

22nd December 2025

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

By email: ncp.engagement@milton-keynes.gov.uk

Dear Sir/Madam,

**PROPOSED SUBMISSION MILTON KEYNES CITY PLAN 2050 REGULATION 19 PLAN FOR CONSULTATION
REPRESENTATIONS ON BEHALF OF ZURICH ASSURANCE LIMITED**

We welcome the opportunity to comment in relation to the Proposed Submission Milton Keynes City Plan 2050 consultation. On behalf of Zurich Assurance Limited, we provide the following comments, in relation to their interests at 800 Grafton Gate, Central Milton Keynes.

Growth Strategy

Policy GS1 (Our Spatial Strategy)

Our Client supports the approach to the settlement hierarchy, directing the majority of development to the City of Milton Keynes. We support the Council's approach to focussing growth and development in locations with good connectivity and existing infrastructure.

Policy GS2 (Strategy for homes)

Our Client supports the proposal to deliver 16,000 new homes in the Central Milton Keynes and Campbell Park, in the period 2022-2050, to support the Council in achieving its growth ambitions and achieve a total housing supply of 59,779 new homes in the plan period.

Policy GS3 (Strategy for economic prosperity)

Policy GS3 seeks to direct proposals for 300,000 square metres of office, education or research and development floorspace, to the Downtown Business Quarter comprising Blocks A1-A4 and B1-4 within Central Milton Keynes. Our Client **objects** to draft Policy GS3, on the basis it creates a potential conflict with draft Policy GS2 given the reliance placed on Central Milton Keynes to also deliver significant residential growth. The plan should be amended to make clear those areas where residential use, commercial use and mixed uses will be supported.

Policy GS10 (Movement and Access)

Our Client welcomes the Council's approach to supporting new development where it minimises the need to travel and in parallel, promotes accessibility by public transport and public travel modes. Our Client's site has excellent transport links, being located less than 400m from Milton Keynes Central train station and several bus routes. We also support draft Policy GS10's supporting text, which sets out that:

“When proposed development is in high-density areas, is proximate to public transport facilities and community amenities, or would integrate car clubs or other shared micromobility services, a reduction in the vehicle parking standards can be considered, but this reduction must be supported by a parking assessment or survey.”

In this regard, we note recently approved residential-led city centre schemes with existing transport connectivity have provided low or no parking provision. Our Client supports a lower level of parking provision for high-density schemes in Central Milton Keynes, and we anticipate that this matter will be dealt with on a case-by-case basis at planning application stage, depending on the nature of each development proposal.

Central Milton Keynes

Policy CMK1 (Central Milton Keynes Development Framework Area)

Our Client supports the CMK Development Framework shown at Figure 7 in principle, including the development of an entertainment venue within CMK. Our Client considers this should be provided in close proximity to the train station to maximise opportunities for sustainable travel to and from the venue.

In relation to the “Downtown” business quarter, draft Policy CMK1.C.1 states that:

“... development proposals within the Downtown Business Quarter should provide at least 80% of the active non-ancillary floorspace for office, education, research and development and/or hotel use...”

As set out in our Client's comments in relation to the Regulation 18 consultation, it is unclear, how this policy will be applied in the determination of planning applications, given that developments across the seven blocks which make up the quarter, will come forward at different times. Additionally, the draft Policy is inconsistent with the wider aspirations of the draft Plan, which seek to promote mixed use development and residential growth within the CMK area. Accordingly, this policy should be amended to ensure it is deliverable, consistent with the remainder of the Plan, sufficiently flexible to support the delivery of development in the most appropriate locations and capable of adapting to changing circumstances which might arise during the plan period. Without these amendments, our Client **objects** to this policy.



Policy CMK3 (Central Milton Keynes Skyline and Tall Building Strategy)

Our Client supports the use of increased height and density in CMK to promote sustainable use of land to reinforce the existing urban structure and create a distinctive skyline, in principle. However we note that the height thresholds (as shown on Figure 9) have been reduced from those suggested in the Regulation 18 consultation document, with the height threshold now being 20 storeys and the Downtown Business Quarter having a height threshold of 15 storeys. We consider our Client's site is in a suitable location for taller buildings and higher density blocks, required to deliver the Council's growth ambition. High density development in this location would act as a catalyst for development in CMK, where taller buildings are more appropriately located. As such, we do not consider that a 'compelling justification' should be required to exceed the height thresholds shown on Figure 9, or the thresholds should be reconsidered, to not place unnecessary additional burdens on taller schemes where viability pressures may already be being faced. Without these amendments, our Client **objects** to this policy.

High Quality Homes

Policy HQH2 (Affordable Homes)

Our Client welcomes the recognition that different areas and sites have differing financial circumstances associated with their development, and that affordable housing requirements may need to be negotiated on a development by development basis, aligned to delivering the wider aspirations of the Plan. In this regard our client welcomes the flexibility indicated in relation to the application of affordable housing requirements, and the recognition that in relation to the Build to Rent homes, a financial contribution in lieu of on site provision is more appropriate and deliverable.

Thank you for the opportunity to comment on the Proposed Submission Milton Keynes City Plan 2050, we trust that our representations will be given due consideration as part of the plan making process. If you require any clarification or any further information, please contact me on [REDACTED]

Yours faithfully,

Marie Jasper
Planning Director

