

MK City Plan 2050 – Regulation 19 Consultation

1. Clause 36 of the National Planning Policy Framework requires the Local Plan to be as follows:

- a) 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;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) 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
- d) 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

The Plan appears not to be sound as stated below.

2. Policy GS9

The Policies Map shows extensive MRT corridors generally consistent with the routes shown in figure 1 on page 8. These corridors threaten significant redevelopment and disruption to these areas.

However there is no Local Transport Plan (LTP) to support or justify them. The Council presented a Summary Report of LTP5 in June 2025 but it never progressed any further.

LTP5 seems essential to justify the MRT, its routes and corridors and to demonstrate the effectiveness of the New City Plan. Consequently in its absence the New City Plan should be deferred until this vital piece of the evidence base is properly concluded and available.

3. Policy GS14

The proposed Eastern Strategic Expansion Area (ESEA), “to the north and east of the city”, will ultimately provide around 16,000 homes and is shown on the Policies Map.

However the Government’s New Towns Task Force report published in September 2025 proposes a new town of around 40,000 homes “commencing in the city centre and in urban extensions”. There are essentially two urban extensions: the ESEA and a large area

to the north of the River Great Ouse between Cosgrove and Little Linford. This new town will have a massive impact on the existing city and needs to be properly considered.

The Regulation 19 Draft does not even acknowledge this proposal for a new town which is likely to impact its compliance with any of the requirements of clause 36. Consequently in such an absence the New City Plan should be deferred until it is reconciled with the approved proposal for the Government's new town.

4. Policy GS19

The Plan acknowledges that over 4,000 further dwellings are currently planned or committed within MK West mainly in Fairfields and Whitehouse. Additionally it proposes an additional 1,000 dwellings at Shenley Dens south west of Whitehouse. Altogether this will produce a projected 55% increase in population of over 10,000 by 2050. The Infrastructure Development Plan predicts 5,200 more vehicular trips per day and a 48MW increase in demand for electricity in MK West due to this growth.

The whole of the Shenley Dens site for the additional 1,000 additional homes (previously site 10.4 in 2004) conflicts with both the Special Landscape Area as shown on the Policies Map and also with Open Countryside as defined by policy GS6. The SLA is an important feature that provides a valuable landscape buffer between the urban area of Milton Keynes and the Aylesbury Vale including Calverton and the Wealds.

This site was rejected by the Local Plan Inquiry 20 years ago because it corrupted the relationship between the urban development at the top of the ridge and the open countryside at its base. Development of the urban edge should therefore stop at the existing western boundary of Fairfields and Whitehouse.

20 years after the publication of the WEA Development Framework neither Fairfields nor Whitehouse are even half finished. They also have significant issues to resolve such as delivering the commercial elements and employment sites; and completing the City Streets and junctions with Watling Street. The developers (Barratts, Urban & Civic) should therefore be required to successfully complete the existing plan before embarking on any additions or extras.

Further extensions to either Fairfields or Whitehouse, including Shenley Dens, are therefore not justified at present and should be omitted from the Plan.

5. Policy CMK1

Almost 25 years ago, in October 2001, EDAW produced a Development Framework for Central Milton Keynes that is largely copied by this draft of the New City Plan. It is evident that very little of EDAW's plan has been implemented and that little or nothing has been learned from this.

Consequently the New City Plan should be deferred to better understand the planning and development of the City Centre over the last 25 years to better comply with clause 36.

6. Policy PFHP2

It is very sad that the Galley Hill Local Centre, a Small Meeting Place and Arts Workshop, has been lost due to the Council converting it into a warehouse in contravention of this policy.

7. Policy CEA1

This policy seems to be concerned with only the carbon emitted during the use of a building. However the construction of new buildings can produce significant amounts of carbon.

Consequently this policy should be amended to require a whole life assessment of all construction based on the RICS Whole Life Carbon Assessment for the Built Environment published in September 2023.

8. Policy CE8

It is very sad that the existing green open space adjacent to St. Mary & St. Giles School and H1 Ridgeway in Galley Hill is threatened by the Council itself in contravention of this policy.

The Play Commission's report "Everything to Play For" published in June 2025 shows the importance and the many uses of such spaces that are greatly preferable to the building of a shop.

9. Policy HE1

The adoption of this policy should be accompanied by the conclusion of the New Town Heritage Register that is still only half complete after years of delay and prevarication.

Michael Moutrie, 22 December 2025