

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at ncp.engagement@milton-keynes.gov.uk

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*

boxes below but complete the full contact details of the agent in 2.

Title

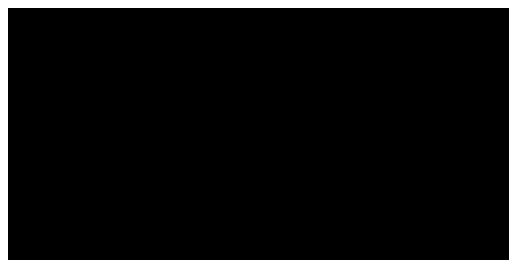
First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

E-mail Address



Address Line 1

Line 2

Line 3

Line 4

Post Code



Telephone Number

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the Duty to co-operate

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see our attached representations.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see our attached representations.

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

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

Representations cannot be treated as confidential and will be published on our website alongside your name. *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*

MK City Plan 2050: Consultation Response

Policy GS22 South East Milton Keynes Strategic Urban Extension

In our previous set of representations to the Issues & Options version of the Emerging Local Plan we strongly welcomed the fact that the MK Strategic Housing Land Availability Assessment (SHLAA) Report Site Information - July 2024 identified that the 3.29 ha (8.13 acre) Tarmac Site, Land off Phoebe Lane, Wavendon (Site ref: 110326) as being suitable for development, given that it forms part of an existing strategic area and that it has an agreed capacity of 105 units.

Paragraph 18 of the Regulation 19 Local Plan states that current planned growth includes the South East Milton Keynes Strategic Urban Extension which has already been allocated in Plan:MK and that the City Council intend to roll forward this allocation from Plan:MK.

Table 9: Retained Strategic Housing Allocations through Plan:MK (Commitments & Completions) within the Milton Keynes Infrastructure Delivery Plan 2025 (IDP) in relation to the South East Sub Area, identifies a total provision of 3,604 existing completions / commitments and an estimated population of 8,433 in 2050.

Table 10: Strategic Allocations for Growth in MK City Plan 2050 - Future Housing Sites provides a summary of the potential combined housing and associated population from the MK City Plan 2050 strategic allocations for growth options for each Milton Keynes Sub Area. In respect of the South East Sub Area, it identifies a projected homes total of 6,384 dwellings over the course of 2022-2050 and a total population of 14,942 people.

The contents of these two tables demonstrate the necessity to ensure that suitable supporting infrastructure to meet the growing population's needs is being considered in a comprehensive rather than isolated fashion.

Consequently, Tarmac fully supports the aims and aspirations of Policy GS22 (South East Milton Keynes Strategic Urban Extension). However, it is concerned to ensure that the policy is robustly worded in order to ensure that development of the SUE can take place in a comprehensive and integrated manner.

The South Milton Keynes SPD references Plan: MK - Policy SD11: SOUTH EAST MILTON KEYNES STRATEGIC URBAN EXTENSION, which stipulates that land is allocated at South East Milton Keynes – as shown on the Key Diagram and Policies Map – for a comprehensive residential-led mixed use development of approximately 3,000 dwellings to meet the needs of Milton Keynes up to 2031 and beyond.

Our previous representations highlighted that it was important to note that the adopted SPD document excluded the northern section of the Tarmac Site from the South East Milton Keynes SUE, reducing the Tarmac site size by around 25%. Not utilising this area of land would result in an awkward shape and leave a section of land missing.

Our client is fully committed to the delivery of 105 dwellings from its Site in tandem with neighbouring developable areas. Consequently, it strongly believes that the new Local Plan should make provision for the whole landholding to be included in the allocation, and / or the SPD boundaries revised.

Tarmac remain of the opinion that moving forward, the Council needs to engage with it and with all other key landowners within the South Milton Keynes SUE in order to produce a robust phasing plan so that the delivery of residential development can be planned in relation to key infrastructure provision to enable the planned SUE to start delivering much needed housing as soon as possible without any further delays.

Policy HQH6 Pitches for Gypsies and Travellers also confirms that in respect of the South East Milton Keynes Strategic Urban Extension, seven pitches are required to be delivered by 2030.

It is not evident that that the proposed location of this additional GTAA provision takes full and proper account of the actual needs of the gypsy and traveller communities themselves.

Gypsies and Travellers must be fully consulted and engaged in the choice of any proposed new GTAA site provision in order to ensure that it is in a suitable location and would meet their lifestyle needs.

For instance, very often, the GTAA community will want to be located very close to major roads in order to facilitate their traveller lifestyle. We are aware that our Client's Land off Phoebe Lane, Wavendon site has no such provision nearby.

The SHLAA Assessment has identified that in relation to highways, the Tarmac Site will need to be delivered as part of the South East Milton Keynes Allocation with access provided from Bow Brickhill Road and the H10 extension. The Council will need to ensure that adjacent development to the south incorporates such provision as part of any planning consent and S.106 Agreement.

The Council will also be fully aware that application 22/02528/OUT: was submitted on behalf of O&H Q7 Ltd in relation to Land West of Woburn Sands and South of Wavendon, Newport Road, Wavendon, which is currently pending:

22/02528/OUT: Outline application (matters of access to be considered, with matters of layout, scale, appearance and landscaping reserved) for residential development with access from the Bow Brickhill Road to comprise up to 335 dwellings (use class C3), formal and informal open spaces including playing fields, site for a pavilion, a local play area, creation of public rights of way and other associated works and operations including, but not limited to demolition, earthworks, and engineering operations (including utilities and drainage).

It is crucial from a placemaking point of view that any planning consent and S.106 issued in respect of this application incorporates provision for affected neighbouring development sites such as our Clients' to be fully accessible in the future in order to ensure that they are capable of being fully integrated into the wider road network as part of the comprehensive and successful delivery of the South East Milton Keynes allocation.

Consequently, despite the application still being pending, we note and welcome the fact that the Committee Report dated 7 November 2024 relating to the above application cross-referenced the importance of integration with adjacent development sites *“The delivery of highways and transport infrastructure will be key to providing a sustainable, well-connected community and providing the necessary mitigation to reduce the impacts on existing residents in the wider area. Parameters for development have been established and co-ordination between applicants on adjacent sites will continue to ensure that the plan for infrastructure delivery will be delivered in a cohesive way. It is considered that the benefits arising from the scheme outweigh the impacts, and the application is recommended for approval”*.

Tarmac believes that infrastructure integration to be of fundamental importance to ensuring the successful delivery of the South East Milton Keynes Strategic Urban Extension.

Therefore, it welcomes the Council's proactive stance in terms of key highway infrastructure provision. It strongly supports the reference in the aforementioned report to the need for well planned growth and to ensure that development proposals should not prejudice the future development or design of suitable adjoining sites.

Tarmac strongly backs Section C of the policy, which seeks a comprehensive development framework for the site to be prepared and approved by the Council prior to planning permissions being granted. Given the highly complex nature of infrastructure provision and the need for its proper integration within the South East Milton Keynes Strategic Urban Extension it is vital that piecemeal developments do not occur or ransom strips arise. Otherwise much needed development will either be delayed or prevented from coming forward.

Tarmac is proposing some minor amendments to the policy wording which it considers would be beneficial to better reflect the overall importance of co-ordinating highway infrastructure throughout the South East Milton Keynes Strategic Urban Extension in order to facilitate residential development on neighbouring sites being capable of implemented without delay or prejudice, as demonstrated by the content of the aforementioned reports.

Recommendation:

The following amendment is proposed to Policy GS22 (which is shown underlined), which Tarmac believes will strengthen the policy:

Policy GS22 South East Milton Keynes Strategic Urban Extension

Policy type: Strategic

Objectives: 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 13, 14

Site/sub-area: South East Milton Keynes

A. Land is allocated at South East Milton Keynes – as shown on the Key Diagram and Policies Map – for a comprehensive residential-led, mixed-use, development of approximately 3,000 dwellings to meet the needs of Milton Keynes up to 2031 and beyond.

B. In addition to the requirements set out in other policies within this plan, development of the site will be required to:

- 1. Provide schools to accommodate seven forms of entry for secondary education and six forms of entry for primary education, as well as necessary nursery and early years provision. Schools should be capable of dual use as community facilities;**
- 2. Ensure development is well connected and integrated with adjacent grid squares, public transport services and the strategic and local highway grid network in line with the Council’s Mobility Strategy. Provision of grade-separated crossings of the railway should be provided or retained as appropriate to ensure connectivity of the southern areas of the site with the remainder of the site and the city to the north. The number, location and purpose of any such crossings will be set out within the development framework;**
- 3. Incorporate buffer areas, structural landscaping and strategic green infrastructure within the site to prevent coalescence with Woburn Sands and Bow Brickhill, respect and reinforce the distinct character of Wavendon, Woburn Sands and Bow Brickhill, ensure ecological connectivity, and mitigate any harm caused to the Brickhills area and wider landscape character;**
- 4. Be informed by appropriate surveys and assessments of built heritage with appropriate mitigation of impact;**
- 5. Pre-determination archaeological evaluation has been undertaken and provided in support of development proposals; and**
- 6. A site to accommodate seven pitches for Gypsies and Travellers shall be provided as part of this development.**

C. A comprehensive development framework for the site will be prepared and approved by the Council prior to planning permissions being granted. Development proposals should not prejudice the future development, design or delivery of suitable adjoining sites in order to enable an integrated approach to infrastructure provision.

December 2025