bletchley Town Centre Boundary. Site indicated by red cross.
 Source: Milton Keynes City Council City Plan 2050 Policy Map.

Point 2 of Draft Policy CB1, states that development proposals within the Central Bletchley area will be guided by policy principles, including Point 2a that states that: *Residential-led development proposals should be within a density range of 150-250 dwellings per hectare.*

The Adil Group is in agreement that Central Bletchley is an appropriate location for the provision of residential-led developments.

Point 3 of Draft Policy CB1 states that any mixed-use development within Bletchley Town Centre outside of the Central Bletchley Site Allocations are also to include an appropriate mix of retail, residential, community and other main town centre uses. Focus on the Town Centre alone as an appropriate location for mixed-use development is seen to contradict NPPF (2023) Para. 96 which emphasises the importance of mixed-use development in promoting social, safe and accessible places. This also contradicts the Central Bletchley Urban Design Framework (2022) which seeks to facilitate and promote mixed-use development around Bletchley Railway Station and the intensification of development at sustainable locations. As a result, it is suggested that the wording for Draft Policy CB1 Point 3 is updated for consistency and to reflect previously identified locations for higher density residential led mixed-use development as follows:

- 3. Other **appropriately located** mixed-use development proposals within **Central Bletchley Town Centre** must include an appropriate mix of retail, residential, community and other main town centre uses.

Point 6 of Draft Policy CB1 states that development proposals are also encouraged to improve the connectivity between Bletchley Station and the Town Centre, ensuring both the strengthening of Bletchley Railway Station

as a major transport hub, but also the creation of safe, direct and inclusive active travel routes. The Adil Group is supportive of this as it is essential to ensure sustainable placemaking of Central Bletchley allowing increased use of sustainable transport in and out of Bletchley via the new East Western Railway Line to Oxford, increasing connectivity and permeability (NPPF, Para. 96).

Draft Policy GS2: Strategy for Homes

The Draft Local Plan sets out that over the plan period of 2022-2050, between 53,245 and 63,000 new homes across Milton Keynes will be provided. In addition to setting out specific Site Allocations and locations such as Central Bletchley (1,000 homes to be provided by 2050), which must be brought forward in a strategic, integrated and comprehensive manner, Draft Policy GS2 also encourages development of small and other brownfield opportunity sites within designated settlements. Such approach is in line with the NPPF's (2023) objectives of making effective use of land, specifically Para. 124 which highlights that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. In the instance of Central Bletchley, by allowing development of underutilised brownfield sites, the town centre will be transformed into a residential-led settlement, with ground floor amenity.

Draft Policy GS2 states that:

D. Development proposals within defined settlement boundaries will be supported where they comply with the spatial strategy contained in Policy GS1.

It is suggested that greater clarity over settlement tiering is given. We suggest this is achieved through the creation of three tiers which would allow for all types of settlements found within MKCC, as suggest through the following amendments to Policy GS1:

A. The development of land for new homes and employment within Milton Keynes up to 2050 will be directed toward locations in accordance with the following settlement hierarchy.

1. Tier 1 – the designated urban area of Milton Keynes City, as shown on the Policies Map, will be where the considerable majority of development that meets our identified need for homes and jobs over the plan period will be provided.

2. Tier 2 - Urban Town Centres (such as Central Bletchley), as shown on the Policies Map, will be where a significant amount of development that meets our identified need for homes and jobs over the plan period will be provided.

~~2.~~ 3. Tier-2-3 – development in Olney and rural settlements should focus on meeting local needs and be located within defined settlement boundaries, including locations identified in relevant made neighbourhood plans.

Draft Policy HQH2: Affordable Homes

Evidence base Housing Economic Development Needs Assessment (March 2024) sets out the overall need for affordable homes, including affordable rent, based on local need. Local need has been cross referenced with the draft Whole Plan Viability Study (June 2024) assessment of affordable housing viability. This sets out a variable approach to providing affordable homes through the creation of 'housing viability sub areas' based on the housing market viability of different areas in MKCC. Central Bletchley has been designated as a 'Housing Viability Area 2', meaning that at least 25% of new homes must be affordable (see Figure 1).

Like existing Policy HN2, Parts 4 and 5 of Draft Policy HQH2 goes onto to state that where the required provision of affordable homes would make the development unviable, a robust viability assessment must be submitted to determine the maximum provision of affordable homes that could be delivered. In addition to the existing review requirement criteria, a new criterion has been added in the form of Point 4 ii. regarding the size and type of homes.

The Adil Group supports the acknowledgement that Central Bletchley has been recognised as an area in need of regeneration which has led to the reduced need in affordable housing through the proposed affordable housing provision of at least 25% of new homes (subject to viability) by being in 'Housing Viability Area 2'. This is particularly important in the context of the rising costs of delivery in comparison to financial returns as this has made housebuilding increasingly marginal and therefore the quantum of affordable housing (and Section 106 obligations) needs to be very carefully assessed to make sure the quantum and delivery of housing is not varied. This is further reinforced by the national housing crisis and the cruciality of enabling the delivery of homes.

Furthermore, The Adil Group supports the continued financial viability-led approach to the provision of affordable housing and supports the flexibility in the viability-led approach set out in Points 4 i-iv. and 5. Support is also given to the Local Planning Authority's acknowledgement that provision of affordable housing is also based on the type/size of homes proposed.

Draft Policy PFHP5: Designing People Friendly Places

Setting out general design principles, Draft Policy PFHP5 states that development proposals must accord with any Design Code that has been approved for a site or wider area.

As such, it is suggested that the wording of Point A of Draft Policy PFHP5 be amended as follows:

A. Development proposals must accord with any Design Code (including supplementary design guides), either area-based or site specific, that has been approved for the site or wider area.

This will ensure that any development proposal in Central Bletchley considers the Central Bletchley Urban Design Framework (2022).

Draft Policy PFHP6: Designing Healthy Streets

Advocating for the increased use of streets by pedestrians and active travel, Draft Policy PFHP6 emphasises the need to create and improve streets to both improve sense of place, accessibility, greening, security and the promotion of active travel, with development tested against ten healthy street indicators. The principles of this policy is supported by The Adil Group, however the draft text is very prescriptive. As such, The Adil Group suggests the following text to enable flexibility on a site-by-site basis:

A. Development proposals will be permitted if they ~~meet the following~~ follow the guiding principles and where they do deviate this must be evidence based:

- 1. Streets are designed as places for social interaction as well as movement;*
- 2. Streets are designed to be inclusive, to meet the needs of their most vulnerable users and to encourage people to walk and cycle;*

3. Street trees and planting, including multifunctional SuDs, are incorporated to soften the streetscape, improve air quality, increase biodiversity and ensure that the public realm is not dominated by hard surfaces, parked cars and bin/storage/collection points;
4. Public and private areas are clearly defined through the use of appropriate boundary treatments;
5. Buildings define the public realm, through the consistency of the building line and the height of buildings in relation to the width of the space, to create a sense of enclosure that is appropriate for the function and character of the street.
6. Fronts of buildings face the public realm with entrances onto the street and windows providing passive surveillance on all public facing elevations;
7. The composition of buildings on each side of the street creates a cohesive and harmonious character;
8. Parking is accommodated in a way that does not dominate the street scene and does not obstruct pedestrian or cycle desire lines;
9. Streets are designed to encourage vehicle speeds that promote pedestrian and cycle safety and provide regular, convenient and accessible pedestrian crossing points;
10. Provision is made for appropriate shade and shelter, including street trees, with space to play and rest, including seating at regular intervals along key pedestrian routes; and
11. Landscape treatment, planting, street furniture, including cycle parking, and surface materials should be fit-for-purpose, durable and sustainable.

Draft Policy PFHP7: Well-designed Buildings

Draft Policy PFHP7 sets out building specific design policy. Whilst the majority of the policy remains unchanged, it is proposed to remove tall building specific design guidance as currently set out within Policy D3 9. i. – vi. As a result, it is unclear as to whether tall buildings will be deemed acceptable outside of Central Milton Keynes and where tall building zones have been established (as per Draft Policy CMK1). Due to the lack of evidence to explain the removal of such policy criteria, The Adil Group requests that the following text is reintroduced into Draft Policy PFHP7:

- A. Development proposals that meet the following objectives and principles will be permitted:
1. The appearance of the building contributes to the enhancement, or creation of, a positive character for the immediate location or development as a whole;
 2. Progressive, forward-thinking and distinctive architecture is incorporated, unless the existing context suggests an alternative approach would be more appropriate;
 3. Buildings are of appropriate scale in relation to other buildings in the immediate vicinity in terms of their height and massing. Buildings of a greater scale than the surrounding context may be acceptable where it is demonstrated that this is necessary to reflect the development's location and the siting, function and importance of the building;
 4. The building's form, massing, rhythm and façade details are carefully designed to create character and visual interest;
 5. Buildings employ high quality and durable materials;
 6. The proposed scale and design of extensions to existing buildings relate well to the existing building and plot, do not adversely affect the amenities of adjoining properties and do not detract from the character of the existing building and the surrounding area;
 7. The levels of sunlight and daylight within buildings and private amenity open spaces are satisfactory, shadowing of other buildings and open public space is minimised, and uncomfortable micro-climates around the building are avoided;

8. Important views and vistas from within the immediate area and wider surrounding area are protected, and the design of the proposal makes a positive contribution to the wider townscape, skyline and landscape;
9. Servicing, utility infrastructure and storage for bins is located to avoid adverse visual impact on the building frontage and street scene; ~~and~~
10. Roofs, balconies, ledges, or internal atria incorporate design measures to help prevent deaths by suicide-;
11. In addition to the above criteria, proposals for tall buildings will be required to demonstrate how they meet the requirements and positively address the principles set out below. Where necessary, the Council will require a Landscape and Visual Impact Assessment to be carried out to assess impacts and inform the design:

- i. Clustering with other existing taller buildings, or creating the potential for clusters, within the immediate and wider area.
- ii. Be a positive addition to the existing skyline, townscape, and landscape in terms of visual amenity, quality of architectural design, coherence with the wider context, and the relationship with existing and proposed buildings of significance in the immediate area.
- iii. Protect important views and vistas from within the immediate area and from the wider surrounding area.
- iv. Minimise inappropriate shadowing of other buildings and open public space.
- v. Avoid creating uncomfortable or unwelcoming micro-climates and wind tunnelling around the building.
- vi. Relationship and interaction with the street to create activity and avoid dead space.

The Adil Group asks that greater clarity is given to the definition of tall buildings in MKCC and where tall buildings would be deemed acceptable. We acknowledge the tall building strategy set out for Central Milton Keynes and query the policy position on the acceptability of tall buildings outside of this area.

In the instance of Central Bletchley, the Central Bletchley Urban Design Framework SPD (2022) paragraphs 5.4.20, 5.4.35 and 5.4.50 all state that:

Taller buildings will be sought that capitalise on Central Bletchley's sustainable location and as per the density policy within Policy SD16.

This SPD acknowledges the acceptability of tall buildings in Central Bletchley, in line with currently adopted Policy SD16: Central Bletchley Prospectus Area. On this basis, The Adil Group requests consistency between draft policy and the adopted Central Bletchley Urban Design Framework SPD (2022).

Draft Policy GS10: Movement and Access

Draft Policy GS10 sets out that new development will be supported where it minimises the need to travel and promotes accessibility by public transport and active travel modes. The Adil Group is in agreement that sustainable travel through public and active travel should be prioritised. This is evident within Central Bletchley, which should focus on providing a sustainable network of public and active travel around Bletchley Station and its connections to Central Milton Keynes, London and Oxford.

Furthermore, where developments do promotes accessibility by public transport and active travel modes and are well-connected to public transport facilities, car parking requirements should be reduced on a site-specific basis in response to the high accessibility of a site.

Draft Policy HQH1: Healthy Homes

It is clear that at a national level we are currently in a housing crisis and enabling the delivery of homes needs to be at the core of planning policy in every location, if we were to address this.

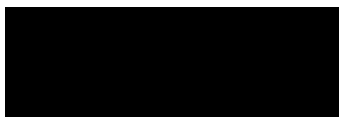
This policy sets out the requirements for the delivery of homes, providing details on mix of homes, self-build and custom homes, accessible and adaptable homes, and amenity. It is important to acknowledge that across MKCC, different building forms and built typologies are more appropriate and better suited to different locations and a standardised approach to housing mix should not be applied. The opportunity to deliver a mix of homes that is appropriate to the location of a site and local needs should be embraced and The Adil Group supports Points B 1. and 2. of Draft Policy HQH1.

Conclusion

We thank Milton Keynes City Council for the opportunity to comment and look forward to future opportunities to engage with the Draft Local Plan 'MK City Plan 2050'.

We would be grateful for confirmation of receipt of these representations and trust that these comments will be taken into consideration. If you have any queries or would like to discuss anything further, please do contact us on the details at the header of this letter.

Yours sincerely,



Savills Planning
On behalf of The Adil Group