

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

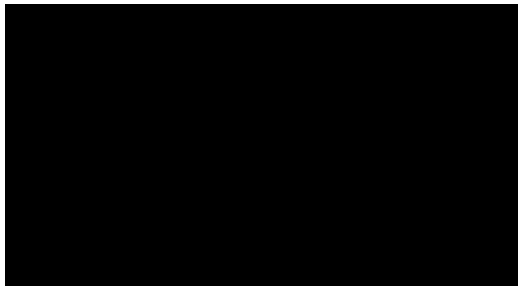
First Name

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

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

See Section 12 of the attached report (CMKTC BU5350(2)PS Milton Keynes Reg.19 Repts 22 Dec 2025 Final).

Please also see the Appendix 1 (Map of SHLAA Appendix 8 Sites) and Appendix 2 (BU5379PD MKCP 2050 Traffic Modelling Review Dec 2025)

(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.

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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:

The Regulation 19 version of the MK City Plan proposes a significant amount of development within Central Milton Keynes including 16,000 homes. On behalf of Central Milton Keynes Town Council, DLP Planning Ltd find the Plan unsound due to the figure of 16,000 additional dwellings not being achievable, not being fully justified and not being evidenced.

Fundamentally, there is a conflict in the Draft City Plan between the proposed uses within Central Milton Keynes ('CMK') based on the 'Quarters' philosophy set out in the draft plan, and the need to achieve other town centre and employment uses within the city centre, alongside a substantial step-change in levels of residential development. The town centre uses within the Draft City Plan are sound and compliant with national policy. However, these risk being undermined by the assumptions for residential development both in terms of the locations for this, control over land use (on matters including but not limited to density, design, layout, provision for mixed-use and provision for servicing, open space and the public realm) and the achievability of requirements for sustainable development (on matters including but not limited to infrastructure funding and affordable housing delivery).

These soundness concerns in relation to assumptions for levels of development and land use exist alongside the lack of clear data to show modal shift away from car usage within the lifetime of the Draft City Plan. This indicates significant uncertainty around the delivery and viability of the new Mass Rapid Transit (MRT) system. This reinforces a potential clash between the need to retain car parking spaces for the effective operation of Central Milton Keynes as a regional economic hub with important retail and leisure offer, and the Draft City Plan's aspiration to build new homes on these car parking spaces in advance of modal shift given the assumptions of a marked change in the use of plots and typologies for development within CMK.

The issues raised in this objection are not stand alone but must be regarded as part of a wider objection to the Local Plan.

In order to full demonstrate the arguments raised in this objection and to appropriately test the soundness of the Local Plan, this will require attendance of suitably knowledgeable persons at the hearings.

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Part B – Please use a separate sheet for each representation

Name or Organisation:

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

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Part B – Please use a separate sheet for each representation

Name or Organisation:

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

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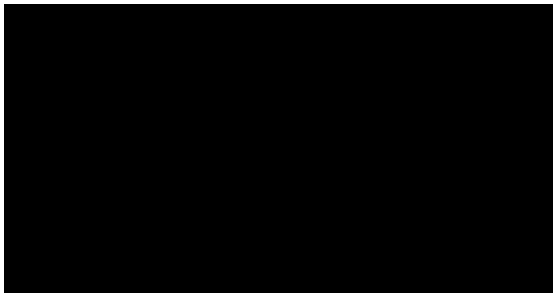
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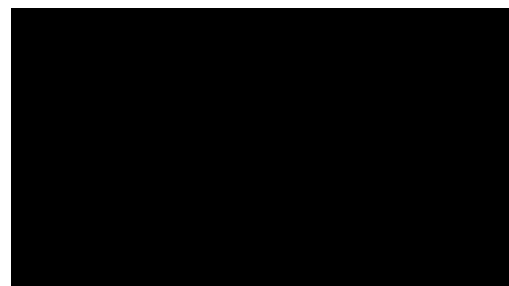
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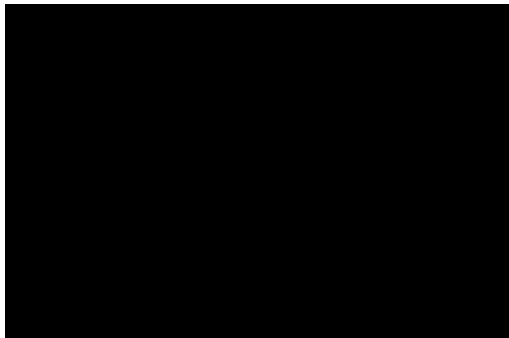


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Title

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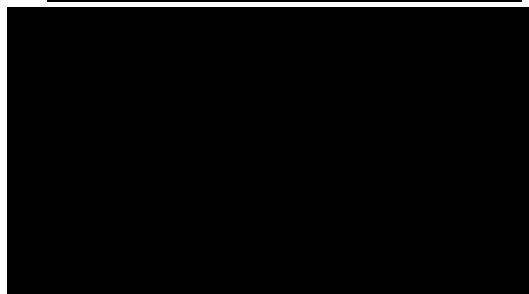
Job Title
(where relevant)

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

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

See Section 11 of the attached report (CMKTC BU5350(2)PS Milton Keynes Reg.19 Repts 22 Dec 2025 Final).

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

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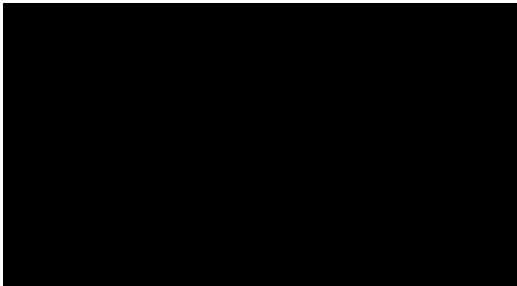
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Part B – Please use a separate sheet for each representation

Name or Organisation:

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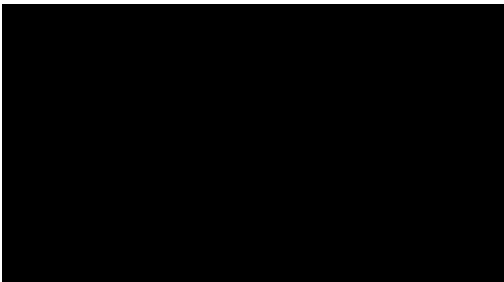
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Part B – Please use a separate sheet for each representation

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)

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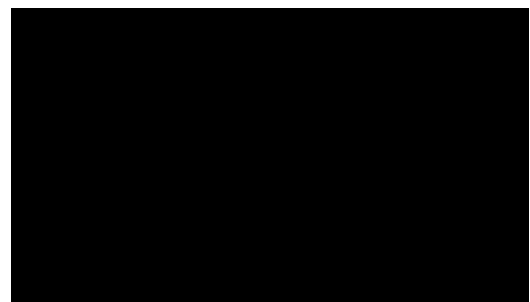
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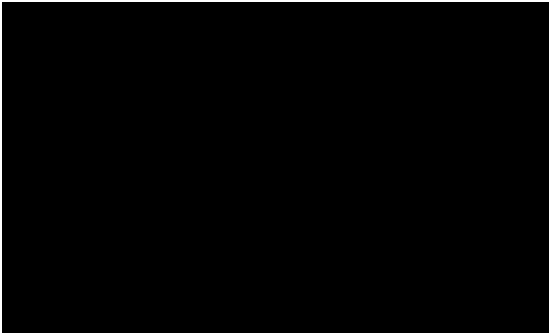


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Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

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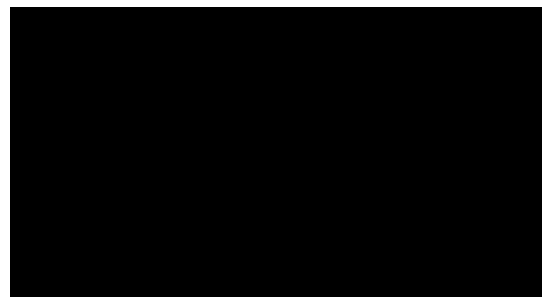
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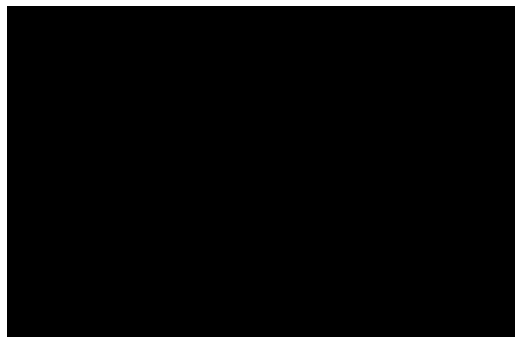


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Part B – Please use a separate sheet for each representation

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 | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 4.(2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
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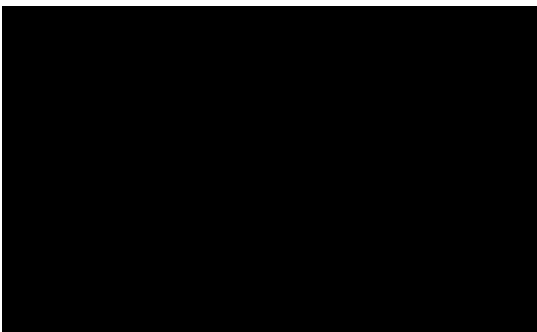


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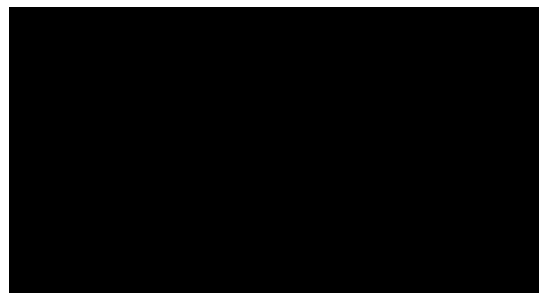
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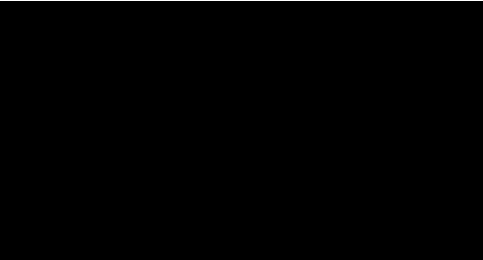
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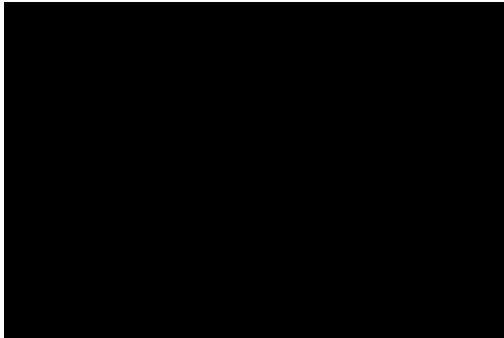


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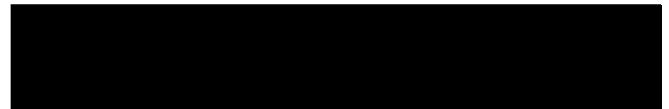
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For and on behalf of
Central Milton Keynes Town Council

**REPRESENTATIONS TO THE MK CITY PLAN 2025
REGULATION 19 CONSULTATION**

**Prepared by
DLP Planning Ltd
Research and Analysis
Sheffield**



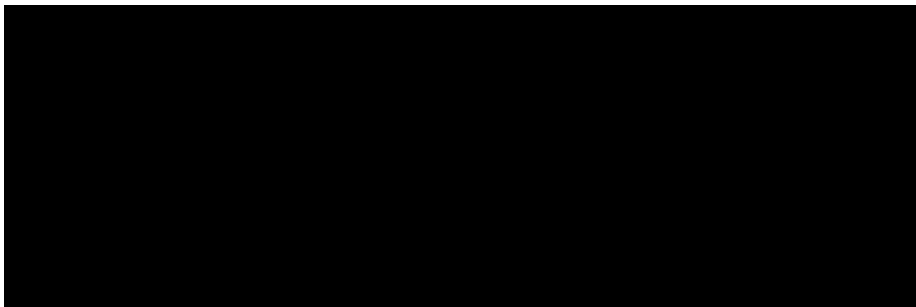
December 2025

Established in 1991

Employee Owned Trust



| | | | |
|--------------|--|---------|---------|
| Prepared by: | Phillippa Martin-Moran LLB (Hons) MRTPI Associate Director | | |
| | Rebecca Neely BA (Hons) Planner | | |
| Checked by: | Jon Goodall MA (Cantab) MSc MRTPI Director | | |
| Approved by: | Jon Goodall MA (Cantab) MSc MRTPI Director | | |
| Date | December 2025 | Office: | Bedford |



DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.



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APPENDICES

- Appendix 1 Map of SHLAA Appendix 8 Sites
- Appendix 2 Milton Keynes City Plan 2050 Traffic Modelling Document Review Report by DLP Planning Ltd Transport and Infrastructure
- Appendix 3 Central Milton Keynes Road Hierarchy

1.0 INTRODUCTION

- 1.1 These Representations have been prepared by DLP Planning Ltd, Research and Analysis on behalf of Central Milton Keynes Town Council in response to Milton Keynes City Council's Regulation 19 (Pre-Submission) version Draft of its City Plan 2050.
- 1.2 As per the requirements of the National Planning Policy Framework (NPPF) 2024 these representations address the issue of whether the Draft Local Plan is "sound".
- 1.3 These representations state that the Draft City Plan is unsound due the figure of 16,000 additional dwellings in Central Milton Keynes not being achievable, not being fully justified and not being evidenced.
- 1.4 Fundamentally, there is a conflict in the Draft City Plan between the proposed uses within Central Milton Keynes ('CMK') based on the 'Quarters' philosophy set out in the draft plan, and the need to achieve other town centre and employment uses within the city centre, alongside a substantial step-change in levels of residential development. The town centre uses within the Draft City Plan are sound and compliant with national policy. However, these risk being undermined by the assumptions for residential development both in terms of the locations for this, control over land use (on matters including but not limited to density, design, layout, provision for mixed-use and provision for servicing, open space and the public realm) and the achievability of requirements for sustainable development (on matters including but not limited to infrastructure funding and affordable housing delivery).
- 1.5 These soundness concerns in relation to assumptions for levels of development and land use exist alongside the lack of clear data to show modal shift away from car usage within the lifetime of the Draft City Plan. This indicates significant uncertainty around the delivery and viability of the new Mass Rapid Transit (MRT) system. This reinforces a potential clash between the need to retain car parking spaces and the local service roads for the effective operation of Central Milton Keynes as a regional economic hub with important retail and leisure offer, and the Draft City Plan's aspiration to build new homes on these car parking spaces in advance of modal shift given the assumptions of a marked change in the use of plots and typologies for development within CMK.

2.0 NATIONAL POLICY CONTEXT

2.1 The National Planning Policy Framework (“the Framework”) sets out the Government’s planning policies for England and how these are expected to be applied.

2.2 Those policies that are relevant to the plan-making process and these representations in respect of MK City Plan 2050 Regulation 19 version are summarised below.

a) Achieving Sustainable Development

2.3 Paragraph 7 of the NPPF outlines the overall purpose of the planning system as to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

2.4 A key element of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision-taking (Paragraph 11). For plan-making, this means:

- a) *All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) *Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - (i) *The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - (ii) *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

b) Plan-Making

2.5 Paragraphs 15 to 38 of the Framework relate specifically to ‘plan-making’.

2.6 Paragraph 15 states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

2.7 Paragraph 16 requires that plans are prepared with the objective of contributing to the achievement of sustainable development, and be prepared positively, in a way that is aspirational but deliverable. They should also be shaped by early, proportionate and effective engagement between plan-makers and communities. Policies should be written in a clear and unambiguous way and serve a clear purpose.

2.8 Paragraph 20 requires that strategic policies set out an overall strategy for the pattern, scale and design quality of places, making sufficient provision for homes; employment; retail; leisure; infrastructure; community facilities; and enhancement of the natural, built and historic

environment.

- 2.9 Paragraph 23 states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.
- 2.10 Paragraphs 24 to 28 require local planning authorities to cooperate with one another, and with other relevant bodies, to address strategic matters and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. Statements of common ground should be prepared to document progress on addressing cross-boundary matters. On the matters which require collaboration, strategic policy-making authorities should make sure that their plan policies align as fully as possible with those of other bodies.
- 2.11 Paragraph 27 states that plans should ensure that a consistent approach is taken to planning the delivery of major infrastructure, such as major transport services/projects, utilities, waste, minerals, environmental improvement and resilience; and strategic health, education and other social infrastructure (such as hospitals, neighbourhood health facilities, universities, schools, major sports facilities and criminal justice accommodation).
- 2.12 Paragraph 32 requires that the preparation of policies be underpinned by relevant, up-to-date, adequate and proportionate evidence.
- 2.13 Paragraph 33 states that local plans should be informed throughout their preparation by a sustainability appraisal that meets legal requirements and demonstrates how the plan has addressed relevant economic, social and environmental objectives. Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).
- 2.14 Paragraph 35 states that Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.
- 2.15 Paragraph 36 is a key section on the examination of Local Plans. It outlines the legal and procedural requirements for which Local Plans have to have been prepared in accordance with to be 'sound'. Plans are 'sound' if they 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.

c) Neighbourhood Plans

- 2.16 The NPPF provides specific guidance on neighbourhood plans. Paragraph 30 states that neighbourhood plans can shape, direct and help to deliver sustainable development by influencing local planning decisions. Importantly, neighbourhood plans can set out more detailed policies for specific areas, provided these policies do not conflict with the strategic policies in the local plan. This allows for more tailored, locally-specific non-strategic policies.
- 2.17 It's worth noting that paragraph 14 of the NPPF offers protections for neighbourhood plans, but only where they allocate sites to meet a housing requirement figure. To our knowledge, besides the 16,000 figure for CMK, the Town Council has not been given a specific housing requirement figure. Paragraph 22 of the Regulation 19 draft Plan appears to confirm this, indicating that the local planning authority's approach is to recommend a nominal (i.e., one dwelling) but unquantified figure of additional homes to plan for. Therefore, any site allocations in a future CMK neighbourhood plan would be in addition to the local plan requirements, although the prospect of site-specific allocations seems limited given the urban context of CMK.

d) Planning for Housing

- 2.18 Paragraphs 61 to 84 relate specifically to 'delivering a sufficient supply of homes'.
- 2.19 Paragraph 61 requires LPAs to ensure that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 2.20 Paragraph 62 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.
- 2.21 Paragraph 69 requires policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- 2.22 Paragraph 72 states that 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 years one to five of the plan period; and*
 - b) *Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*
- 2.23 Paragraph 77 states that the supply of large numbers of new homes can be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and **supported by the necessary infrastructure and facilities** (our emphasis). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:
- a) *Consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*

- b) *Ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) *Set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;*
- d) *Make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*
- e) *Consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.*

2.24 Paragraph 78 states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. These representations identify that the submission version draft Plan is wholly deficient in respect of the presentation of a draft housing trajectory and the assumptions (or lack thereof) provided to justify this for CMK.

e) Making Effective Use of land

2.25 Paragraph 124 states that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

2.26 Paragraph 125 goes on to state that planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, as well as promoting and supporting the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

2.27 In terms of achieving appropriate densities, paragraph 129 states that planning policies should support development that makes efficient use of land, taking into account: the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting; and the importance of securing well-designed, attractive and healthy places.

2.28 Where there is an existing or anticipated shortage of land for meeting identified housing needs, paragraph 130 states that it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances, plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible including through the use of area-based character assessments.

f) Good Design

- 2.29 Chapter 12 makes provision for achieving well-designed and beautiful places. Paragraph 132 outlines that plans should “at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.”
- 2.30 Paragraphs 133 and 134 provide further detail on the importance of design codes and guides in providing clarity regarding expectations and confirms that these can be prepared at a range of scales. Paragraph 135 explains that the outcome of policies and decisions addressing good design should ensure well-functioning and attractive spaces over the long-term, which respond to local character and establish a strong sense of place. Policies should provide places that are safe, inclusive and accessible in terms of providing for good levels of amenity. Importantly, good design should optimise the potential sites to accommodate and sustain an appropriate amount and mix of development.

g) Transport

- 2.31 Paragraphs 109 to 118 refer to ‘promoting sustainable transport’.
- 2.32 Paragraph 109 requires that transport issues are assessed from the earliest stages of plan-making and development proposals, so that:
- a) *The potential impacts of development on transport networks can be addressed;*
 - b) *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
 - c) *Opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - d) *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
 - e) *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*
- 2.33 Paragraph 110 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 2.34 Paragraph 111 requires that planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Policies should also be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.
- 2.35 Paragraph 115 states that in assessing sites that may be allocated for development in plans, it should be ensured that:
- a) *Appropriate opportunities to promote sustainable transport modes can be – or have*

- been – taken up, given the type of development and its location;*
- b) Safe and suitable access to the site can be achieved for all users;*
- c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

h) Landscape and Biodiversity

- 2.36 Paragraphs 187 to 201 relate to 'conserving and enhancing the natural environment'.
- 2.37 Paragraph 187 states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). Policies should also recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.
- 2.38 Paragraph 192 identifies the role plans should play in mapping and safeguarding components of local wildlife-rich habitats and wider ecological networks, seeking to enhancing their connectivity and provide for their restoration, management and the achievement of measurable net gains.

i) Historic Environment

- 2.39 Paragraphs 202 to 221 relate to 'conserving and enhancing the historic environment'.
- 2.40 Paragraph 203 states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.

j) Town Centres

- 2.41 Paragraphs 90 to 95 relate to 'ensuring the vitality of town centres'.
- 2.42 Paragraph 90 states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.

k) Promoting Healthy and Safe Communities

- 2.43 Paragraphs 96 to 108 relate to 'promoting healthy and safe communities'.
- 2.44 Paragraph 96 outlines how planning policies and decisions should aim to achieve healthy, inclusive and safe communities which:

- a) *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- b) *are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*
- c) *enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*

- 2.45 Paragraph 98 outlines how, to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, support the delivery of local strategies to improve health, guard against the unnecessary loss of valued facilities and services, ensure that established shops are able to develop and ensure an integrated approach for considering the location of housing, economic uses and community facilities and services.
- 2.46 Paragraph 100 emphasises the importance of ensuring a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach, giving great weight to the need to create, expand or alter early years, schools and post-16 facilities and working with promoters and delivery partners to identify and resolve key planning issues before applications are submitted.
- 2.47 Paragraph 101 states that local planning authorities should also work proactively and positively with promoters and delivery partners to ensure faster delivery of other public service infrastructure such as health, blue light, library, adult education, university and criminal justice facilities.



3.0 LOCAL PLAN – POLICY GS1 OUR SPATIAL STRATEGY

a) Introduction and Policy Outline

3.1 Policy GS1 of the Regulation 19 Consultation version of the MK City Plan 2025 states that development will be directed to locations in accordance with the settlement hierarchy. Tier 1 is the City of Milton Keynes where the majority of development will be provided, and Tier 2 which is the towns and villages of Milton Keynes district.

b) Policy Analysis/Commentary

3.2 The Policy does not adhere to the principles of sustainable development as set out in the NPPF, it fails to reference the infrastructure requirements of this plan and the proposed development particularly paragraphs 109 and 111 of the NPPF 2024. As such it is not consistent with national policy as required by paragraph 36(d) of the NPPF.

4.0 LOCAL PLAN – POLICY GS2 STRATEGY FOR HOMES

a) Introduction and Policy Outline

- 4.1 Policy GS2 of the Regulation 19 Consultation version of the MK City Plan 2050 states that the Plan will provide for a minimum of 50,372 new homes over the period 2022-2050. In line with Policy GS1, in total 59,779 homes are planned to provide an adequate buffer on meeting the minimum housing requirement and to support the growth ambitions set out within the Strategy for 2050.
- 4.2 The Policy proposes that 16,000 homes will be delivered in Central Milton Keynes and Campbell Park between 2022 and 2050, including completions from 2022/23 and 2023/24 and sites under construction.

b) Policy Analysis

- 4.3 CMKTC reiterates its concerns set out in its representations to the Regulation 18 consultation. CMKTC recognises the need for growth, however the proposals for the scale of housing and the density of housing proposed for Central Milton Keynes is unsound. The target for new dwellings in Central Milton Keynes in the Regulation 19 draft City Plan 2050 has increased from the previous draft at Regulation 18.
- 4.4 There needs to be a clear evidence base for how the 16,000 homes figure for CMK was derived. In particular there needs to be clarity on how the sites in CMK are suitable, available and deliverable. This must include viability considerations and provision of sustainable communities, such as providing open spaces for residents and required infrastructure as per the NPPF paragraphs 72 and 77. With regards to North and South Rows and car parking area, including the local service roads within them, within blocks it needs to be established that they are not constrained by underground utilities, how the local service roads would be replaced for access, and demonstrated that the proposed family homes on these areas which are adjacent to commercial uses would create a sustainable, viable, community.
- 4.5 It is recognised that the NPPF 2024 at paragraph 61 reiterates the Government's objective of significantly boosting the supply of homes. However, it also states that there should be an appropriate mix of housing types for the local community. The approach in the Reg 19 City Plan is for homes for older people and specialist needs to be outside of Central Milton Keynes. There have also been numerous build-to-rent schemes within Central Milton Keynes and there is a proposal for less affordable housing in the City Centre. This is not a positively prepared or justified approach to plan-making and this is unsound under paragraph 36(a) of the NPPF.
- 4.6 Given the soundness issues identified it is considered that the capacity assumptions for CMK do not support the 16,000 figure, or the resultant level of buffer in supply versus the requirement. We also do not consider that the extent of the buffer, and reliance of delivery from CMK to achieve it is sound or consistent with national policy. Therefore, the Plan is not consistent with NPPF Paragraph 129, and Paragraph 130 should not apply because there is not a shortfall against needs.

5.0 LOCAL PLAN – POLICY GS3 STRATEGY FOR ECONOMIC PROSPERITY

a) Introduction and Policy Outline

- 5.1 The Policy and its preamble put significant emphasis on the national importance of Milton Keynes City as an economic powerhouse. The policy notes that MK City has more jobs than its working-age population. The key jobs are in the service sector and knowledge economy. Wholesale and retail trade make up 16.6% of jobs. Other significant sectors include health and social work, education, logistics and transport, storage, administrative and support services, professional, scientific and technical, information, communications, finance and insurance. MK is expected to contribute to digital technology and defence is an emerging sector.
- 5.2 The proposals include a tech, design and innovation quarter to establish a physical home for this sector (one in three jobs in the city is estimated to be in technology).
- 5.3 Around 80% of the future forecast floor space requirements for offices including research and development floor space is expected to be developed in Central Milton Keynes; this is around 420,000 square metres gross or 300,000 square metres net. The policy notes that this will take place in Central Milton Keynes blocks A to B near the railway station which is also known as Downtown Quarter. However, there is no land use allocation in the Plan which secures this and so it is dependent on Policies CMK1 and CMK2 and the overall framework. Additionally, the plan recognises the lack of undergraduate university of a residential nature within the city of Milton Keynes and therefore includes this as an aspiration within the plan. The housing and economic development needs assessment has analysed the need for employment land and in particular notes that there is a need to replace and repurpose ageing stock of commercial floorspace within the area (office industrial and warehousing) and the impact of changing work practises particularly hybrid working.

b) Policy Analysis

- 5.4 The aspirations for the local economy are positively prepared. There is likely to continue to be very significant inward commuting to Central Milton Keynes by car as well as rail and other transport modes for business, study, retail and leisure purposes. The proposals to build on North and South Rows and to reduce car parking and change the road hierarchy in Central Milton Keynes are at odds with this approach to economic growth and therefore there is a risk that the economic growth of Milton Keynes will falter due to lack of accessibility to the city centre.
- 5.5 The functioning of Central Milton Keynes relies on the established road hierarchy which was part of Milton Keynes' design. This will be affected by the proposals to build on North and South Rows and car parking areas (see Appendix 1). As the road hierarchy plan below in figure 1 and at Appendix 3, shows within the on-street parking areas are local service roads. The road hierarchy below can also be seen in the CMK Alliance Neighbourhood Plan, however for clarity in that Plan these roads are referred to as "minor blocked-paved routes through parking areas". This description while accurate fails to clearly denote the role which the internal roads play in the hierarchy. The local streets in these areas, especially associated with North and South Row and adjacent to the CMK 'Gates', serve existing occupied development. Within the Draft MK City Plan these areas are referred to these areas as simply parking areas without referencing that the roads within these areas perform a wider function which is important to the effective functioning of Central Milton Keynes as an economic area.

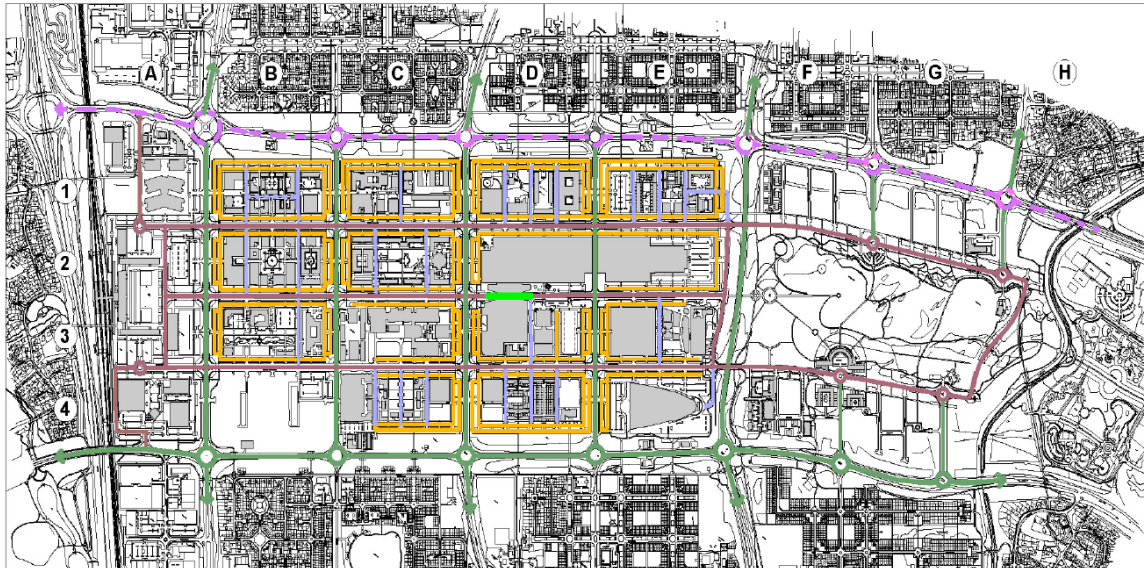


Figure 8: CMK Road Hierarchy

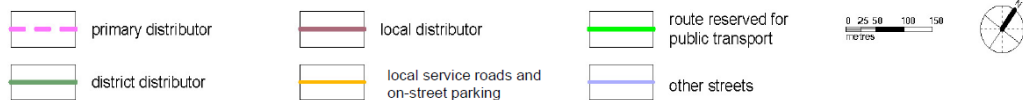


Figure 1: CMK Road Hierarchy

- 5.6 In determining the possible quantum of development the Draft City Plan has failed to consider the effect on accessing and servicing existing developments including the existing frontage development that in building on the car parking and local service roads would have. There would be a requirement for additional access designed to serve new development proposals. It is important that the services, facilities and businesses that the Plan wishes to sustain and increase are accessible for servicing and for custom in order for Central Milton Keynes to be economically successful.
- 5.7 Further the accompanying Traffic Modelling Review by DLP Planning Ltd Transport and Infrastructure sets out that car journeys are in fact expected to increase during the plan period. Moreover, there is a lack of certainty over the deliverability and viability of the mass rapid transit system. There is no certainty on when an MRT will be delivered and therefore the Draft City Plan is premature in building on car parking spaces (see Policy CMK1). The viability of the MRT is also questionable as Milton Keynes does not have the density of other cities with other MRTs (991 km² compared to 1,583 km², 2,826 km², and 4,420 km² in Sheffield, Newcastle and Birmingham respectively¹). There is therefore a conflict between economic strategy and the quantum of housing in Central Milton Keynes and the lack of certainty regarding the MRT. As such the Plan is therefore not properly justified or effective.
- 5.8 The accompanying the Traffic Modelling Review also notes the lack of clarity around car parking in the Draft City Plan and the supporting documents. There is a suggestion that car parking may increase however this has not been substantiated and it is not clear when or where that car parking will be provided, or whether this will be a net gain.
- 5.9 Car parking is not merely a numerical exercise. The proximity of car parking to specific

¹ ONS Mid-Year Estimates – MYE5: Population Density for Local Authorities in the UK

developments must also be considered. For example, the MK Gateway development in Central Milton Keynes grid block D4.1 (also known as Land at Saxon Court, Avebury Boulevard, Central Milton Keynes MK9 3HS) has provided no car parking on the basis of available on-street car parking within block D4, which is mainly along South Row, however it is now proposed to build over the car parking which would cause issues within Block D and a likely knock on effect on other blocks.

- 5.10 The MK Gateway development is on Block D4.1 planning application reference: 21/02246/FULEIS comprises:

“Erection of two blocks (Block A up to 34-storeys, and Block B up to 3-storeys) to the rear of Saxon Court and the refurbishment and upward extension (up to 3-storeys) to Saxon Court, to provide up to 288 residential units (built to rent and discount market rent), office employment, co-working & flexible workshop space, restaurant, cafe, retail and leisure space (all Use Class E), community space (Use Class F2), central public open space and associated infrastructure including hard and soft landscaping.”

- 5.11 The accompanying Traffic Assessment noted that based on their analysis of the MK Parking Standards of September 2019 the maximum car parking permit potential uptake was 677 and the anticipated permit take-up was 339. Block D4 was analysed at the time of the application as having 916 spaces of which the average weekend availability was 54% and the average weekday availability was 67%.

Figure 3-7: Average weekend availability



Copyright: Image: © 2019 Maxar Technologies

Figure 2: Extract from the Transport Assessment for MK Gateway (our highlight) - weekend availability

Figure 3-8: Average weekday availability



Copyright: Image: © 2019 Maxar Technologies

Figure 3: Extract from the Transport Assessment for MK Gateway (our highlight) – weekday availability

- 5.12 MKC Highways confirmed that the local area has capacity in the parking network to accommodate demand for all elements of this development. It was determined that there is no justification to secure additional provision. (Development Control Committee Report). As a result no car parking was provided.
- 5.13 However, the Draft City Plan now proposes building further residential development on South Row as highlighted which will reduce the available on-street car parking in this area.
- 5.14 By way of further example, the Park Square application as amended, on Block D4.4 references: 23/00267/NMA and 18/01591/FUL for “Non-material amendment seeking to permit the fitting out and use of 46m2 of permitted residents facility as 1 additional apartment, and therefore to amend the description of the approved development to read - The construction of 329 apartments (use class C3) of varying sizes. Up to 1180sqm of commercial space (use classes vary) with permitted subdivision, landscaped courtyard, a basement level and separate service area. (relating to permission ref. 18/01591/FUL for the construction of 328 apartments (use class C3) of varying sizes, 1180m2 of commercial space with permitted subdivision (Use classes A1, A2, A3, A5, B1, D1), landscaped courtyard, basement level and a separate service area.)” has been consented. Only limited car parking has been provided as part of the development it is understood, however the planning documents are not available online. It is believed however that the car parking provided on site may not be adequate for the need. If this is the case it places further pressure on car parking should South Row be developed. Other sites have been consented where car parking has not been

provided in accordance with standards or needs.

- 5.15 The two examples above are relevant to the Economic Prosperity policy set out in the Draft City Plan and in pertinent to the success of Central Milton Keynes; should the car parking along South Row be built on. This is then widened to the whole of Central Milton Keynes when other blocks are considered and the proposals to build on car parking areas and local service roads in blocks and to build on North Row.
- 5.16 There has been insufficient analysis provided of where car parking spaces are available in Central Milton Keynes, the impact of recent developments and consents to date on existing car parking demand within Central Milton Keynes and how building on North and South Rows and existing car parking within Blocks will affect car parking in Central Milton Keynes for those coming in for employment, education, retail and leisure purposes. The analysis must also go further than simply tallying the total number of spaces within Central Milton Keynes, it must consider the relationship between land uses and car parking within Blocks and Blocklets themselves to ensure that those wishing to access a particular non-residential facility will not be dissuaded from coming to Milton Keynes due to a lack of proximate accessible car parking for the facility they are visiting, particularly with the MRT yet to be confirmed.
- 5.17 To be explicit should accessibility to the Central Milton Keynes be constrained it prejudices the economic viability of the existing economic viability, including that of the Milton Keynes shopping centre. Adequate access to the shopping centre, and other non-retail offers, is important to sustain the existing viability of the retail offer, and to support the desired growth in the Draft City Plan. The Milton Keynes Retail & Commercial Leisure Study 2025 Update does not consider modal choice and car parking as part of the economic viability of Central Milton Keynes.
- 5.18 The Draft City Plan is therefore unsound under paragraph 36 of the NPPF.

6.0 LOCAL PLAN – POLICY GS4 STRATEGY FOR PEOPLE-FRIENDLY AND HEALTH PLACES

a) Introduction and Policy Outline

6.1 The preamble to Policy GS4 acknowledges the importance of planning to people's health through the potential to create health and safe communities. The preamble notes that compact urban design and mixed land uses (residential areas with shops, workplaces and leisure facilities) allow for facilities within walking distance. Parks, green and blue spaces, and leisure and community facilities also support physical and mental health. Access to local shops and supermarkets for groceries are important.

b) Policy Analysis

6.2 The policy sets out community facilities and their catchment distances. However, it does not set out density of users to facilities. This has the potential to cause significant issues in the proposed denser development areas, namely Central Milton Keynes. For example, as can be seen in our representations on Policy CMK2 this can lead to overreliance on existing facilities, such as Campbell Park and the temptation to not provide new infrastructure such that the facilities are overwhelmed. There is also a real risk of developments being cramped rather than compact, again this is seen in our response on CMK2 where playspaces are not being provided with adequate buffer distances and in sub-optimal locations in sites in order to maximise residential units on sites. The allotment provision requirement will be particularly difficult to achieve in Central Milton Keynes if 16,000 additional dwellings are required as well. The tension between the policies is means that the Plan is not fully justified or positively prepared. The Plan is therefore inconsistent with national policy including Paragraph 98 of the NPPF.

6.3 In order for the Plan to be sound in this regard there needs to be a stronger evidence base to ensure that health communities will be delivered and that the development is societally sustainable.

7.0 LOCAL PLAN – POLICY GS5 OUR RETAIL HIERARCHY

a) Introduction and Policy Outline

- 7.1 The preamble to Policy GS5 states that *the “City of Milton Keynes is a major regional centre for retail and leisure, drawing people in from the Midlands, east and south-east regions. At the heart of this are the Centre:MK Shopping Building and the Midsummer Place Shopping Centre within Central Milton Keynes, but our other centres around the city are equally vital to this success.”*
- 7.2 The provision of local convenience stores within Central Milton Keynes is recognised as being difficult on a capacity basis until at least 2050. It is proposed that vacant retail units can be used to provide capacity.

b) Policy Analysis

- 7.3 Protecting the primacy of the City Centre for comparison shopping in the Primary Shopping Area and the use of the remainder of the City Centre for other town centre uses such as leisure functions and clusters of civic and public buildings is sound and in accordance with Chapter 7 of the NPPF. It is important to ensure that convenience shopping does not erode this principle in order to maintain the vitality of Central Milton Keynes, and to do so would be contrary to paragraph 90(a) as this would not reflect the distinctive character of Central Milton Keynes.
- 7.4 This Policy must be considered in light of the wider comments in these representations around the conflict between land uses (namely the proposed quantum of residential development in Central Milton Keynes), employment uses and leisure uses. While this Policy is sound it is put at risk by other policies within the Plan creating a fundamental internal conflict with the Plan.

8.0 LOCAL PLAN – POLICY INF2 INFRASTRUCTURE PLANNING AND DELIVERY PRINCIPLES FOR STRATEGIC ALLOCATIONS

a) Introduction and Policy Outline

- 8.1 Policy INF2 of the Regulation 19 Consultation version of the MK City Plan 2050 outlines how the Council will encourage a consistent approach to planning obligations using Section 106 Agreements across all development proposals modelled on an overarching Framework Agreement and allocation-wide Infrastructure Delivery Plan. The aim is to coordinate programmes of infrastructure planning and delivery across Strategic Allocations and Central Milton Keynes in a fair, transparent and efficient way.
- 8.2 Where Section 106 Agreements are not possible or cannot be agreed, development proposals must meet their own infrastructure requirements, including on-site provision of infrastructure.

b) Policy Analysis

- 8.3 The analysis contained within Chapter 13 of these representations on Policy CMK1 queries the approach and the achievability of planning for strategic infrastructure in CMK and the evidence base for the ‘infrastructure first’ approach to development in this part of the City. The barriers – including but not limited to viability, phasing, housing mix and capacity assumptions – to development in CMK represent a fundamental constraint upon the coordinated funding and delivery of infrastructure as proposed under INF2. Where the aims of the policy are sought as part of decision-taking this is highly likely to either (a) result in further delays or barriers to securing permission if seeking to achieve the approach under criterion A or (b) where this is not possible deficits in the ability to secure (and resulting provision of) on-site infrastructure under criterion B due to the land use constraints within CMK. The points raised in Chapter 13 therefore apply to Policy INF2 and should be referred to as objections to the proposed approach as unsound – not justified and not effective or consistent with national policy (contrary to paragraph 36(b) and (c)).

9.0 LOCAL PLAN – POLICY ECP2 SUPPORTING THE VITALITY AND VIABILITY OF CENTRES

a) Introduction and Policy Outline

9.1 The Policy seeks to support the vitality and viability of centres recognising that town centre uses extend beyond mere shopping destinations but also include leisure and cultural activities and uses such as cafes restaurant community and wider services cultural uses can include galleries , concert halls, museums and theatres. The policy sets out primary shopping areas and uses which would be acceptable in certain areas within the town centre.

b) Policy Analysis

9.2 This Policy is sound and adheres to paragraph 36(d) of the NPPF as it is in accordance with national policy which seek to preserve town centre uses. In particular the primacy of Central Milton Keynes as the overall city centre for the Milton Keynes area is recognised and justified through evidence as required under NPPF2024 paragraph 36(b).

9.3 However, it should be noted that other policies in the Draft City Plan have the potential to jeopardise the vitality of Central Milton Keynes as a town centre due to the conflict between policies on housing and other development and infrastructure needs. The proposals to build on car parking and local service roads on North and South Rows; however these areas and roads will be needed to access the town centre offer within Central Milton Keynes, for those from the City and the wider region. This is all the more so in the absence of the Mass Rapid Transit system, which while under consideration which has yet to be a confirmed project. The roads within Blocks and Blockets are also used for servicing existing and future units and their loss would need to be carefully considered to ensure that units can still function well in order to support the vitality and viability of Central Milton Keynes. Therefore, while this Policy is considered sound, the overall of the Draft City Plan is not sound under paragraph 36 of the NPPF.

10.0 LOCAL PLAN – POLICY ECP3 SEQUENTIAL AND IMPACT TESTS

a) Introduction and Policy Outline

10.1 The policy sets out how the council will assess proposals for main town centre uses which includes retail leisure and office proposals outside of the town centre. It sets out a clear town centres first approach in accordance with the NPPF. The policy sets out both a sequential and an impact test approach for retail and leisure uses and emphasises the primacy of Central Milton Keynes followed by other town centres. Leisure users can include cinemas, 'Drive-thru restaurants, restaurants, bars, pubs, nightclubs, casinos, health and fitness centres indoor bowling centres and bingo halls. Cultural and arts uses include museums art galleries exhibition spaces theatres and studios.

b) Policy Analysis

10.2 This approach is sound under the NPPF Chapter 7 and is important for ensuring that the vitality and character of Central Milton Keynes is preserved and not diluted.



11.0 LOCAL PLAN – POLICY ECP4 HOTEL AND VISITOR ACCOMMODATION

a) Introduction and Policy Outline

11.1 The Policy sets out that proposals which improve hotel and visitor accommodation will be supported in accordance with the town centre approach.

b) Policy Analysis

11.2 This is sound under the NPPF; the need for hotels is justified as part of the overall economic strategy for Central Milton Keynes as a destination in its own right and its proximity to other planned attractions in the region. The need for hotels is also referenced in Policy CMK1. However, it is important to stress that this is another competing land use within Central Milton Keynes and an overly high unjustified housing figure for Central Milton Keynes again causes tension with the delivery of this use and the economic benefits that this use brings. The issue of short-term lets and serviced apartments in CMK has also not been addressed by the policy and will therefore continue to be free from land use control as far as the Plan is concerned. The 16,000 dwelling capacity assumption will reinforce this, particularly if serviced apartments are already part of delivery trends.

12.0 LOCAL PLAN – POLICY CMK1 CENTRAL MILTON KEYNES DEVELOPMENT FRAMEWORK AREA

a) Introduction and Policy Outline

- 12.1 Policy CMK1 of the Regulation 19 Consultation version of the MK City Plan 2050 outlines how development within CMK will contribute to the delivery of around 16,000 additional new homes (including completions and commitments from 2022) as part of a vibrant and thriving city centre.
- 12.2 The Policy also states that, in addition to employment and retail floorspace, “*development within Central Milton Keynes will contribute to the delivery of the following uses as part of a vibrant and thriving city centre, including:*
- *Community facilities and infrastructure to support a growing city centre population, including primary health care, education facilities, community space, library space and arts/cultural space;*
 - *Development of higher education facilities, including purpose-built student accommodation;*
 - *Additional food, drink, hotel, leisure and cultural provision;*
 - *A multi-use Events Venue;*
 - *Improved justice facilities including a new Crown Court; and*
 - *A new cultural attraction in Campbell Park.”*
- 12.3 The Policy also sets out Central Milton Keynes Quarters which are set out in Figure 8 “Central Milton Keynes Quarters” and on the Proposed Policies Map. These quarters related to specific blocks and paragraph 145 sets out the uses for each quarter. This is then reflected in Policy CMK1. The Quarters are based on the CMK blocks and they are use-based:
- *The Downtown Business Quarter and Block B4 will use the benefits of proximity to the central station and existing businesses to reinforce the office and employment focus of this part of our city centre and provide strong linkages with the proposals to develop an undergraduate university as part of a Tech and Innovation Area.*
 - *The Midtown Quarter will provide a greater mix of uses; residential, office, cultural, retail, community and civic, including the Justice Quarter with an intention for much improved justice facilities with a new Crown Court.*
 - *The Uptown Quarter will encourage a greater focus on retail, cultural, community and leisure facilities, reflecting the existing mix of uses and activities already taking place here.*
 - *Finally, the Parkside Quarter adjacent to Campbell Park will be mainly residential and provide the opportunity to create a far greater mix of types of homes for future residents of Central Milton Keynes as part of new neighbourhoods.*
- 12.4 In addition to the 16,000 additional new homes in CMK the plan sets out in the preamble that it expects the creation of 26,900 additional jobs in Central Milton Keynes across a range of sectors “*including tech, digital and knowledge-intensive businesses, education, the creative and cultural sectors, as well as retail and hospitality.*”
- 12.5 The NPPF outlines the necessity to ensure that sufficient infrastructure and facilities are delivered to support the significant scale of housing proposed in Policy CMK1. Paragraph 77, which is as follows, states:

“The supply of large numbers of new homes can often be best achieved through planning

*for larger scale development, such as new settlements or significant extensions to existing villages and towns, **provided they are well located and designed, and supported by the necessary infrastructure and facilities** [emphasis added] (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.”*

- 12.6 Paragraphs 129 and 129c further emphasise the need to ensure that infrastructure and service provision is not at capacity. Together, the paragraphs remark that planning policies should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services.
- 12.7 The need to ensure vibrancy and vitality of Central Milton Keynes as the city centre, as stated within Policy CMK1, is also supported by the NPPF. Paragraph 128a acknowledges that local planning authorities should support proposals to use retail and employment land for homes in areas of high housing demand. However, this is caveated with the requirement that this should not undermine key economic sectors or sites or the vitality and viability of town centres.

b) Policy Analysis

- 12.8 Policy CMK1 outlines how development proposals should support patterns of use in line with the Central Milton Keynes quarters which are outlined above.
- 12.9 At the outset it is relevant to note that the evidence base for the Plan does not provide a specific justification for the 16,000-dwelling total. The SHLAA 2025, including Appendix 8, indicates that this total is net of completions since 2022 but does include existing commitments (stated as 3,329 dwellings although the evidence at Appendix 8.1 sums to 3,323 dwellings). The sites analysed within the SHLAA 2025 have been mapped in Appendix 1 which is submitted alongside these representations.
- 12.10 The Council also relies on this total not including a specific ‘windfall’ component from CMK or assumptions about the redevelopment of existing blocks containing buildings (unless already permissioned). However, fundamentally the residual ‘uncommitted’ total of 12,677 dwellings (net of 3,323 dwellings) is not supported by specific land use allocations or requirements for development from specific sites. The residual capacity is essentially ‘not identified’ and should be considered against NPPF paragraph 75 in respect of ‘windfall’ development and historic delivery rates and expected future trends.
- 12.11 This notwithstanding, the evidence base does not state which particular scenario is relied upon to demonstrate that the 16,000 total will be achieved. The table below provides the Council’s outputs from the SHLAA, which are all inclusive of the 3,323 committed total, and the surplus or deficit these generate versus the ‘residual uncommitted’ total of 12,677 dwellings required to achieve 16,000 dwellings:

Table 1: SHLAA Capacity Scenarios versus 16,000 Dwelling Total

| | Total Capacity | Capacity net of Commitments | Difference versus 'Residual Uncommitted' total (12,677 dwellings) to be Provided | % Difference |
|--|-----------------------|------------------------------------|---|---------------------|
| Density Scenario 1 - Reg 18 Policy & Growth Study Densities | 18,550 | 15,227 | 2,550 | 20% |
| Density Scenario 2 - As per scenario 1, but densities on Rows at 100 dph | 16,115 | 12,792 | 115 | 1% |
| Density Scenario 3 - As per Scenario 1, but densities on Rows at 60 dph | 15,726 | 12,403 | -274 | -2% |
| Density Scenario 4 - Scenario 1 but assume only half of the land on the Rows and Gates come forward for residential | 15,166 | 11,843 | -834 | -7% |
| Density Scenario 5 - Inner and Outer densities as per draft policy, but Gates and Rows at 100 dph | 13,681 | 10,358 | -2,319 | -18% |

Source: DLP Analysis of SHLAA Appendix 8

- 12.12 It is clear that even without any further analysis regarding the soundness of these capacity assumptions only Scenario 1 reflects an outcome where assumed densities applied to all sites would achieve the c.16,000 dwelling figure. When any of the flexibilities in terms of densities or land use from Scenarios 2-5 are applied there is effectively a deficit against the 16,000 dwelling total. That would mean either the development of additional sites not covered by the SHLAA or an assumption that other parts of the identified capacity would need to be delivered in excess of proposed density and storey height assumptions.
- 12.13 Analysis has been undertaken on the location of the SHLAA Appendix 8 sites within the proposed Quarters. As stated in the Policy, the Quarters which will support residential development proposals are the Midtown Quarter (balanced alongside other uses including community, cultural, retail, hotel, office and education) and the Parkside Quarter which is residential led. The 'Residential Quarters Capacity' figures presented below therefore include only proposals for those locations.

Table 2: Identified Capacity within Residential Quarters

| | Total Capacity | Residential Quarters Capacity | % of Capacity in Residential Quarters |
|--|-----------------------|--------------------------------------|--|
| Density Scenario 1 - Reg 18 Policy & Growth Study Densities | 18,550 | 10,515 | 56.7% |
| Density Scenario 2 - As per scenario 1, but densities on Rows at 100 dph | 16,115 | 8,669 | 53.8% |
| Density Scenario 3 - As per Scenario 1, but densities on Rows at 60 dph | 15,726 | 8,374 | 53.2% |
| Density Scenario 4 - Scenario 1 but assume only half of the land on the Rows and Gates come forward for residential | 15,166 | 8,243 | 54.4% |
| Density Scenario 5 - Inner and Outer densities as per draft policy, but Gates and Rows at 100 dph | 13,681 | 7,269 | 53.1% |

Source: DLP Analysis of SHLAA Appendix 8

- 12.14 It is evident from the table above that just over half (between 53.1% and 56.7%) of the identified capacity is located within the residential 'Parkside' or 'Midtown' Quarters. There is, therefore, a maximum of 8,035 units which are proposed to be delivered within quarters designated only for leisure, retail, community, business and justice uses.
- 12.15 Appendix 1 submitted alongside these representations maps the Midtown and Parkside Quarters alongside the SHLAA sites. The map provides a visual breakdown of the number of sites which fall outside of the residential quarters.
- 12.16 Policy CMK1 is therefore not consistent with itself, as delivering the 16,000 homes identified in SHLAA Appendix 8 would not support patterns of land use within the Central Milton Keynes quarters as outlined in Figure 8 of the Plan.
- 12.17 The Policy requirements to 'zone' the City into Quarters is not objected to in principle. These would seek to rightly preserve land for the other necessary town centre uses which would be expected of any town centre but all the more so given Milton Keynes' role in the national and regional economy as highlighted in GS3 and GS5 and with the Council's ambitions around the technology and justice sectors and the functioning of Central Milton Keynes as a City Centre also supported. By safeguarding these quarters in planning policy terms it ensures that the City centre can continue to function as such and provide additional opportunities for work and leisure for those in the City/District and the wider region and this is supported.
- 12.18 However, it creates an even greater tension with the proposals for 16,000 dwellings in Central Milton Keynes. This further suggests constraints on where new residential development totalling 16,000 new dwellings can be located within the CMK area in terms of providing an

appropriate mix of land use, as only Parkside is residential led for its land-use. Some of Parkside is already developed and is unlikely to be redeveloped, for example F1.1 where it is for residential houses of a low density. The Downtown and Uptown Leisure blocks are not proposed to contain residential development. The remaining quarter, Midtown, contains a Justice Quarter in Blocklets C1.1 and C1.2, otherwise residential is proposed as part of the land use within the quarter, however this is in conjunction with other land uses.

- 12.19 It is noted that Policy CMK1E.4 states that residential-led mixed-use developments should be sited on the surface level car parking along North and South Row with the exception of areas in the Downtown Quarter and that they should provide and or enhance pedestrian crossings into neighbourhood grid squares. There appears to be very little justification for the removal of the car parking spaces and local service roads. The timing of any such development would be crucial to ensure that the lack of car parking spaces was not problematic to the functioning of the city centre and that adequate new servicing by road was provided.
- 12.20 As has been set out above in response to Policy GS3 and ECP2 the proposals to build on car parking areas has not considered the role which these areas play within the road hierarchy of Central Milton Keynes. As shown in Figure 1 above, within what has been termed the car parking areas of Central Milton Keynes there are local service roads which serve not only the car parking, but the occupants of the buildings within the Blocks/Blocklets whether residential or non-residential. Should these areas be built on there will be a need to provide alternative car parking based on the traffic modelling contained in Appendix 2 and re-provide service access to units. Moreover, the viability of developing this area does not appear to have been considered as it is understood that there are utilities underneath these areas which would need to be considered. Redevelopment of these areas is not impossible, however, there is a lack of evidence and justification for the proposals within the Draft City Plan, as a result calls further in question the proposed quantum of residential development within Central Milton Keynes. This is contrary to paragraphs 36(c) and (d) of the NPPF.
- 12.21 Finally, these proposals seem to be at odds with the place making principles in policy CMK2 which emphasises the green nature of Central Milton Keynes and its ongoing importance to character and the healthy functioning of place. These policies would result in the removal of city trees and create a dense development with limited opportunities for greening, growing and the associated infrastructure required with new housing. It would also be contrary to the classic block and grid structure of Milton Keynes which is referenced in policy CMK2 and whose importance is highlighted. The policies of CMK1 and CMK2 are contradictory to each other and therefore the policies are not sound.
- 12.22 There is therefore a very limited area for residential development which is available for development within policy terms in Central Milton Keynes. This then must be considered in light of the other constraints and policy requirement set out below in Policy CMK2 and CMK3 which set out clear place making principles and limits on tall build heights.
- 12.23 The Sustainability Appraisal recognises the risk associated with the proposed delivery, both in terms of delivery in the plan period and timely delivery within the plan period (i.e. in line with anticipated 'trajectory'). It notes remaining uncertainties such as the MRT corridors. It states that there is a case for exploring a lower urban supply figure with a view to a healthy 'supply buffer' in a non-urban location. The issue is that in land use terms, the Plan commits CMK to the total, and therefore a loss of control and effectiveness become the concern.
- 12.24 These uncertain effects are reinforced by the housing trajectory contained in the Pre-Submission version Plan. This is not consistent with national policy at paragraphs 77 and 78

of the NPPF. It contains no realistic assessment of lead-in and build-out rates for CMK (paragraph 77(d) and in-fact contains no breakdown of the forecast for specific sites in CMK whatsoever. The Plan provides no evidence of the phasing and build-out of flatted/block development in CMK, which will have a particular delivery profile and basis for absorption rates dependent on factors including (but not limited to) housing mix, construction programmes and potential competition between development plots.

- 12.25 The trajectory forecasts 16,000 dwellings in total, but these are effectively at an average of c.640dpa from 2029/30 to 2049/50. In the five years 2024-2029 2,534 units are forecast, which is an average of only 507dpa. The evidence base provides no justification for why the average is likely to increase from 2029/30, particularly given that there are already significant extant commitments in CMK achieving relatively slow build-out. The 2,534 unit total to 2029 suggests that even construction of the existing committed total (stated as 3,323 dwellings in the SHLAA2025) will extend beyond the period to 2029.
- 12.26 The evidence base provides no confidence that even the forecast to 2029 is robust, and it is noted that this includes years of very low forecast delivery (225 and 113 dwellings). The evidence base provides no indication of how the trajectory (to 2029 and beyond) addresses concerns raised in Appendix 9 of the 2024 SHLAA or how constraints to development will be overcome. This includes delivery of permissions that principally comprise one and two-bedroom (and studio properties) and where developers are in some instances reconsidering tenure options (e.g., build-to-rent and serviced apartments). Appendix 9 of the 2024 SHLAA went on to state:
- “With the need for more cores, often reduced efficiencies and higher build costs combined with the recent more onerous requirement of the 2022 Building Safety Act, this means that it simply may be uneconomic to build at higher densities at the moment in Milton Keynes. **A consideration then is there may be planning permissions for tall buildings, but these may not be built out because they are simply unviable.** This is a pattern that has been seen in emerging parts of London, Birmingham and Manchester in particular.*
- It should be noted that there are already permissions for new residential schemes at higher dph in the outer central part of CMK that we are using for this analysis.”***
(our emphasis).
- 12.27 This indicates that not only the capacity assessment but also the trajectory assumptions (including the ‘at best’ forecast of 2,534 units to 2029/30) continue to be affected by these factors. There is no sound basis, or justification, to indicate why the trajectory should now support a total forecast of 16,000 dwellings (as a revised from the Regulation 18 draft proposals) from non-specific allocations where these factors continue to apply and it is quite plain that the trajectory assumptions (both overall or as a (not provided) sum of sites identified in the 2025 SHLAA) demonstrate this is wholly without merit.
- 12.28 The Milton Keynes Infrastructure Delivery Plan (IDP) which supports the Regulation 19 Consultation Version of the MK City Plan 2050 sets out the Sub Area Profile in terms of infrastructure provision for CMK. The current profile identifies 2,470 households in CMK based on the 2021 Census. The addition of 16,000 homes would consequently represent a more than seven times increase in the number of households to 2050. It is therefore vital that the infrastructure capacity and service provision increases by a similar proportion to meet the significant additional demand which is proposed to be placed on services in CMK.
- 12.29 One of the key infrastructural constraints facing CMK in terms of existing provision relates to

highways. It is noted within the IDP that roads providing links to the CMK Sub Area including H5/A509 and sections of Childs Way and Saxon Street are presently operating at over 100% capacity with just 2,470 current households.

- 12.30 The Traffic Modelling Review prepared by the Transport & Infrastructure team at DLP Planning (Appendix 2) reveals further highways and transport capacity constraints to be anticipated by 2050. The number of car movements throughout Milton Keynes is predicted to rise by 24% between 2019 and 2050, with the percentage of trips made by car also predicted to rise. Increased congestion and delay are predicted throughout Milton Keynes in all scenarios tested within the Review.
- 12.31 Despite the emphasis placed within the IDP on maximising sustainable travel opportunities, the Traffic Modelling Review note finds that public transport mode split is predicted to stay at a similar level throughout the Plan period. The delivery of the MRT is only anticipated to generate a 1.8% mode share of all trips, with a maximum of around 3,000 journeys made on the MRT in the AM and PM peak hours. This suggests that the plans within the IDP will not support the delivery of 16,000 homes and sustainable development of the CMK area.
- 12.32 Another key infrastructure planning constraint on capacity in CMK lies in education provision. At present, there is just one early years provider operating in CMK, with no primary, secondary or SEND facilities at all operating for the 2,470 households situated within the Sub Area.
- 12.33 To meet the significant increase in demand it is outlined within the Strategic Site Profile in the IDP that the following education infrastructure will be required:
- 3,232 early years places
 - 12 form entries of primary school provision
 - 12 form entries of secondary school provision
 - 100 SEND pupil places and 61 alternative education places
 - 806 further education/college places
 - 153 adult education learning places
 - University offer
- 12.34 However, all of the identified need for early years, primary, secondary and SEND provision, as well as the majority of identified need for further education, adult education and university places is proposed to be delivered in Phases 2 and 3 of the MK Plan. This means there will be no provision until at least 2032. With 3,232 dwellings proposed to be completed in the short term (2024 to 2030), there will be potentially hundreds of additional school-age students with no nearby educational provision. This raises soundness points as the proposed housing delivery is not based on proportionate evidence relating to infrastructure.
- 12.35 It is important to note that this lack of coordinated provision is acknowledged in the Sustainability Appraisal, indicating an awareness that the levels of development and delivery of identified requirements are fundamentally unsound and inconsistent with national policy:
- “9.2.7. With regards to CMK, confidence is generated by Policy CMK1 Central Milton Keynes Development Framework Area, including its approach of planning for distinct ‘quarters’ but it is noted that there is no discussion of planning for schools capacity.”*
- 12.36 Healthcare and social care provision will also act as a key constraint against housing development. Existing provision is limited as outlined in the IDP, with no GPs located within CMK. Proposed growth within the plan will have the greatest impact on Fishermead and CMK

Medical Centres which are located in the North of CMK and South of CMK Sub Areas respectively. However, Fishermead Surgery is currently the most constrained GP practice in Milton Keynes and CMK Medical Centre does not have the capacity to absorb the significant population growth associated with 16,000 dwellings.

12.37 Health and social care infrastructure requirements are set out in the IDP and include:

- 1,800 sqm of primary healthcare floorspace (including GP services)
- 1,020 sqm of new dental facility space
- 6 community pharmacies
- 1,470 sqm of community and mental health services floorspace
- 523 bed spaces in residential social care for working age adults, 507 bed spaces for older persons
- 207 children's social care beds in foster homes

12.38 Similar to education provision, the majority of the infrastructure provision in health and social care is proposed to be delivered in Phases 2 and 3 of the MK Plan (2032 to 2050). There will therefore be inadequate provision and a lack of capacity for the 3,232 dwellings which are planned to be delivered in CMK between 2024 and 2030. As above, this raises soundness points as the proposed housing delivery is not based on proportionate evidence relating to infrastructure.

12.39 In terms of community facilities including libraries, youth services, community centres, and cultural facilities, it is identified within the IDP that a reconfiguration of these existing services and co-located community spaces is more appropriate to address growth than new facilities. However, it is also outlined that space requirements may therefore be combined.

12.40 To ensure a vibrant and thriving community as aimed for within Policy CMK1, it is essential that a balanced provision of services is achieved. Combining the space requirements for the facilities should not result in an overall lower or uneven level of provision.

12.41 To interrogate the recent completions and sites which have been granted planning permission, the 'existing commitments' within Appendix 8 of the Strategic Housing Land Availability Assessment (SHLAA) (November 2025) have been analysed in terms of their on-site infrastructure provision. This analysis reveals that applications have not consistently come forwards to include commercial and leisure units for uses such as retail, office, restaurant, and community spaces which are set out in Policy CMK1 (criterion E) as being required for a thriving and vibrant city centre.

12.42 Out of the 15 existing commitments, only 6² specify that retail units will be included on-site. 6³ of the sites specifically mention restaurant or food and drink uses within their planning documents, a further 3⁴ mention community uses and 3 include reference to commercial space with no additional detail provided. However, 5⁵ of the sites provide solely residential units or amenity space for residents only. It should also be noted that 6 of the sites were previously used for office space, meaning planning permission has resulted in the loss of

² Canalside Marina, Land to North of Glebe Roundabout, Silbury Court, Land Southeast of Saxon Court, The Point, Bank House

³ Canalside Marina, Land to North of Glebe Roundabout, Campbell Park View (MK Theatre MSCP), Land Southeast of Saxon Court, The Point, Bank House

⁴ Land to North of Glebe Roundabout, Campbell Park View (MK Theatre MSCP), Land Southeast of Saxon Court

⁵ Westminster House, Technology House, Tempus House, Station House Upward Extension, Sovereign Court Upward Extension

non-residential use in CMK. Therefore, potential soundness issues are raised against the delivery of additional city centre uses as set out in Policy CMK1 in terms of whether this would be effective.

- 12.43 The soundness of the allocation of 16,000 additional dwellings is therefore further undermined on the basis that it is not effective (NPPF paragraph 36c). There is a clear tension between the Quarters approach (and the other urban design constraints around heights for example) and the residential target. However, if the Quarters approach was changed then the non-residential targets around town centre uses would be jeopardised. The town centres uses for Central Milton Keynes are appropriate under the NPPF and is sound under Paragraph 36(d). However, the quantum of residential dwellings along with the other proposed land uses in the policy that are not deliverable when considered as a whole.
- 12.44 The SA indicates that the design and heritage tensions are going to continue. The primary focus of Historic England's consultation response from 2024 concerned the proposed very high growth strategy against the city's origins in low density development. Paragraph 9.9.6 of the SA states that Historic England will comment further and that there is potential to make adjustments to the strategy through the Examination. This is inconsistent with national policy as the Plan should be considered sound when submitted for Examination.

c) Summary

- 12.45 We consider that Policy CMK1 is unsound and will not meet the tests of soundness for the reasons set out below.
- 12.46 There is no evidence to suggest that Policy CMK1 is effective under Paragraph 36c) of the NPPF or would be deliverable over the plan period. Our analysis, including our mapping in Appendix 1, has identified that the residential dwellings are constrained by the proposed Quarters limiting the ability to deliver 16,000 additional dwellings. The existing commitments have thus far not consistently delivered additional uses including retail and leisure which contribute to a vibrant and thriving city centre as set out in the Policy.
- 12.47 Sufficient or compelling evidence surrounded infrastructure delivery has not been provided within the IDP to justify the proposed 16,000 homes in CMK, particularly surrounding healthcare and education provision. The Policy is therefore not justified as defined under Paragraph 36b of the NPPF.
- 12.48 As set out above, a significant proportion of the planned infrastructure delivery is proposed for Phases 2 and 3 of the MK City Plan, at which point it is intended that 3,232 homes will already have been delivered. It is also noted within the IDP that existing facilities including healthcare and highways infrastructure are at capacity. When considered alongside the IDP, Policy CMK1 is therefore not compliant with national policy which, as outlined in the section introduction, emphasises the need for infrastructure and facilities to have the capacity to support the population increase.

13.0 LOCAL PLAN – POLICY CMK2 CENTRAL MILTON KEYNES PLACEMAKING PRINCIPLES

a) Introduction and Policy Outline

- 13.1 Part A of Policy CMK2 states that “*development proposals should make provision for, and/or enhance, sustainable public transport, including Metro, and active travel to prioritise the use of the public realm for active modes of travel over private vehicles.*”
- 13.2 Part B of the Policy addresses parking and discusses how development proposals must manage the level of parking needed to support a vibrant city centre while maintaining high levels of convenience.
- 13.3 The Policy also states, in relation to density, that proposals that promote the sustainable use of land in ways which maintain the existing grid structure and make a positive contribution to skyline will be supported where, among other reasons, development would be in the following density ranges:
- Around 425 dwellings per hectare within Blocks B2/3, C2/3, D2/3 and E2/3
 - Around 135 dwellings per hectare within the Parkside Quarter
 - Around 350 dwellings per hectare elsewhere in the city centre

b) Policy Analysis

- 13.4 Part A of Policy CMK2 focuses on the need for development proposals to make provision for and enhance sustainable public transport, including the Metro, as well as active travel. The Traffic Modelling Review prepared by the Transport & Infrastructure team at DLP Planning (Appendix 2) reveals key issues associated with the delivery of the Mass Rapid Transit and active travel to be anticipated by 2050.
- 13.5 The Traffic Modelling Review note finds that the delivery of the MRT is only anticipated to generate a 1.8% mode share of all trips, with a maximum of around 3,000 journeys made on the MRT in the AM and PM peak hours. It was also found that the delivery of the MRT will increase vehicle congestion on and around its routes as its delivery repurposes available carriageway, reducing the number of lanes available for car use. Active travel movements are also predicted to fall.
- 13.6 It is also noted within Policy GS3 that Milton Keynes City has more jobs than working age population, further querying the necessity and proposed benefits associated with the delivery of the Metro.
- 13.7 The development proposals set out within the Draft City Plan therefore do not enhance sustainable public transport, including the Metro, or active travel routes.
- 13.8 To assess the implications of the 16,000 new homes on parking provision, analysis of the sites and capacities set out in Appendix 8.1 of the SHLAA was undertaken for each of the Density Scenarios. The sites in Appendix 8.1 were first distinguished as deliverable or non-deliverable based on their designation in Appendix 8. Out of the homes regarded as deliverable, the number of which are planned on existing parking sites was then established. The results of the analysis for each of the density scenarios is presented below.

Table 3: Proportion of Deliverable Homes Proposed for Existing Car Parking Land

| | Total Capacity | Total Deliverable | Total Deliverable on Current Car Parks | Deliverable on Car Parks as a % of Total Deliverable |
|--|-----------------------|--------------------------|---|---|
| Density Scenario 1 - Reg 18 Policy & Growth Study Densities | 18,550 | 16,015 | 9,812 | 61.3% |
| Density Scenario 2 - As per scenario 1, but densities on Rows at 100 dph | 16,115 | 13,579 | 7,376 | 54.3% |
| Density Scenario 3 - As per Scenario 1, but densities on Rows at 60 dph | 15,726 | 13,190 | 6,987 | 53.0% |
| Density Scenario 4 - Scenario 1 but assume only half of the land on the Rows and Gates come forward for residential | 15,166 | 12,631 | 6,428 | 50.9% |
| Density Scenario 5 - Inner and Outer densities as per draft policy, but Gates and Rows at 100 dph | 13,681 | 11,144 | 4,941 | 44.3% |

Source: DLP Analysis of SHLAA Appendices 8 and 8.1

- 13.9 Each of the density scenarios above are therefore quite heavily reliant on the development of current car parking and local service road sites. For example, in Density Scenario 1, which is the capacity of CMK based on the Regulation 18 Policy and Growth Study densities, 9,812 homes are proposed to be built on parking sites. This represents 61.3% of the total number of deliverable homes⁶.
- 13.10 Appendix 1 which is submitted alongside these representations visually presents the SHLAA sites which are currently car parking sites. The scale of such sites across CMK is immediately evident.
- 13.11 Although it is noted within the IDP that there is an over-supply of car parking spaces within MK, with 20,000 spaces in CMK alone, it is still highly significant that 36 of the proposed housing sites are situated on existing parking and existing local service roads. With the number of households and therefore the population increasing by over seven times by 2050, it is likely that this will create a significant additional demand for parking at the same time as the land available for parking is decreasing. A detailed analysis of location of car parking is also required. The local service roads' contribution to the Milton Keynes grid network needs to also be considered and a coherent proposal for their replacement provided.
- 13.12 An analysis of the sites recently completed or with extant planning permission as categorised

⁶ SHLAA IDs: 112041, 112046, 112047, 112048, 112051, 112052, 112053, 112054, 112056, 112059, 112061, 112062, 112063, 112064, 112066, 112068, 112071, 112072, 112073, 112074, 112075, 112076, 112077, 112078, 112095, 112096, 112097, 112098, 112099, 112101, 112102, 112103, 112104, 112105, 112109, 112109, 112121

as 'existing commitments' within Appendix 8 reveals that only a small number of these are providing car parking spaces whilst delivering, in some cases, hundreds of new units. Of the 15 sites regarded as existing commitments, 4 of these sites have been recently completed, 2 are under construction and 9 are extant permissions. 7 of these sites are providing car parking on-site, however further research into the developments reveals that in many cases this is limited provision and there is fewer than one space available per unit.

- 13.13 The Policy also sets out the maximum density for developments within CMK. As above, the 'existing commitments' within Appendix 8 of the SHLAA have been analysed in terms of their approved density. This density has then been compared to the allowed density as set out within the Policy. The table below shows the result of this analysis for each of the 15 sites.

Table 4: Site Densities of the Existing Commitments (SHLAA Appendix 8)

| Site Name | Site Area (ha) | Capacity (Planning Docs) | Proposed Density Limit (Reg 19 Plan) | Site Density (dph) |
|--|----------------|--------------------------|--------------------------------------|--------------------|
| Canalside Marina | 4.54 | 128 | 135 | 28 |
| Land to North Of Glebe Roundabout | 1.15 | 60 | 135 | 52 |
| Campbell Park View (MK Theatre MSCP) | 0.48 | 285 | 425 | 594 |
| Park Square (Former Wyevale Garden Centre) | 0.65 | 329 | 350 | 506 |
| Bowback House | 0.26 | 306 | 350 | 1177 |
| Silbury Court | 0.57 | 154 | 425 | 270 |
| Westminster House | 0.76 | 376 | 350 | 495 |
| Tempus House | 0.22 | 100 | 425 | 455 |
| Technology House | 0.09 | 53 | 350 | 589 |
| Station House Upward Extension | 0.34 | 64 | 350 | 188 |
| Land Southeast of Saxon Court | 0.34 | 288 | 350 | 847 |
| Former Jaipur Restaurant | 0.11 | 302 | 425 | 2745 |
| The Point | 0.87 | 487 | 425 | 560 |
| Bank House | 0.34 | 355 | 425 | 1044 |
| Sovereign Court Upward Extension | 0.17 | 42 | 425 | 247 |

Source: DLP Analysis of SHLAA Appendix 8 and 8.1

- 13.14 The above table reveals that 10 of the 15 existing commitments, highlighted in red, exceed the allowed density set out within the Regulation 19 Plan. These sites have been coloured blue in the attached Appendix 1 (accompanying the submission). Several of the sites have an exceptionally high density including Former Jaipur Restaurant (2745 dph), Bowback House (1177 dph) and Bank House (1044 dph). Silbury Court, Tempus House, Technology House and Sovereign Court Upward Extension all relied on permitted development to achieve the totals. Part F of Policy CMK2 states that proposals that promote the sustainable use of land will be supported where residential development would be within the density ranges set out for each of the Blocks.

- 13.15 This suggests that thus far developments, contrary to the expectations of sustainable development and density levels as indicated in Policy CMK2, have been, and are being, relied upon to contribute to delivery against the requirement for 16,000 homes as set out within Policy CMK1.
- 13.16 It is key to note that despite a significant change in approach between the Regulation 18 and Regulation 19 version draft Plans the SHLAA evidence base still uses the density of recently permitted schemes to inform the overall estimate of capacity. This is confirmed by Appendix 8.2 of the SHLAA2025, prepared by Montagu Evans.
- 13.17 Initial assessments of densities recently permitted and delivered have been taken forward to inform indicative density and capacity calculations for specific parcels in the SHLAA 2025 (albeit in some cases subject to an uplift as explained in Appendix 8.2 and the SHLAA2024 Appendix 9). While Appendix 8.2 states that other site-specific information has been used in some instances this in practice only really affects sites with permission (typically at higher densities).
- 13.18 The main distinction between the approaches is that whereas in the 2024 SHLAA these assumptions were applied on the basis of blocks in CMK, and subject to tempering of assumptions for land use and plot ratio in different parts of the city centre, in the 2025 SHLAA the relevant densities have been applied specifically to a list of specifically identified sites. Different Density Scenarios 2-5 are then derived based on the specific location of sites (e.g., within Gates and Rows). The main issue with this is that as demonstrated by our analysis the Growth Study average densities are still substantially informed by permitted schemes that in many instances (and by definition) exceed the Growth Study densities used to calculate an overall average.
- 13.19 While the application of capacity assumptions to specific sites is generally more consistent with policy and guidance regarding land availability assessment there is a far bigger risk to the effectiveness of such an approach within the finer-grained setting of CMK where it relies on an average and a relatively small sample of permitted development. This is apparent when reading back the approach at Appendix 9 of the 2024 SHLAA based on applying a similar methodology to overall blocks. This acknowledges, for example, that the city is at a “relatively early stage” of increasing population and residential use of the city centre and as a result many of the recently consented schemes face barriers to delivery and viability (even where seeking higher densities) and comprise only studio to two-bedroom accommodation. The strategic approach also needs to take account of permitted development on recent trends.
- 13.20 The outputs in Appendix 9 of the 2024 SHLAA are net of a then-committed total of 4,429 units in the pipeline (including allocations and Permitted Development). The 2025 SHLAA, having reviewed some allocations for deliverability and updating completions, presents a lower pipeline figure (3,323 dwellings; indicating that some of the original pipeline faces constraints to development and the 2024 SHLAA totals were likely to be an overestimate).
- 13.21 In any case, when the pipeline is deducted the SHLAA 2024 summarises that:
- “The LAA residential analysis shows that there is a significant opportunity to accommodate new homes in Central Milton Keynes. We have tested various scenarios, and our conclusion is that even without relying on residential densities of 425 dph in the Central spine, Central Milton Keynes can accommodate between 10,900 and 14,000 new homes (the former being tested on the basis of very limited residential developments in grids A and B). A higher dph of 425 in the Central spine does not dramatically increase*

housing delivery (11,500 and 14,700 respectively)”

- 13.22 The figures in the recommended range apply some flexibility in terms of zones of density and the lower end of the range acknowledges a greater allowance for flexibility for other non-residential land uses in CMK. What is clear is that the lower end of the previously recommended approach and range (11,500 or 10,900 dwellings) inclusive of the current pipeline (3,323 dwellings) is materially less than the 16,000 dwellings identified in the Pre-Submission version Plan. This indicates that applying averages to specific sites is counteracting the flexibility for different land uses, reductions in the pipeline and other flexibilities allowed for in the previous approach to testing notwithstanding that in practice this would mean that delivery of all sites identified in the 2025 SHLAA would be required in their entirety and in many cases at densities in excess of the ‘average’ derived from SHLAA2025 Appendix 8.2/SHLAA2024 Appendix 9.
- 13.23 This overall approach to capacity assessment, and specifically the generation of the 16,000 figure applied in the Submission version Plan is fundamentally unsound in terms of informing justified and effective future decisions on land use.
- 13.24 Analysis has been undertaken on each of the sites within Appendices 8 and 8.1 to understand the proportion of the identified capacity which is already approved or planned to exceed density limits. The lower figure out of either the actual site density (based on the agreed capacity) or the site density limit (Regulation 19 Plan) has been summed to constitute the capacity if the Regulation 19 site density limits were adhered to. The results of the analysis for each density scenario are shown in the table below:

Table 5: Capacity if Regulation 19 Plan Density Limits were Adhered to

| | Total Capacity | Capacity if Density Limits were Adhered to | % of Capacity which Exceeds Density Limits |
|--|-----------------------|---|---|
| Density Scenario 1 - Reg 18 Policy & Growth Study Densities | 18,550 | 16,612 | 10.5% |
| Density Scenario 2 - As per scenario 1, but densities on Rows at 100 dph | 16,115 | 15,263 | 5.3% |
| Density Scenario 3 - As per Scenario 1, but densities on Rows at 60 dph | 15,726 | 15,047 | 4.3% |
| Density Scenario 4 - Scenario 1 but assume only half of the land on the Rows and Gates come forward for residential | 15,166 | 13,092 | 13.7% |
| Density Scenario 5 - Inner and Outer densities as per draft policy, but Gates and Rows at 100 dph | 13,681 | 11,501 | 15.9% |

Source: DLP Analysis of Appendices 8 and 8.1

- 13.25 The capacities of each of the scenarios is therefore lowered by between 4.3% and 15.9% if the density limits set out within the Regulation 19 Plan were adhered to. This suggests the 16,000 homes target is unjustified as it cannot realistically be delivered in line with sustainable density limits. The aim for 16,000 new housing units is therefore not be effective as the Plan would fail to deliver sustainable development.
- 13.26 The place making issues are borne out in recent planning applications on Campbell Parkside North, which is within the residential-led “Parkside Quarter”:
- Planning Application Reference: 24/01612/FUL at Campbell Park Northside Phase 1, Overgate, Campbell Park, Milton Keynes for *“The construction of 397 residential apartments (use class C3), a canalside cafe (use class E), and a new pedestrian and cycle link through the site to connect the existing redway network with associated landscaping, drainage, access, parking and infrastructure. EIA development”* was refused at Planning Committee for the heritage reasons:
- The proposal would result in less than substantial harm, at the moderate level, to the Grade II Listed Register Park and Garden (Campbell Park). The public benefits arising are not considered to clearly and demonstrably outweigh the harm caused by the scale and massing, resulting in an incongruous, dominant, and isolated feature within key views and the experience of the lower park. The proposal is contrary to Policy HE1 of Plan:MK and Paragraph 215 of the National Planning Policy Framework (NPPF).*
- 13.27 The application, which is in Block H1, followed the withdrawal of a previous scheme on the site. The proposals were for a buy to rent scheme comprising five building plots:
- Plot A: a ground + 5-storey building accommodating 51 dwellings;
 - Plot B: a ground + 9-storey building accommodating 90 dwellings;
 - Plot C: a ground + 5-storey building accommodating 46 dwellings;
 - Plot D: a ground + 11-storey building accommodating 114 dwellings; and
 - Plot E: a ground + 6-storey building accommodating 96 dwellings, along with the localised car parking for 274 spaces.
- 13.28 The scale, massing and orientation of the buildings was also fundamental in the planning balance. No affordable housing was proposed on the site on viability grounds.
- 13.29 It is important to note that concerns arising from previous applications in respect of affordable housing and housing mix underpin wider soundness concerns with the effectiveness of proposed policies on these matters in the emerging Plan and their achievability in CMK. This concern is supported by the Sustainability Appraisal for the Plan which states at paragraph 9.10.2 *“CMK – it is important to recognise that there will be limited potential to deliver affordable housing and also family housing”* and expands in relation to affordable housing:
- “Requirements have been adjusted since the Regulation 18 stage, and the headline requirement is now: 40% in Housing Viability Area 1; 20% in Housing Viability Area 2; and 10% in Housing Viability Area 3. Specifically, there is now a reduced requirement for affordable housing in the lower viability areas including CMK.”*
- 13.30 In circumstances where the policies of the Plan (albeit not specific land use allocations) commit the Plan to the proposed level of buffer against the housing requirement based on

assumptions for the quantum of development in CMK the Sustainability Appraisal should fully reflect the uncertain effects of this approach. It logically follows that more specific allocation of land uses, and potentially stricter control over total levels of development would reduce these uncertain effects.

- 13.31 The application was recommended for approval by officers, however, as set out above this was overturned at Committee by Members based on the conflict between the proposed development and the existing Campbell Park's heritage value. Several other consultees also commented on the heights of the buildings being higher than the surrounds. The planning officer's recommendation for approval was contrary to the Conservation Officer's consultee response which objected to the application. There was no heritage objection to the principle of residential development of the sites, and their allocation was noted by the Conservation Officer, however the specific design of the proposals and their impact on the heritage aspects of the park was objected to. The orientation, scale and massing of the buildings was a key aspect in the impact. In coming to their determination, the Members placed greater weight on this objection than the case officer as they are entitled to do.
- 13.32 A resubmission has been made on this site reference: PLN/2025/2013 for *"The construction of 306 residential apartments (use class C3), a canal side café (use class E), and a new pedestrian and cycle link through the site to connect the existing Redway network with associated landscaping, drainage, access, parking and infrastructure. EIA development"* and this proposal is now under consideration. The proposal has reduced the number of new residential dwellings by 91 which is approximately one quarter fewer dwellings. The density proposed is 130 dwellings per hectare which is broadly in line with the Regulation 19 City Plan Policy CMK2 Policy of 135 dwellings per hectare. However mathematically to deliver 16,000 dwellings this approach does not stack up. The reality, with the constraints on sites and principles of good design applied through the development management process, demonstrates that in this instance (having regard to the character of CMK) an appropriate quantum of development will be materially less than the assumptions behind the emerging Plan's evidence base.
- 13.33 This therefore demonstrates that there are wider placemaking principles at play and a simplistic approach of high densities cannot be relied upon to achieve an additional 16,000 dwellings in Central Milton Keynes. As such the proposals are not effective or consistent with national planning policy.
- 13.34 A planning application is currently being determined at Campbell Park Northside Phases 2-5 which covers blocks G1 (excluding G1.4S) and F1.2 1.3 1.4, reference: PLN/2025/0703. The application is for:
- "Outline permission (all matters reserved) for residential development, for a maximum of 1,850 dwellings inclusive of up to 300 later living units (use class C2/C3), up to 300 student accommodation units (sui generis), up to 1 ha of self-build land and up to 2,800 sq. m of non-residential floorspace (use class E and F)"*
- 13.35 The application has received a number of objections and comments including:
- National Highways holding objection due to the impact on the M1 J14 and A5 Portway Roundabout in the AM and PM peaks.
 - Active Travel England deferral due to lack of data other than on travel to work data from the 2011 census which does not encompass the wide variety of trips being taken throughout the day and does not reflect the wider demographics on site. The proposed target of 34% for active travel mode share was not sufficiently ambitious

or in line with the Government's objectives.

- MKCC Landscape architect- open space typologies are not evidenced by a land use calculations plan with adequate calculations and buffers as per policy. Play space and outdoor gyms must also be for appropriate ages and with adequate buffers. There needs to be allotment provision on site or nearby. Sports provision is not identified but the new population size could put an unrealistic burden on existing sports facilities in the area. Street trees need to be provided as per policy and should not conflict with any utilities including lighting. Concerns that some 9 storey buildings are too high. The daylight and sunlight assessment only considers the existing dwellings not the proposed dwellings.
- MK Parks Trust- does not object however notes that proximity to Campbell Park does not mean that the development can rely on Campbell Park as is and further demand will be placed on the park. The Park is recognised as a public space for all of the City of Milton Keynes and adequate car parking will be required near to the park and careful management of car parks in Central Milton Keynes. Concerns over 9 storey tall buildings and their impact on the park.

13.36 This application has not yet been determined, however there are relevant issues around placemaking which need to be resolved. The application highlights the tensions between maximising density (the proposals are for 1850 dwellings rather than the allocated 1500) and the other necessary infrastructure and land uses without creating compromised development.

14.0 LOCAL PLAN – POLICY CMK3 CENTRAL MILTON KEYNES SKYLINE AND TALL BUILDINGS STRATEGY

a) Introduction and Policy Outline

14.1 Policy CMK3 Part A of the Regulation 19 plan states:

“A. Proposals that contribute to creating a distinctive skyline in Central Milton Keynes will be supported where they:

1. *Propose buildings of high-quality design and architecture that do not exceed the Central Milton Keynes Building Height Thresholds shown on the Policies Map and which are in accordance with Policies CMK2...*
2. *Where a site spans across two or more threshold zones, the lower threshold zone is the one that triggers how this policy is applied.”*

b) Policy Analysis

14.2 To assess the implications of the Tall Buildings Strategy for the housing target of 16,000 units, we have analysed the planning documents of the existing commitments. The following table sets out the approved building heights and the limits set out in the Plan.

Table 6: Building Height of the Existing Commitments (SHLAA Appendix 8)

| Site Name | Proposed Building Height Threshold (Regulation 19 Plan) | Max Actual Building Height (Planning Docs) |
|--|---|--|
| Canalside Marina | 8 Storeys | 8 Storeys |
| Land to North Of Glebe Roundabout | 8 Storeys | 4 Storeys |
| Campbell Park View (MK Theatre MSCP) | 15 Storeys | 25 Storeys |
| Park Square (Former Wyevale Garden Centre) | 15 Storeys | 11 Storeys |
| Bowback House | 8 Storeys | 14 Storeys |
| Silbury Court | 15 Storeys | 6 Storeys |
| Westminster House | 15 Storeys | 9 Storeys |
| Tempus House | 20 Storeys | 5 Storeys |
| Technology House | 15 Storeys | 5 Storeys |
| Station House Upward Extension | 15 Storeys | 8 Storeys |
| Land Southeast of Saxon Court | 8 Storeys | 34 Storeys |
| Former Jaipur Restaurant | 15 Storeys | 33 Storeys |
| The Point | 15 Storeys | 21 Storeys |
| Bank House | 20 Storeys | 20 Storeys |
| Sovereign Court Upward Extension | 20 Storeys | 5 Storeys |

Source: DLP Analysis of SHLAA Appendices 8 and 8.1

14.3 The analysis reveals that 5 out of the 15 sites exceed the allowed height as set out within the Regulation 19 Plan, with Land Southeast of Saxon Court (34 storeys against a limit of 8),

former Jaipur restaurant (33 storeys against a limit of 15) and Campbell Park View (25 storeys against a limit of 15) standing out as especially significant.

- 14.4 Our analysis of Policy CMK3 demonstrates inconsistency between the Plan's housing target and the building height thresholds set out in the Regulation 19 version of the Plan. The Policy establishes strict height thresholds for CMK, designed to ensure a distinctive skyline without creating negative visual, functional or environmental effects. However, several existing committed developments included within the 16,000 home target already exceed these thresholds. A proportion of the CMK housing requirement is therefore dependent on developments that could not be delivered were the height limits applied as written.
- 14.5 With the raised points regarding accommodating mixed uses and servicing/utilities which would change plot ratios, there is perhaps not necessarily much scope to limit storey height without also facing potential other restrictions on site capacity to achieve the assumptions for the 16,000 figure. The issues identified with the approach to capacity generation at Appendix 8 of the 2025 SHLAA (when compared with Appendix 9 of the 2024 SHLAA) further demonstrate the difficulty of applying average assumptions on density to specific sites. This applies particularly when sites are assumed to accommodate mixed uses, contrary to the evidence of previous permissions. This is as opposed to applying generic density assumptions to overall blocks, which generated on balance lower recommended totals for CMK once allowing for other land uses.

c) Summary

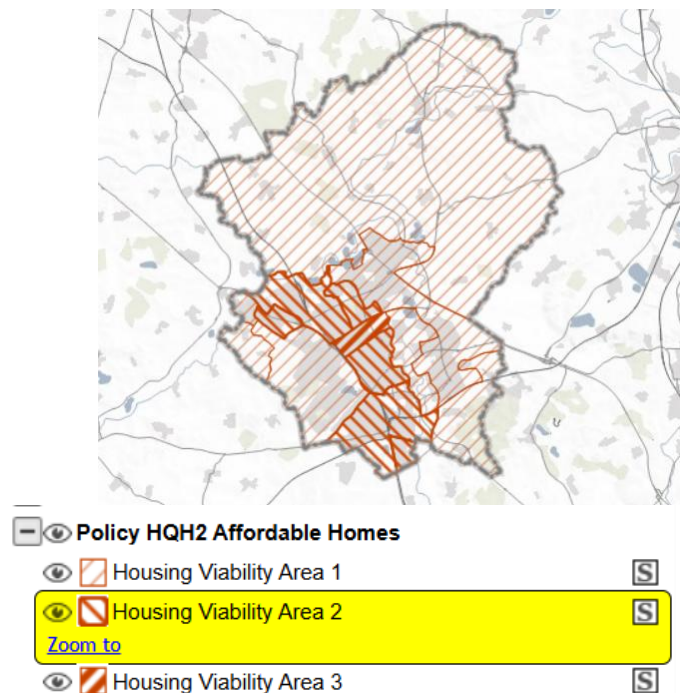
- 14.6 The analysis indicates that the 16,000-home target is not realistically deliverable under the Plan's own height policies. Counting commitments that exceed the height thresholds inflates the 16,000 figure and overstates the Plan's ability to meet assessed housing needs. This means the housing requirement is not fully justified, as it does not reflect existing development patterns or the constraints introduced by Policy CMK3.
- 14.7 To ensure the Plan is both positively prepared and effective, the housing target should be revised to reflect what can genuinely be delivered within the proposed height limits. Without such adjustments, the Plan fails the soundness tests in paragraph 36 of the NPPF.

15.0 LOCAL PLAN – POLICY HQH2 AFFORDABLE HOMES

a) Introduction and Policy Outline

15.1 The Policy sets out the sites over 10 dwellings must provide affordable housing. The proportions are split into housing viability areas:

- 40% in Housing Viability Area 1
- 20% in Housing Viability Area 2
- 10% in Housing Viability Area 3



15.2 The Policy also sets out the expected percentages of tenure mix which should be achieved unless site specific considerations dictate otherwise:

- 13% Affordable Home Ownership;
- 67% Social Rent; and
- 20% Affordable Rent

15.3 Where proposals are for solely Build-to-Rent schemes a financial contribution in lieu of on-site provision will be accepted subject to a viability assessment.

15.4 There is also a policy presumption against more than 50% affordable housing being delivered on sites unless criteria on certain number and mix of types and tenure are met, namely:

- Is the need evidenced by an up-to-date housing needs assessment that clearly demonstrates the need for the development in that location;
- Will create or maintain a mixed and sustainable community, considering tenure mix within the wider estate or neighbourhood.

b) Policy Analysis

15.5 The HEDNA states that 15,579 affordable dwellings are required over the plan period which

equates to approximately 30% which is 556 per annum over the 28-year plan period. The HEDNA Update has identified 5,704 households living in unsuitable housing taking account of the latest information with a reference date of 2022 (aligned to the base date of the Plan) (paragraph 33).

- 15.6 The draft Milton Keynes City Plan does not seek to address the extant need early on in the Plan period. In this regard there is therefore a failure to positively plan under paragraph 36(a) of the NPPF. There is also a risk that affordable housing will either not be delivered until later in the Plan period as the sites delivering the highest levels of affordable housing in Viability Area 1 form larger urban extension sites which will take time to deliver and has set out in the policies some sites will deliver housing beyond the plan period, for example GS14 Eastern City Extension is due to deliver 16000 homes, but only 7,750 within the Plan Period. This demonstrates the length of time that larger sites can take to deliver.
- 15.7 In the Draft Plan 27% housing is due to be delivered in viability area 1 (Central Milton Keynes). The Milton Keynes Whole Plan Viability Study Residential Update Note October 2025 proposes that affordable housing should be split as follows:
- In Housing Viability Area 1 (Rural/High Value/Flanks) 30%
 - Greenfield Strategic Sites 40%
 - In Housing Viability Area 2 (Older Centres and City Estates) 20%
 - In Housing Viability Area 3 (Central Milton Keynes) 10%
- 15.8 This is not the approach that the Draft Plan takes and therefore the approach taken of merging Greenfield Strategic Sites into Housing Viability Area 1 with a 40% affordable housing requirement in this area is not justified on the evidence (contrary to paragraph 36 of the NPPF).
- 15.9 The Study Update also highlights the issues around delivery rates and viability on brownfield and large sites.
- “8.25 As was the case in 2024, if the Council were to follow suggestion, it would be necessary to be cautious in relying on brownfield sites in the five year land supply and overall housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters. This may influence the selection of sites for allocation.*
- 8.26 Also, and as set out earlier in the 2024 WPVA, the delivery of any very large site is challenging. It is recommended that the Council engages with the owners and promoters of the Strategic Sites in line with the advice set out in the Harman Guidance, and only includes these sites in the new Local Plan if they can be demonstrated to be viable”.*
- 15.10 There is therefore a risk that adequate affordable housing will not be provided across the Plan area. There are already recognised viability challenges with even 10% affordable housing in Central Milton Keynes as evidenced in recent consents. Should the sites in Viability Area 1 face viability issues which results in less than 40% affordable housing there is limited opportunities to recoup this lost affordable housing in Viability Areas 1 and 2, due to the policy position which includes a presumption against 50% affordable housing on sites, and their viability. The reliance on very dense schemes in Central Milton Keynes therefore,

results in a need to create large, flatted schemes in tall buildings, has the potential to exacerbate the issues of securing affordable housing in the Plan area and creating a mixed community in the Central Milton Keynes area.

- 15.11 The HEDNA also concludes that more residents in affordable housing have a wheelchair user than private housing:

Figure 22: Households needing Wheelchair Adapted Housing Using Standard Method Housing Need (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

| Modelled Need for Wheelchair Adapted Housing | 2022 | 2050 | Net change 2022-50 |
|--|--------------|--------------|--------------------|
| Market Housing | 2,060 | 3,390 | +1,330 |
| Affordable Housing | 1,650 | 3,450 | +1,810 |
| Total | 3,710 | 6,840 | +3,130 |

- 15.12 By taking an annualised approach rather than meting the existing need there is a risk of discrimination against those who are disabled as they will have to wait longer to access an accessible affordable home than those who are not disabled as they are limited to what types of houses are build which are suitable for their needs. The Planning Practice Guidance is clear that local planning authorities must adhere to the requirements of the Equality Act (PPG “*Chapter Housing needs of different groups*”). The Policies need to also ensure that those with disabilities are not excluded from city centre living due to the further, affordable housing stock being further limited by the Viability Area approach limiting affordable housing to only 10% set out in this policy. This is further compounded by acknowledging offsite contributions for build-to-rent properties as there is no clarity on where that in lieu funding will be spent and if there is capacity to spend that money within Central Milton Keynes and so it risks excluding those with disabilities who need affordable housing from city centre
- 15.13 It is noted that the data also shows that 64% of the increase for accessible housing comes from the over 75 age group. There is the potential for specialist housing for this group can be provided in Central Milton Keynes and this has been seen in the applications received today in Campbell Park North. However, greater modelling should be done on this to ensure that younger disabled people are not excluded from Central Milton Keynes.
- 15.14 The Equalities Impact Assessment 2025 fails to consider the unequal waiting times and the resulting impact on those with disabilities and in need of affordable housing vs the general population. It correctly identified the positive impact of greater provision of affordable and specialist housing, but not the longer waiting time for those with those needs. There needs to be clarity that the proposals are in accordance with the Planning Practice Guidance chapters on “*Housing for older and disabled people*” and “*Housing needs of different groups*” in order for the Plan to be sound under paragraph 36 of the NPPF in terms of being positively prepared, justified and in accordance with national policy.

c) Conclusion

- 15.15 The approach to affordable housing is not fully evidenced and justified by the supporting documents and the potential viability of schemes in Central Milton Keynes has not been fully set out in accordance with the Harman Review 2012. There is also a failure to secure mixed and balanced communities as set out in paragraphs 64 and 71 of the NPPF. The Draft City Plan is therefore not sound in this regard as required under paragraph 36 of the NPPF.

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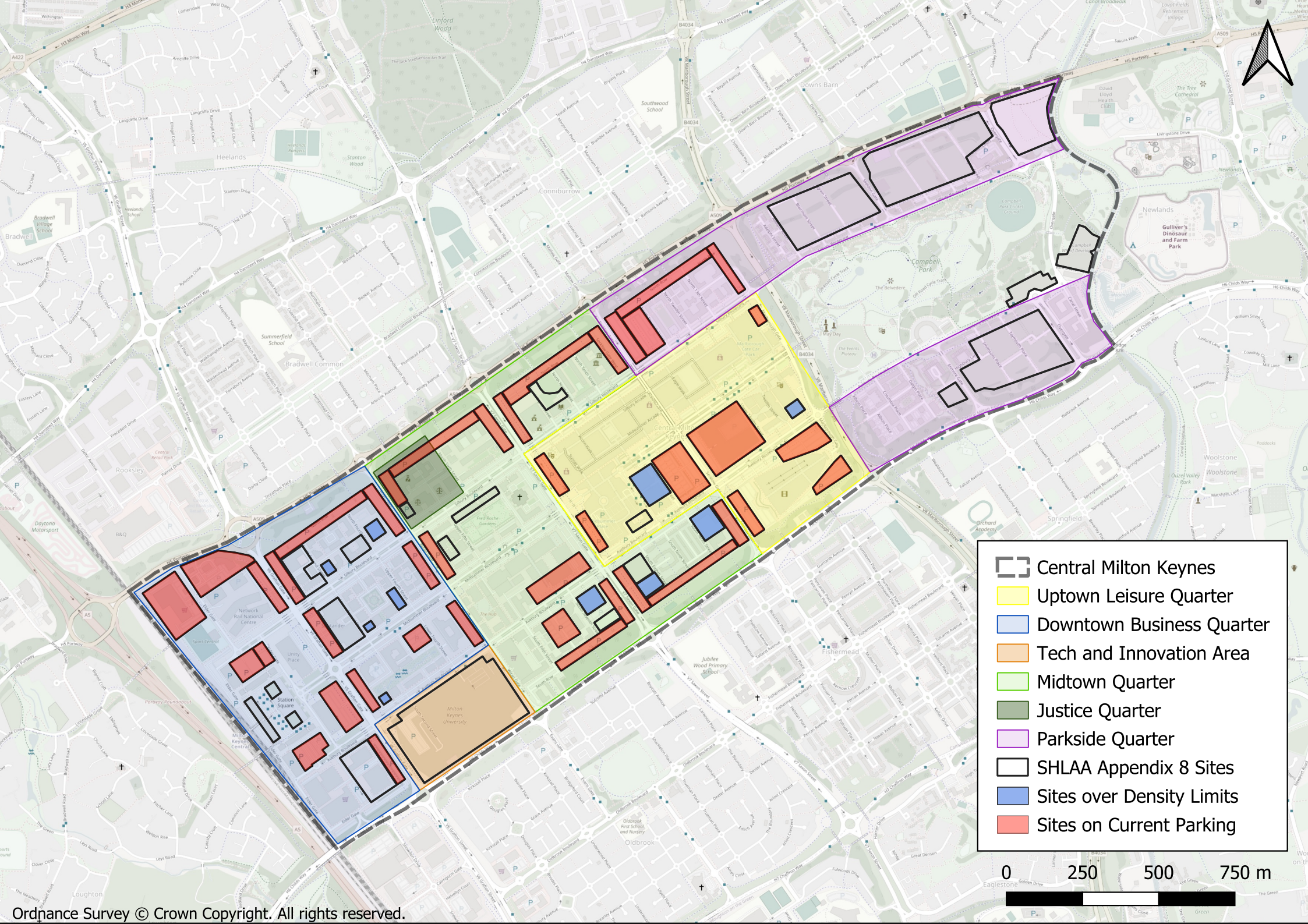












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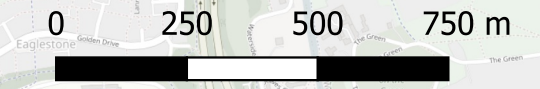
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-  Central Milton Keynes
-  Uptown Leisure Quarter
-  Downtown Business Quarter
-  Tech and Innovation Area
-  Midtown Quarter
-  Justice Quarter
-  Parkside Quarter
-  SHLAA Appendix 8 Sites
-  Sites over Density Limits
-  Sites on Current Parking





**Transport &
Infrastructure**

For and on behalf of
Central Milton Keynes Town Council

Milton Keynes City Plan 2050 Traffic Modelling Document Review Report

Central Milton Keynes – Modelling Review

**Prepared by
DLP Planning Ltd
Transport and Infrastructure
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December 2025

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1.0 INTRODUCTION

- 1.1 This report has been prepared by the Transport and Infrastructure team of DLP Planning Limited (DLP) and is a review of the published Transport Evidence base that has been prepared by Milton Keynes City Council (MKCC) to inform the Regulation 19 emerging Milton Keynes Local Plan, known as the Milton Keynes City Plan 2050 (MKCP 2050).
- 1.2 This report has been prepared on behalf of Central Milton Keynes Town Council (CMKTC) who have concerns over the suitability of the traffic modelling undertaken to inform the MKCP 2050 document. Of particular concern to CMKTC is whether robust assumptions and subsequent assessments have been made in terms of how forecast vehicle movements that could be generated by the proposed 13,000 new dwellings and associated employment land uses will impact on the immediate and surrounding road network of the CMKTC area.
- 1.3 As set out, this report primarily focuses on the evidence base that is publicly accessible on the MKCC MKCP 2050 Evidence Base website. These documents include:
- Milton Keynes Multi-Modal Transport Model – MKCP Forecasting Report – V3.0 5th November 2025; and
 - Milton Keynes Multi-Modal Transport Testing – MKCP – V1 – October 2025.
- 1.4 In addition to the above, a further report, which was not publicly available on the Evidence Base website, has also been reviewed. This report is titled 'Milton Keynes Multi-Modal Transport Model – MKCP Forecasting Report – V3.1 11th February 2025' and is regularly cited in the footnotes of the November 2025 version of the report of the same name that is available on the Evidence Base website. As set out, the February 2025 report was not available on the MKCC Evidence Base website and was obtained through a freedom of information request from a third party and accessible as a download associated with the response to said request.
- 1.5 Whilst it has been reviewed as part of this work, the 'Milton Keynes Multi-Modal Transport Testing – MKCP – V1 – October 2025' provides a short non-technical summary of the 'Milton Keynes Multi-Modal Transport Model – MKCP Forecasting Reports' – February 2025 and 5th November 2025 and as such, it is these reports that are reviewed in depth as part of this document.

- 1.6 Based on our initial discussions, we understand that CMKTC would like to understand the key principles behind the vehicle trip generation that has been allowed for in the modelling work as well as the mode split assumptions and the implications of the delivery of the proposed Milton Keynes Mass Rapid Transport (MRT) programme, and how this will impact mode shift and split. In addition, we understand that CMKTC would also like to know if the transport modelling undertaken takes in to account the potential severing of any key vehicle routes through CMKTC's area.
- 1.7 Whilst, based on the publicly available reports, it is not possible to definitively answer all of the key questions posed by CMKTC, this report summarises the key results of the documents and the assumptions (where explicitly listed) on which the results are based.
- 1.8 Please note, this report reflects DLP interpretation of the information that is in the public domain. As DLP do not have access to the specific models used to generate the results set out in the transport Evidence Base documents it is not possible to undertake a full technical audit of the work undertaken.

2.0 MILTON KEYNES MULTI-MODAL TRANSPORT MODEL

MKCP FORECASTING REPORT – V3.0 5TH NOVEMBER 2025 AND V3.1 11TH FEBRUARY 2025 REVIEW

- 2.1 This report provides a summary and assessment of the February and November 2025 MKCP 2050 multi-modal forecasting studies, with particular emphasis on the potential impacts on traffic flows and delays across roads within the CMKTC area.
- 2.2 The MKCP reports present the key inputs and outcomes of modelling work commissioned by MKCC to evaluate growth associated with the forthcoming MKCP 2050. The modelling has been undertaken using the Milton Keynes Multi-Modal Model (MKMMM).
- 2.3 The MKMMM is a ‘macro Saturn’ traffic simulation model that covers the whole of Great Britain, with a particular focus on the Milton Keynes area. While this type of model is well-suited to assessing the broad impacts of changing traffic flows, it does not provide detailed junction or link capacity analysis. Consequently, further junction-level modelling is typically required to fully understand the effects of development traffic once the macro-level model (in this case, the Saturn model) has identified the links or junctions most likely to experience significant increases in traffic.
- 2.4 The November 2025 Forecasting Report summarises the results of traffic forecasting models prepared for 2031, 2040, and 2050 to test the MKCP 2050 growth scenarios. On page 1, paragraph 1.1.2 it also states that the *“The assumptions and model outputs for the latest Forecast Reference Case scenarios for 2031, 2040 and 2050 are documented in a Traffic Forecasting Report (TFR)¹.”*
- 2.5 It has not been possible to obtain a copy of the TFR - *“Milton Keynes Multi-Modal Model 2019 - Forecasting Report v3.1.pdf* referred to in paragraph 1.1.2 via a search of publicly available data sources. However, the PDF file name of the February 2025 forecasting report (which was obtained by DLP from documents published as part of a response to a freedom of information request from a third party) is v3.1 and the PDF file name of the report references 2019. As such, it is not clear as to whether the *“Milton Keynes Multi-Modal Model 2019 - Forecasting Report v3.1.pdf* is a separate standalone document or whether the *February 2025 v3.1 document*, which was obtained via a freedom of information request is the report that is referenced in the November 2025 document. DLP’s view is that, the Local Plan Evidence Base should not have been published without full clarity and the full suite of

documents that are referred to in the final November 2025 modelling report. This should be clarified with MKCC.

- 2.6 Both the November 2025 and February 2025 reports adopt a broadly similar format. Accordingly, this assessment focuses on the November 2025 document, as it contains the most recent and comprehensive growth scenarios tested by MKCC. Where the February 2025 report provides additional detail beyond that included in the November 2025 version, those findings are also referenced.
- 2.7 In addition to the baseline and future development scenarios, the November 2025 report also provides an assessment on the potential impact of the delivery of the proposed Milton Keynes Mass Rapid Transport (MRT) scheme. Further details on the MRT are set out later in this report but in summary, the MRT is anticipated to provide a predominantly on-carriageway rapid transport scheme where the existing carriageway would be re-prioritised to allow for the exclusive use of MRT vehicles.
- 2.8 For clarity, this report sets out the key matters that are assessed and reported on in the same order as the MKCC documents. Where appropriate the November 2025 report is cross referenced with the February report to confirm if the earlier report provides more information than the latter November 2025 document.

Model Information Forecasting Assumptions

- 2.9 Chapter 2 of the MKCC November 2025 report details the assumptions adopted in preparing the MKCP 2050 scenario forecast models. This includes information on the MKCP growth assumptions, highway network amendments, the uncertainty log and the forecast economic parameters.
- 2.10 The following two forecast scenarios were run as part of the assessment of the proposed MKCP impacts, one of which also includes the proposed MRT scheme for Milton Keynes.
- Priority 1 – MKCP scenario tests in 2050 with the MRT (MKCPM2050); and
 - Priority 2 – MKCP scenario tests in 2050 without MRT and without MRT associated housing developments – sensitivity test (MKCP2050).
- 2.11 Forecasting years assessed are 2031, 2040 and 2050.
- 2.12 In terms of growth assumptions, the November 2025 report provides two assumptions

namely Priority 1 and Priority 2. Priority 1 allows for 33,743 new dwellings by 2050 within the MKCC area with 12,279 of these allowed for in CMKTC area.

2.13 In Priority 2, 31,227 dwellings are proposed with the reduction of 2,516 related to the fact that these dwellings were proposed to be delivered as part of the MRT, which is not allowed for in Priority 2. The same number of dwellings are forecast in the CMKTC area in Priority 2 as Priority 1.

2.14 In terms of jobs/employment, the November 2025 report allows for a total of 31,663 additional jobs in the Milton Keynes area in 2050 with 15,030 of these being delivered in the CMKTC area.

MRT Assumptions

2.15 The routes of the proposed MRT that have informed the MKCC traffic modelling is set out in paragraphs 2.7.1 and 2.7.2 of the November 2025 report. A snapshot of the routes used in the modelling is shown below in **Figure 1**.

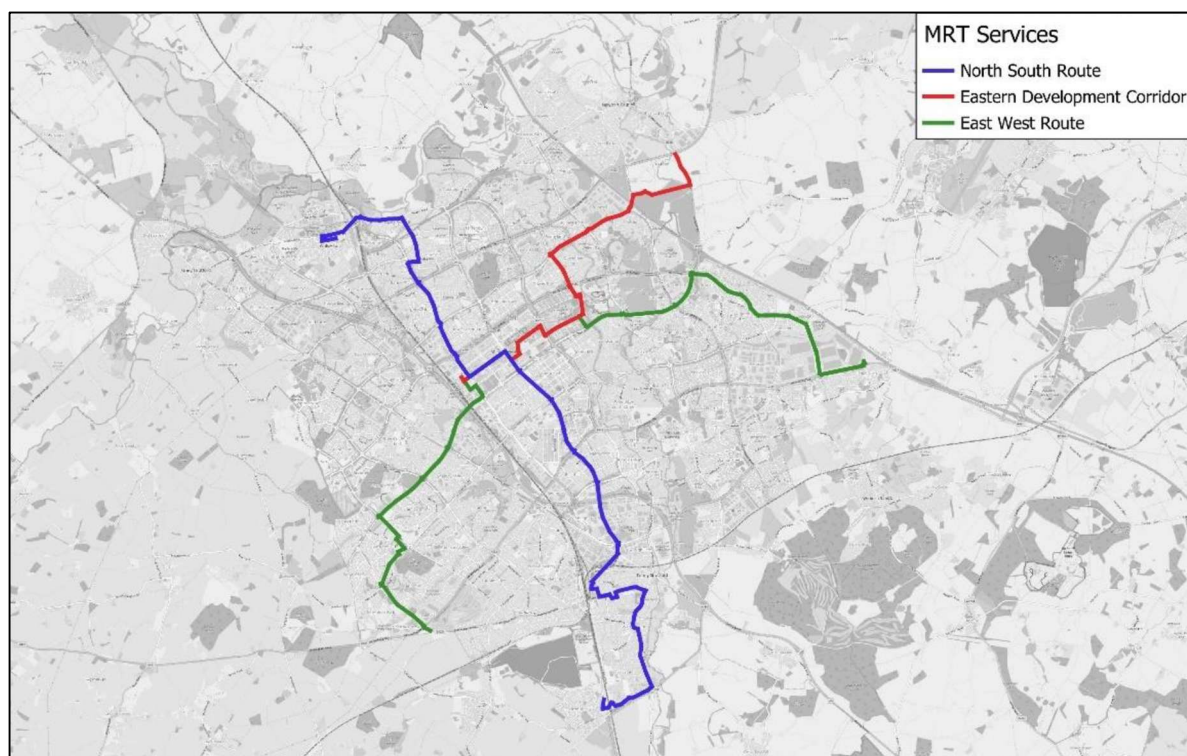


Figure 1: Proposed MRT Routes

Parking Assumptions

- 2.16 Changes in the potential parking provision within Milton Keynes and in particular within the CMKTC area between 2019 and 2031 are set out in Paragraph 2.7.1 and Table 2.11 of the February 2025 report. This information is included in the ‘uncertainty log’ which informs the modelling that is reported on in both the February and November reports. Table 2.11 of the February 2025 report is shown as a snapshot in **Figure 2** below. This indicates that the traffic modelling undertaken assumes that there will be an overall increase in ‘private non-residential’ parking provision in CMKTC areas when comparing 2019 to 2031.
- 2.17 Whilst it is indicated that the traffic modelling undertaken reflects an overall increase in parking provision within the CMKTC area, there is no further information on the ‘parking model’ referenced or justification for or analysis of the parking changes within the wider Evidence Base documents. Therefore, in DLP’s view, it is not possible to fully assess the accuracy of this key input utilising the information provided as part of the Local Plan Evidence Base.

Table 2.11: Changes to Central Milton Keynes PNR Parking Spaces

| CMK Area | Zone | 2019 | 2031 | Difference |
|----------|------|------|------|------------|
| A1 | 1045 | 381 | 397 | +16 |
| A2 | 8036 | 364 | 801 | +437 |
| A4 | 1041 | 0 | 240 | +240 |
| B1 | 1030 | 309 | 352 | +43 |
| B3 | 1027 | 614 | 603 | -11 |
| C2 | 1016 | 317 | 319 | +2 |
| D1 | 1011 | 98 | 128 | +30 |
| D4 | 1008 | 26 | 131 | +105 |
| E1 | 1009 | 87 | 191 | +104 |
| E3 | 1001 | 33 | 83 | +50 |

Figure 2: Parking Changes 2019 - 2031

Trip Generation, Traffic Growth and Mode Split

- 2.18 The November 2025 report does not set out explicit trip rates for either the proposed residential or employment land uses to be delivered as part of the MKCP 2050. As such, it

is not possible to confirm whether the overall trip rates that have gone on to inform the vehicle trip generation calculations and associated capacity modelling work in the MKMMM are appropriate.

- 2.19 Notwithstanding the above, the earlier February 2025 report states at Paragraph 3.2.1 that forecast trips for the 2031, 2040 and 2050 testing years have been calculated using the Department for Transport's trip end model, CTripEnd.
- 2.20 However, neither the actual quantum of additional trips nor generation rates used are included in the report. DLP's view is that without clear information on the trip rates utilised being easily accessible in the published Evidence Base, it is not possible to confirm the suitability of the modelling undertaken and therefore, not possible to fully assess the suitability of the Evidence Base published.
- 2.21 Both the February and November 2025 reports state that overarching traffic growth has been calculated using the MKCP 2050 residential and employment planning projections. However, without an understanding of the trip generation of each element, it is not possible to confirm the suitability of this approach.
- 2.22 Paragraphs 3.3.1–3.3.3 of the February 2025 report summarise other data sets that are generated by the DfT's CTripEnd model. These include estimated percentage changes in trips by mode and journey purpose, covering commuting, education, home-based business, non-home-based business, and other categories.
- 2.23 Table 3.1 of the February 2025 report presents the percentage change in trips by mode projected by the CTripEnd model between the 2019 base year and the 2050 forecast year. A snapshot of Table 3.1 is provided at **Figure 3**.

Table 3.1: Comparison of 2019, 2031, 2040 and 2050 Trip End Productions (Internal)

| Mode | Purpose | 2019 | 2031 | % Diff from 2019 | 2040 | % Diff from 2019 | 2050 | % Diff from 2019 |
|---------|--------------|---------|------------------|------------------|------------|------------------|------------|------------------|
| Highway | Commuting | 210,616 | 256,866 | 22% | 261,749 | 24% | 255,979 | 22% |
| | Education | 236,358 | 265,528 | 12% | 265,731 | 12% | 264,417 | 12% |
| | HB Business | 19,190 | 24,229 | 26% | 25,393 | 32% | 25,353 | 32% |
| | HB Other | 510,896 | 635,999 | 24% | 666,613 | 30% | 677,246 | 33% |
| | NHB Business | 7,221 | 8,751 | 21% | 9,108 | 26% | 9,093 | 26% |
| | NHB Other | 173,823 | 201,167 | 16% | 202,445 | 16% | 201,391 | 16% |
| | Total | | 1,158,104 | 1,392,540 | 20% | 1,431,038 | 24% | 1,433,479 |

Figure 3: Snapshot of Table 3.1 – Trip Increase - Vehicles

- 2.24 The table indicates that car use is expected to rise by 24% over this period, while rail and active travel are projected to experience modest reductions. It is not clear from the table in the February 2025 report as to whether any mode shift associated with the delivery of the MRT has been allowed for. However, our view is that the 24% increase in car travel is unlikely to take account of the MRT.
- 2.25 Predicting a rise in car use and a limited reduction in public transport and active travel mode choice could indicate that the vehicle traffic modelling undertaken as part of the MKMMM is robust as it does not account for a significant increase in non-car modes, which would remove vehicles from the road network. Whether this data and assumption of increased car use has been included in the November 2025 modelling should be, but does not appear to be, explicitly set out.

Modelling Outputs

- 2.26 Modelling outputs are provided in chapter 4 of the November 2025 report. These results reflect the scenarios tested which include:
- RC2031 – Reference Case 2031;
 - RC2050 – Reference Case 2050;
 - Priority 1 – MKCP scenario tests in 2050 with MRT (MKCPM2050); and
 - Priority 2 – MKCP scenario tests in 2050 without MRT and without MRT associated housing developments – sensitivity test (MKCP2050).

Model Split

2.27 Based on the modelling, paragraph 4.2.1 of the November 2025 report states that the mode split for 'highway car' (car use) increases slightly across the years from the 2019 Base Year to the Reference Case 2050, with other modes decreasing including active travel and public transport modes. In the 2050 Priority 1 scenario (with MRT), the MRT has 1.8% mode share, and in 2050 Priority 2 this is redistributed across the other modes, with the exception of rail. A summary of the mode split results is shown in Table 4-1 of the report and replicated in **Figure 4**.

| Mode | Base 2019 | RC2031 | RC2050 | 2050 Priority 1 | 2050 Priority 2 |
|-----------------------|------------------|---------------|---------------|----------------------------|----------------------------|
| Highway Car | 79.8% | 81.2% | 83.0% | 81.2% | 82.3% |
| Public Transport Bus | 3.0% | 2.9% | 2.7% | 2.8% | 3.0% |
| Public Transport Rail | 1.6% | 1.4% | 1.3% | 1.4% | 1.4% |
| Active | 15.7% | 14.5% | 13.0% | 12.8% | 13.2% |
| MRT | - | - | - | 1.8% | - |

Figure 4: Mode Split statistics

2.28 There is no clarification as to why the effective number of car journeys increases over the MKCP 2050 plan period. The 82.3% of journeys that are predicted to be made to and from/within Milton Keynes by car is well over the Government's aspirations for half of all trips within towns and cities to be walked, wheeled or cycled by 2030.

Highway Flow Difference Plots

2.29 Forecast changes in highway traffic flows are shown graphically in the November 2025 report in Figures 4-1 – 4-9. A summary of the key changes in terms of traffic flows is also provided in Paragraphs 4.3.1 – 4.3.4.

2.30 In summary, these paragraphs conclude that:

- There are significant increases in traffic on the M1 and A5 through all tested scenarios;
- There are increases in traffic flows in the CMKTC area in all scenarios, which are anticipated to be linked to the increase in employment and leisure trips associated with the development allocations in this area;

- The modelling shows reductions in overall traffic flows on the routes of the MRT in the Priority 1 scenario as road capacity will be taken up by the delivery of the MRT on these specific road links; and
- Traffic flows will increase on road links surrounding the MRT routes as traffic redistributes due to the reduction in carriageway availability associated with the delivery of the on-road MRT.

High Level Road Link and Junction Capacity Assessments

- 2.31 Given that the MKMMM is a 'Saturn' model, it does not provide detailed junction and road link capacity assessments but provides a high level assessment of the overall 'headroom' of a junction or a road link, which can be used to establish which junctions and links will be exhibiting congestion in the scenarios tested.
- 2.32 This 'headroom' is measured using V/C (volume over capacity). A V/C of 85% indicates that traffic will be slow moving with congestion and delays likely. A V/C of 100% indicates that traffic volumes exceed the link/junction capacity and that delays would be expected.
- 2.33 Whilst it is difficult to provide an accurate comparison on the potential impact on the V/C of the key roads and links using the images included in the November 2025 report, paragraph 4.4.5 of the November 2025 report confirms that the CMKTC area will see an increase in links/junctions that have a V/C of over 85% in the 2050 Priority 1 and 2 scenarios when compared to the 2050 reference case scenario. In full Paragraph 4.4.5 states "*The 2050 Priority 1 scenario generally has a greater number of links and nodes above the thresholds, particularly in Central Milton Keynes and around the ESCE development. The greatest number of links with a V/C ratio above 115% occurs in the AM Peak hour*".
- 2.34 Interestingly, the delivery of the MRT as part of the Priority 1 scenario will lead to a greater number of links/junctions operating with a V/C of greater than 85% when compared to the Priority 2 scenario (no MRT). This is because the delivery of the MRT reduces road capacity on its routes but only provides a limited mode shift (1.1% as shown in **Figure 3**) away from private car use.

Journey Time Changes

- 2.35 A summary of the proposed 'journey times' (car trips) associated with the delivery of the MKCP 2050 developments is set out in Paragraphs 4.7.1 – 4.7.7. These paragraphs confirm overall, the journey times across all routes increase by 10% in the AM Peak hour, 5% in the Interpeak, and 9% in the PM Peak hour between the 2031 and 2050 Reference Case.

- 2.36 For 2050 Priority 1 (with MRT), the journey times increase by 26%, 10% and 25% in the AM Peak hour, Interpeak and PM Peak hour respectively compared to the 2031 Reference Case. For 2050 Priority 2 (without MRT), the increases from 2031 Reference Case are slightly less than 2050 Priority 1, with 23% in the AM Peak hour, 8% in the Interpeak, and 23% in the PM Peak hour.
- 2.37 Of particular interest to CMKTC will be the significant increases in journey times that Routes 4 and 5 are exhibiting as these are key routes through central Milton Keynes. Route 4 experiences a journey time increase of between 32% and 37% in the AM and PM peaks whilst Route 5 shows an increase between 35% and 57% in the AM and PM peaks.
- 2.38 An annotated snapshot of the Route plan shown in Figure 4-40 of the November 2025 report is shown below in **Figure 5**.

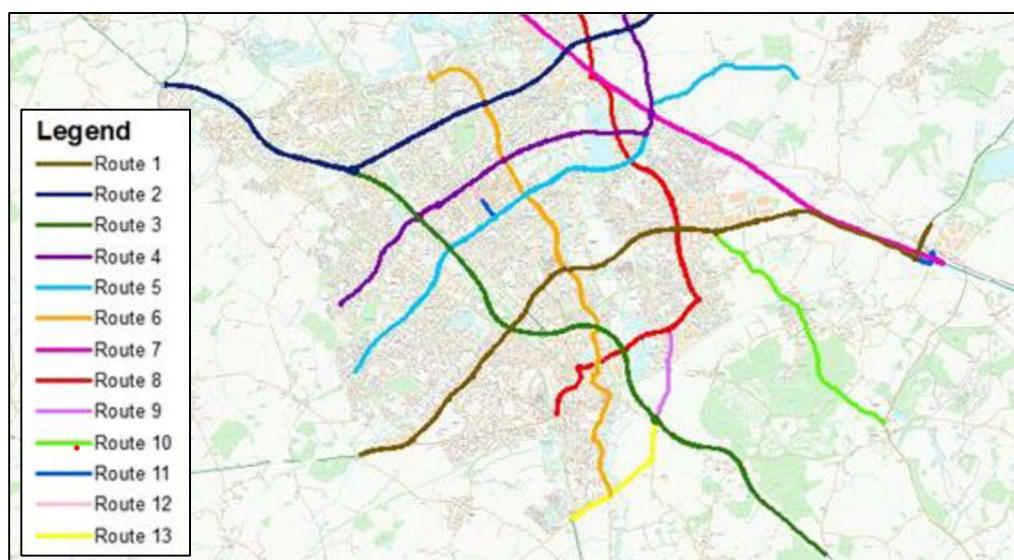


Figure 5: Journey Time Route Maps

MRT Users

- 2.39 Paragraph 4.8.1 of the November 2025 report sets out the number of people that are predicted to use the MRT in 2050. The total number of boarders are anticipated to be 3,038, 3,118 and 2,098 in the AM, interpeak and PM peak hours respectively.
- 2.40 This would appear to be a relatively low level of new public transport trips which are anticipated to be made on the MRT. This is supported by the fact that it is predicted that the MRT will only make up 1.8% of the mode split of all journeys made in and around Milton

Keynes in 2050.

Junctions Impacted

- 2.41 Twenty-seven junctions were identified as being adversely affected under the 2050 Priority 1 scenario, where the V/C ratios exceed 85% and increase by more than 5% compared to the Reference Case 2050 scenario. The 2050 Priority 2 (no MRT) scenario recorded eleven fewer adversely affected junctions, with most recording high V/C levels in the 2050 Priority 1 scenario. This is due to the fact that the delivery of the MRT reduces carriageway availability for cars on its routes and as such, increases congestion given the limited mode shift that is anticipated by the delivery of the MRT.

Severance of Routes through CMK

- 2.42 It was noted by CMKTC that their understanding was that a number of key routes through central Milton Keynes were proposed to be severed as part of the MKCP 2050 proposals.
- 2.43 Following a review of the MKCC February and November 2025 reports, it is not clear if any material changes to the main through routes through central Milton Keynes are proposed and if they are, there does not appear to be any specific capacity testing to establish the potential impact of these road network changes.
- 2.44 If any routes are to be severed or subject to material change in terms of use, we would typically expect this to be explicitly and clearly stated. Without this confirmation, it is not possible to fully assess and understand the validity of the modelling undertaken.

3.0 SUMMARY AND CONCLUSIONS

- 3.1 This report has been prepared by the Transport and Infrastructure team of DLP Planning Limited and considers the suitability of the published Transport Evidence base that has been prepared by Milton Keynes City Council (MKCC) to inform the Regulation 19 emerging Milton Keynes Local Plan known as the Milton Keynes City Plan 2050 (MKCP 2050).
- 3.2 This report has been prepared on behalf of Central Milton Keynes Town Council (CMKTC) who have concerns over the suitability of the traffic modelling undertaken to inform the MKCP 2050 document. Of particular concern to CMKTC is whether robust assumptions and assessments have been made in terms of the how additional vehicle movements that could be generated by the proposals to provide up to 13,000 new dwellings and associated employment land uses within the CMKTC area will impact on the immediate and surrounding road network.
- 3.3 This report primarily focuses on the two below reports:
- Milton Keynes Multi-Modal Transport Model – MKCP Forecasting Report – V3.0 5th November 2025; and
 - Milton Keynes Multi-Modal Transport Model – MKCP Forecasting Report – V3.1 11th February 2025.
- 3.4 Whilst the MKCC reports provide an overview of the modelling undertaken to inform the MKCP 2050 document, based on the information provided it is not possible to confirm the vehicle trips rates used to calculate traffic generation associated with the proposed allocations in MKCP 2050. We understand that this a significant concern for CMKTC and without it, it is not possible to fully understand or assess the validity of the modelling undertaken.
- 3.5 In addition, it has not been able to confirm whether the traffic modelling undertaken allows for or proposes any significant changes to the road network which runs through central Milton Keynes over and above the repurposing of road carriageway for the MRT. Whether there are any proposals for significant road closures and if modelling has been undertaken to establish the potential impact of the re-routing of traffic should be clearly set out in the modelling reports to allow a full assessment of the Evidence Base to be undertaken.

3.6 The key matters requiring further clarification, in order to properly assess both the modelling work undertaken and the overall suitability of the MKCP 2050 Evidence Base, are as follows:

- Whether the February 2025 report is in fact the “Milton Keynes Multi-Modal Model 2019 - Forecasting Report v3.1.pdf report which is referenced as a footnote in the November 2025 report;
- The vehicle and person trip rates that have gone on to inform the MKCP 2050 traffic modelling reports;
- Whether any key routes through Milton Keynes and in particular CMK will be ‘severed’ due to the delivery of the MRT and if so, if this has been taken in to account in the modelling completed; and
- Whether the modelling undertaken accounts for the predicted 24% increase in vehicle movements in the 2050 scenario.

3.7 In terms of the results of the modelling that has been undertaken and reported on in the February and November 2025 reports, this is summarised below;

- The number of car movements throughout Milton Keynes is predicted to rise by 24% from the base (2019) year to the 2050 end period;
- The percentage of trips made by car (mode split) is predicted to rise throughout the Plan period to 2050;
- Public transport mode split is predicted to stay at a similar level throughout the Plan period but active travel movements are predicted to fall;
- The delivery of the MRT is only anticipated to generate a 1.8% mode share of all trips with a maximum of around 3,000 journeys made on the MRT in the AM and PM peak hours;
- The delivery of the MRT will increase vehicle congestion on and around the routes of the MRT as its delivery repurposes available carriageway reducing the number of lanes available for car use;
- Increased congestion and delay is predicted throughout Milton Keynes in all scenarios tested; and
- Vehicle journey times will increase throughout Milton Keynes in all scenarios tested There are forecast to be significant increases in journey times on routes 4 and 5 which pass through central Milton Keynes - Route 4 experiences a journey time increase of between 32% and 37% in the AM and PM peaks whilst Route 5 shows an increase between 35% and 57% in the AM and PM peaks.

- 3.8 Based on our review of the publicly available transport evidence base documents, it is clear that whilst it has not been possible to validate the vehicle trips rates used in the modelling, the modelling that has been undertaken confirms that congestion and delay will significantly increase throughout Milton Keynes and in particular, in the CMKTC area due to the delivery of the proposed MKCP 2050 allocations. In addition, the delivery of the MRT scheme is forecast to only lead to a limited mode shift to this travel mode and will increase vehicle delay and congestion along the key routes of the MRT and on the roads in the immediate vicinity due to the reassignment of available carriageway and the redistribution of existing vehicle movements.

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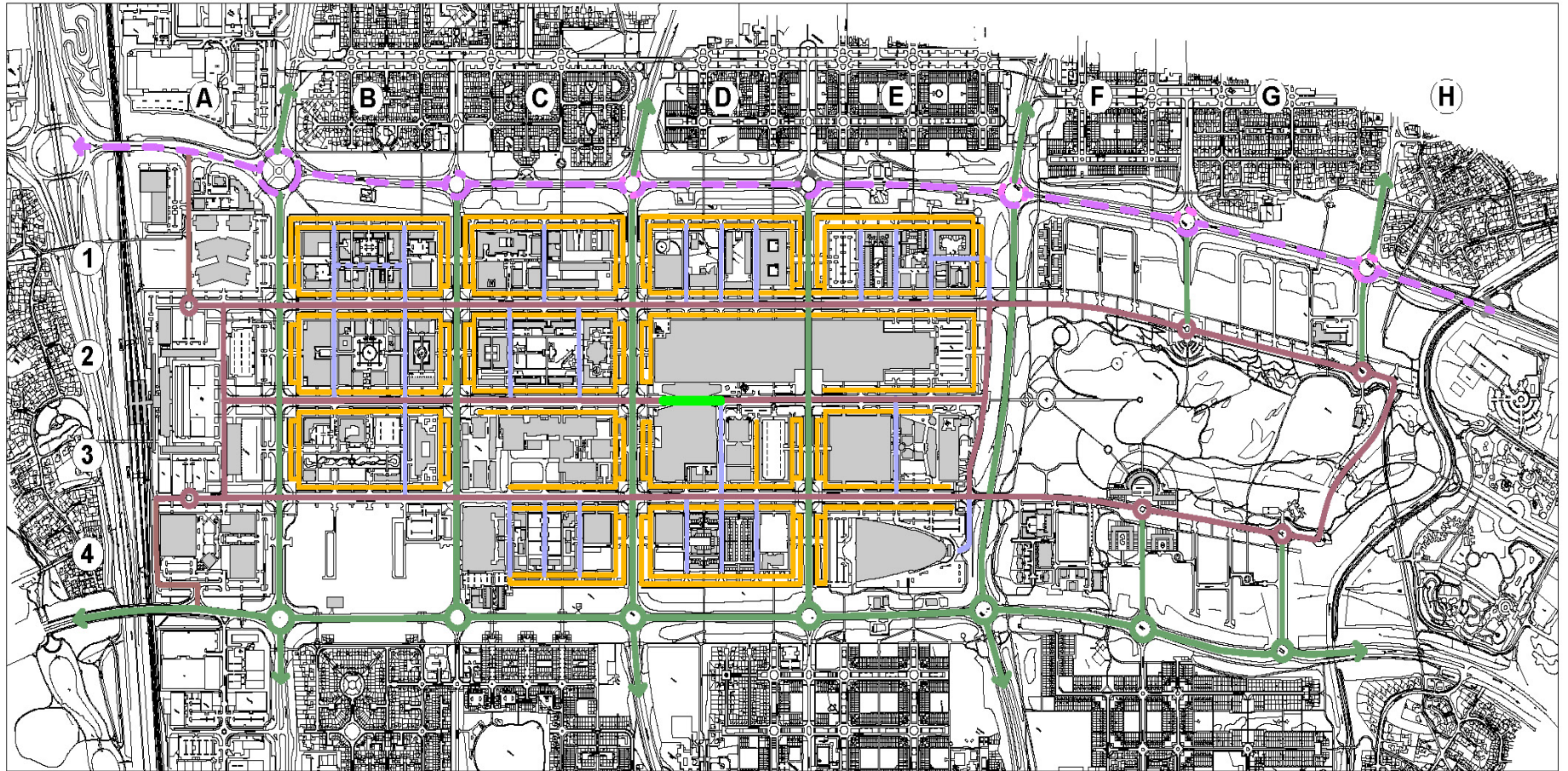


Figure 8; CMK Road Hierarchy

