



Historic England

FAO: Planning Policy team
Milton Keynes Council

Our ref: PL00793301

Ncp.engagement@milton-keynes.gov.uk

by email only

17 December 2025

Dear Planning Policy team

Milton Keynes City Plan 2050: Regulation 19 consultation

Thank you for consulting Historic England on the MK City Plan 2050: Regulation 19. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

In this letter I set out a summary of our general comments below, followed by a more detailed set of comments in the Appendix.

Our primary soundness concerns relate to policies:

- Policy CMK3 Central Milton Keynes Skyline and Tall Buildings Strategy
- Policy GS15 East of Wavendon Strategic City Extension
- Policy GS12 Redevelopment of Wolverton Railway Works
- Policy PFHP8 Tall buildings outside Central Milton Keynes

Also, we raise concerns and queries regarding selected other policies; for example:

- Policy CMK2 Central Milton Keynes placemaking principles
- Policy HE1 Heritage

In our response, we have tried to take a proactive approach to support the Council in resolving as many of these concerns as possible. I would welcome an opportunity to discuss our comments with you, especially on matters where we raise soundness concerns, and to collaborate with the Council on a Statement of Common Ground.

In the remainder of our cover letter, I try to summarise our more detailed comments on the primary soundness concerns mentioned above.

Central Milton Keynes (CMK) and the Council's Tall Building Strategy

We warmly welcome the breadth of work being done to inform the plans for major growth in CMK, not least the preparation of a heritage impact assessment (HIA), including its analysis of relevant planning decisions regarding tall buildings.

We recognise the need for change to support the city's sustainable future. That said, we are keen to support the Council in taking a positive strategy towards the historic environment and, especially, its heritage assets.

Given the area-based nature of this big allocation, the degree to which one can understand heritage impacts is shaped by various factors, including (but not limited to) the plan's references to density in CMK2 and height in CMK3. At this time, we raise concerns and queries regarding elements of CMK2 and **we consider that elements of CMK3 are** unsound: in our opinion, policy CMK3 does not represent a positive strategy for the historic environment in line with paragraph 203 of the NPPF.

Furthermore, we highlight that ideally the HIA would be expanded to consider the heritage impacts of the 4000-seat events venue in the location proposed adjacent to the listed former bus station and at a key entry point to CMK.

Strategic city urban extensions

We broadly support most of the proposed strategic urban extensions, while suggesting revised wording for some of the Council's urban extension policies to sharpen their heritage provisions.

That said, **we consider the policy for development East of Wavendon (GS15) is unsound**. It omits reference to the Scheduled Monument within the site and does not represent a positive strategy for the historic environment (NPPF paragraph 203). Our concern in this regard can be resolved through changes to the policy wording.

Supporting policy GS15, we welcome the preparation of a HIA; however, we note it does not engage in the overlap between the proposed allocation and the Registered Park and Garden (RPG). Clearly this connects with plans for a new District Park. We welcome the Council's sensitive approach to development within the setting of the RPG and ideas for enhancement. Plans for the new District Park would benefit from responding to historic landscape character and we suggest relevant wording that would secure such consideration.

Redevelopment of Wolverton Railway Works

We assert that this allocation (GS12) as proposed is unsound. Our appended comments explain our rationale in more detail. To align with paragraph 32 of the NPPF, the policy needs to be underpinned by proportionate evidence. We have yet to see evidence that allocation of 400 houses on this site can be accommodated in a way that would avoid large-scale demolition of historic buildings, which make a fundamental contribution to the significance, character and appearance of the conservation area. As a result, the proposal risks conflict with:

- the NPPF's requirement for plans to set out a positive strategy for the conservation and enjoyment of the historic environment (paragraph 203); and
- the Council duty for "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area" according to the Planning (Listed Buildings and Conservation Areas) Act 1990".

Tall buildings outside Central Milton Keynes

We raise soundness concerns about Policy PFHP8 due to its lack of adequate reference to heritage considerations. For areas such as Central Bletchley, where tall buildings are likely to be proposed, a positive strategy for the historic environment needs to make clear that heritage impacts will be considered within the application process. We believe these concerns can be resolved through editing of the policy.

Concluding remarks

We support many elements of the Council's plan. Clearly the Council is looking to stimulate major growth. In support of sustainable development, we advocate for more nuanced consideration of heritage, in particular in the approach to tall buildings (policies CMK3 and PFHP8), development plans East of Wavendon (policy GS15) and the regeneration of Wolverton Railway Works (GS12).

To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed Local Plan, where we consider these would have an adverse effect on the historic environment.

I hope that these comments are helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

Guy Robinson, BSc, MRTPI

[Redacted signature line]

[Redacted signature line]

[Redacted signature line]

Appendix A: Table of Historic England's comments on the Milton Keynes City Vision Plan (Regulation 19)

Page	Section	Sound/ Unsound	Comments	Suggested Change
41	Policy GS7 Wind and solar development spatial strategy	Comment	<p>We repeat concerns raised in our response at Regulation 18 regarding the approach taken by the Council. While we support renewable energy provision, it needs to be informed by opportunities and constraints; and mapping only Scheduled Monuments (rather than also considering other types of heritage asset) will inevitably lead to promoting areas of land that are not suited to such development. To remedy this and to ensure that the settings of all types of heritage asset are adequately considered, we recommend adding a new consideration to criterion c, such as that proposed in the adjacent wording.</p> <p>Also, we recommend explaining in the supporting text that heritage impact assessment will be needed at the planning application stage and landscape and visual impact assessment (LVIA), including relevant views and visualisations relating to heritage assets. As stated previously, if the local plan is going to steer such development to locations with heritage sensitivities, the local plan needs to be clear about the assessments required to determine the application.</p>	<p><u>3. avoid or minimise harm to the significance of designated and non-designated heritage assets (including through development in their settings) in accordance with policy HE1.</u></p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
43	Policy GS8 Hanslope Park	Comment	National policy places great weight on the conservation of heritage assets. The proposed wording could be misconstrued in its approach to the conservation of assets and their significance without reference to avoiding and minimise harm.	A. ... <u>3. Harm to heritage significance is avoided and minimised.</u> Any harm to heritage assets is assessed and considered in line with Policy HE1;
51	Policy GS12 Redevelopm ent of Wolverton Railway Works	Unsound	<p>What is the Council's evidence to support the assertion that 400 dwellings can be accommodated while respecting the heritage of the former Railway works (referenced in criterion 4) and without significant harm to the character and appearance of the conservation area? We believe what is proposed risks conflict with:</p> <ul style="list-style-type: none"> • the NPPF's requirement for plans to set out a positive strategy for the conservation and enjoyment of the historic environment (paragraph 203); and • the Council duty for "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area" according to the Planning (Listed Buildings and Conservation Areas) Act 1990". <p>In our response at Regulation 18, we recommended heritage impact assessment of the proposed allocation to inform the approach to Wolverton's growth in a way that stays connected with its past. We maintain that HIA is needed to understand the capacity of the site in more detail, informed also by the needs of Gemini Rail Services (the current operator) and ensure an optimal policy approach.</p> <p>The importance of the Railway Works to the conservation area is made clear in the Conservation Area Review, which states in section 2.2 on its Definition of Special Interest for Wolverton Conservation Area: "<i>Built on a much larger scale, the works built by the London and Birmingham Railway underpinned the economy and development of Wolverton from the middle of the nineteenth century until being significantly scaled down during the late 1970's and 1980's. In their heyday the works were nationally renowned in a similar way to those of Crewe and Swindon. A collection of important buildings and structures from this period still survives in sufficient numbers to convey the historic scale and cohesiveness of the site's functions, processes and purpose.</i>" In paragraph 2.3.3, the Conservation Area Review makes clear that the Railway Works directly instigated and then indirectly sustained the residential and commercial development that took place south of the boundary wall that runs along Stratford Road. The Railway Works are the reason for the existence of the rest of the Conservation Area; it cannot be understood without it.</p>	

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>We note, too, that the Conservation Area Review states that “<i>The council will not normally permit changes of use to a building where the new use would adversely affect the historic character or appearance of the conservation area</i>” and in its approach to demolition: “<i>Demolition of historic buildings and structures in the conservation area will only be permitted in exceptional circumstances.</i>”</p> <p>The policy approach requires an applicant’s Heritage Impact Assessment to justify any demolition of buildings that are feasible for reuse. This stance postpones grappling with the central issue of what represents a heritage-led approach to regeneration, which we believe is fundamental to the allocation. The local plan refers to the outline planning permission granted in 2017 (15/02030/OUTEIS), which included a level of demolition of historic fabric that Historic England did not support. We were not convinced that demolition on this scale was necessary and objected to the proposal. Quoting from the committee report the proposal “would leave no complete building standing on the site with all of the historic works buildings on the site being completely or substantially demolished”.</p> <p>Looking at the proposed allocation afresh, we remain concerned that the aim of 400 dwellings centres on an intensity of housing that is challenging, if not impossible to deliver without major demolition including buildings that make a positive contribution to the conservation area.</p> <p>We do not object to the concept of redevelopment here. Indeed, we would welcome heritage-led regeneration that would support a sustainable future for these buildings. Surely, at least in part, some of the buildings that make a positive contribution to the conservation area are more suited to employment use than housing? We would be keen to discuss with the Council how this could best be delivered in a way that is acceptable in heritage terms, underpinned by proportionate evidence.</p>	
55	Policy GS14 Eastern Strategic City Extension	Comment	We recommend discussing criterion 16 with the Council’s archaeological advisers, if this has not been done already e.g. would 16 benefit from reference to a Written Scheme of Investigation to be agreed with the Council? Presumably such evaluation is to be done in addition to the desk-based assessment required by policy HE1.	<p>15. Be informed by appropriate surveys and assessments of built heritage and ecology with appropriate mitigation of impact; and</p> <p>16. Pre-determination archaeological evaluation has been undertaken and provided in support of development proposals.</p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
55	New paragraph 106	Comment	We recommend adding a new paragraph to the supporting text on the Eastern urban extension that clarifies what the Council expects in terms of heritage assessments. We suggest wording for consideration, which would need to be discussed with the Council's archaeological advisers.	<u>Heritage impact assessment will be needed, incorporating desk-based archaeological assessment (as required by policy HE1). A key concern is the heritage and identity of Moulsoe, including (but not limited to) taking a sensitive approach to the setting of the Grade I Church of St. Mary. Field evaluation will be needed in addition to the desk-based archaeological work.</u>
58 / 59	Policy GS15 East of Wavendon Strategic City Extension	Unsound	<p>The policy includes a degree of repetition in criteria E4 and E5, which could usefully be combined.</p> <p>Having combined E4 and E5 (into E4), a new E5 is needed regarding the Scheduled Monument, establishing the key requirements associated with that monument. This is informed by the Council's own Heritage Impact Assessment (HIA) and we consider the policy to be unsound without this explicit requirement, because it does not represent a positive strategy for the historic environment as required by the NPPF (para 203).</p> <p>Currently, the HIA does not engage with the overlap between the proposed allocation and the RPG. This forms part of the Council's appealing idea for a new District Park.</p> <p>We support measures to sustain the significance of the RPG and enhance its appreciation through a sensitive approach to development within its setting. To achieve this, criterion 4 would benefit from reference to the District Park within the development described.</p>	<p>3. Appropriate distribution, layout and design of development to protect and, where possible, enhance the character and sense of place of Woburn Sands and Cross End;</p> <p>4. Appropriate distribution, layout and design of development, <u>including the proposed District Park</u>, to conserve and, where possible, enhance the designated and non-designated heritage assets and their setting within the site and wider area that may be affected, including Wavendon House and the Registered Park and Garden <u>in accordance with Policy HE1</u>;</p> <p>5. <u>Assess the significance of the Scheduled Monument, and impacts on that significance, including measures to conserve the monument and support its appreciation and long-term management. Heritage impact assessment will be required, including careful consideration of how best to reintroduce the adjacent historic drive. Conserve and enhance designated and non-designated heritage assets within the site and wider area that may be affected, including Wavendon House and the Registered Park and Garden, in accordance with Policy HE1</u>;</p> <p>....</p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>When implementing a new District Park, we encourage proposals to take account of historic landscape character. We recommend related wording changes to criterion 11, ensuring that a future applicant understands and engages with the historic character of the landscape.</p> <p>Natural England’s work on historic parkland states that: “Historic parklands are uniquely placed to deliver integrated multi-objective benefits for the historic and natural environments. They are a finite and non-renewable resource, and they remain working landscapes. Through active management, their countless interests can be secured to great public benefit.”</p> <p>Presumably this will entail engagement with the Parks Trust.</p> <p>As a final comment, should the HIA be reviewed, we encourage the HIA also to summarize its main recommendations for the plan, when seeking to avoid and minimise harm. Section 6 refers to the potential for harm and related considerations, but the HIA does not see this through to make clear recommendations. It may be that the approach does take account of the most important heritage considerations, but this would benefit from being made clearer.</p>	<p>11. Provision for a new District Park of at least 15 hectares, alongside other green and blue infrastructure and open space in line with an approved Strategic Green and Blue Infrastructure and Open Space Strategy for the Strategic City Extension, in accordance with the Infrastructure Delivery Plan, the Council’s Nature, Green and Blue Infrastructure Strategy, and open space standards <u>and informed by the historic landscape character</u>;</p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
64	Policy GS17 South of Bow Brickhill Strategic City Extension	Comment	As with GS14, we recommend discussing the relevant criterion (C12) with the Council's archaeological advisers, if this has not been done already e.g. would it benefit from reference to a Written Scheme of Investigation to be agreed with the Council? Furthermore, we recommend explicit reference to the need to consider impacts on the nearby scheduled Roman town through development in its setting.	11. Be informed by appropriate surveys and assessments of built heritage and ecology with appropriate mitigation of impact; and 12. Pre-determination archaeological evaluation has been undertaken and provided in support of development proposals. <u>The archaeological desk-based assessment (required by HE1) should include consideration of any impacts on the significance of the scheduled Magiovinium Roman town through development in its setting.</u>
66 / 67	Policy GS18 Levante Gate Strategic City Extension	Comment	As with GS14, we recommend discussing the relevant criterion (C11) with the Council's archaeological advisers, if this has not been done already e.g. would it benefit from reference to a Written Scheme of Investigation to be agreed with the Council? Furthermore, we recommend explicit reference to the need to consider impacts on the nearby scheduled Roman town through development in its setting.	10. Be informed by appropriate surveys and assessments of built heritage and ecology with appropriate mitigation of impact; and 11. Pre-determination archaeological evaluation has been undertaken and provided in support of development proposals. <u>The archaeological desk-based assessment (required by HE1) should include consideration of any impacts on the significance of the scheduled Magiovinium Roman town through development in its setting.</u>
69 / 70	Policy GS19 Shenley Dens Strategic City Extension	Comment	As with GS14, we recommend discussing the relevant criterion (C13) with the Council's archaeological advisers, if this has not been done already e.g. would it benefit from reference to a Written Scheme of Investigation to be agreed with the Council?	

Page	Section	Sound/ Unsound	Comments	Suggested Change
72	Policy GS20 Western Expansion Area	Comment	We recommend minor revision to criterion A7 to ensure the policy requirements extend beyond retaining the buildings (or should that be building?) to engage also with their setting. Whitehouse Farm is likely to derive some of its significance due to its agricultural setting.	Retention of the Listed Buildings at Whitehouse Farm, <u>and a sensitive approach to development in the setting of those assets.</u>
73	Policy GS21 Milton Keynes East Strategic Urban Extension	Comment	Is there a reason not to include a policy requirement similar to that included in GS20 to retain the listed farmhouse and promote a sensitive response within its setting? We suggest wording for consideration. As with GS14, we recommend discussing the relevant criterion (C10) with the Council's archaeological advisers, if this has not been done already e.g. would it benefit from reference to a Written Scheme of Investigation to be agreed with the Council?	<u>Retention of Moulsoe Buildings Farmhouse, and a sensitive approach to development in its setting.</u>
74 / 75	Policy GS22 South East Milton Keynes Strategic Urban Extension	Comment	As with GS14, we recommend discussing the relevant criterion (B5) with the Council's archaeological advisers, if this has not been done already e.g. would it benefit from reference to a Written Scheme of Investigation to be agreed with the Council?	
75 / 76	Policy GS23 South Caldecotte Strategic	Comment	As with GS14, we recommend discussing the relevant criterion (C10) with the Council's archaeological advisers, if this has not been done already e.g. would it benefit from reference to a	6. Building heights should be informed by the Landscape and Visual Impact Assessment (LVIA) and should avoid unacceptable impact on the wider landscape and heritage assets;

Page	Section	Sound/ Unsound	Comments	Suggested Change
	Employment Allocation		<p>Written Scheme of Investigation to be agreed with the Council?</p> <p>Furthermore, we recommend explicit reference to the need to consider impacts on the nearby scheduled Roman town through development in its setting.</p>	<p>...</p> <p>9. Be informed by appropriate surveys and assessments of built heritage with appropriate mitigation of impact; and</p> <p>10. Pre-determination archaeological evaluation has been undertaken and provided in support of development proposals. <u>The archaeological desk-based assessment (required by HE1) should include consideration of any impacts on the significance of the scheduled Magiovinium Roman town through development in its setting.</u></p>
80	Types of infrastructure	Comment	<p>The NPPF paragraph 20 refers to community infrastructure and includes “cultural infrastructure” within that reference. We recommend broadening the language in the Council’s reference to community infrastructure to ensure it does not exclude certain types of cultural infrastructure and consider referring to aspects such as MK’s designed public realm that contribute to its classic infrastructure, such as porte cochère and its generous blockwork.</p>	
89	Figure 7	Comment	<p>We advise aligning terminology in Figure 7 and the Council’s emerging masterplan with the NPPF – referring to a Scheduled Monument, rather than Scheduled Ancient Monument.</p> <p>It would be helpful if the HIA for CMK were to be revised to include assessment of the impacts of the proposed events venues on the historic environment. How will they affect the significance of heritage assets? It would appear that the events venue proposed near the former bus station is further advanced of any proposals.</p>	
94 / 95	Policy CMK1 Central Milton Keynes Development Framework	Comment	<p>We infer the housing target for CMK has increased from 11,000 at Regulation 18 to 16,000 at Regulation 19; or does the larger figure include commitments in a way that the former figure did not? Regardless, the area-based nature of the allocation mean that one can only infer in broad terms what the impacts of such large-scale development will be.</p> <p>Certainly, it will mean major change to the character of Milton Keynes. We recognise the need for change to support the city’s sustainable future.</p> <p>The CMK masterplan framework refers on page 33 to the notion of developing the surface car park adjacent to the former bus station with high quality public realm / amenity space. However, paragraph 149 of the local plan proposes</p>	

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>an events venue with a capacity for 4000 people, delivering A5 and C1 of policy CMK1. It would be helpful if the HIA for CMK were to be revised to include assessment of the impacts of the proposed events venue on the historic environment. How will the new venue affect the listed former bus station and appreciation of this crucial entry point to CMK? While other potential locations have been identified for the venue through the Council's masterplanning work, the proposed local plan identifies the site next to the former bus station as the preferred location without having considered its potential heritage impacts.</p>	
98 / 99	<p>Policy CMK2 Central Milton Keynes placemaking principles</p> <p>and its supporting text</p>	Comment	<p>There is much in the CMK masterplan and CMK2 that we welcome, ranging from the creation of a greenway along Midsummer Boulevard greenway that promotes active travel, to support for adaptive reuse of existing buildings (F3). Focusing on the enjoyment of that greenway, the height of development resulting from the application of CMK3 may make this a shaded experience. Potentially future working on a lighting strategy would help.</p> <p>Policy CMK3 applies a blanket high-density approach (425 dwellings per hectare) where residential development is proposed in blocks B2/3 to E2/3. Given the significant presence of the Shopping Building in D2 & E2 and the changes in height proposed via CMK3 across this central spine, we query whether CMK2's approach to density requirements is sufficiently nuanced and informed by other aspects of the Council's evidence and strategy.</p> <p>In addition, we encourage greater connection with heritage as a placemaking principle. Reference to classic infrastructure in criterion D3 is welcome. When considering key elements of designed public realm, should the supporting text refer to porte cochère, for example? The Council's masterplan refers to the importance of maintaining them. But how will that be achieved? Lack of explicit consideration leaves this very much open to interpretation. This could also connect with the generous stonework used in planters and other elements of designed public realm. Table 9 on page 80 also refers.</p>	
105	Paragraph 176	Comment	<p>Impacts on heritage significance are not solely considered in the context of LVIA or TVIA. It may be that heritage impact assessment is also required. We suggest wording for consideration.</p>	<p>Where proposals diverge from the Central Milton Keynes Tall Building Strategy, applicants must clearly, as a minimum, set out:</p> <ul style="list-style-type: none"> • The extent and location of the height threshold exceedance; • The proposed layout, form, scale, height, massing and proportions;

Page	Section	Sound/ Unsound	Comments	Suggested Change
				<ul style="list-style-type: none"> • A justification for and impact of exceeding the height thresholds, including townscape and visual impact analysis, the relationship with surrounding buildings and spaces and daylight/sunlight studies, <u>and where needed heritage impact assessment</u>;
106 / 107	Policy CMK3 Central Milton Keynes Skyline and Tall Buildings Strategy	Unsound	<p>Our first concern is to establish with certainty the tall buildings thresholds that are being proposed. Is the policies map the definitive version of those thresholds? The tall building strategy map in the opportunity study and the tall buildings strategy (both dated October 2025) appear to be the same, but this differs from the threshold heights (Figure 9.6) in the Sustainability Appraisal, and the data layer in the policies map (also presented as Figure 9 in the published plan).</p> <p>We note these different versions of the data layer are different, once again, from the version assessed in the Heritage Impact Assessment (HIA) for CMK (September 2025); though that is perhaps not surprising if the HIA has been used to inform plans.</p> <p>Treating the policies map / Fig. 9 as the Council's preferred strategy on tall buildings, we note the area of greatest height proposed focuses on a central spine either side of Midsummer Boulevard in a way that is tightly defined and not fully aligned with the Council's Tall Buildings Strategy:</p>	<p>C. Proposals for tall buildings in Central Milton Keynes will be expected to meet the following criteria:</p> <ol style="list-style-type: none"> 1. Should not have an adverse impact on local or strategic views <u>and avoid or minimise harm to the significance of heritage assets (including through development in their setting)</u>; 2. Should consider in detail the design of the base, middle and top of the building as follows: ... 3. Where the boundary or boundaries of the proposal are adjacent to buildings of significantly lower height, parks or other open spaces an appropriate transition in scale between the tall building and its surrounding context must be created to protect amenity and/or privacy. <u>Evidence will be needed to demonstrate that the proposal will not have an unacceptable overshadowing effect, especially on open spaces that are also heritage assets</u>; 4. Clustering of tall buildings is encouraged where it reinforces the spatial hierarchy of the local and wider area, aids legibility and wayfinding, and makes a positive contribution to the skyline; ...

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>a) We are especially concerned by the planned heights west of the iconic Shopping Building – up to 15 stories, increasing to 20 stories. The Council’s HIA recommends lowering threshold heights near to the listed building (para 5.6); but the heights in the policies map do the opposite (compared to the Tall Buildings Strategy) west of the Shopping Building.</p> <p>b) The proposed heights will surely harm appreciation of the Fred Roche gardens, a non-designated heritage asset. Paragraph 5.6 in the HIA identifies this risk and recommends lowering threshold heights where they are directly next to public open spaces or ensuring the tall buildings policy to address potential impacts. The thresholds shown in Figure 7.1 of the Tall Buildings Strategy indicate these Gardens are unsuitable for tall buildings. But the policies map includes areas of the Fred Roche gardens as suitable for over 20 storeys. Policy CMK3 criterion C3 obliquely refers to this matter in the context of impacts on amenity. We recommend revising criterion C3 in CMK3 to address the potential for overshadowing and harm to heritage assets. As it stands, the approach also risks conflict with Policy PFHP9 Amenity for healthy buildings and spaces.</p>	

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>Modelling studies would help to demonstrate the effects of what is being proposed. We're unclear if any such studies have been undertaken.</p> <p>For concerns a-b above, we assert that changes to the height thresholds are merited: namely, to show greater sensitivity west of the Shopping Building and to Fred Roche Gardens.</p> <p>Should more height be needed to avoid a net loss in height across CMK, surely there is scope to consider more height further south (as suggested by the Tall Buildings Strategy). Also, this reflects the topographical changes as one heads southwest from the centre of CMK.</p> <p>Note we do not consider it is helpful or appropriate for the HIA to prejudge the outcome of any future heritage assessment (in paragraph 5.2) that proposals "may tend towards the lower end of the spectrum" of less than substantial harm.</p> <p>Criterion C1 of policy CMK3 refers to avoiding adverse impacts on local or strategic views. We note views are identified in the Tall Buildings Strategy, but plan clearly leaves this matter to potential applicants (see plan paragraph 166). We believe this is a missed opportunity which, in combination with the area-based nature of the big allocation, will inevitably heighten the risk of harm to views which the Council considers important.</p>	

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>We assert that the policy is incomplete as written without a reference to heritage significance. We suggest wording for consideration and note that the Council's own Tall Buildings Strategy (page 41, paragraph 6.7) states: "<i>We therefore recommend that any policy related to the assessment of tall buildings should specifically require an assessment of the effect of a proposal on the significance of heritage assets.</i>"</p> <p>On the above basis, we consider the policy unsound because it does not represent a positive strategy for the historic environment (NPPF paragraph 203).</p> <p>Finally, please note: paragraph 1.8 of the Tall Buildings Strategy is incorrect to state that Historic England reviewed a previous version of the Tall Buildings Strategy report. We requested sight of a draft but did not receive a copy.</p>	
111 / 112	Policy CB1 Supporting investment in Central Bletchley	Comment	We strongly recommend reference to heritage considerations in this policy, especially the conservation area. We suggest wording of a new criterion for consideration.	<u>Proposals should take into account potential heritage impacts and respond sympathetically to the character of the Bletchley conservation area.</u>
129 / 130	Policy PFHP7 Well-designed buildings and spaces	Sound		

Page	Section	Sound/ Unsound	Comments	Suggested Change
130	Paragraph 229	Comment	Impacts on heritage significance are not solely considered in the context of LVIA or TVIA. It may be that heritage impact assessment is also required. We suggest wording for consideration.	Tall buildings will require a Landscape/Townscape Visual Impact Assessment and, where necessary, an urban design analysis that demonstrates the proposal is part of a strategy that will meet the policy criteria below. This must identify any important views and vistas associated with the proposal. This is particularly important if the site has not been identified as a location for taller buildings in supporting guidance. <u>Heritage impact assessment may be needed if the proposal has the potential to affect the significance of one or more heritage assets.</u>
131	Policy PFHP8 Tall buildings outside Central Milton Keynes	Unsound	<p>The policy refers to significance, but only of buildings and does not connect this explicitly to heritage significance. Care is needed to avoid and minimise harm to the significance of heritage assets more widely; for example, the conservation area in Bletchley, noting central Bletchley is identified as a proposed location for tall buildings.</p> <p>To provide appropriate, more holistic consideration of heritage issues, we recommend insertion of a new criterion focused on the location, design and massing of schemes in relation to the significance of heritage assets.</p>	<p>C. In highly sustainable locations, development will be supported if the design is of a high quality and meets the following criteria:</p> <ol style="list-style-type: none"> 1. The development is 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; <u>2. The location, design and massing of the scheme avoids and minimises harm to the significance of heritage assets;</u> <u>23.</u> Protects important views and vistas from within the immediate area and from the wider surrounding area; ...
135 / 136	Table 10: Design code principles	Comment	The principles do not appear to connect with the historic environment, which should be a key consideration and is embedded in various ways in the National Design Guide and the National Model Design Code. We suggest amending principle 4 as suggested.	<p>Principle 4 – Landscape, <u>Heritage</u> and Green City</p> <p>There will be an emphasis on promoting a ‘Green City’ and, enhancing biodiversity and air quality <u>and conserving and enhancing the historic environment</u>. Enhance and protect the existing natural <u>and heritage</u> features across the city, and meeting the residents’ needs for access to open green space.</p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
165	Policy CEA4 Retrofitting	Sound		
168 / 169	Policy CEA6 Low and zero carbon energy provision	Comment	Reference is made in criterion A to “significant negative adverse”. Surely negative adverse is tautological?	
169 - 172	Policy CEA7 Mitigating wider environmental pollution	Comment	<p>To set an appropriately broad context, we suggest revising criterion A as proposed.</p> <p>We welcome reference to heritage assets when considering light pollution. That said, while the focus for conservation areas principally connects with character, we recommend broadening the criterion (as suggested in our revised text) when considering impacts on historic buildings.</p>	<p>A. Development proposals must ensure that pollution will not have an unacceptable impact on human health, groundwater, general amenity, biodiversity or the wider natural <u>and/or historic</u> environment.</p> <p>...</p> <p>K 5. The <u>significance and</u> visual character of historic buildings and conservation areas <u>are</u> not adversely affected;</p>
172	Policy CEA8 Provision and protection of accessible open space	Comment	The Council’s approach should make clear that some accessible open spaces are also heritage assets. Support to their protection, maintenance and enjoyment provides scope to deliver multiple benefits. We recommend making minor revisions to enable the plan to encourage such multiple benefits and where appropriate the integrated management of the natural and historic environment.	
174	Paragraph 314	Comment	We welcome reference to heritage features and the historic environment.	
183	Urban greening factor and urban tree canopy cover	Comment	We recommend adding text that makes clear that the natural and historic environment are integral to each other. Newly created or altered habitats will sit within a historical landscape and may have both positive and negative impacts on setting as well as the physical and chemical conditions of heritage assets.	

Page	Section	Sound/ Unsound	Comments	Suggested Change
185 / 186	Policy CEA12 Conserving and enhancing landscape character / Special Landscape Areas	Comment	We recommend reference to historic landscape character, rather than solely focus on historic layout and setting in criterion A2.	<u>Historic landscape character, including t</u> The historic layout and setting of villages and hamlets
189	Policy CEA14 Protecting and enhancing watercourses	Comment	Policy HQH7 Accommodation for boat dwellers refers to the historic character of watercourses; this policy should too. We recommend this is addressed and suggest wording for consideration.	Development proposals adjacent to or containing a watercourse should protect and enhance the watercourse's <u>historic character</u> , biodiversity, ecological connectivity, marginal vegetation, and aquatic and riparian vegetation as well as their associated species.
190 / 191	Policy CEA15 Managing flood risk	Comment	We recommend minor revision to criterion F, acknowledging the potential for flood risk to affect heritage and, indeed, flood mitigation measures to affect the significance of heritage assets.	Where the risk of flooding from rivers could be reduced by flood risk management measures, or where the extent of protection is below the required standard (either now or in the future), development proposals will be required to make provision for improvements. <u>Such measures should take account of local character and impacts on the significance of heritage assets.</u> ...
206	Paragraph 381	Comment	We recommend being a little more explicit about the role of setting i.e. it is not something in addition to significance, but (for some assets) makes an important contribution to significance.	A clear understanding of the significance of a heritage asset, <u>including the contribution to significance made by</u> and its setting, is necessary to develop proposals that avoid or minimise harm.
207	Paragraph 382	Comment	We welcome the plan's encouragement for to early engagement and recommend that this is extended to engagement with Historic England for proposals that are likely to impact on Scheduled Monuments.	Early engagement about forthcoming schemes that affect heritage assets is strongly encouraged (<u>including with Historic England for proposals that are likely to affect Scheduled Monuments</u>).

Page	Section	Sound/ Unsound	Comments	Suggested Change
207	Paragraph 385	Comment	We recommend adding reference to relevant national policy and suggest changes as shown.	Where enabling development is proposed to help sustain or enhance heritage assets, we will expect the proposal to accord with <u>national policy and be informed by</u> Historic England's published guidance.
208	Paragraph 387	Comment	We recommend maximising the scope for public engagement as suggested. Engagement may extend beyond open days, exhibitions and publications.	Where significant archaeological remains are found, provision shall be made for public <u>engagement, including</u> open days, exhibitions and/or popular publications/booklets.
209	Policy HE1 Heritage	Comment	<p>Crucially, the policy should refer explicitly to setting in criterion A. There are various ways this can be done. We suggest one option.</p> <p>Also, we advise against include reference to enabling development in the policy. It is inappropriate for enabling development to be covered in local plan policy. By definition such development does not align with policy.</p> <p>As an additional comment, I advise against a requirement to "preserve" setting because that may not be appropriate in all circumstances. We suggest alternative wording for consideration that focuses in the first instance on understanding impacts on significance, supporting that with a requirement to preserve established local character.</p>	<p>Explain how the scheme has taken account of the significance of the assets (<u>including the contribution made to significance by their setting</u>) in its scope, design and detail, in order to minimise or avoid harm to the heritage assets affected;</p> <p>Where enabling development is proposed to secure the future of a heritage asset, accurate and robust evidence to demonstrate that a 'conservation deficit' exists must be provided.</p> <p>F. Development proposals containing heritage assets that may be harmed by a long delivery period (such as large housing schemes) must set out a strategy for their preservation in the interim period. This should include information about:</p> <p>...</p> <p>3. <u>Impacts on the significance of the assets affected through development in Preserving their setting to ensure so that they continue to provide a historical focal point, preserving established local character; and</u></p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
298	Archaeology	Comment	We recommend in the short section on archaeology explicitly referring to non-designated heritage assets.	Milton Keynes is rich in archaeological remains with sites and finds from the Palaeolithic period onwards. Designated sites include 50 scheduled monuments which range in date and character from Bronze Age burial mounds to the Iron Age Hill Fort at Danesborough, the Roman town of Magiovinium, medieval castles and villages, and the cast-iron Tickford Bridge in Newport Pagnell. Milton Keynes Historic Environment Record (HER) also contains information on over 8000 sites and finds and many new discoveries are made each year. The designated New Town area in particular has a long history of structured, strategic archaeological investigation from the appointment of the first archaeologist by MKDC in 1971. Many significant sites have been preserved in the linear parks, or where preservation was not possible, excavated and the results published. <u>Remains that are not Scheduled but which have a degree of heritage significance meriting consideration in planning decisions are considered non-designated heritage assets. In cases where non-designated archaeological remains are nationally important, the assets will be treated as if they were Scheduled.</u>
298 / 299	Historic Landscapes, Parks & Gardens	Comment	I think this underplays the protection afforded to RPGs via the changes arising from the LURA. Additional wording is merited, and I've suggested a couple of new lines. Happy to confer further	The effect of proposed development on a registered park or garden or its setting, is a material consideration in the determination of a planning application. <u>The Levelling-up and Regeneration Act 2023 requires local planning authorities to have special regard to the desirability of preserving or enhancing Registered Parks and Gardens. At the time of preparing this plan, secondary legislation is needed to fully implement this statutory protection.</u>
320	Policy HE1 Heritage	Comment	The proposed indicators connect principally with developer interest, rather than how the plan operates. We suggest further consideration is given to the plan's monitoring indicators on the historic environment.	