

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

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

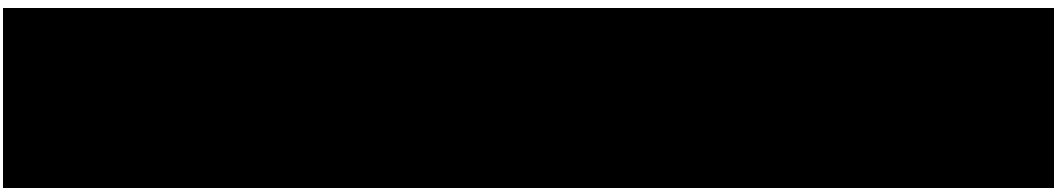
E-mail Address
Address Line 1
Line 2
Line 3

[Redacted Agent Contact Details]

Line 4

Post Code

Telephone Numb



Part B – Please use a separate sheet for each representation

Name or Organisation: St Joseph Homes

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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" 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.

St Joseph support the Plan’s retention and re-allocation of the Milton Keynes East Strategic Urban Extension under Policy GS21. The proposed allocation Policy GS21 is essentially the same as that found sound within the adopted Plan:MK (2020) as Policy SD12.

Whilst much of the MKE strategic urban extension benefits from planning permission, and construction is well underway on infrastructure, employment and the first phase of new homes within the allocation, parts of the allocation site do not yet benefit from planning permission and the retention of the MKE Policy will help to guide both the holistic delivery of this sustainable urban extension, as well as provide the basis and principles upon which the detailed design of future phases can come through via future design codes and reserved matters applications.

We note that under Paragraph B of the policy it sets out that a comprehensive development framework for the site will be prepared and approved by the Council prior to planning permissions being granted. A Milton Keynes East Development Framework has already been prepared by the Council and adopted in March 2020 as a Supplementary Planning Document (SPD). Although not a matter of soundness, we consider it would aid clarity if paragraph B were to explicitly cross refer to this SPD, rather than give the impression that a new development framework is to be prepared in the future (which we understand is not the intention).

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.

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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:

n/a

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St Joseph support the identification and allocation of the Eastern Strategic City Extension for a new mixed-use, residential-led, strategic development. As part of Milton Keynes’ spatial strategy, the ESCE will make a substantial contribution to meeting housing needs, whilst also providing the critical mass to provide a range of supporting infrastructure, including integration of a mass-rapid transit system that may also serve MKE. We note that the successful delivery of ESCE is reliant on MKE and its strategic highway improvements being delivered first, and we support the need to integrate the ESCE with MKE to ensure the two allocations work seamlessly together.

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Policy CEA2 (Green Roofs and Walls)

St Joseph note the increased support for green roofs and walls and how this is reflected within policy CEA2. Whilst we note the policy states it is a “*where feasible, viable and appropriate*” requirement, the supporting text at Plan paragraph 294 indicates that feasibility and/or viability evidence would be required to be submitted as part of any planning application for a development scheme which does not include Green Roofs. This is considered unduly onerous on applicants.

We note that the MKCC Viability Study Residential Update Note (October 2025) indicates at para 5.54 that “*costs of green roofs are not included in the base assumption as this is an aspirational policy rather than a requirement*” and that “*Solar panels are not normally compatible with green roofs*”. However, against this position within the evidence base:

1. The Plan does set it as a policy requirement through CEA2, rather than merely an aspiration – the default position of the policy is it should be provided unless scheme specific feasibility and viability evidence demonstrates it cannot be.
2. The viability implications of the costs associated with this policy requirement have not been tested. It has not been shown whether the costs of this policy (alongside others) is of a scale that would make the housing proposed within the plan undeliverable (as

required by PPG ID:61-039). This burden of viability testing for Green Roofs is instead shifted onto an applicant.

3. The Plan at Paragraph 293 indicates that “we support green roofs being appropriately provided alongside solar panels” despite the Viability Study indicates that they are not normally compatible with one another.

It is considered this policy requirement is not appropriately justified. St Joseph is particularly concerned that such a policy would impact upon delivery of PV solar panels on new development and that not all types of development and design are appropriate for Green Roofs. This is recognised in the supporting text, with particularly lower rise urban extension type developments where design forms, either for houses or apartment blocks, include pitched roofs – such as at MKE – are not suited to provision of such Green Roofs.

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It is not considered proportionate for the policy to apply as a blanket to all such developments; if evidence is produced which justifies the policy requirement to be appropriately viable (a minimum requirement of guidance), the policy should instead be focussed on parts of the City and typologies of development which provide higher density and more urban forms of development, and should explicitly exclude areas of roof where Solar PV is proposed.

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Policy CEA5 - Water Efficiency

Policy CEA5 sets a water efficiency requirement for 93 litres per person per day (LPPPD). This compares with the current policy standard set by Plan:MK of 110 LPPPD, which follows the current building regulations optional standard for areas in water stress (the standard being 125 LPPPD where that enhanced optional standard does not apply). As standard across the business Berkeley design their homes to meet a minimum standard of 105 LPPPD. The proposed Plan requirement is in excess of all such benchmarks, and St Joseph consider that achieving 93 LPPPD is difficult and adds significant cost.

We note that the MKCC Viability Study Residential Update Note (October 2025) indicates at para 5.56-5.57 that the cost of achieving 100 LPPPD is £350 per dwelling, and the cost of achieving 90 LPPPD is £1,000-£3,000 per dwelling. This is based on 'Water Ready – A report to inform HM Government's roadmap for water efficient new homes' (Future Homes Hub, April 2024). Notwithstanding the policy being set at 93 LPPPD, the Viability Study states "*the Cost of the Policy is taken to be £350 per dwelling*". There is no clear explanation as to how MKCC has equated the cost for 100 LPPPD (£350), with also being able to achieve 93 LPPPD, which 'Water Ready' would suggest is closer to £1,000-£3,000 per dwelling. Indeed, the earlier 2024 Whole Plan Viability Study indicated water efficiency was accounted for at £2,000 per unit (see Viability Study para 5.1b), but this has been reduced to £350 per unit without explanation.

The viability evidence appears to significantly underestimate the costs of achieving 93 LPPPD. The viability evidence would seemingly only support the adoption of 100 LPPPD. This accords with St Joseph's own experience that the costs of achieving such efficiency standards ramp up quickly beyond its own 105 LPPPD design standard.

Further, under part C of the policy there is a requirement for SuDS tree pits to all street trees. However, these – alongside other elements of part C – can also add costs to design, which are not reflected in the £350 per dwellings amount above (nor any other aspect of the Viability Study). St Joseph also note that not all street trees will necessarily need SuDS tree pits, either for their ongoing health or to reflect the design specifics of a given scheme. Requiring them as a 'must' element on all street trees within the Policy is overly onerous, and their provision should respond to the design context of streets within which they will be located.

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Either viability evidence should be updated to assess the impact of 93 LPPPD and suitably justify the inclusion of the policy, or the standard should be adapted to match the cost actually tested within the viability study (i.e. closer to 100 LPPPD).

Furthermore Part C.3. should be updated to reflect provision of SuDS tree pits only "*where necessary for both tree health and management of surface water drainage*".

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Policy CEA11 - Urban greening, trees and woodland

St Joseph note the requirement for developments to assess Urban Greening Factor (UGF) and to deliver 19% tree canopy cover. At Plan paragraph 326 the supporting text indicates that such a requirement will apply to “*new major development proposals*” (our emphasis), with a UGF baseline score needed to be submitted pre-development and prior to any site clearance. This indicates the policy does not apply to existing consented, but phased, sites (such as at MKE). This is logical, as such factors would need to be addressed at the very earliest design stages and reflected in layouts, and the parameters set where schemes are in outline.

However, the text in Policy CEA11 identifies it applies to all development proposals, indicating it could be applied to existing development proposals when detailed design for future phases come through. We do not consider this is likely the intention of policy (given what is said in supporting text), but it should be clarified in the policy text that this only applies to new applications for planning permission and new development proposals (as distinct from existing planning permissions on existing allocations, where detailed phase design is still to be considered).

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Clarify that Urban Greening Factor and Urban Tree Canopy Cover apply to new major development proposals.

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Milton Keynes City Council

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

Date: 19 December 2025

Our ref: 12491/04/MS/MT/40452159v1

To Whom It May Concern

Milton Keynes City Plan 2050 – Regulation 19 Consultation

We write on behalf of our client St Joseph Homes Ltd to set out representations to the draft MK City Plan 2050 ('MKCP 2050') Regulation 19 Consultation. Our representations to individual policies and parts of the Plan are set out on the requisite forms accompanying this letter.

St Joseph is part of the Berkeley Group ('Berkeley'). Berkeley builds homes and neighbourhoods across London, Birmingham and the South of England through six market leading brands: Berkeley, St Edward, St George, St James, St Joseph and St William. Berkeley's passion and purpose is to build quality homes, strengthen communities and make a positive difference to people's lives.

St Joseph is constructing Eastbrook Village at the Milton Keynes East ('MKE') site. St Joseph's development at Milton Keynes East, allocated within the previous Local Plan for Milton Keynes, will deliver up to 4,600 homes and 80ha of employment land. An upgraded A509, primary school and health hub are already constructed, and the first homes are on sale will welcome the first residents to Eastbrook in 2026. The MKCP 2050 will undoubtedly shape the delivery of MKE as further phases of the development are planned and brought forward.

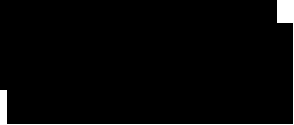
Berkeley is also one of the developers with a major land interest in the proposed Eastern Strategic City Extension ('ESCE') allocation. These representations are made in respect of St Joseph and their role delivering the Milton Keynes East development. They focus on policy matters that may affect delivery of the Milton Keynes East allocation. Separate representations will be being made by Berkeley in respect of their interest in the ESCE. Notwithstanding the ESCE will represent an extension to the growth of Milton Keynes east of the M1 that has commenced with MKE and St Joseph is supportive of the role that MKE and the ESCE can collectively have in delivering infrastructure and growth within this new part of the city.

Whilst St Joseph is pleased to see the positive ambition that the MKCP 2050 takes towards planning for the long term growth of Milton Keynes, it is considered that the Council should be careful in seeking to implement policies that, collectively, can significantly increase the costs for development and/or make it more difficult to deliver existing planning consents. This is reflected in some of our comments on individual non-strategic policies of the Plan.

We trust that our representations are helpful in assessing the soundness of the MKCP 2050.

LICHFIELDS

Yours faithfully


Martin Taylor
Planning Director
BSc (Hons) MSc MRTPI MIED