



MK City Plan 2050 Regulation 19 Submission Plan Consultation

Land north of Tickford End,
Newport Pagnell

Kler Group

Contents

1.	Introduction	1
2.	Omission Site	3
3.	Plan Making Context	8
4.	Strategic Objectives & Core Policies	11
5.	Housing Strategy	18
6.	Employment Strategy	21
7.	Conclusion	23

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1. Introduction

1.1 Cerda Planning Ltd has been instructed by Kler Group Limited (KGL) to make representations to the Milton Keynes Regulation 19 Submission Plan Consultation 2024.

1.2 KGL welcome the production of the MK City Plan 2050 and wish to support the Council in its preparation. Modifications will be required to the plan to address certain issues, and particularly that more land needs to be identified for residential development to ensure that:

- Enough flexibility has been built into the housing land supply to safeguard against the issues identified with the current supply and emerging effects of the changes proposed by the Proposed reforms to the National Planning Policy Framework and to the Written Ministerial Statement 'Building the homes we need' on assessing housing need;
- Enough affordable housing will be delivered to address identified needs;
- Homes are provided as soon as possible; and,
- A diverse mix of housing can be provided to address the specific needs of the Borough.

1.3 The Local Plan review provides a vision and framework for Milton Keynes for the period to 2050, addressing housing needs and other economic, social, and environmental priorities, assess the future levels of need, and an appropriate basis, for new homes (including market, affordable, and specialist housing), employment land, and infrastructure provision over that period and assess the future levels of need, and an appropriate basis, for new homes (including market, affordable, and specialist housing), employment land, and infrastructure provision over that period.

1.4 Before submitting a local plan to the Secretary of State under section 20¹ of the Act, the local planning authority must

¹ Planning and Compulsory Purchase Act 2004

- (a) make a copy of each of the proposed submission documents and a statement of the representation's procedure available in accordance with regulation 35, and
- (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 19(1).

1.5 The next stage in the process following this consultation will be to submit the document and information to the Secretary of State.

2. Omission Site

- 2.1 Land North of Tickford End site is an omission site which, as set out later in these representations, is put forward to assist in rectifying the significant soundness issues identified in relation to the draft plan.
- 2.2 The site is within the Milton Keynes Housing Market Area (HMA). Milton Keynes City Council operates as a self-contained HMA, with neighbouring councils adhering to their own local authority boundaries. This arrangement enables neighbouring authorities to develop their local plans independently, avoiding complications such as those that might arise if areas of Central Bedfordshire were included within the Milton Keynes HMA.
- 2.3 The site is situated parallel to the A509, to the north of the village of Tickford End, made of up agricultural parcels of land that sit on outlying countryside. The site extends to approximately 60 hectares.
- 2.4 The larger settlement of Newport Pagnell and the M1 are in close proximity to the site.
- 2.5 The site is located within Flood Zone 1, there are no heritage issues, landscape or other designations relevant to the site.
- 2.6 The Council have previously allocated two parcels of land for residential development immediately to the south of the site. The first for 5000 units by Berkeley Strategic Land and secondly 930 units on land owned by the Council. Once developed out these two parcels of land will extend the settlement edge to the north. The site will then have a functional relationship to the new edge of the settlement and being sustainably located to the facilities in the Sherington village and Newport Pagnell.
- 2.7 Furthermore, the Council is proposing to allocate land immediately to the east of the site, thus essentially encircling the omission site on three sides. Given the omission site sits within the framework formed by existing and proposed residential allocations, rather than extending residential development outwards into open countryside, the site is a logical addition to the proposed allocations being put forward by the Local Plan.

- 2.8 The site is also located near the Southern edge of Sherington, situated in what has historically been a settlement gap to Newport Pagnell to the South. Sherington has a population of around 985 according to the 2021 Census and has recorded a similar number for at least 23 years with a number of 963 recorded in 2001 and 954 in 2011, overall, a percentage increase of 2.2% compared to a national increase over the same period of 5.9%.
- 2.9 Both Newport Pagnell and Sherington can be accessed via the A509 which runs parallel to the site to the East. Newport Pagnell is 2.19km away and Sherington is 1.19km away.
- 2.10 The site is in a sustainable location on a key route, with bus stops located in Newport Pagnell, providing direct links to Olney and Sherrington. The site is bounded to the north by Chicheley Hill, Bath Road and Bradford Road on the southern boundary. Both provide access east to the town centre and links towards Chippenham, and westward links towards Bath.

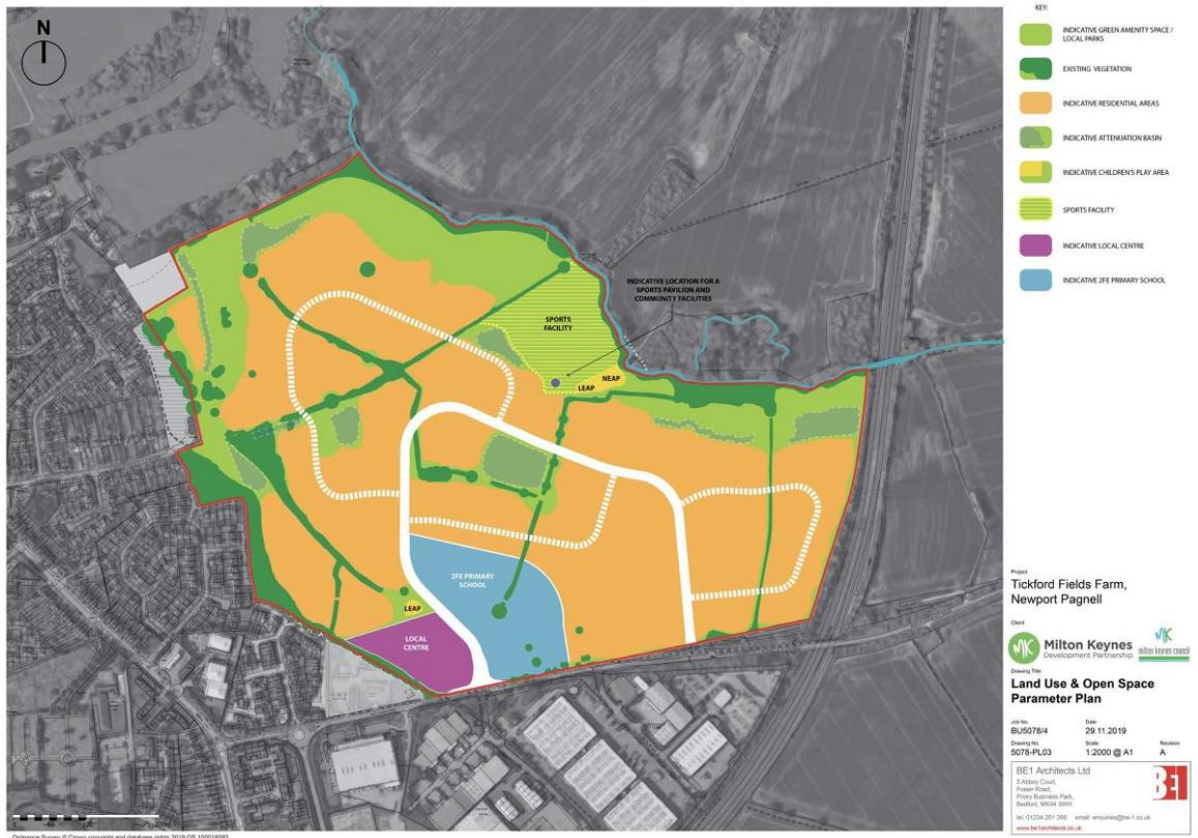
Service or Facility	Walking Distance	Walking Time
Tickford Fields Farm Sports Facility	500m	5.8 minutes
Tickford Fields Farm Play Park	500m	5.8 minutes
Tickford Fields Farm Primary School	850m	10 minutes
Tickford Fields Farm Local Centre	950m	11.2 minutes
Interchange Park	2000m	24 minutes
The Corsham School (Secondary)	2000m	24 minutes
Newport Pagnell High Street access to all services including the Post Office.	2400m	28.9 minutes

- 2.11 The Chartered Institute of Highways and Transportation (CIHT)² state that the preferred maximum walking distance for education and commuting purposes is 2km and for more general services and facilities it is 1.2km. Many of the local services and facilities, as illustrated in the table above are within these recommended distances. Both the omission site and adjacent recently approved developments have the potential to mitigate any gaps. The combination of both allocations would likely enable the bus services to run directly and ensure that the proposed local centre at Tickford Fields is viable.

² CIHT Planning for Walking April 2015

- 2.12 The former Department for Transport³, stated that “two out of every three personal trips are less than five miles in length - an achievable distance to cycle for most people”. All services and facilities and within this distance of the omission site.
- 2.13 There are bus stops in both Newport Pagnell and Sherington which run from Lavendon – Olney – Newport Pagnell – Central Milton Keynes number 21 buses which pass the omission site. The bus shelters are less than 1500m away and include a large shelter with brick construction with windows, tiled roof and bench around the perimeter of the interior.
- 2.14 This service operates at a 1-hour frequency between 06:57 and 18:58 during the week with a reduced service of 12 buses running on a Saturday.
- 2.15 These timings ensure good opportunities for travel to and from the larger settlements in the area for all retail, employment, education and leisure purposes. Newport Pagnell Town Centre can be reached in less than a 6-minute journey time. The Market Town of Olney can be reached in 9 minutes.
- 2.16 Taking all the above into account, this report has identified that, in transport terms, the land North of Tickford End is an appropriate location for a housing allocation. It is accessible by non-car modes of travel with appropriate vehicle access arrangements being achievable from Chicheley Hill, with potential to integrate with development which has Outline planning permission (20/00133/OUTEIS) and is allocated in the emerging Neighbourhood Plan which adjoins this site. The additional traffic flows associated with the proposed site allocation are unlikely to lead to any adverse highway capacity issues.
- 2.17 The following plan illustrates the masterplan for the Tickford Fields allocation in the emerging Neighbourhood Plan:

³ Department for Transport (DfT) Local Transport Note 2/08: Cycle infrastructure Design



- 2.18 The Northern boundary of Tickford Fields meets the Southern boundary of Land North of Tickford End.
- 2.19 Planning permission was granted in May 2021 for Outline planning application (all matters reserved except access) for the demolition of the existing farm buildings on site and the development of up to 930 dwellings (including affordable dwellings), primary school, local centre, open space, sports pitches, play areas, pavilion/wellbeing centre and other associated works.
- 2.20 Policy NP2 of the emerging plan proposes a residential led extension to Newport Pagnell with a capacity of around 930 homes, 37dph and will provide a local centre with parking when the development reaches 600 units.
- 2.21 The omission site would therefore be part of a wider area of development which is already providing many complimentary services and facilities which the omission site can contribute to, and which can provide support to existing Northern settlements. The allocation of the omission site for housing would help delivery and viability of houses, services and facilities at Tickford Fields.

2.22 The surrounding land is a mix of agricultural fields and to the West beyond the river Great Ouse is a former Blisworth Limestone extraction site with large pools and areas subject to aggregate infilling.

3. Plan Making Context

- 3.1 The Framework places significant importance upon delivering sustainable development, whilst meeting the needs of local communities, and in particular delivering a sufficient supply of homes with the overall aim to meet an areas identified housing need, including with an appropriate mix of housing types for the local community.
- 3.2 Paragraph 61 states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.
- 3.3 Furthermore, the Framework advises on identifying land for home, in particular Paragraph 72 advises on identifying sufficient land for housing including a mix of sites taking into account their availability, suitability and likely economic viability. "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- (a) specific, deliverable sites for five years following the intended date of adoption; and
 - (b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period."
- 3.4 The Framework recognises (paragraph 77), "the supply of large numbers of new homes can often be best achieved through planning for larger scale development, provided they are well located and designed and supported by the necessary infrastructure and facilitates (including a genuine choice of transport modes). Working with the support of their local communities and with other authorities as appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help meet identified needs in a sustainable way. "When larger sites are being considered they should present planned investment in infrastructure and scope for environmental gains, ensure their size and location will support a sustainable community, with sufficient access to services and employment

opportunities with the site itself or in larger towns to which there is good access, the quality of the place to be created, realistic rate of delivery.

- 3.5 A fundamental principle of the Framework is the delivery of sustainable development. This is achieved primarily through the identification and provision of sufficient housing to meet identified needs. The Framework emphasises that this process should be plan-led, ensuring that development is guided by an up-to-date Local Plan which allocates suitable sites to accommodate these requirements. By adopting a plan-led approach, local authorities can provide certainty for communities and developers, promote the efficient use of land, and support the creation of well-designed, sustainable places that meet housing demand while balancing environmental, social, and economic objectives.
- 3.6 In July 2024, the UK Labour Government announced an ambitious target to deliver 1.5 million new homes in England over the current five-year parliamentary term—equating to over 300,000 homes per year. This represents a significant increase compared to previous delivery levels of around 221,000 net additional homes annually.
- 3.7 To achieve this, the Government has introduced a series of planning system reforms aimed at unlocking land, streamlining processes, and accelerating housing delivery. One of the first major steps came in December 2024, with amendments to the National Planning Policy Framework (NPPF), including the introduction of a ‘grey belt’ designation to release certain Green Belt sites and the reinstatement of mandatory housing targets for Local Plans.
- 3.8 Further changes to the NPPF are anticipated in 2026, as the Government continues to pursue its housing ambitions. A key principle underpinning these reforms is the commitment to a plan-led system, with new measures requiring Local Plans to be prepared and adopted within 30 months (approx. half the time that most plans currently take) significantly reducing timescales to speed up decision-making. It is understood that during the transition period, existing Local Plans can still progress under current legislation, provided they are submitted for examination by December 2026.
- 3.9 As part of streamlining the plan making process, the Government has announced (November 2025) it will revoke Duty to Cooperate. It is anticipated that this will take effect early 2026. The aim of revoking the Duty to Cooperate will prevent unnecessary delays to local plans during examination.

3.10 These changes to the planning system demonstrate that planning and economic growth are central to the Government's agenda, with Development Plans positioned as the primary catalyst for delivering its housing objectives.

4. Strategic Objectives & Core Policies

Background

- 4.1 The National Planning Policy Framework (the Framework), which underpins every local authority's Development Plan, maintains that the planning system is plan led.
- 4.2 In terms of plan preparation, the Framework and Planning Practice Guidance (PPG) set out robust guidance for local planning authorities to follow, the most relevant set out in the subsequent paragraphs.
- 4.3 Paragraph 15 of the Framework states that succinct and up-to-date plans should provide a positive vision for the future of each area and serve as a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 4.4 Paragraph 17 sets out that the Development Plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area.
- 4.5 Paragraph 31 maintains that a plan should be underpinned by relevant and up-to-date evidence, including a Sustainability Appraisal that meets the relevant legal requirements.
- 4.6 The PPG puts forward that a local planning authority must complete a review of the plan document every 5 years from the date of its adoption.
- 4.7 In relation to the examination of plans, paragraph 36 states that they are found 'sound' if they are:

Positively prepared - providing a strategy which, as a minimum, seeks to meet the areas 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;

Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

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

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

- 4.8 The Framework stresses that authorities should objectively identify the housing, business and other development needs of an area responding positively to opportunities for growth within an area taking account of market signals such as land prices and housing affordability. It goes on to advise that this information should advise Local Plans by setting out a clear strategy for allocating such land for such development.
- 4.9 In relation to plan-making the Framework is clear that the plan is the key to delivering sustainable development and all planning decisions must accord with the adopted Plan. Plans should identify and set out the strategic priorities for an area by planning positively to provide housing, retail, leisure and commercial development. This is encouraged through the allocation of land being identified as suitable for such development.
- 4.10 These allocations should be based on an adequate, up-to-date and appropriate evidence base including relevant market and economic signals which assess the role and function of each settlement and the capacity of these to accommodate new housing and employment growth.
- 4.11 In relation to housing, the Framework sets out that local authorities should have a clear understanding of the housing needs within their area. The Framework goes on to state that local authorities should prepare a Strategic Housing and Land Availability Assessment to fully understand the housing needs for the area and, where necessary, work across administrative boundaries to identify the scale and mix of housing that is required to meet the needs of the local population over the Plan period.
- 4.12 Such assessments should ensure that the housing needs of all different groups of society are catered for and that the scale and supply of housing is necessary to meet this demand during the plan period.

Spatial Strategy

- 4.13 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a plan must do so “with the objective of contributing to the achievement of sustainable development”.
- 4.14 The MK City Plan 2050 is underpinned by MK Futures 2050 and the evidence which supports it and Policy GS2 *Strategy for homes Our ambition and objective for growth* states that the MK City Plan 2050 “*should be read alongside, our Strategy for 2050 which sets out a bold vision for Milton Keynes. This vision seeks to bring transformational change, whilst protecting that which is unique to Milton Keynes and will play an important role in our future success. The Strategy for 2050 also provides important context that has been integrated into the City Plan’s evidence base and policies.*” It is perhaps unfortunate that much of the evidence was produced in 2020 at the height of the Covid pandemic.
- 4.15 As part of the MK Futures 2050 Evidence which supports the Spatial Strategy was a Growth Options Assessment which for Land Northeast of Milton Keynes, beyond Newport Pagnell makes the following assessment:

Direction of Growth Locations	Strengths/ Opportunities	Weakness/Threats
13. North East MK beyond Newport Pagnell	Development in this area could be connected to a rapid transit link from Olney into Milton Keynes, creating a new growth corridor to the north east of Milton Keynes. Growth could present an opportunity to create new landscape scale strategic GI links to the River Great Ouse corridor and the wider GI network.	Due to the small scale of existing settlements in this area and the associated lack of physical and social infrastructure, large scale growth in this location would need to fund and deliver all of the necessary infrastructure. The area is remote from the east-west growth axis to the south of Milton Keynes and has limited connectivity with the wider Milton Keynes area. The area has no direct rail connections.

		The area has strong landscape character, significant heritage assets and high sensitivity to development. As such, significant growth would result in irreversible change to its character.
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- 4.16 The assessment is from 2020 so predates the 2021 planning permission. The assessment is out of date and the subsequent Neighbourhood Plan allocation for the land at Tickford Fields which would provide much of the necessary infrastructure is not considered at all.
- 4.17 Whilst there would be no direct rail connections, the locations proximity to Milton Keynes means that it would be possible to cycle to the Train Station or catch a bus and as highlighted in the strengths and options for the growth location these is potential to improve the accessibility of the existing settlement of Olney by improving access to alternative modes of transport. The new services and facilities which would be delivered on the adjacent site would significantly affect the conclusions of the Councils assessment of the omission site.
- 4.18 The approved outline development Tickford fields also contribute to the emerging landscape character which the omission site would reflect. The assessment also failed to the refer to the nearby mining activity which also forms part of the character of this area, a mixed landscape where the urban meets to the rural.
- 4.19 The Housing and Economic Development Needs Assessment (HEDNA) for Newport Pagnell which supports The MK City Plan 2050, states that the area *“sits outside the MK urban area with a higher rate of homeownership, but house prices are much lower than the rest of the rural area with a lower proportion of larger and/or detached homes. There are also slightly more young households and economic activity rates are higher.”* There is an existing issue around housing mix in the area for larger homes which would be well suited to being located near the edge of the urban area where a transition between higher density to lower density houses would be expected prior to the transition to more rural settlements.
- 4.20 The Issues and options plan consultation also provides an opportunity to review and comment on the Sustainability Appraisal which underpins the Local Plan. The Sustainability Appraisal is an iterative process which must be carried out during the

preparation of a Local Plan. Its purpose is to promote sustainable development by assessing the extent to which the emerging plan, when considered against alternatives, will help to achieve relevant environmental, economic and social objectives.

4.21 In accordance with Article 5(1) of the SEA Directive and regulation 12(2) of the SEA Regulations, the environmental report must identify, describe and evaluate the likely significant effects of the reasonable alternatives to the plan taking into account the objectives and geographical scope of the plan.

4.22 Alternatives is the SEA/SA stage that has been most consistently challenged at examination/inquiry and in the courts. Three sets of information are needed for each set of alternatives:

What reasonable alternatives have been identified and on what basis?

How they have been assessed and compared (including how sustainability issues have been considered)?

What are the preferred alternatives and why they are they preferred over other alternatives?

4.23 National Planning Practice Guidance sets out that a Sustainability Appraisal is a systematic process that must be carried out during the preparation of a Local Plan. The appraisal must set out how sustainable development is achieved, in doing so assessing reasonable alternatives, achieving environment, economic and social objectives.

4.24 The Sustainability Appraisal offers an opportunity to ensure that proposals within the Local Plan are the most appropriate and suitable having assessed reasonable alternatives. The Sustainability Appraisal underpins the Local Plan and as such its lawfulness is a requirement in the plan making process. Importantly guidance sets out that Sustainability Appraisal should be an iterative process informing the Local Plan prior to the completion.

4.25 The Sustainability Appraisal considered four strategies to meet the growth target of 53,000-63,000 homes over the plan period. For Milton Keynes these are summarised as follows:

Milton Keynes - Alternative Strategies
Reasonable Alternative (RA) 1 Existing Commitments and Completions 2022-2050 CMK Central Bletchley Strategic brownfield site at Wolverton Works Strategic brownfield site at Walton Campus Eastern Strategic City Extension South of Now Brickhill Strategic City Extension Levante Gate Strategic City Extension Shenley Dens Strategic City Extension East of Wavendon Strategic City Extension (post 2038 option) Transport Hubs Other small and brownfield sites (windfall)
Reasonable Alternative 2: Same as RA 1 but Remove sites affected by Special Landscape Areas (South of Bow Brickhill, Levante Gate, Shenley Dens)
Reasonable Alternative 3: Same as RA 1 but Remove sites affected by Special Landscape Areas (South of Bow Brickhill, Levante Gate, Shenley Dens) and add West of Olney
Reasonable Alternative 4: Same as RA 1 but Remove East of Wavendon and add West of Olney

4.26 Based on the evidence and the appraisal of Reasonable Alternative growth scenarios the Council considers that Reasonable Alternative 1 best aligns with their plan objectives and performs best against the SA Framework, is an appropriate strategy to follow, and is the Preferred Growth Strategy.

4.27 Of the four strategies there was in effect little difference between them and while broadly a mixed approach which deliveries more housing than the alternatives would be a positive approach, the sustainability appraisal is based on the options tested which themselves are based on flawed evidence which was out of date.

4.28 The Development Plan covers a period until 2050, but the preferred strategy is solely focussed on delivering housing to meet in migration, it does not consider the existing sustainability issues for existing communities and provides no strategy for resolving them through plan making.

- 4.29 The plan makes the decision that the growth of smaller settlements will be managed through Neighbourhood Plans.
- 4.30 The Newport Pagnell Neighbourhood Plan is still not Made, and the only allocation is for a site which already has planning permission. University of Reading research concluded that “a significant number of emerging plans, especially those in rural locations, have been prepared with the aim of protecting neighbourhood areas from new development.”⁴ The Council will realise that Neighbourhood Plans are not likely to be developed in the interests of allocating new sites for development based on past experience and evidence.
- 4.31 No growth is being planned for Communities in Tier 2 settlements. Paragraph 82 of the NPPF requires that planning policies should be responsive to local circumstances and support housing developments that reflect local needs. Paragraph 83 goes further “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”
- 4.32 Paragraph 13 of the NPPF states “Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”.
- 4.33 The evidence suggests that Neighbourhood plans and the recent example of the Newport Pagnell Neighbourhood Plan strongly suggests that the Council cannot rely on Neighbourhood plans to allocate land for development. If the strategic plan allocates sites, then a Neighbourhood Plan could be effective at shaping them. Both the past experience and size of the settlements means that the Council cannot rely on Neighbourhood Plans to fill the gaps or to ensure that sustainable development is strategically delivered.

⁴ 2014 University of Reading and Locality report

5. Housing Strategy

- 5.1 It is recognised by the Government that there is an urgent need to increase the rate of house building in England and make housing supply more responsive to changes and demand.
- 5.2 This Regulation 19 plan proposes to provide 59,779 new homes to meet objectively assessed needs through the plan period from 2022 to 2050. 22,705 houses are already committed, leaving a residual requirement for the emerging plan to find of 37,074 new houses.
- 5.3 The MKCC SHLAA published July 2024 confirmed that at that time there were 29,075 homes which can contribute to meeting the MK City Plan 2050, leaving a need to allocate development to provide 33,925. Thus, the requirement for this plan to deliver has significantly increased, making it ever more important that suitable deliverable sites are identified at plan making stage.
- 5.4 Newport Pagnell is the largest settlement outside of Milton Keynes within the same Housing Market Area. Only 4.8% of the housing stock is built after 2009 compared to 38.9% for Central Milton Keynes⁵. The omission site is on the edge of Newport Pagnell and can provide newer more sustainably built properties which are suitable for our changing climate and to meet the needs of the community.
- 5.5 The plan provides very little development which might serve nearby settlements such as Olney or Sherington. Olney with only a 0.19% annual population growth (2021 census) is unable to serve its own growth needs meaning that the children born in these areas will likely need to move further elsewhere to find accommodation when they leave home. This figure also falls significantly behind the UK annual population increase percentage.
- 5.6 The size and type of housing in Newport Pagnell is also limited and the Housing & Economic Development Needs Assessment (HEDNA) states “Newport Pagnell sits outside the MK urban area with a higher rate of homeownership, but house prices are much lower than the rest of the rural area with a lower proportion of larger and/or

⁵ Milton Keynes Housing and Economic Needs Assessment 2024

detached homes. There are also slightly more young households and economic activity rates are higher.”

- 5.7 This is relevant because it shows that there is not a mix of houses, and this is reflected in the average age of occupants and in house prices. The NPPF paragraph 69 states “planning policies should identify a sufficient supply and mix of sites”. The Regulation 19 plan is focussed on the overall housing need figure and fails to fully consider what existing issues existing with regard to housing mix.
- 5.8 The housing mix can have an impact on the social groups who live in a community, and the absence of larger homes would mean that those wishing to find larger accommodation, they would have to do so elsewhere. Authorities must also consider the implications of their duties under the Equality Act 2010, including the Public Sector Equality Duty, so to ensure, that there is some growth and that there is a choice of housing to ensure that the community is well balanced being of a mix of ages, background and wealth.
- 5.9 The Development Plan is a chance rebalance existing communities and ensure that they have a plan for growth.
- 5.10 The HDNA assesses need across the whole of the Authority, yet the allocations and growth are focussed only on Milton Keynes. The HEDNA states that 5% of new dwellings will need to be built to M4(3) standards so that wheelchair users can live in them. This average percentage is across the borough so is likely to be significantly higher for areas such as Newport Pagnell and rural areas with older housing stock.

Eastern Strategic City Extension

- 5.11 On the opposite side of the road to the omission site is the proposed Eastern Strategic City Extension. The allocation in terms of its accessibility to both Newport or Sherrington is sequentially less preferable than the omission site and is severed to these urban areas by the A509.
- 5.12 The Eastern Strategic City Extension is a significant urban development project aimed at expanding the city’s boundaries and providing substantial new housing. This extension is projected to deliver 7,750 homes and represents a major extension to the city, featuring distinct built areas or districts.

- 5.13 The Eastern Strategic City Extension will extend beyond the already planned Milton Keynes East Strategic Urban Extension, which has been allocated in Plan:MK and has received planning permission.
- 5.14 A defining feature of this growth location is its transit-oriented layout and design. The development will focus on creating new homes and community amenities around new Mass Rapid Transit services and active travel routes. This approach is grounded in principles that prioritise people-friendly and healthy places, aiming to support more sustainable modes of movement.
- 5.15 The draft plan states that this allocation places emphasis on transit-oriented development and active travel routes highlights a commitment to sustainability. By promoting mass transit and active travel, the project aims to reduce reliance on private vehicles, thereby contributing to lower carbon emissions and fostering a healthier urban environment.
- 5.16 What is clear from the allocation is that it is self-serving, there is no intention for the allocation to integrate with existing settlements or provide any enhancement opportunities for existing settlement. The extent of the allocation to the North exceeds the Northern extent of the omission site, therefore, to include the omission site within the allocation would not result in any additional harm to landscape and the benefits of the allocation would be shared with existing communities with opportunities to enhance existing services and facilities.
- 5.17 With no development allocations North of Tickford Fields, there is no opportunity for a plan period and a generation to improve the sustainability or accessibility of existing settlements or redress any imbalance or overall quality of housing stock. The draft plan is plan provides a no growth Strategy for Newport Pagnell, Olney or the smaller villages which reflects the aims of the Milton Keynes Strategy for 2050 which also proposes nothing for these areas. It is also notable that Newport Pagnell and Olney are mentioned just three times each within the 90-page document. Consequently, these areas and smaller Northern Settlement will need to find the funding to produce their own Neighbourhood plans to fill the policy void left by the Council, such policies are non-strategic so cannot deal with strategic issues. For these reasons the plan would not be consistent with National Policy which requires Strategic Policies to be in place which address the strategic policies of the area.

6. Employment Strategy

- 6.1 The NPPF states that planning policies should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings.
- 6.2 The HDNA identified the following challenges and trends for Milton Keynes:
- Need to replace and repurpose ageing stock of commercial floorspace (office, industrial and warehousing floorspace) within the area. The amount of floorspace required to replace ageing commercial floorspace is greater than the amount of floorspace forecast to be required by economic growth.
 - Forecast need for around 480,000 – 520,000 square metres of office floorspace should be considered in the MK City Plan 2050. Most of this office development, at around 300,000 square metres, will occur in CMK in line with both occupier and policy requirements.
 - Forecast need for around 420-580 hectares of land for warehousing and general industrial purposes, most of which is for warehousing. Taking account of land already due to come forward and new employment sites totalling 275.5 hectares, this means a remaining need of 144.5 to 304.5 350 hectares of land.
- 6.3 The MK City Plan 2050 solution to this is to focus on employment allocations in Milton Keynes centre, expand existing locations in Caldecote, Linford Wood (only 3.2ha) and Knowhill.
- 6.4 Caldecote and Knowhill is to the South of Milton Keynes, so for those in Newport Pagnell and those settlements to the North they would have to cross central Milton Keynes. The plan does propose a large allocation in the Eastern Strategic City extension but in all cases, there would be little integration to the existing settlements near to the omission site.
- 6.5 The policy GS3 Strategy for economic prosperity supports the reuse and refurbishment of existing buildings but this policy is unlikely to be ineffective in delivering employment in Newport Pagnell and beyond to the North as the housing demand and lack of housing allocations in these areas will mean residential uses are more desirable.

6.6 The allocation of the omission site would be able to share the benefits of the Eastern Strategic City Extension by not only providing houses to support the employee requirements of the employment uses but by also providing better services, facilities and sustainable travel options which can benefit settlements to the North. The draft plan fails to fully meet the requirements of the NPPF because it does not plan for rural expansion. A solution to this would be for a strategic plan which delivers for all of Milton Keynes with development to the North including the integration and infrastructure required to ensure those benefits are shared more equitably.

7. Conclusion

- 7.1 The Framework requires that local plans area examined to assess whether they have been prepared in accordance with the legal and procedural requirement. Plan must meet the tests of soundness which are:
- 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.
- 7.2 The plan is focussed on the assessed needs of Milton Keynes and does not consider all of the settlements and rural areas to the North of Milton Keynes. There are no agreements with the neighbouring planning authorities to accommodate their known unmet needs, even though it is practical to do so. For these reasons the plan is not positively prepared and fails the soundness test in this respect.
- 7.3 The strategy is based on a limited set of strategies which are assessed in the Sustainability Appraisal. These strategies are almost identical and are not based on the known issues which affect smaller settlements in the northern part of Milton Keynes. The evidence behind the SA is also not up to date. For these reasons the strategy is not Justified and fails the soundness test in this respect.
- 7.4 There is no evidence of the strategy being cross-boundary and even though the evidence suggests that Milton Keynes is well placed to meet the unmet needs of adjoining Authorities no progress has been made with Statements of Common Ground and there is no flexibility in the plan to accommodate additional housing. Existing

sustainability and access issues as well as sustainable and managed growth of local housing needs are deferred to Neighbourhood Plans for which no evidence exists that any might come forward over the plan period. For these reasons the plan is not effective and fails the soundness test in this respect.

- 7.5 Because not all the relevant information is considered, not all of it is up to date and because the Sustainability Appraisal does not consider and therefore does not demonstrate that all relevant economic, social and environment objective are addressed the plan is not entirely consistent with National Policy so would not enable the delivery of sustainable development and fails the soundness test in this respect.