

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 npc.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	Martin	
Last Name	Davies	
Job Title (where relevant)	Committee member	
Organisation (where relevant)	MK Climate Action Network	
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: MKCAN

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 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 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.

1. The Plan states that only new homes and commercial buildings will be net zero by 2030. We think that all new buildings, including industrial and warehousing, should be net zero and where possible they should be net zero before 2030, in line with the Milton Keynes Sustainability Strategy aim of creating a zero-carbon city by 2030.
2. The Council's Carbon and Climate Study 2024 looks at various options but the median scenario shows an increase in overall carbon emissions caused by new development starting at 12,000 tons per year, peaking at 33,000 tons per year at around 2030. This is significant and suggests that this Plan is not compatible with the MK Sustainability Strategy and Objective 4. Para 286 of the Plan states that during the plan period to 2050 total carbon emissions from the built environment and transport are expected to slowly decrease. This is unclear and potentially contradictory.

3. There are significant implementation risks to this policy. Higher sustainability standards can conflict with developer profitability and pressure will arise to dilute standards during viability assessments. The Sustainability Appraisal states there is an argument for concluding a negative effect on the basis that decarbonisation is a national and local priority, and the Council has committed to achieving net zero by 2030.
4. The Plan aims to help meet our international obligations as set out in the Climate Change Act (2008). The Plan therefore seeks a step change in how development is delivered in MK. The above points raise doubts about whether this step change would be achieved.
5. The inclusion of ambitious circular economy and zero waste aims in the Plan are welcome but should be strengthened.

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

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1. The policy should apply to all new buildings and major changes of use and needs to be made clear that it should apply to all developments equally and not make exceptions like warehousing and industry or only apply to Major Developments. There are other ways of assessing carbon emissions besides building regulations. In the case of proposals exempt from the carbon offset requirement, maximum use of other means of achieving zero carbon should be required.
2. Any unavoidable increase in emissions will need to be offset as proposed using the MK Carbon Offset Fund. This should be used to help existing homes become zero carbon, preferably in cooperation with local organisations such as MK Community Energy and maximum use of central government schemes.
3. The Plan should more clearly identify a quantified predicted carbon-reduction trajectory in order to monitor its effectiveness. A measurable carbon budget and pathway linked to the trajectory with embodied carbon standards and citywide carbon accounting is recommended.
6. There should be a clearer requirement for electrification of all new developments, that is, that they be gas-free. There should be an encouragement to exceed the minimum requirement of 25% use of on-site renewable energy such as solar panels and battery storage. The overall aims of the Plan cannot be delivered without a really strong commitment to design standards for energy

efficient buildings, renewable energy and heat networks. . It will be important to establish sustainability requirements as non-negotiable and maintain clear thresholds in design codes. Maintaining transparency and public accountability will provide an important control.

4. Should be more detail on the waste service infrastructure required to support the circular economy aims. The current waste system capacity may not match new development scale and there is insufficient alignment with recycling/energy-from-waste facilities. Also construction waste standards are not clearly mandated. Circular-economy assessments should be required for all major developments.
5. The scale of growth and the challenge of achieving net-zero emissions present significant delivery risks. If the Plan does not apply consistent net zero building standards, more ambitious transport infrastructure and carbon mitigation, adaptation, and circular-economy policies, the city may struggle to meet its sustainability commitments.

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Part B – Please use a separate sheet for each representation

Name or Organisation: MKCAN

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="CEA3"/>	Policies Map	<input type="text"/>
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Whilst the Plan recognizes future climate risks for MK (more hot days, flood risk, demand for cooling, extreme weather) the robustness of adaptation and resilience measures may need strengthening to match long-term climate risk. The Sustainability Appraisal concludes that the Plan will have a moderate or uncertain negative effect.

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your suggested revised wording of any policy or text. Please be as precise as possible.

A clearer Adaptation Plan is required. The aspects of extreme weather to be taken into account should include wildfires, which will become more likely, especially in MK given its relatively high tree coverage. Greater detail on heat-resilient design, climate-resilient public health planning and urban cooling strategies would be useful together with clear adaptation design codes, district-level heat and flood risk assessments and mandatory shading, cool materials, water efficiency standards.

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The Plan has welcome coverage of river corridors, linear parks, biodiversity net gain, tree planting, nature-based flood mitigation and linking ecological networks. We would note specific nature concerns raised in the Sustainability Appraisal about the proposals for major developments in Shenley Dens,

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We support the need for a bespoke framework for monitoring progress towards delivery of green and blue infrastructure, as well as biodiversity net gain objectives. We also agree with AECOM that consideration should be given to use of the Urban Greening Factor, as is being done in plans elsewhere, In addition, the Plan must be aligned with the emerging Buckinghamshire and Milton Keynes Local Nature Recovery Strategy.

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We note specific concerns about the proposals for major developments in Shenley Dens, south of Bow Brickhill and Levant Gate which are described as being in special landscape areas. We suggest that the impact on these special landscape areas will be significant and challenging to mitigate.

We also note that the AECOM Sustainability Appraisal concludes that the Plan will have a moderate or uncertain negative effect on the special landscape areas.

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Specific consideration should be made into omitting or significantly reducing these development areas because of the landscape impact. In addition, the Plan must be aligned with the emerging Buckinghamshire and Milton Keynes Local Nature Recovery Strategy.

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The inclusion of walkable neighbourhoods and people friendly movement priorities as core design principles is welcome and aligns well with compact urban living and modal shift. However current MK development and transport plans say much the same and don't seem to have had much effect on the design of the latest new developments or the travel behaviour of residents. We are not aware of any evidence that this Plan will bring about the step change that it says is required.

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It important to be clearer how the new peripheral expansion areas will meet this objective, while having a target of 40% affordable homes, being well serviced with community facilities and public transport to enable access to education and employment and enjoyment of all that MK City has to offer.

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This policy and relevant map has missed a major opportunity for solar PV installation.

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Should include the landfill site south of Bletchley as a large potential solar PV site

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Last Name	Davies	
Job Title (where relevant)	Committee member	
Organisation (where relevant)	MK Climate Action Network	
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: MKCAN

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 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.

1. We think the use of the term Metro is confusing and misleading in this plan. It seems to refer to a type of bus service, which does not meet the accepted definition of the term metro anywhere else nor is it appropriate to use the term mass rapid transport for the same reasons. The councils Local Transport Plan defines it as a "tram-like system using rubber tyre vehicles on conventional roads". The accepted definition of the term metro refers to a system with a fully separate right of way on tracks with a high capacity and high speed with fixed routes and stops and frequent service. Most of these aspects do not apply to the proposal in this Plan. Figure 1 shows the routes will be partially on bus lanes and partly without bus lanes, so they are not completely separated from other traffic.
2. The proposed corridors for this system also do not serve the majority of the city and therefore leaving most people without an improved public transport system.

3. Using a bus-based transport system as the key modal shift tool of this Plan is unlikely to provide sufficient cultural change from MK's car-centric orientation. The MK Bus Service Improvement Plan is evidence of this and states that bus use per head in MK has fallen by about 40 % since 2016. We have seen no evidence to support the claims made about this transport system.
4. It is a concern that the AECOM Sustainability Appraisal concludes that the Plan has a moderate or uncertain negative effect on transport.

(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.

To achieve a "step-change" or significant modal shift in MK will require a "carrot and stick" approach". The improved bus service would be a carrot but a stick in the form of a significant disincentive for car use would also be needed such as financial measures or lower speed limits.

If not already done, we recommend working with the MK Bus Users Group on this issue.

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:

To determine whether these matters are considered appropriately and to be available to supply further information if required.

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.*