

**Name of the Local Plan to which this representation relates:**

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22<sup>nd</sup> 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](mailto: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

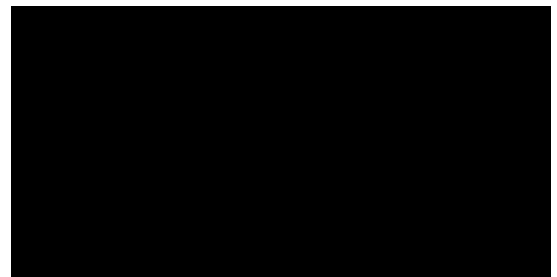
(where relevant)

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:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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 checked="" 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 checked="" 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.

The first bullet should be clearer regarding which elements of infrastructure and facilities should be considered essential within the “infrastructure first” approach. The examples given do not allow a definite interpretation of what is intended. In particular, the omission of any reference to transport and movement infrastructure from this text is considered to be an unhelpful anomaly, as this is clearly a very important infrastructure element for any significant development within the Plan.

The fourth bullet addresses issues around the economic significance of Milton Keynes, and envisages substantial jobs growth during the Plan period. However, it is unclear how the Plan responds to this dynamic, and the issues arising have not been addressed here or elsewhere in the Plan. In particular, the stated importance of Milton Keynes implies strongly that substantial volumes of inward commuting could be expected, not only from within the LPA’s own area but also from adjoining authorities. This implication is confirmed in Paragraph 26 of the Plan, where it is stated that the City already has more jobs than working age people. Therefore, if there is to be the level of job growth that is being suggested by the Plan then this has a direct impact on the Duty to Cooperate. It would be expected that adjoining Authorities would have been consulted specifically in respect of this additional job demand and that coordination would have been detailed to match their housing demand with the jobs planned to be created in the City.

The sixth bullet references the planned Metro (MRT) network for the City, but does not make clear how much progress has been made since the draft Business Case was prepared in March 2023. It is clear that much of the development and allocations proposed by the Plan are entirely dependent on the delivery of the MRT system – we have set out our representations in this regard on other sections of the Plan, but there is little clarity with regard to the deliverability of the MRT scheme. Further, the New Towns Taskforce reported in September 2025 that, “Delivery of a Mass Rapid Transit system would not only discourage car dependency and connect residents to key existing employment, commercial, and cultural spaces, but it could unlock other neighbouring sites for large-scale development that would otherwise be unviable or unappealing to the private sector.” Milton Keynes’ future ‘new town’ status is dependant on the delivery of this infrastructure.

This sixth bullet also relates to the Duty to Cooperate, as reference is made to the requirement to secure the investment necessary for the MRT alongside the City’s growth proposals. However, bearing in mind the shortfall in working age people compared to the forecast number of jobs that will be created in the City over the plan period, it is clearly a requirement to demonstrate that the investment may well also necessarily include sections of MRT network that stretch beyond the boundaries of the Council’s jurisdiction.

Overall, this outline of the strategy makes clear that the Milton Keynes 2050 Plan must take account of impacts, effects and opportunities that it will create beyond its own boundaries. The reality is that people do not plan or live their lives according to notional administrative boundaries, and so the Plan must provide an adequate response to this.

(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.

The Council should provide a more definitive text to the first bullet, making clear which infrastructure elements and facilities would be included in the “infrastructure first” philosophy, or state categorically if this applies to all potential infrastructure.

The Council should provide evidence that the issue of an excess of jobs over working age people, and the consequent requirement to facilitate inward commuting to Milton Keynes in a sustainable way has been considered by the plan, and also that adjoining authorities have been consulted with respect to the places where these employees may be living. It would also be expected that the Council would have made appropriate representations and undertaken liaison with adjoining Authorities to make sure that, as they prepare their own plans, they have taken proper account of the fact that people who may choose to live in housing they provide may well be working in Milton Keynes.

If this is the case, then it would make sense, and would represent sound planning, to ensure that residential allocations in neighbouring authorities were located to provide sustainable travel patterns towards Milton Keynes. The Council should, therefore, provide Duty to Cooperate evidence making clear that this outcome of the Milton Keynes Plan had been appropriately and fully considered.

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

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

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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:

It will be important to be able to seek clarification from the Council regarding the extent to which they shared details of the shortfall in working age people within Milton Keynes with neighbouring authorities, and to understand how this was considered and addressed in the Duty to Cooperate evidence. We would also like to seek assurances from the Council that adjoining authorities will take account of this in their own plan-making – meeting the mutual requirement to cooperate.

We anticipate that the Council will need to provide additional evidence with respect to our representations, and so the examination sessions will be the appropriate place to consider and discuss these.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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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|--|-----|-------------------------------------|----|-------------------------------------|
| 4.(1) Legally compliant                    | Yes | <input checked="" 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 checked="" type="checkbox"/> |

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We agree that the delivery of the Metro (MRT) system will assist greatly in the meeting of carbon reduction aspirations. However, we are concerned that the proposed MRT system only seems to have been considered in the context of the Milton Keynes administrative boundaries. Indeed, the draft plan doesn't go as far as the Milton Keynes Strategy for 2050 document from 2021 which anticipated that the MRT network would extend outside of the MK administrative boundaries into Buckinghamshire (Winslow), Northamptonshire and Bedfordshire. We consider that the Local Plan should reference wider travel needs, and the opportunity to connect key locations outside of the Council's jurisdiction. It should also target opportunities to increase connectivity between other public transport networks – most notably by increasing the links between the north-south and east-west rail lines.

The opportunity to create better connections to more of the East-West Rail stations would increase public transport permeability within the area more widely, and create opportunities for a much greater level of flexible journey making within the wider Milton Keynes catchment and beyond.

A more comprehensive MRT strategy, going beyond the Council's own housing need requirements could assist adjoining authorities to better meet their own carbon reduction targets – which is hugely relevant to Milton Keynes if many of the workers in its employment spaces would be emanating from these other authority areas.

We note that climate change effects are not constrained by administrative boundaries, and so the Council has a genuine opportunity to maximise benefits across a wider area here. This would suggest a more novel and creative approach could be expected within the structure of the Duty to Cooperate, in order to maximise the planning and environmental benefits across the widest possible area.

(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.

The transport strategy and approach should have considered a wider opportunity for Metro (MRT) services based on the maximum feasible potential carbon reduction benefits for Milton Keynes and the surrounding area. The forecast level of inward commuting to the employment in the City means that this is a relevant impact of the Plan, and so the accessibility and movement evidence base and Duty to Cooperate evidence should make clear how this has been considered and accounted for in the Plan proposals.

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

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

We anticipate that the Council will need to consider additional evidence, or the clarification of evidence in order to address the issues raised in these representations. We consider that the Examination sessions would be the most appropriate forum in which to then consider and discuss the Council's approach to this issue – either based on the current evidence base, which does not seem to address or, or any further evidence that is produced in the meantime.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

The paragraph states that growth is aligned to the Metro (MRT) system and that c.2,500 homes will be delivered as a result of this infrastructure.

We welcome the proposal that growth should be centred around the MRT scheme – but note that elsewhere in the Plan it is made clear that many more than 2,500 homes will be dependent upon it being delivered if they are to come forward in a sustainable way. In addition, it is certainly the intention of the New Towns Taskforce that the MRT will open up additional ‘new town’ scale growth along the periphery.

We have addressed this issue in detail in our representations to Policy GS2.

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

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The Council needs to provide greater clarity on the extent to which the Plan is dependent on the delivery of the MRT scheme, and also on how it will be funded, procured and delivered.

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

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**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:

We have set out the reasons why we would like to attend the Examination in respect of the links between MRT and strategic allocation delivery in our representations to Policy GS2.

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

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Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

16 & 23

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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The study of any map of the Milton Keynes area shows that the City itself is constructed hard up against the West and South-west boundaries of the Authorities jurisdiction. The Plan states that several opportunities for sustainable growth have been assessed. However, these all appear to relate only to land that sits within the authority's jurisdiction, rather than considering land that lies beyond it, but which is nevertheless coincident with and immediately adjoining the City boundary.

As people do not plan and live their lives based on notional administrative boundaries, it would appear logical to have considered geographical extensions to the City that were located beyond the Authorities boundaries, as these may well offer the most sustainable and deliverable options for the growth that is needed. If that proved to be the case, then the Duty to Cooperate would require the Council to liaise with the relevant neighbouring authority to incorporate these sustainable development proposals within their plans.

However, this process does not seem to have taken place, and opportunities for growth in neighbouring authorities – especially to the west and south-west, where the existing City already touches the administrative boundary, have not been considered.

Despite the significant need for housing related to the growth of the City itself, the Council does not appear to have given proper consideration to a concentric growth model, centred around the centre of the City, in order to minimise the overall travel distances to its facilities

and amenities. This would undoubtedly have required liaison with neighbouring authorities, in which the land closest to the City centre sits.

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

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The Council should ensure that the most sustainable opportunities for growth have been considered, in a way that is blind to administrative boundaries, to provide the best possible planning and environmental outcomes for the existing and future communities. There is no evidence to suggest that the spatial strategy for the City considered potential land in close proximity to the City – potentially in the closest proximity of all by distance, but which happened to lie outside of the administrative boundary of the Council.

This should be rectified, with suitable evidence produced to show that the most sustainable options for growth, in practice, have been proposed by the Plan.

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

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**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:

We would wish to be able to question the Council on the logic of its strategic approach, and to ascertain if it explored growth options that were close to the City and its facilities, but which were beyond its own administrative boundaries. The opportunity existed to explore these options, which represent the locations with the closest proximity to the City, through the Duty to Cooperate, and inclusion of sustainable housing provision in the best locations through incorporation in the Plans of neighbouring authorities. The evidence provided to date does not suggest that this opportunity was ever raised as part of the Council's plan preparation.

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Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

GS2

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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The table 1 in this policy sets out the various sources of housing supply envisaged by the Plan and further states that sites within Metro (MRT) corridors must be brought forward in accordance with Policy GS9 (which addresses the need, among other things, to facilitate or deliver MRT infrastructure as part of these allocations). This makes clear, therefore, that much of the development proposed by the Plan is effectively dependent on the delivery of the MRT system to make it sustainable and deliverable.

Breaking this down:

- of the 22,705 homes allowed for in the Committed sites, 5,000 are dependent on MRT delivery (as set out in Policy GS21);
- 2,500 homes are identified for sites along the Metro Corridors (and hence are dependent on MRT);
- The Eastern Strategic Extension allocation (Policy GS14) is stated to be dependent on MRT to deliver its 7,750 homes;
- The East of Wavendon Extension (Policy GS15) is also stated to be dependent on MRT to deliver its 2,250 homes.

This means that 29.3% of the total housing requirement (17,500 / 59,779) is dependent on the MRT being delivered, and 33.7% of the uncommitted and new housing supply (12,500 / 37,074) is dependent on MRT being delivered. In addition, the delivery of the New Towns

housing, identified by the New Towns Task Force, is understood to be excluded from this housing demand.

This would not be an issue, except for the reality that certainty in the delivery of the MRT is very hard to find in the evidence base for the Plan. We have considered this further in our representations to section 3 of the Plan and Policies INF1 and INF2, but, suffice to say, the lack of evidence provided that the MRT is sufficiently advanced or adequately funded means that the delivery of large volumes of housing contained in the Plan must be considered at considerable risk.

We would contend that this does not make the Plan as presented soundly prepared.

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

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The IDP states that the details of the funding, procurement and delivery of the MRT are set out in the Infrastructure Investment Strategy (ISS), that it says was published alongside it. However, the ISS is not available on the Councils Local Plan evidence base website (<https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/mk-city-plan-2050/evidence-base>), and nor is it available on the MKISS website (<https://uk.planengage.com/mkiss-digital-idp/page/Home1>).

The Council must publish the ISS as soon as possible, as it represents a fundamental part of the evidence base for the Plan, and is critical to understanding whether a third of the housing allocations identified within it can be delivered. Depending on the content of the evidence in this document, the Council may need to provide assurances regarding the delivery of the MRT scheme and how this is to be achieved.

We would also refer to our representations on section 3 of the Plan, and Policies INF1 and INF2.

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

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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:

We have set out our reasons for wishing to attend the Examination in respect of the access and movement matters in our representations to Section 3 of the Plan and Policies INF1 and INF2.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

GS4

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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The movement hierarchy set out at point 2 is flawed. It is incorrect to prioritise active travel modes as being more important than public transport, as these two categories of travel mode reflect quite different journey purposes, and they are rarely interchangeable. Active travel modes are typically suitable for local and shorter journeys, whilst public transport modes offer travel over longer distances and time periods.

It is also a certainty that active travel modes will play a part in every public transport journey, with travel to a suitable PT stop being achieved by walking or wheeling, as part of a longer overall journey.

Therefore, in recognition of the actuality that existing settlements do not allow entirely local living, and more distant travel is a practical necessity, the Plan should recognise active travel and public transport as equal in any movement hierarchy.

In addition, the amalgamation of every other mode of travel as being equal in a third tier is also an extremely crude delineation. The movement of freight and deliveries, emergency vehicles, taxis and ride hails, vehicles for mobility impaired people, alongside private cars, vans and motorcycles of all types, as a single hierarchy is likely to lead to an undesirable and potentially less sustainable overall transport response, especially from larger scale allocation sites.

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

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There should be a better definition of the hierarchy of modes and journey purposes, allowing a clearer understanding of when and which modes and journeys are considered legitimate and which are considered less sustainable. The use of active modes and public transport should be considered together, and in a holistic fashion, recognising that these modes are intertwined. They are both necessary in a sustainable development.

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

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

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We wish to be able to discuss with the Council the reasons why they have adopted a crude and ultimately unhelpful approach to movement hierarchy and to explore with them how this could be improved in practice, to enhance the sustainability of all development proposals.

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**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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The limiting of the proposed Metro (MRT) system to defined, and predominantly already built, routes and corridors limits the network to a “Hub and Spoke” configuration that centres all travel around the City Centre and may mean that many journeys need to involve interchanges and consequent delays to passengers. We would argue that the philosophical approach to MRT should be very much broader, and should allow the exploration of other options and connections.

In particular, strengthening radial opportunities, linking amenities and facilities around the suburbs of the City may well create wholly new opportunities for growth and support a wider range of employment, educational, retail and leisure activities. Making greater connections with heavy rail stations in the area – especially with those emerging on East-West Rail, would allow residents and employers to tap into a far greater catchment of people, and would support better economic growth. This would accord with the movement strategy envisaged in the Milton Keynes Strategy 2050.

It may be appropriate for a “Hub and Spoke” arrangement to form the initial basis of the system, but there should be scope to consider alternatives, to develop greater levels of accessibility than a City Centre interchange model could deliver. The Plan sets out that the growth planned in the MRT corridors would benefit from the delivery of the MRT – but experience elsewhere suggests that, in reality, it may work the other way around. The provision of MRT services becoming a catalyst for regeneration and redevelopment rather than

the other way round.

Such an approach could be helpful in allowing greater levels of sustainable growth than has currently been contemplated by the Plan, as the effects of MRT connectivity – especially where this might provide links to a wide range of onward journeys by heavy rail (i.e. connections to both East-West Rail and the West Coast Main Line) mean that new opportunities for regeneration and denser development can be realised.

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

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The text should be revised to make clear that the initial proposals for MRT may be represented by the information in the Plan, but that further development of the system is anticipated. The fundamental basis of the system – to provide sustainable access to many of the proposed housing sites, should also be tested in the opposite way. This would explore the extent to which the provision of MRT to locations with poor sustainable access would be likely to then experience a step-change in access and hence the creation of opportunities for growth that were otherwise not considered.

The Council should also consider the need for wider connectivity and the opportunities that this may bring. The current Outline Business Case addresses the role that MRT can play in solving an existing problem of accessibility to the City Centre from the suburbs – and this is certainly a situation that needs to be addressed. But the scope of the work does not seem to have considered the much wider range of journey patterns that the Plan contemplates. For example, if the levels of inward commuting envisaged by the Plan are to come to fruition, how will this be sustainably achieved, and what role might the MRT play in ensuring workers arriving, say, on the East-West Rail line can get to places of employment across Milton Keynes sustainably and efficiently?

We would contend that additional transport evidence is needed in order to answer these questions, before consideration can be given to the changes required to the Plan and its text.

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

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

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

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

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

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

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

We would hope to discuss with the Council the somewhat conservative approach that has been taken to the development of the MRT, and explore with them the benefits and additional sustainable opportunities for growth that could be opened up by a more creative and innovative approach to the MRT delivery. We would like to provide an overview of our experience in delivering MRT schemes, and the way that opportunities for growth can be leveraged as a consequence.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

GS9

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The policy sets out the way that significant development along the Metro (MRT) corridors should provide infrastructure support. However, we consider that this policy is worded in such a way that it fails to recognise how the corridors may work in practice. The reality is that it is the interchange and stop locations that are critical to development opportunities, and not the existence of the "corridor". Long stretches of strategic Metro route with no stops would not provide the basis for densification of development, or contribute to more sustainable forms of development.

The policy would be better if it was wholly centred around Metro stops, with clear guidance regarding densities within defined radii of the stops – most likely based on walking distances. The policy could then make clear the way that densities would be intended to "ramp up" the closer the site was to a stop, maximising the likelihood of maintaining or increasing the ridership catchment for the MRT. This is the model that has been used elsewhere to define the principles of "PTOD" – Public Transport Oriented Development, and they should be applied in Milton Keynes.

Indeed, in other places, there has also been a differentiation of densities, facilities and configuration of development based on a hierarchy of MRT stop types. Larger, more strategic stops, that represented interchanges on the network itself, or with other active or PT modes, might be capable of supporting an even higher level of development, or particular types of land use, compared to stops in less strategic locations. Meanwhile, stops that were local in

scale, and purely intended to serve nearby residential development to allow sustainable commuting may have themselves be configured in such a location and in such a way that they supported and encouraged this activity – for example, such stops should have a coffee shop and publicly accessible toilets close by so that using the stop was as convenient as possible.

The policy fails to provide a hierarchy of stop and interchange types, and hence fails to then define how the opportunities provided by them will be maximised in the Plan.

(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.

The policy should be amended to make clear that there will be expectations on developments along the defined Metro Corridors that they will ensure relevant facilities and design parameters (such as density) at the stops within or close to their boundaries.

The plan should also contain (perhaps as a new INF policy, as it applies to the larger strategic sites too) a hierarchy or matrix of MRT stop types, considering their locations, functionality and strategic importance, allowing site specific response to be made on the basis of the particular nature of the stop within or close to the site, and hence maximising the mutual benefit of the MRT and the development.

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

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

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

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

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

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

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

The principle of how the MRT will be dovetailed into the Plan, and into both the Metro Corridor and strategic allocation sites is critical to its effectiveness in helping to deliver the Plan. We would like to discuss these aspects with the Council, with reference to our prior experience with MRT schemes, and to help them to develop an approach that maximises the effectiveness (and hence the potential returns) of the MRT scheme.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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 checked="" 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 checked="" 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.

The paragraph specifically references the limits of the grid road network, and the fact that this has now reached the limits of what can be achieved. Reasons are set out for limiting the further expansion of the network to the north, south and east that all relate to geographical, physical barriers that it would be difficult to overcome.

However, to the west of the City the “barrier” to continuation of the grid system is stated to be the “city boundary”. This is a notional, administrative limitation, and is quite unlike the other barriers on the other three sides. We would therefore question whether this is, in fact, any sort of barrier at all?

In practice, there is not a geographical, physical impediment to the continuation of the “Milton Keynes development model” to the west. As the Council has the ability, under the Duty to Cooperate, to discuss and explore opportunities for mutual benefit that may assist one or both authorities, it seems to us that they should, or could, have considered the potential to extend the City to the west in practical terms.

(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.

The Council should make clear whether it considered the practical implications of extending the City to the west, albeit this would go beyond its administrative boundaries, but might make sense in bring into play the land that was geographically closest to the City Centre itself. If it did not, then it should consider this option and provide evidence on the conclusions of such consideration.

It should also provide evidence that it undertook liaison with the adjoining authority to consider this opportunity, and also confirm that it agrees that an arbitrary administrative boundary is not, in itself, a reason to fail to consider sustainable growth options that may otherwise exist on its boundaries, and bearing in mind that they are immediately adjacent and coincident to the City.

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

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

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

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

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

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

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

We would expect the Council to provide additional evidence of its approach to the way the extension of the City had been considered, especially to the west, and so the Examination is likely to be the next available forum to discuss and clarify their approach.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

GS10

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

The policy requirement at point A does not appear to follow the movement hierarchy approach set out in the Plan, as it appears to state that, if a highway mitigation strategy can be set out, then development will be acceptable. The policy should make clear that any development would be expected, first and foremost, to demonstrate how it would maximise movement and access according to the movement hierarchy.

This would mean that it must set out proposals for active travel and public transport – both in terms of infrastructure and facilities, but also in terms of encouragements to users, and that it should set out the proportion of trips that it forecasts would therefore be met by these proposals. It would only then consider any residual highway trips, and would propose mitigation measures in that basis only.

The policy could, or should (in our view) also make provision for developers to have to set out measures to monitor the forecast mode share, and to take steps to redress the situation should they then create impacts that were unacceptable or where beyond the level of impacts that may have been considered acceptable. In general, such steps would generally be expected to be to encourage greater reliance on active or PT modes, or in trip reduction overall, rather than to rely on further highway enhancements to facilitate greater levels of private car usage.

Such a policy approach would then follow the aspirations of the movement hierarchy, and

would also support the carbon reduction and equality targets set out elsewhere in the Plan.

We would also note that the “Our Growth Strategy” topic paper makes specific reference to overall Mode Shift targets for Milton Keynes (Figure 4; Objective 3). Similarly the “Transport and Movement” topic paper also mentions the need to shift the modes of travel away from the car in the future, with an increasing proportion using public transport. Moreover, it makes clear (paragraph 2.15) that the first choice for residents and visitors for journeys across the City by 2050 will be the Metro system – further reinforcing the requirement for the Plan to ensure the delivery of this critical infrastructure in the context of the outcomes of the Plan.

The “Transport and Movement” topic paper seems to go much further than the wording of Policy GS10 – at paragraph 8.3 it states that new development proposals will be expected to maximise public transport use, and references planning obligations and tariffs to achieve this. Paragraph 8.5 and onwards applies the same logic to active travel for local journeys whilst paragraph 8.8 onwards talks about reducing dependency on the car. This all therefore appears to follow the same approach that we consider should be the minimum requirement, and which should be a clear policy requirement of the Plan. Developers should be required to set out measures and targets that they can be measured against, and which are defined to meet these stated objectives of the Council.

Therefore, in order for these modal shift and revised mode share targets to be carried forward into the Plan, it would make sense (and could be considered a clear requirement) that significant development proposals should also be expected to set out mode share and mode shift targets for their schemes, following the aspirations of the topic paper.

(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.

The policy should be re-worded to more closely follow the movement hierarchy, and should make clear that the preferred approach was always towards active travel and public transport modes, and that measure to accommodate car usage would be considered only as a last resort.

Developers should be required, under the policy, to set out how they intended to minimise reliance on the private car, and how they would encourage a shift to active travel and PT modes. The policy should set out that they would be expected to set and agree targets in this respect as part of any planning consent, and would then be required to monitor the performance of the development and take action when necessary.

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

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

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

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

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

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

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

We anticipate that the Council will need to recast the policy in the light of our representations, and we would like to be at the examination to ensure that this has been undertaken and that the proposed wording meets the requirements of the movement hierarchy.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

GS11

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The overall approach of this policy appears to seek to give Milton Keynes Council control over issues that are beyond its boundaries, and we would question whether the approach adopted is lawful. In particular, points 3 to 11 effectively impose policy requirements directly onto site promoters on sites that lie outside of Milton Keynes. We cannot see how a developer or site promoter would be able to resolve any situation where there was a policy conflict between the LPA where its site was and the requirements of this policy GS11 as drafted. It seems likely that, in that case, the promoter would probably quite justifiably follow the policy requirements of the authority area that was determining their application.

The policy is also vaguely worded, and hence difficult to interpret in terms of what proposals the Council anticipates would be subject to it. There is no definition of any scale of development proposal that would be affected, and the use of the "on the edge of Milton Keynes City administrative boundary" is also open to interpretation. It may be that the Council intends that this would only apply to sites where the red line of the application was coincident with its own administrative boundary, but this would seem to miss the point of the intent of the policy to try to ensure some "joined up thinking".

(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.

The policy would be more helpful, and could be considered lawful in our view, if it followed the approach of the first two points, which express the aspiration that the Council would work with the determining authority where there was a perceived impact on Milton Keynes from a scheme that was close to its boundary. All of the following points (3 -11) could be re-worded in this format to state that the expectation of the Council would be along these lines, and it would work closely with the determining authority to seek to have these considered and incorporated in any consent.

The policy should also provide a greater level of clarity on what proposals would be expected to see this policy applied – both in terms of scale of development and proximity to the boundary (noting that these two may need to be considered together, such that larger schemes further from the boundary with Milton Keynes would still fall within its purview).

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

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

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

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

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

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

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

We would like to be able to satisfy ourselves that the aspirations of this policy, as it may be redrafted or now, are clear and that it represents a lawful provision. It would also be helpful to understand whether the Council have discussed this policy with any of their neighbouring authorities, and the extent to which they might be comfortable with its provisions and the application of them.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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 checked="" 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 checked="" 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.

The Infrastructure Delivery Plan (IDP) makes clear (paragraph 1.3) that the Metro (MRT) system represents an absolutely foundational element of the Plan, stating that it has been the basis of the definition of the strategic growth plan for Milton Keynes. Therefore, we would have expected that there would be a good deal of certainty around the way that this would be delivered – whether or not it could be delivered in advance of growth (following the Infrastructure First mantra of the City). However, this does not appear to be the case.

In particular, the significant funding requirement of the MRT is not addressed or evidenced by the Plan. Paragraph 1.19 of the IDP states that the Infrastructure Investment Strategy sets out in more detail how the infrastructure needed will be paid for and delivered. It also states that the Further Assessment report and the Investment Strategy are published alongside the IDP. However – this is not the case – the Further Assessment report is available on the Local Plan evidence page, but the Investment Strategy is not available. (<https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/mk-city-plan-2050/evidence-base>)

This is an unfortunate and significant omission, as it means that the ability to understand if the IDP is deliverable and realistic – indeed, if it is “sound” is missing.

The biggest element of the transport infrastructure is likely to be the implementation of the MRT scheme. Our previous experience elsewhere suggests that this is costly both in terms of physical works to develop the routes (even where these are for rubber-tyred vehicles on

existing streets) and for the purchase of vehicles themselves, and the establishment of a depot and other necessary service elements. The only reference we have with regard to potential costs of the network is from the Arup MRT Strategic Outline Business Case – Executive Summary March 2023, which indicates a cost of £200m at 2022 prices. This document also states that the bulk of the capital costs (trackway, engineering works and vehicle purchase, presumably) will need to come from Central Government.

This represents a significant risk to the delivery of the MRT, and hence to the sustainable deliverability of the Plan. As set out in our representations in respect of Policy GS2, if the delivery of the MRT is a requirement for 33.7% of the proposed housing, then this becomes absolutely fundamental to the soundness of the Plan. If the funding for the MRT cannot be secured from Government, then the Plan will fail.

Although we understand that the Council has been working on the Business Case for the MRT, and the “Transport and Movement” topic paper confirms that a bid for funding is expected in 2026/27, the magnitude of the risk to the Plan if this is not secured would be enormous. Hence, with this in mind, it would be helpful if the Infrastructure Investment Strategy were to be available, to show the breakdown of MRT costs across different parts of the route network and, potentially, to allow conclusions to be drawn about what could be achieved through developer funding and other sources, perhaps as a stop-gap, in the event that the Government funding was either not forthcoming or was delayed.

It is possible that the Plan could still be salvaged, with a partial introduction of MRT that could be shown to achieve the mode share and mode shift aspirations for the new development sites and which could be funded from contributions and other sources. However, in the absence of any evidence to this effect, or of any definitive information regarding the costs of infrastructure and how they breakdown, we would contend that it is impossible to say with certainty that the Plan has been soundly prepared.

(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.

The Council must publish the Infrastructure Investment Strategy without delay, and must allow for a period of consultation on it, as it is so fundamental to the implementation of the Plan. They should also provide an update on the MRT Business Case, and, in particular, any discussions that they have had with Government to show which departmental budgets or funding streams may be appropriate for them to seek funding for the MRT scheme, and how they intend to justify this.

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

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

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

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

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

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

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

We would expect to attend the Examination session to discuss the IDP and to contribute to the debate in respect of the likely costs and funding sources for the MRT scheme. We would want to ensure that the Plan was robust in respect of its reliance on the MRT scheme, and, if not, that there was a suitable and workable contingency plan in place before the Plan could be found to be sound.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

121

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

The text states that infrastructure in Milton Keynes is funded through a mix of sources. It is unclear whether the reference here is to how it has been funded in the past, or how it is intended to be funded in this Plan. If it is the latter, then evidence is required to show that this funding is available and in what proportions to different elements of the Plan.

(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.

The Council should clarify the wording of this paragraph to make clear whether it refers to historic funding – and if so to clarify the relevance of the statement, or if it is intended to set out the mix of sources to be used to realise this Plan. In the latter case, the Council should provide evidence to demonstrate how the mix is made up and when it would be expected to be available alongside the Plan trajectory.

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

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

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

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

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

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

The text at paragraph 133 states that Annex F provides benchmark standards for specific infrastructure requirements. We consider that this is flawed in respect of the Transport aspects of the Plan. In fact, the Annex makes clear that benchmarks for transport interventions will be made based on the Milton Keynes Multi-modal Model (MK MMM) on a site specific basis. However, the annex also makes clear that the MK MMM is not yet complete and hence has not (at the time of writing) been capable of undertaking assessments.

This means that the transport aspects were not fully tested or understood at the time when the Plan was put together. This would suggest that the Plan has not been prepared based on evidence, but that the evidence may have been retrospectively completed in justification of a plan that had already been written.

With respect to Policy INF1, we are concerned that there is no reference in this policy to the implementation of the Metro (MRT). It is clear that the MRT is necessary to support the delivery of around a third of the proposed new housing allocations, and some (c.5,000) of the committed residential development as well. Therefore, we would have expected that the policy would make some provision for development to progress in the context of the much wider MRT scheme being delivered.

The policy is titled "Infrastructure first principles", and it essentially requires that developers make clear proposals to ensure that infrastructure is delivered in advance of need, or that

temporary provision is made in the case of some buildings. However, we are conscious (based on previous experience elsewhere) that this may be impossible in respect of the MRT delivery. The implementation of a City-wide network is a complex undertaking, requiring input from multiple stakeholders and needing to be done in a planned way. This may not be possible in the context of some strategic allocations. New routes passing through the centre of allocation sites may not be able to be delivered in their entirety at the outset, but have to be phased for a range of practical reasons.

Therefore, this policy is likely to need to make a more specific provision, both for the way that strategic allocations are expected to integrate and liaise with the MRT scheme as it is being developed and implemented, but also to set out temporary or short-term contingencies to deal with shortfalls in MRT delivery or to cope with the inevitable challenges of implementing two large scale schemes, that are inter-dependent, simultaneously.

It would be highly unfortunate if much-needed development was delayed because of the phased implementation of the MRT over time. It may be logical to provide an MRT link to a particular site later rather than sooner, but that would preclude that site from coming forward on a pedantic application of Policy INF1. It may therefore be better to make provision in the policy for interim provision to be made, pending the arrival of the MRT, to allow development to go ahead but without pioneering residents being left without any public transport support.

(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.

The Council needs to publish a timeline of transport work and when it was completed so that everyone can be clear regarding the actual evidence that was available at the time of the preparation of the Plan, and hence of its soundness at that time.

Policy INF1 needs to be reworded, specifically in respect of those sites that are dependent on the delivery of MRT to allow some breathing space between the two. So long as the delivery of MRT is committed, then housing should be allowed to proceed on the basis of an agreed interim strategy to ensure that public transport is available at an early stage, with MRT taking over as and when appropriate.

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

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

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

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

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

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

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

We would like to be able to share our previous experience of implementing an MRT scheme across a major area of regeneration and to make sure that the Council understand the way that planning them simultaneously may well require a flexible approach.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

CMK2

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

We are surprised that the policy requires the maintaining of a high level of convenience for City Centre parking. This seems wholly inconsistent with the mode shift aspirations set out in the transport evidence and elsewhere, where there was a recognition that there was too much cheap and accessible parking in the City Centre, and that this was acting against carbon reduction and more equitable travel choices.

(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.

The policy should be amended to delete the reference to high levels of convenience, and simply leave the policy to manage the level of parking to support a vibrant city.

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

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

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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:

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

PFHP6

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The first point does not mention the specific requirements that would be expected to be provided at MRT stops. The function of stops should be to encourage these locations as focal points for the local community, and as such masterplans should recognise this and use them as a centre for convenience shopping, community spaces and buildings, retail and food and beverage provision and for public toilets and open spaces.

The fifth point references the apparent requirement for consistency of building lines – but we would argue that this may well be unhelpful in some contexts – especially around MRT stops. Experience elsewhere suggests strongly that the creation of local destinations at stops can be very helpful. This creates a sense of space, and is consistent with the aspiration to create local community hubs around the stops. Stepping buildings back, and creating locally significant squares and open spaces can be extremely helpful in punctuating the built form and providing navigational cues to passengers, who perceive the route as a passage between a distinct series of places rather than as a linear route through an unchanging sea of development. The need to create a sense of logic to where the stops are located, from a users perspective, is important in place-making and community building.

(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.

The Council should amend the policy to make specific reference to the way both spaces, facilities and land uses should be planned around MRT stops. They should also amend the policy to allow for the creation of clear destinations and places at MRT stops, to aid legibility of routes and allow for better place-making.

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

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

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

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

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

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

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

We would like to ensure that the Council have taken account of experiences gained elsewhere to ensure that the best possible places are created along the MRT routes through new developments.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

311

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The text references working with relevant stakeholders, but we would note that many of these spaces and corridors are cross—boundary, with important ecological and environmental connections being made between adjoining authorities. We therefore consider that this aspect of the Plan should be made stronger, with a clear commitment by the Council to recognise the need to work with partner authorities and to especially undertaken liaison with neighbouring planning authorities.

(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.

The text at paragraph 311 should be expended to include a specific reference to the importance of liaison with neighbouring planning authorities. It would be even better if the Council included a specific policy reference to their commitment to cross-border working on LNRS's.

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

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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:

In order to ensure that the Council has given sufficient weight to the need to liaise and undertake cross-border working in respect of LNRS's, and that there is a clear commitment by them to do so in the Plan.

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

Name or Organisation:

**Varsity Town Planning Ltd on behalf of The RO Group Ltd**

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

Paragraph

Policy

ECP2

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

The importance of ensuring that MRT stops are located at the heart of communities should be enhanced and stated more particularly in this context.

(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.

The text at point A should be amended to include the words “especially at MRT stops” at the end of the first sentence, to emphasise the importance of the synergy between MRT ridership and local amenities.

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

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

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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:

In order to ensure that the Council has understood the importance of the synergy between MRT stops and local community amenities – this is at the heart of place-making and community-building.

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

## **Sharing your personal details**

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

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

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