

**Representations to the  
MK City Plan 2050  
Regulation 19 Draft**

---

Smith Jenkins Planning & Heritage

---

December 2025

Smith Jenkins Ltd



# 1 Introduction

## Overview

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage in response to the Milton Keynes City Plan Regulation 19 consultation. They should be read alongside, and in continuation of, our detailed Regulation 18 representations (October 2024), which accompany this submission at **Appendix 1**.
- 1.2 Smith Jenkins is an independent town planning consultancy based in Milton Keynes acting for a wide range of clients with active development interests across the city. We engage regularly with the Council on strategic planning matters and in 2023 submitted 133 planning applications to Milton Keynes City Council. Our comments therefore reflect extensive professional experience of the operation of adopted policies, the delivery challenges faced by applicants, and the practical implications of the emerging policy framework.
- 1.3 One of the key purposes of the Regulation 19 stage is to assess whether the draft City Plan is sound, as defined by paragraph 36 of the National Planning Policy Framework (2024). Accordingly, our representations are structured to address the four tests of soundness:
- Positively prepared – seeking to meet identified needs;
  - Justified – supported by proportionate evidence and reasonable alternatives;
  - Effective – deliverable and capable of being implemented; and
  - Consistent with national policy – enabling the delivery of sustainable development.
- 1.4 We are not raising issues of legal compliance or the Duty to Cooperate.
- 1.5 For each policy considered, our representations:
1. Identify whether the Regulation 19 wording addresses the matters raised at Regulation 18, taking account of any changes between drafts;
  2. Assess whether the policy is sound against the tests in paragraph 36 of the NPPF; and
  3. Set out the precise modifications needed to make the policy sound where deficiencies remain.
- 1.6 We have only referenced national policy in those instances where it was already relevant to the points raised in our Regulation 18 submissions. This ensures continuity between the two stages and provides the Inspector with a clear audit trail of unresolved issues.
- 1.7 Smith Jenkins broadly welcomes many aspects of the emerging City Plan, particularly where it promotes sustainable growth, efficient use of land, and the revitalisation of Central Milton Keynes. However, in several key areas the Regulation 19 draft has not resolved the concerns previously raised, and in some cases the restructuring of policies introduces new issues of justification, effectiveness or

internal inconsistency. Where this occurs, we have recommended amendments to ensure the plan is robust and fit for examination.

- 1.8 We trust that these representations will assist the Council in finalising the Plan and ensuring that it proceeds to examination in a sound form. We would welcome continued dialogue with officers on any of the matters raised.

## 2 Representations

### Policy GS6 Open Countryside

#### 1. Soundness

- 2.1 At Regulation 18, we raised a concern about the proposed restriction on the redevelopment or reuse of brownfield land to *non-residential* brownfield land. This was not consistent with the NPPF, which requires strategic policies to make as much use as possible of previously developed ‘brownfield land.’ There is no restriction in national policy to *non-residential* brownfield land.
- 2.2 At Regulation 19, this restriction on the redevelopment of brownfield land has been removed. However draft Policy GS6 remains **unsound** for the reasons set out below.

#### ***d) Consistent with national policy***

- 2.3 Draft Policy GS6 (Open Countryside) is overly restrictive (seeking to prevent, with some minor exceptions, any new housing development in rural areas on land outside of settlement boundaries). The approach is not consistent with national policy for the following reasons:
- NPPF Paragraph 142 confirms that the Government attaches ‘great importance’ to Green Belts. Although the open countryside is not afforded the same level of protection in national policy as the Green Belt, draft Policy GS6 is more restrictive of development in the open countryside than national policy is of development in the Green Belt. NPPF Paragraph 154 states that the construction of new buildings in the Green Belt is inappropriate, but (subject to the impact on the openness of the Green Belt) exceptions to this are ‘limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use...’ The acceptability of redeveloping previously developed land or buildings in the Green Belt is not dependent on whether they are redundant or disused. By restricting redevelopment to redundant or disused buildings, draft Policy GS6 is overly restrictive and does not accord with the NPPF (which seeks to make as much use as possible of brownfield land – irrespective of whether it is redundant or disused).
  - NPPF Paragraph 155 confirms that the development of homes in the Green Belt is not inappropriate if the development would utilise ‘Grey Belt’ land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the Plan (as well as satisfying other criteria). This approach recognises that even parts of the Green Belt (which the Government attaches ‘great importance’ to) do not contribute to the purposes of the Green Belt. Draft Policy GS6, although dealing with ‘open countryside’ (which is not afforded the same level of protection in national policy as Green Belt), adopts a blanket approach to the development of new homes in the open countryside, allowing no opportunity to assess the actual contribution of a site to the open countryside.

- Paragraph B introduces the concept of the impact of a proposal on the surrounding landscape. However, protection to the surrounding landscape is already addressed in draft Local Plan Policy PFHP7(8), which requires that *‘important views and vistas are protected, and the design of the proposal makes a positive contribution to the wider townscape, skyline and landscape’*. It is therefore unnecessary for draft Policy GS6 to restrict proposals on the basis of their impact on the landscape.

## **2. Modifications Required to Make the Policy Sound**

- 2.4 Draft Policy GS6 is unsound because it is overly restrictive and is not consistent with national policy, which allows the opportunity to assess a site’s contribution to the purposes of the Green Belt (which is afforded a higher level of protection in national policy than open countryside).
- 2.5 Draft Policy GS6 should be updated to allow the assessment of a site’s actual contribution to the open countryside.

## **3. Summary**

- 2.6 Whilst some of the concerns raised at Regulation 18 have now been addressed, the draft Policy remains inconsistent with National Policy. To make the Policy sound, it must be amended to allow the assessment of a site’s actual contribution to the open countryside.

## **Policy PFHP1 – Delivering Healthier Places**

### **1. Soundness**

- 2.7 At Regulation 18, we raised a single concern with the draft PFHP1 policy, namely that it was:
- “unnecessary for proposals for a Hospital to submit a Health Impact Assessment given this use will provide clear health improvement.”*
- 2.8 The Regulation 19 version of PFHP1 retains the requirement for Hospitals (Policy PFHP1 A(4)(b)) to provide a Health Impact Assessment (HIA). No further justification or evidence is presented for this requirement, and no adjustment has been made to exempt an inherently health-improving use from this procedural obligation.
- 2.9 Accordingly, PFHP1 remains **unsound** for the reasons set out below.

#### ***a) Not Positively Prepared***

- 2.10 Requiring an HIA for Hospital development does not support the delivery of health infrastructure. Hospitals are, by definition, facilities that improve the health outcomes of the population and address health inequalities. Requiring an HIA introduces additional administrative burden without

contributing to better policy outcomes or supporting delivery. This part of the policy is therefore not positively prepared.

***b) Not Justified***

- 2.11 No proportionate or evidence-based rationale has been provided for applying the HIA requirement to hospitals. Unlike other forms of development that may generate adverse health impacts, a hospital is an unequivocally health-enhancing land use. PFHP1 is therefore not justified in respect of this criterion.

***c) Not Effective***

- 2.12 The requirement has no meaningful practical value in determining applications for Hospital development. It risks creating delay and additional cost for healthcare providers, both NHS and private, without improving scheme outcomes or informing mitigation, as hospitals inherently generate net positive health effects. This renders the requirement ineffective, contrary to the NPPF tests of soundness.

**2. Modifications Required to Make the Policy Sound**

- 2.13 To address the above concerns and ensure the policy is sound, the following modification is required:
- 2.14 **Remove the requirement for Hospitals to submit a Health Impact Assessment** – Amend PFHP1 A(4)(b) to exclude Hospitals from the list of uses requiring an HIA.

**3. Summary**

- 2.15 The Regulation 19 version of PFHP1 has not addressed the concern raised at Regulation 18. Requiring a Health Impact Assessment for Hospitals remains unnecessary, unjustified and ineffective. To make the policy sound, the requirement for Hospitals to provide an HIA must be removed or amended as set out above.

**Policy PFHP4 – Delivering a Healthier Food Environment**

**1. Soundness**

- 2.16 At Regulation 18, we expressed support for the broad intention of creating a healthier food environment but raised two specific concerns with the proposed restrictions on Hot Food Takeaways:
- that applying a 400m exclusion zone around all schools was unreasonable given the limited ability of unaccompanied primary school children to access such premises; and
  - that the policy failed to strike the appropriate balance between reducing health inequalities and the NPPF's requirement to support economic development.

2.17 The Regulation 19 version of PFHP4 not only retains the 400m exclusion but widens it significantly to include further education facilities, youth and community centres, leisure centres and parks. No additional justification has been provided for this expansion, nor has any balancing test been introduced.

2.18 For the reasons set out below, PFHP4 remains **unsound**.

***a) Not Positively Prepared***

2.19 The expanded 400m exclusion zone applies to a wide range of facilities located throughout the urban area. When mapped spatially, these exclusions would cover a substantial proportion of Milton Keynes, meaning the policy would severely limit opportunities for new Hot Food Takeaways outside designated town centres.

2.20 This level of restriction is disproportionate to the evidence cited in the plan and does not reflect the NPPF's requirement that policies should support economic growth, particularly for small businesses. In this respect, PFHP4 is not positively prepared.

***b) Not Justified***

2.21 At Regulation 18, we noted that applying a 400m buffer to all schools was unjustified. At Regulation 19, this requirement has been expanded materially, yet the Council has provided no additional proportionate evidence justifying the 400m distance. In addition, no explanation has been provided for extending the buffer to leisure centres, parks, or community/youth facilities. The policy also fails to include an assessment of the cumulative spatial impact of these exclusions on the availability of suitable sites.

2.22 Given the limited ability of unaccompanied primary school children to patronise hot food takeaway premises, and the absence of any new evidence to support the expanded exclusions, the policy remains unsupported by proportionate evidence. PFHP4 is therefore not justified.

***c) Not Effective***

2.23 The expansion of the exclusion zones reduces flexibility and could significantly restrict the operation and growth of legitimate businesses. This creates risks of displacing such uses to less appropriate locations and encouraging vacancy within certain frontages. The policy could also potentially undermine the commercial vitality of centres outside GS5 locations.

2.24 Because the policy has been extended without a clear mechanism for balancing economic and health considerations, and without an evidence-based justification, PFHP4 is not effective.

**2. Modifications Required to Make the Policy Sound**

2.25 To address the concerns identified above and make PFHP4 sound, the following modifications are required:

- 2.26 **Clarify and refine the 400m exclusion zone** – Limit the 400m buffer to secondary schools and further education establishments, reflecting those age groups most capable of independently accessing hot food takeaways. Alternatively, provide proportionate, evidence-based justification for any wider exclusion.
- 2.27 **Introduce a balancing mechanism** – Insert wording that enables decision-makers to balance health impacts and the economic role and contribution of Hot Food Takeaways, having regard to NPPF support for economic development.
- 2.28 **Provide evidence for expanded exclusions** – If the Council wishes to retain exclusions for youth/community centres, leisure centres or parks, proportionate justification must be provided.

### **3. Summary**

- 2.29 The Regulation 19 version of PFHP4 has not addressed the concerns raised at Regulation 18. Instead, the expansion of exclusion zones has amplified the disproportionality of the approach. The policy remains not positively prepared, not justified and not effective, and requires modification to introduce a proportionate, evidence-led and balanced framework for regulating Hot Food Takeaways.

## **Policy PFHP7 – Well Designed Buildings and Spaces**

### **1. Soundness**

- 2.30 At Regulation 18, Smith Jenkins expressed general support for the design principles contained in former Policy PFHP7 but raised one specific concern relating to criterion 10, which required buildings to incorporate design measures intended to prevent deaths by suicide. Our representation noted that such matters are more appropriately addressed through Building Regulations and specialist health and social care frameworks, and it was therefore unnecessary and inappropriate to embed them within planning policy.
- 2.31 The Regulation 19 version of PFHP7 (“Well-designed buildings and spaces”) has removed this requirement entirely. The updated policy now focuses on high-quality design principles, context-appropriate scale and massing, inclusive design, protection of important views, and integrated servicing/parking—without including suicide-prevention provisions.
- 2.32 Accordingly, the concern raised at Regulation 18 has been addressed in full. The policy is sound for the purposes of paragraph 36 of the NPPF. We have no other comments on this policy.

## **Policy HQH1 – Healthy Homes**

### **1. Soundness**

- 2.33 At Regulation 18, we raised two specific concerns with Policy HQH1, namely:

- the lack of clarity regarding the source and publication of the Council’s “latest evidence of need”; and
- the unrealistic expectation that small developments (fewer than 10 homes) should fully reflect the Council’s assessment of need, particularly in the absence of any viability testing to support this requirement.

2.34 The Regulation 19 version of the policy retains both requirements. While the drafting has been restructured, no additional clarity has been provided regarding the housing need evidence base, and the mix requirements for small schemes remain substantively unchanged. In certain respects, the policy becomes more onerous by requiring applicants to submit robust evidence if a varied mix is deemed unfeasible.

2.35 For these reasons, Policy HQH1 remains unsound.

***a) Not Positively Prepared***

2.36 The requirement for small sites to reflect the Council’s “latest assessment of need” places disproportionate weight on the role of minor developments in meeting strategic housing mix objectives. Many small sites, particularly single-plot infill schemes, constrained brownfield plots, specialist housing or conversions, are inherently unable to deliver a balanced mix of size and type.

2.37 Without flexibility or a clear evidence base demonstrating that small schemes can viably deliver such variety, the policy does not represent a positively prepared strategy for meeting identified needs.

***b) Not Justified***

2.38 No proportionate evidence is provided to support the requirement that schemes of fewer than 10 homes should reflect the Council’s housing mix evidence. Nor is any viability testing presented to demonstrate that small developers can meet these requirements alongside other obligations.

2.39 In addition, the policy continues to refer to the Council’s “latest assessment of need” without specifying where this evidence will be published or providing any indication as to which documents will comprise that assessment. A policy that relies on external evidence must clearly identify the source of that evidence. The continued absence of this clarity means HQH1 is not justified or based on proportionate evidence.

***c) Not Effective***

2.40 The mix requirements for small sites are likely to be unworkable in practice. The need for “robust evidence” to justify alternative mixes on small sites introduces additional process without corresponding benefit. As drafted, the policy risks generating inconsistent decision-making and potential appeals, thereby reducing effectiveness.

**2. Modifications Required to Make the Policy Sound**

- 2.41 To address the concerns identified above and ensure HQH1 is sound, the following modifications are required:
- 2.42 **Clarify the “latest assessment of need”** – Amend the policy or supporting text to specify:
- the evidence base documents that constitute the “latest assessment of need”;
  - where these will be published; and
  - the mechanism for updating and notifying applicants of new evidence.
- 2.43 **Revise requirements for small sites (<10 homes)** – Amend the policy criterion to clarify that while small schemes should have regard to the Council’s mix evidence, they will not be required to reproduce a full mix where this is not feasible due to site size, design constraints, viability etc.

### **3. Summary**

- 2.44 The concerns raised at Regulation 18 have not been addressed. The policy remains not positively prepared, not justified and not effective, particularly in respect of mix requirements for small sites and the lack of clarity around the Council’s assessment of need. The modifications set out above are required to make HQH1 sound.

## **Policy HQH3 –Supported and Specialist Homes**

### **1. Soundness**

- 2.45 At Regulation 18, we expressed partial support for Policy HQH3 but raised a specific concern with criterion D (loss of supported and specialist homes). Our representation noted that the policy should also allow for situations where existing supported or specialist accommodation is no longer viable, including where the quality of accommodation is not suitable.
- 2.46 The Regulation 19 version of HQH3 retains a very similar test for the loss of supported and specialist homes. Criterion D continues to restrict loss to circumstances where there is “no longer a need for these homes in this location” or where “suitable alternative provision has or will be made elsewhere.” No allowance has been introduced for circumstances where existing provision is demonstrably no longer fit for purpose or cannot reasonably be refurbished or operated viably.
- 2.47 In all other respects, including support for new supported and specialist homes and provision within strategic allocations, we raise no objection. However, the policy remains **unsound** in relation to the loss of existing supported and specialist homes for the reasons set out below.

#### ***a) Not Positively Prepared***

- 2.48 As drafted, criterion D may inadvertently frustrate the renewal or replacement of outdated or substandard supported and specialist accommodation. In some cases, there will clearly still be an

underlying need for supported or specialist homes in a locality, but the specific buildings may be physically incapable of reasonable adaptation to modern standards and/or operationally or financially unviable for providers to maintain or refurbish.

- 2.49 A positively prepared strategy for supported and specialist housing should allow for the rationalisation and renewal of such stock, including redevelopment where this will ultimately improve the overall quality and suitability of provision. Criterion D, in its current form, does not recognise this and therefore is not positively prepared.

***b) Not Justified***

- 2.50 No proportionate evidence is presented to justify a rigid requirement that existing supported and specialist homes can only be lost where need has disappeared or alternative provision has been made elsewhere. In practice, the need for supported and specialist homes is likely to remain high, but the location, configuration and quality of specific schemes may no longer be appropriate.
- 2.51 The absence of any reference to viability is not consistent with how supported and specialist housing is typically planned and managed by providers, who must balance need against building condition, regulatory standards, care models and funding constraints. For this reason, criterion D, as currently worded, is not justified.

***c) Not Effective***

- 2.52 Without explicit recognition of viability and accommodation quality, criterion D risks locking in outdated or substandard stock because “need” persists, even where better solutions could be delivered. It also risks generating uncertainty for applicants and decision-makers when proposals seek to rationalise or replace existing provision. This could hinder the effective delivery of modern, high-quality supported and specialist housing, undermining the wider aims of HQH3. The policy is therefore not fully effective in its current form.

**2. Modifications Required to Make the Policy Sound**

- 2.53 To address the concerns identified above and ensure HQH3 is sound, the following modification is required, directly reflecting our Regulation 18 representation:
- 2.54 **Allow loss of specialist homes when they are demonstrably no longer viable/fit for purpose** – implementing this change would maintain strong protection against unjustified loss while allowing rationalisation and renewal where accommodation is obsolete, substandard or cannot reasonably be sustained, thereby supporting the long-term delivery of appropriate supported and specialist homes.

**3. Summary**

- 2.55 We support the overall intent of HQH3 to deliver and safeguard supported and specialist homes. However, the policy remains not positively prepared, not justified and not fully effective in respect of

the loss of existing provision. A targeted modification to criterion D, as set out above, is required to make the policy sound.

## **Policy HQH8 –Exception Sites**

### **1. Soundness**

2.56 At Regulation 18, we expressed support for the inclusion of an Exception Sites policy, recognising its importance in meeting affordable housing need in rural areas. However, we raised two substantive concerns:

- that the rigid quantitative limits applied to Rural Exception Sites (maximum 0.5ha / 10 homes, and a prohibition on any development that could lead to coalescence) were inconsistent with national policy, which does not impose such thresholds; and
- that the size restrictions on First Homes Exception Sites did not reflect the Government’s intent, as set out in the Written Ministerial Statement (WMS) (May 2021) and PPG, which anticipate proportionate development rather than fixed maximums, with proportionality potentially extending up to 1ha or 5% of the size of the settlement.

2.57 The Regulation 19 version of the policy (now HQH8) has made some amendments, including introducing a larger site allowance for community-led exception schemes. However, the core concerns regarding the inflexible quantitative thresholds for Rural Exception Sites and First Homes Exception Sites remain largely unaddressed. The policy therefore remains **unsound** for the reasons set out below.

#### ***a) Not Positively Prepared***

2.58 The continued application of rigid quantitative thresholds (0.5ha / 10 homes) to most exception sites is not reflective of a positively prepared strategy for meeting rural affordable housing needs. National policy does not impose size caps or numerical limits; instead, it requires proportionate development that meets locally evidenced need.

2.59 By constraining the scale of exception sites through fixed thresholds, the Reg 19 policy risks restricting delivery in rural settlements where local need may justify a larger scheme. This is reinforced by the fact that the policy differentiates community-led development, correctly allowing larger sites, yet does not extend similar proportional flexibility to other forms of exception housing.

#### ***b) Not Justified***

2.60 The Council has not provided proportionate evidence to justify the imposition of the 0.5ha / 10-home cap on rural exception sites and First Homes exception sites, nor the prohibition on any development that may contribute to settlement coalescence. National policy does not require such restrictions,

and the WMS (May 2021) explicitly supports First Homes Exception Sites on unallocated land adjacent to settlements, with proportionality guiding scale rather than fixed limits.

- 2.61 Our Regulation 18 representation noted that proportionality could reasonably reflect earlier guidance for Entry-Level Exception Sites. The Reg 19 version of HQH8 introduces this proportionality only for community-led schemes. There is no explanation for why the same principle is not applied to Rural Exception Sites and First Homes Exception Sites more generally.
- 2.62 Without evidence supporting the chosen numerical thresholds, the Reg 19 policy is not based on proportionate justification.

### ***c) Not Effective***

- 2.63 The rigidity of the thresholds limits the policy's effectiveness in delivering rural affordable housing. Key consequences include:
- preventing otherwise suitable sites from coming forward solely because they marginally exceed the 0.5ha / 10-home constraint;
  - restricting First Homes Exception Sites, despite the Government's explicit intention to encourage such provision; and
  - relying on an overly restrictive coalescence test that does not provide for balancing considerations or site-specific mitigation.
- 2.64 Because the policy departs from national guidance without adequate justification and does not allow proportionate flexibility, it risks being inconsistently applied and vulnerable to challenge at decision-making or appeal.

## **2. Modifications Required to Make the Policy Sound**

- 2.65 To address the concerns identified and ensure HQH8 is sound, the following modifications are required, each directly reflecting the issues raised at Regulation 18.
- 2.66 **Introduce proportionality in place of rigid thresholds** – Replace fixed size limits for Rural Exception Sites and First Homes Exception Sites with a proportional approach aligned with national policy.
- 2.67 **Amend coalescence criterion to allow appropriate planning judgement** – Modify criterion A(3) to ensure that minor reductions in physical separation do not automatically preclude otherwise acceptable schemes.
- 2.68 **Clarify consistency with national policy for First Homes Exception Sites** – Reinstate the intent of national guidance by explicitly allowing proportionate flexibility for First Homes Exception Sites rather than applying an inflexible cap.

## **3. Summary**

- 2.69 While we support the principle of Policy HQH8, the Regulation 19 draft has not addressed the core issues raised at Regulation 18. The use of rigid quantitative thresholds, inconsistent with national policy, continues to constrain the delivery of affordable rural housing and First Homes Exception Sites. The policy therefore remains not positively prepared, not justified and not effective. The targeted modifications set out above are required to ensure HQH8 is sound.

## **Policy CEA7 – Mitigating Wider Environmental Pollution**

### **1. Soundness**

- 2.70 At Regulation 18, we supported the general intent of the policy but raised a single, focused concern regarding the drafting of the air quality and noise/vibration provisions. Specifically, we noted that the requirement for minor development proposals to undertake assessment where sites are within 50 metres of a “major road or heavily trafficked route” was unclear because the list of roads in the policy was not definitive.
- 2.71 The Regulation 19 policy has altered the structure of the relevant provisions and now references specific road classifications, namely the Strategic Road Network, Major Road Network, Grid Roads, and A422. However, the revised drafting still retains open-ended categories requiring interpretation and continues to rely on road types defined outside the Local Plan. For example, what is the difference between highway associated with the SRN and the ‘Major Road Network’? As such, the core concern about definitional certainty has only been partially addressed.

### ***c) Not Effective***

- 2.72 The absence of certainty around which roads fall within the referenced categories will create practical difficulties in implementation. Applicants may commission unnecessary assessments due to uncertainty, or conversely may omit them where required, increasing the risk of delay, further information requests, or appeal. This undermines the consistency of decision-making and reduces the effectiveness of the policy in achieving its environmental objectives.

### **2. Modifications Required to Make the Policy Sound**

- 2.73 To remedy the issues identified and ensure the policy is clear, proportionate and enforceable, the following targeted modifications are required.
- 2.74 **Provide a definitive list or map of relevant road corridors** – Amend Part F(3) and Part J to specify the exact roads included within the Strategic Road Network, Major Road Network and Grid Roads as they apply in Milton Keynes. Alternatively, incorporate a map or schedule in the Local Plan or an accompanying appendix showing all road segments to which the 50m threshold applies.
- 2.75 **Ensure parallel clarity for noise and vibration** –The same definitional issue arises under Part J for noise and vibration. The modification above should apply equally to both criteria so the air quality and noise components operate consistently.

### 3. Summary

- 2.76 Policy CEA7 remains partially unresolved in respect of the concerns raised at Regulation 18. While the Reg 19 version has adjusted the drafting, it continues to rely on undefined classifications rather than a definitive list or mapped identification of qualifying road corridors. The targeted modifications above are required to bring Policy CEA7 into alignment with the NPPF tests of soundness.

## **Policy CEA11 – Mitigating Wider Environmental Pollution**

### 1. Soundness

- 2.77 At Regulation 18, we raised two principal concerns with the emerging Urban Greening, Trees and Woodland policy:

- that there was no justification for applying the Urban Greening Factor (UGF) in Milton Keynes, noting that it is a tool developed for the London Plan and not part of national policy; and
- that applying UGF and a 19% minimum tree canopy cover standard to all new residential and commercial development was not justified by proportionate evidence and would be onerous in practice, particularly for constrained sites or non-new-build proposals.

- 2.78 The Regulation 19 version of the policy has made some improvements, notably limiting UGF requirements to major development only and clarifying feasibility and viability considerations. However, the core issues raised at Regulation 18 remain unresolved. There is no evidence is presented to justify the adoption of UGF in Milton Keynes; the 19% tree canopy cover requirement remains unsubstantiated; and the policy is still drafted in a way that may inadvertently capture changes of use, minor works, or constrained forms of development, despite the lack of evidence that such development can meaningfully contribute to canopy or greening targets.

- 2.79 For the reasons set out below, Policy CEA11 remains **unsound**.

#### ***a) Not Positively Prepared***

- 2.80 Policy CEA11 continues to apply UGF and canopy standards in ways that may restrict or delay development without clear evidence of need or deliverability. Specifically:

- Adopting the UGF tool without supporting evidence risks imposing design burdens that are not suitable to the Milton Keynes context;
- The canopy cover requirement of 19% has no demonstrated baseline analysis showing that this level is achievable across all major developments within defined settlement boundaries; and
- The expectation to retain soft landscape features and trees (Part D) does not acknowledge that some urban or brownfield sites have low existing baseline provision and that redevelopment often provides net environmental gain even where limited tree retention is possible.

2.81 A positively prepared strategy would ensure that greening standards are achievable, proportionate, and supported by evidence of need and feasibility. The Reg 19 policy does not yet achieve this.

***b) Not Justified***

2.82 The NPPF requires policies to be underpinned by proportionate evidence. The Reg 19 draft still provides:

- no evidence-base or appraisal demonstrating that the UGF metric is appropriate for Milton Keynes or how its scoring system correlates with local ecological objectives;
- no justification for selecting 19% canopy cover as the minimum standard, nor any assessment of baseline conditions, viability, or spatial feasibility; and
- no explanation as to why Milton Keynes should adopt a London-specific greening tool when alternative approaches (e.g., biodiversity net gain, GI standards, landscape strategies) already exist and are tailored to national policy.

2.83 Without proportionate evidence, the UGF and canopy requirements cannot be considered justified.

***c) Not Effective***

2.84 The effectiveness of the policy is undermined by several issues:

- UGF scores may be unworkable on small or densely developed major sites, especially in CMK or other intensively developed areas;
- a rigid canopy cover percentage may drive impractical design solutions (e.g., excessive clustering of trees, conflicts with utilities or active travel infrastructure);
- the lack of clear applicability thresholds risks uncertainty for change-of-use or minor development proposals, despite our Reg 18 position that such forms of development should be excluded; and
- the absence of a clear viability and feasibility framework introduces uncertainty into implementation and risks inconsistent decision-making.

2.85 As drafted, the policy may therefore be ineffective in balancing development needs with environmental outcomes.

**2. Modifications Required to Make the Policy Sound**

2.86 To address the concerns identified above and ensure CEA11 is sound, the following modifications are required. These reflect directly the issues raised at Regulation 18.

2.87 **Clarify the justification and applicability of the Urban Greening Factor** – Provide proportionate evidence explaining why the UGF tool and confirm explicitly in the policy or supporting text that UGF

applies only to major, new-build development and not to changes of use, minor works or constrained infill sites.

- 2.88 **Provide evidence and flexibility for the 19% tree canopy cover requirement** – Supply a robust evidence base demonstrating how the 19% standard was derived and whether it is feasible across different development typologies. In addition, amend art C to allow a flexible, site-responsive approach, recognising variable baseline conditions and physical constraints.
- 2.89 **Clarify retention and replacement expectations** – Amend Part D to recognise that full tree retention may not be feasible on all sites and that net gain can be delivered through high-quality replacement planting, biodiversity net gain measures, or off-site contributions where necessary.
- 2.90 **Confirm feasibility and viability provisions** – Strengthen the wording in Part B to ensure that both feasibility and viability are key considerations of whether of UGF and canopy standards can be met.

### **3. Summary**

- 2.91 Policy CEA11 remains only partially responsive to the issues raised at Regulation 18. While limiting UGF to major development is a welcome step, the policy continues to lack the proportionate evidence required to justify the adoption of the Urban Greening Factor, the 19% canopy standard, and the scale of obligations applied to development.
- 2.92 Without further amendments, CEA11 is not positively prepared, not justified, and not effective. The targeted modifications set out above are required to ensure that the policy is grounded in proportionate evidence, deliverable in practice, and aligned with the NPPF tests of soundness.

## **Policy HE1 – Heritage**

### **1. Soundness**

- 2.93 At Regulation 18, we raised a number of concerns with former Policy ECP5 relating principally to:
- the need for clearer alignment with statutory duties and the NPPF harm tests;
  - the absence of a clear distinction between designated and non-designated heritage assets;
  - the incomplete and unpublished status of the Milton Keynes New Town Heritage Register; and
  - the overly prescriptive requirements for technical detail and full scopes of works at application stage.
- 2.94 The Regulation 19 version of the policy (now HE1) has been substantially restructured and some points raised at Regulation 18 have been addressed, notably through the correct use of “conservation deficit” and the removal of misaligned harm tests from this policy. However, the central issues of proportionality and clarity remain unresolved.

- 2.95 First, HE1 continues to rely on the New Town Heritage Register as a basis for imposing additional evidential requirements without confirming that the Register is complete, robust, transparently prepared or formally adopted. Without this clarity, the policy lacks the evidential foundation required for sound decision-making.
- 2.96 Second, Parts B and C still require structural engineers' reports and detailed scopes of works for listed building conversions in all cases, with no explicit allowance for proportionality or the use of conditions. This risks creating unnecessary barriers to the viable reuse and repair of heritage assets.
- 2.97 In these respects, HE1 is not positively prepared, not justified and not effective, as it imposes blanket requirements without evidential justification and without a mechanism to ensure proportionate implementation.

***a) Not Positively Prepared***

- 2.98 Parts B and C of HE1 require that all proposals involving conversion or structural works to listed buildings are accompanied by a structural engineer's report and that the "full scope of works required" is included at application stage. In practice, this approach risks:
- creating unnecessary barriers to the timely reuse and repair of listed buildings, especially where proposals are at an early stage or where detailed building regulations-driven interventions can be sensibly conditioned; and
  - discouraging applicants from bringing forward beneficial schemes (including repairs, adaptive reuse, or modest conversion proposals) because of front-loaded technical costs.
- 2.99 A positively prepared heritage strategy should encourage viable reuse and conservation of heritage assets, not impose process requirements that may unintentionally deter or delay such proposals. HE1 does not currently strike that balance.

***b) Not Justified***

- 2.100 No evidence is presented to justify why all schemes involving structural works or listed building conversions must provide a structural engineer's report and full scope of works at application stage, rather than allowing a proportionate approach where some elements are secured by condition once the principle and main impacts are understood.
- 2.101 In addition, Part D continues to attach specific consequences to assets on the New Town Heritage Register, yet our Regulation 18 concerns regarding the Register's completeness and robustness remain unaddressed in the policy wording. There is no explicit confirmation that:
- the Register has been fully published and formally adopted;
  - the methodology for inclusion is robust and transparent; and
  - the extent and significance of each asset are clearly defined and publicly available.

2.102 Without clear evidence and procedural clarity on these points, the additional requirements attached to New Town Heritage Register assets risk being insufficiently justified.

***c) Not Effective***

2.103 The effectiveness of HE1 is undermined in two main respects:

- The blanket requirement for structural reports and full scopes of work (Parts B and C) is likely to result in over-detailed and front-loaded submission requirements, even for relatively modest interventions. This may lead to inconsistent application by decision-makers and encourage repeated requests for further information where a more proportionate, risk-based approach would suffice.
- Part D requires evidence that “all feasible solutions to avoid and minimise [the] loss” of non-designated heritage assets have been fully evaluated. While we support the principle of minimising harm, the wording risks going beyond the balanced-judgement approach of NPPF paragraph 209 in practice, especially where it interacts with assets on the New Town Heritage Register whose status and evidence base are not fully set out in the Plan. This may generate uncertainty and make decision-making less transparent and predictable.

2.104 In combination, these issues mean that HE1, as drafted, is unlikely to operate effectively as a clear, proportionate and implementable framework for heritage assessment and management.

**2. Modifications Required to Make the Policy Sound**

2.105 To address the above concerns and make HE1 sound, the following modifications are required, each flowing directly from our Regulation 18 representations:

2.106 **Clarify the status and robustness of the New Town Heritage Register** – Amend the policy and/or supporting text to confirm that the New Town Heritage Register has been fully published and formally adopted.

2.107 **Introduce proportionality and flexibility into information requirements for listed buildings** – Amend Parts B and C to confirm that a proportionate approach will be taken to technical information, with structural engineer’s reports required where structural risk or complexity justifies this, rather than as a blanket requirement. In addition, clarify that certain detailed works may be secured by suitably worded conditions rather than always requiring full specification at application stage.

2.108 **Align the approach to non-designated heritage assets with the NPPF** – Amend Part D to clarify that decisions on the loss of non-designated heritage assets, including those on the New Town Heritage Register, will be made in accordance with the balanced-judgement approach in the NPPF, having regard to the asset’s significance and the scale of harm or loss. The policy should also be amended to reflect that “all feasible solutions” will be applied proportionately, in a way that supports, rather than frustrates, delivery of sustainable development.

### **3. Summary**

- 2.109 While the restructuring of the heritage policies at Regulation 19 has addressed some of the detailed concerns raised at Regulation 18 – notably the use of “conservation deficit” and the removal of misaligned harm tests from this policy – Policy HE1 still contains elements that are not positively prepared, not justified and not effective.
- 2.110 In particular, the policy remains overly prescriptive in its information requirements for listed building conversions and structural works, and continues to rely on the New Town Heritage Register without clearly establishing its status and evidential robustness. The modifications set out above are necessary to ensure that HE1 provides a clear, proportionate and NPPF-compliant framework for heritage assessment and management in Milton Keynes.

**Appendix 1**

**Representations to the  
MK City Plan 2050  
Regulation 18 Draft**

---

Smith Jenkins Planning & Heritage

---

October 2024

Smith Jenkins Ltd



## **1 Introduction**

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage in response to the current MK City Plan 2050 Regulation 18 Consultation.
- 1.2 Smith Jenkins is an independent town planning consultancy based in Milton Keynes who act for numerous clients including some of the largest organisations in the city. In 2023 Smith Jenkins submitted 133 planning applications to Milton Keynes City Council.
- 1.3 These comments form the corporate view of Smith Jenkins Planning & Heritage and focus on the key development management policies of the draft Plan which are most likely to affect development proposals being brought forward in the city by our various clients.
- 1.4 We trust that these representations will be duly considered and would welcome the opportunity to discuss matters with officers further as the preparation of the new Local Plan continues.

## 2 Representations

### Overview

- 2.1 The MK City Plan 2050 Regulation 18 Plan sets out the ambitions, objectives and overall policy framework for delivering growth aligned with the Council’s vision contained within the Strategy for 2050.
- 2.2 Smith Jenkins Planning & Heritage welcome the opportunity to comment on the draft Plan given our active involvement in planning in the City.
- 2.3 The responses are set out in relation to the various policies are set out under the various topic areas below.

### Policy GS1 Our Spatial Strategy

#### **Question 2(a) Do you agree with the draft policy?**

- 2.4 No.

#### **Question 2(b) – Policy GS1 Our spatial strategy**

##### ***Please say why you gave the answer to 2(a) above***

- 2.5 Draft Policy GS1 sets out the strategic growth options in Milton Keynes over the proposed Plan period. The draft policy is given in full below:

*“The development of land for new homes and employment within Milton Keynes up to 2050 will be directed toward locations in accordance with the following settlement hierarchy.*

*Tier 1 – the designated urban area of Milton Keynes City, as shown on the Policies Map, will be where the considerable majority of development that meets our identified need for homes and jobs over the plan period will be provided.*

*Tier 2 – development in Olney and rural settlements should focus on meeting local needs and be located within defined settlement boundaries, including locations identified in relevant made neighbourhood plans”*

- 2.6 Paragraph 23 explains the ‘Role of Neighbourhood Plans and small sites’ and states:

*“As identified in Policies GS1 and GS2 below, we still expect local communities to plan for growth that responds to their own local ambitions and needs through Neighbourhood Plans. This includes communities within the city as well as those beyond, in Olney and villages within Tier 2 of the settlement hierarchy. Where groups want to prepare or review a Neighbourhood Plan, we intend to continue our current approach of recommending a nominal housing figure to plan for (currently, we advise at least one dwelling). We always encourage groups to gain a close understanding of their specific local housing and other development needs. This should be informed through conversations with the local*

*community about how a Neighbourhood Plan can positively shape and deliver this growth. Through this route, we expect an additional, but unquantified, number of homes to come forward by 2050, complementing the growth locations set out in the MK City Plan 2050”.*

- 2.7 The spatial strategy sets out a two-tiered settlement hierarchy. This approach sees the majority of development focused within the designated urban area of Milton Keynes (Tier 1) and limited development elsewhere, i.e., in rural areas, villages with settlement boundaries and locations identified via Neighbourhood Plans (Tier 2).
- 2.8 With reference to the housing supply identified in Table 1 of the Plan, the vast majority of the identified supply, circa. 63,000 homes, is from locations in the urban area of Milton Keynes (Tier 1). Within Table 1, there are no allocations for homes to be delivered in rural areas (Tier 2 locations).
- 2.9 The spatial strategy is therefore binary, either development in the urban area of Milton Keynes (Tier 1) or no development elsewhere (Tier 2). This is not a sustainable approach. This approach effectively condemns locations within Tier 2 to ‘no development’ up to 2050.
- 2.10 If development is limited to villages or small settlements with existing settlement boundaries or development allocated via Neighbourhood Plans, growth in villages and smaller settlement will be stifled. Those villages will not benefit from new housing and therefore will not be able to deliver sustainable development. If no rural housing is provided there will be a number of negative consequences, for example: housing affordability issues will be exacerbated; younger people will be forced out due to a lack of housing options; local services and rural businesses will stagnate.
- 2.11 The two-tiered strategy is not justified. Housing should be distributed across the Borough in a proportionate and rational manner, underpinned by evidence of need. The settlement hierarchy should reflect the size and sustainability of settlements in Milton Keynes.
- 2.12 Whilst we agree development should be focussed in the urban area of Milton Keynes (Tier 1), we do not agree that this should be the only place which accommodates growth. A multi-tiered hierarchy should be established apportioning growth to the respective tiers based on their capacity to accommodate it.
- 2.13 While the Plan needs to be reviewed in light of the emerging 2024 NPPF, in respect of the current NPPF (2023), Paragraph 67 states that plan making authorities should establish a housing requirement for their whole area, and that strategic policies should set out a housing requirement for designated neighbourhood areas. The draft Policy does not specify a number of homes to be delivered through neighbourhood plans, and Paragraph 23 simply states that neighbourhood plans should deliver a nominal number of homes, with the Council advising that one dwelling per plan is acceptable.
- 2.14 This fails to identify the specific needs of villages and the rural areas. It prevents the potential for community-led housing coming forward, and is not consistent with Paragraph 83 of the Framework which states:

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*

#### *Neighbourhood Plans*

- 2.15 The Spatial Strategy indicates that development in rural areas will come from allocations in neighbourhood plans – this is very unlikely to happen. The expectation that local communities will plan for growth in the absence of any requirement to meet housing targets is misconceived and not a reflection on how neighbourhood planning has operated in Milton Keynes since its introduction.
- 2.16 To meet the requirements of the Framework and the ‘Basic Conditions’, Neighbourhood Plans should be prepared to conform to up-to-date strategic policy requirements set out in Local Plans. If no housing is required in rural areas via the Strategic Policies of the City Plan, then neighbourhood plans could provide zero housing and still be in conformity with those strategic policies. Removing any requirement for housing to be delivered in rural areas will inevitably result in neighbourhood plans becoming mechanisms to stop growth, i.e., if neighbourhood plans are not required to deliver housing, then Neighbourhood Plans will not to deliver housing.
- 2.17 Research undertaken by Smith Jenkins shows that of the 9 Neighbourhood Plans ‘made’ since the adoption of Plan:MK (2019), which are outside of the urban area or the ‘key settlements’ of Newport Pagnell, Olney and Woburn Sands (and excluding Hanslope, as the majority of the allocations in the Hanslope Neighbourhood Plan already had planning permission prior to 2019 due to a lack of 5YHLS in Milton Keynes and so were not ‘true’ allocations) these Neighbourhood Plans have allocated just 96 dwellings – this is just 0.3% of the housing target in the current Plan:MK (26,500 dwellings). If a similar number of allocations were in Neighbourhood Plans for the City Plan (96), then this would amount to just 0.1% of the housing target 53,256 dwellings. This will clearly not meet the housing requirement for rural areas.
- 2.18 The Plan must seek to meet the growth needs of villages and quantify this need into a housing target for rural areas. If the Plan identifies a housing requirement for rural areas, neighbourhood plan will need to accommodate this growth. If no number is provided, neighbourhood plans will deliver no growth.

#### *Justified*

- 2.19 The spatial strategy must be justified. The strategy must be based on proportionate evidence. In its current form, the spatial strategy is not justified.

The broad justification for the spatial strategy is summarised in paragraph 26 of the Plan:

*“This strategy seeks to protect the character of our villages and communities, which are principally located to the north of the city. In these locations the MK City Plan does not propose to allocate sites for strategic new developments. As noted above, we would expect*

*the relevant Town and Parish Councils to identify opportunities to deliver the growth their communities need through a locally prepared Neighbourhood Plan.”*

- 2.20 The approach seeks to protect the ‘character’ of villages and communities. It follows that any new housing in these villages would be harmful to the character of the villages and the communities that live within them. This is simply not the case and plainly at odds with national planning policy. Paragraph 83.
- 2.21 The Sustainability Appraisal, which underpins the Spatial Strategy, considered ‘Expansion of Villages’ as a development option. It was considered that this was not a ‘Reasonable Alternative’ within the growth strategy due to number of reasons such poor public transport links and sensitivity to change.
- 2.22 Whilst we agree that it is reasonable to direct strategic growth to more sustainable locations, this does not mean that villages or other smaller settlements should not have any growth. Growth of villages should be proportionate to their size and their growth needs. Villages must be able to grow, the level of growth is subject to assessment, however, a blanket ‘no growth’ to all villages is not sustainable or justified.

**Question 7(a) – Policy GS6 Open Countryside**

***Do you agree with the draft policy?***

- 2.23 No.

**Question 7(b) – Policy GS6 Open Countryside**

***Please say why you gave the answer to 7(a) above.***

- 2.24 Draft Local Plan Policy GS6 is modelled on NPPF Paragraph 84 (Paragraph 82 in the draft NPPF) – although it should be noted that NPPF Paragraph 84 seeks to restrict *isolated* homes in the countryside, not *all* homes. Draft Policy DS6 goes further than the NPPF in restricting development in the open countryside and is therefore out of step with both adopted and emerging national planning policy, as well as the Government’s clear intention to ‘significantly boost’ the supply of housing and prioritise brownfield land.
- 2.25 It is worth noting that, with reference to brownfield land, the WMS published alongside the draft NPPF states:

*“The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes; expanding the current definition of brownfield land to include hardstanding and glasshouses...”*

- 2.26 In light of this, it is considered inappropriate and unnecessary for Draft Policy GS6 (criterion ‘d’) to restrict the redevelopment or reuse of brownfield land to *non-residential* brownfield land. In order to promote ‘an effective use of land in meeting the needs of homes and other uses’, NPPF Paragraph 123 requires strategic policies to set out a clear strategy for accommodating objectively assessed

needs 'in a way that makes as much use as possible of previously developed "brownfield" land'. Since draft Policy GS6 seeks to restrict the redevelopment of brownfield land to *non-residential* brownfield land, it is overly restrictive and does not accord with the NPPF (which seeks to make as much use as possible of *all* brownfield land – irrespective of its use class).

- 2.27 Although NPPF Paragraph 142 confirms that the Government attaches 'great importance' to Green Belts, the open countryside is not afforded the same level of protection. Despite this, Draft Policy GS6 is more restrictive of development in the open countryside than national policy is of development in the Green Belt which is not justified.
- 2.28 Paragraph 2 of Draft Policy GS6, which introduces the concept of the impact of a proposal on the surrounding landscape, is also considered unnecessarily restrictive. Protection to the surrounding landscape is already addressed in draft Policy PFHP7(h), which requires that 'important views and vistas from within the immediate area and wider surrounding area are protected, and the design of the proposal makes a positive contribution to the wider townscape, skyline and landscape'. It is therefore unnecessary for draft Policy GS6 to restrict proposals on the basis of their impact on the landscape.
- 2.29 The policy should also refer to other suitable land uses in the country such as sports facilities and affordable housing schemes to be consistent with draft Policy HQH9 and NPPF Paragraph 70b.
- 2.30 Point 7 would be clearer if it were separated in to two: criteria applicable to replacement dwellings and criteria applicable to isolated new homes.

#### **Question 11(c) – Policy GS10 Movement and access**

***Should the plan be allocating a site for a lorry park to support this sector whilst mitigating some of the issues associated with lorry parking? If so, where should this best be located and what would be the parameters guiding its layout, design, and relationship with surrounding land uses/neighbours?***

- 2.31 We consider that the New City Plan should identify a site for lorry parking to support the wider logistics industry which has a large presence both in Milton Keynes but also in terms of the strategic nature of Junctions 13 and 14 on the M1.
- 2.32 The need for additional lorry parking in England is well documented. The National Lorry Parking Survey Part 1 (2022) identified an immediate need for 4,400 on-site vehicle parking spaces across England. The concentration of need is in the East of England and the South East (Milton Keynes sitting on the boundary of the two regions). The survey reported that current utilisation of existing lorry parks at 95% in the East of England, and 94% within the South East. Both are considered to be 'critical' in terms of utilisation.
- 2.33 It is clear that on a nightly basis, there is excess lorry parking taking place in Milton Keynes. Lorries park on industrial estates and in the bus stops on grid roads. Other than at Newport Pagnell services, there are no other dedicated lorry or commercial vehicle parking facilities in the City. The 2022 National Lorry Parking Survey did not report individual numbers of lorries parked at individual sites,

however the 2017 Parking Study reported that parking utilisation the Newport Pagnell Southbound was 245% utilisation, and Northbound was 111% utilisation. This would suggest there is no capacity at Newport Pagnell, and there is a significant need to meet the requirements of additional vehicles unable to park in these locations.

- 2.34 In terms of the issues associated with drivers not being able to park safely, these are well documented. They relate to welfare issues for drivers themselves (which has an effect on the ability to recruit to the industry) alongside the issue of theft of freight, which has a significant economic consequence.
- 2.35 Paragraph 81 of DfT Circular 01/2022 establishes that in areas where there is an identified need for greater lorry parking provision, National Highways will work with relevant local planning authorities to ensure that local plan allocations and planning application decisions address the shortage. As such, the data is presented at the Local Authority boundary level to enable local authorities to consider the information as part of their evidence base for planning documents such as Local Plans and Local Transport Plans, and when determining planning applications. It is unclear from the draft Plan or from the evidence base whether National Highways have been consulted on this matter.
- 2.36 A site should be well located to the SRN. An optimum site area is to provide parking for 200 lorries, alongside provision for welfare facilities including showers and launderette. DfT Circular 01/2022 sets out minimum standards for parking for HGV parking alongside a list of welfare facilities which are the minimum requirements for those facilities seeking signage from the SRN. This is a good starting point to assess the likely site size and facilities requirements.
- 2.37 Smith Jenkins currently sit on a DfT Task and Finish Group (TFG) which seeks to provide advice on HGV Parking Capacity and Standards. We attach at **Appendix 1** the submission made to the NPPF consultation in respect of lorry parking which might assist the Council in answering this question.
- 2.38 We would be happy to provide the Council with additional information on the requirements for a site based on our industry knowledge.

**Question 22(a) – Policy CMK1 Central Milton Keynes Placemaking Principles**

**Do you agree with the draft policy?**

- 2.39 Yes.

**Question 22(b) – Policy CMK1 Central Milton Keynes Placemaking Principles**

***Please say why you gave the answer to 22(a) above.***

- 2.40 We support the re-use of existing buildings and the provision of new sites in CMK to support the objectives of the Plan. This includes the creation of sustainable developments in locations accessible by existing and improved multi-modal transport options.
- 2.41 The use of taller buildings and more dense development is welcomed to create and support the existing urban structure and to create a distinct skyline.

- 2.42 Part C of the Policy (Parking) needs to have an associated review of the Car Parking Standards SPD which conflicts with the approach to the reduction in surface level car parking.
- 2.43 We support the reduction in surface level car parking to support new developments and creation of more housing.

**Question 23(a) – Policy CMK2 Central Milton Keynes Development Framework Area**

***Do you agree with the draft policy?***

- 2.44 No.

**Question 23(b) – Policy CMK2 Central Milton Keynes Development Framework Area**

***Please say why you gave the answer to 23(a) above.***

- 2.45 The Policy states that development in CMK should be in accordance with the CMK Development Framework shown at Figure 3 of the Plan. This Framework Plan is developed at such a high level it is difficult to interpret. It does also not reflect the development proposals for additional buildings set out in the text, such as at Paragraph 88 e) with the potential for development of land between North Row and Portway. The Framework plan needs to actually reflect the aspirations of the Plan.
- 2.46 Part B of the Policy sets out quantum of development for CMK. This reflects the capacity exercise within the SHLAA however due to a lack of identified sites in CMK for specific development, it is difficult to understand how this will be achieved in practice. It is not clear how the Council will deliver 11,000 new homes without increasing the density of development on new sites in CMK.
- 2.47 In the ‘Midtown’ quarter, the policy supports ‘residential mixed use’ development. It is not clear whether this applies to individual development sites or across the whole of the ‘Midtown’ quarter. There are significant issues with providing mixed use residential developments on small sites, such as those presented through the re-development of block-lets. This is due to the requirements from fire safety regulations and the requirements of the Building Safety Act. Therefore the requirement for mixed use development should not be universal, but applied on a site by site basis having regard to the particular development characteristics of specific sites.
- 2.48 In respect of ‘design and development parameters’, we do not support the density ranges set out in Part E of the Policy. These are not consistent with recent permissions granted at Bank House, Saxon Court or the Theatre Car Park site. They also conflict with the Council’s Figure 5 – Tall Buildings Strategy. The density proposed will prevent the development of tall buildings, prevent the creation of the ‘distinct’ skyline, and likely to prevent the creation of 11,000 dwellings in CMK.
- 2.49 Part G makes reference to the development on surface level car parking, as shown in Figure 3, however Figure 3 is unclear and does not specifically show development in these locations. The Figure needs to be amended to reflect the Policy.

**Question 23(d) – Policy CMK2 Central Milton Keynes Development Framework Area**

*We are developing proposals for a Tech and Innovation Quarter within the city centre, as a focus for our tech, digital and knowledge-intensive industries and building stronger links with higher education. Are there any facilities or uses that should also be encouraged as part of the Downtown area to help enable the delivery of the Tech and Innovation Quarter?*

2.50 To enable the delivery of the Tech and Innovation Quarter, the Downtown area needs to be complimentary in its delivery of associated facilities. Part of this needs to be the delivery of a residential quarter to enable people to live and work in close proximity. This will also create a vibrant community in high quality residential buildings, that will create the environment that attracts people to work in cities. Good examples of this include the regeneration of areas in Manchester and Leeds where high quality residential developments are located amongst offices, shops and leisure facilities. The development of knowledge-intense industries cannot happen in isolation without the associated facilities to support the workforce.

**2.51 Question 24(a) – Policy CMK3 Supporting a thriving CMK**

*Do you agree with the draft policy?*

2.52 No.

**Question 24(b) – Policy CMK3 Supporting a thriving CMK**

*Please say why you gave the answer to 24(a) above.*

2.53 While the objective of this policy is supported, this could be included in CMK1 or CMK2 as it is repetitive in its approach. It adds nothing new to the Plan.

**Question 26(a) – Policy PFHP1 Delivering Healthier Places**

*Do you agree with the draft policy?*

2.54 It is considered unnecessary for proposals for a Hospital (4.ii) to submit a Health Impact Assessment given this use will provide clear health improvement.

**Question 29(a) – Policy PFHP4 Delivering and healthier food environment**

*Do you agree with the draft policy?*

2.55 No.

**Question 29(b) – Policy PFHP4 Delivering and healthier food environment**

*Please say why you gave the answer to 29(a) above.*

2.56 While the overall intentions of the policy are supported, it is considered unreasonable to restrict proposals for hot food takeaways within 400m of all schools given that it is unlikely that unaccompanied primary school children would be able to patronise such premises.

2.57 Bearing in mind the proportion of the City potentially affected, the policy needs to strike an appropriate balance between the NPPF's support for economic development and the extent of health threats stemming from hot food takeaways.

**Question 32(a) – Policy PFHP7 Well-designed buildings**

***Do you agree with the draft policy?***

2.58 Partly.

**Question 32(b) – Policy PFHP7 Well-designed buildings**

***Please say why you gave the answer to 32(a) above***

2.59 While the general policy requirements for well-designed buildings seem appropriate, it is unnecessary and inappropriate for the policy to refer to buildings being designed to prevent suicide. This is a matter which is addressed through Building Regulations and social care.

**2.60 Question 34(a) – Policy HQH1 Healthy homes**

***Do you agree with the draft policy?***

2.61 Partly.

**Question 34(b) – Policy HQH1 Healthy homes**

***Please say why you gave the answer to 34(a) above***

2.62 For clarity, reference of where the Council's 'latest evidence of need' will be published should be added.

2.63 In terms of Criterion C, it is unrealistic/unachievable to expect small developments to fully reflect need. There is no indication that this policy been viability tested.

**Question 35(a) – Policy HQH2 Affordable homes**

***Do you agree with the draft policy?***

2.64 No.

**Question 35(b) – Policy HQH2 Affordable homes**

***Please say why you gave the answer to 35(a) above.***

2.65 We do not support the tenure mix proposed for affordable homes. The absence of any shared ownership products from the list of acceptable tenures does not agree with the advice in the HEDNA nor does it reflect the experience 'on the ground' where Registered Providers are able to utilise shared ownership dwellings to cross-subsidise the delivery of rented tenure affordable homes.

- 2.66 It is understood that the potential demand for affordable home ownership products amounts to 13,950 households, but that the modelling shows that only 2,233 households will be able to access First Homes (16%). Paragraph 41 of the HEDNA (2024) states that:

*“...the potential demand for affordable home ownership products amounts to 13,950 households, but the modelling shows that only 2,253 of these households will be able to [access] First Homes. This leaves 11,700 households who may wish to own in Milton Keynes, but will not find First Homes suitable for them”.*

- 2.67 The HEDNA acknowledges that “a significant number of households who aspire to own cannot have their need met by First Homes because the mortgage will be too expensive for them, or they require too high a deposit.”

- 2.68 Paragraph 6.110 of the HEDNA explains that a 30% discount on newbuild properties (under the First Homes scheme) would still leave most priced at a higher price than the equivalent second hand market price – or above the £250,000 price cap (particularly for larger homes). For this reason, a discount of 30% may be insufficient and there is a ‘strong case’ for a larger discount. However, as the HEDNA acknowledges, prescribing a larger discount would impact upon the viability of schemes and could mean that a lower number of other affordable units are delivered. Paragraph 6.110 of the HEDNA states that:

*“...if Milton Keynes continue to seek to deliver significant numbers of shared ownership dwellings then there is a case to apply the 30% discount to any First Homes properties and allow shared ownership to offer a more affordable entry point to home ownership for households.”*

- 2.69 Figure 85 of the HEDNA shows the proportion of households aspiring to home ownership that can afford First Homes with a 30% discount (only 239 of the 2,253 households) and those that can afford First Homes with a 50% discount but not with a 30% discount (2,016 of the 2,253 households). Paragraph 6.116 of the HEDNA asserts that those that can’t afford First Homes with a 30% discount will require the provision of a more accessible product (such as a form of Shared Ownership or First Homes with a larger discount). Indeed, paragraph 44 of the HEDNA highlights that “there is a case for providing more Shared Ownership” to cater for households that will aspire to own, but will not be able to access First Homes.

- 2.70 Draft Policy HQH2, and indeed the City Plan as a whole, is silent on the required minimum discount. If the discount is set at 30%, the evidence suggests that only 239 households could access First Homes. This is less than 2% of the 13,950 households representing the potential demand for affordable home ownership products (and less than 3% of the total affordable housing need for 14,300 affordable homes). A policy target for 16% First Homes is therefore unfounded. If the discount is set at 50%, this is likely to jeopardise the viability of schemes and the ability to deliver other affordable units (as set out in paragraph 6.110 of the HEDNA).

- 2.71 The HEDNA also highlights the disadvantages of First Homes. Paragraph 4.23 reports:

*“First Homes were seen as a distraction with considerable scepticism about how the scheme would work and concern that it would draw development away from shared ownership, which can be accessed with a smaller deposit than First Homes and is more flexible (although possibly with higher monthly costs). First Homes is considered to be a private market-led product, not really affordable.”*

2.72 Whilst paragraph 6.106 acknowledges that First Homes are typically more affordable on a weekly cost basis than Shared Ownership in Milton Keynes, Shared Ownership often requires a lower deposit and allows staircasing the remaining property value over time. The HEDNA highlights that those in First Homes risk become stuck in a First Home because they can only be sold through a longer process than normal house sales and only to a household who qualifies for First Homes in Milton Keynes.

2.73 Paragraph 42 of the HEDNA suggests that, since Milton Keynes has been the ‘pioneer’ of Shared Ownership housing in England, this may represent a more accessible option for home ownership in the city. Despite national policy concentrating on First Homes, the HEDNA concludes that alternative products such as existing Shared Ownership schemes may be ‘a more realistic route into home ownership’ for many households.

2.74 Paragraphs 4.20 – 4.23 of the HEDNA report feedback from stakeholders involved with development. Of Shared Ownership, paragraph 4.20 reports:

*“Stakeholders involved with development favoured the shared ownership model in the City for two reasons. It is seen as a viable model, including providing some cross subsidy for affordable rented housing. At the same time, it provides affordable home ownership for many households”.*

2.75 In light of the evidence prepared as part of the HEDNA, it is unclear why draft Policy HQH2 does not include provision for Shared Ownership homes and requires 16% of affordable homes to be First Homes. This is contrary to the evidence in the HEDNA – which states that Shared Ownership schemes may be a more accessible and realistic route into home ownership and suggests that only 239 households could access First Homes (if set at a 30% discount). Even if set at a 50% discount, the HEDNA highlights the risk to the viability of schemes and the ability to deliver other affordable units. The draft policy should be reviewed – removing the requirement for First Homes and introducing a requirement for Shared Ownership homes.

2.76 We object to Part E of the Policy which prevents the development of more than 50% affordable housing on a single site. There are many circumstances where more than 50% affordable housing is beneficial, particularly where developments are being delivered in partnership with an RP. The funding and management arrangements for such facilities mean that it is better to provide these all in one place.

2.77 Draft Policy HQH2 (part 5) also states that proposals resulting in the creation of more than 50% affordable homes will only be permitted where the number and mix of types and tenures is evidenced by an up-to-date housing needs assessment and will create or maintain a mixed and sustainable community within the wider neighbourhood. This part of the draft Policy overlooks the practicalities of delivering affordable housing for many Registered Providers and the benefits of bringing all (or a

large proportion) of the affordable units under the control of one Registered Provider, rather than multiple Registered Social Landlords. Bringing the management of affordable housing under the control of one organisation enables that organisation to better manage the site and maintain the dwellings to the required standard.

**2.78 Question 35(c) – Policy HQH2 Affordable homes**

**2.79 *The proposed tenure mix meets the identified requirement in our background evidence. Is the proposed tenure split likely to be deliverable in practice across various types of residential development? Would an alternative tenure split be better for certain types of residential development? Please state what this could be and why.***

2.80 Please see answer to 35(b).

**Question 36(a) – Policy HQH3 Supported and specialist homes**

***Do you agree with the draft policy?***

2.81 Partly.

**Question 36(b) – Policy HQH3 Supported and specialist homes**

***Please say why you gave the answer to 36(a) above.***

2.82 Criterion D in relation to the loss of supported and specialist homes should also allow for situations where these are no longer viable (including where the quality of accommodation is not suitable).

**Question 42(a) – Policy HQH9 Exception sites**

***Do you agree with the draft policy?***

2.83 Partly.

**Question 42(b) – Policy HQH9 Exception sites**

***Please say why you gave the answer to 42(a) above***

2.84 The Plan's inclusion of a policy in relation to Exception Sites is applauded given the need for affordable housing overall and the requirement to meet local needs on sites outside the development limits of rural settlements.

2.85 However, it is considered that the set of criteria against which Rural Exception sites will be assessed (limited to 0.5 hectare size sites or ten homes and must not lead to settlement coalescence) is not consistent national planning policy which does not contain any such quantitative restrictions or spatial restrictions.

2.86 In terms of First Homes Exception Sites, the May 2021 Written Ministerial Statement (WMS) and subsequent updates to the Planning Practice Guidance (PPG) confirm the Government's commitment to deliver First Homes via exception sites. A First Homes exception site should be on unallocated land

adjacent to existing settlements and proportionate in size to them. There is no defined limitation on what constitutes a proportionate scale for such site. Nevertheless, using the guidelines set out previously for Entry-Level exception sites, proportionality could be taken to mean a site not more than 1 hectare in size or 5% of the size of the existing settlement.

- 2.87 As drafted, the policy will therefore serve to constrain the delivery of such exception sites and therefore the achievement of sustainable development and should be amended accordingly.

**Question 49(a) – Policy CEA7 Mitigating wider environmental pollution**

*Do you agree with the draft policy?*

- 2.88 Partly.

**Question 49(b) – Policy CEA7 Mitigating wider environmental pollution**

*Please say why you gave the answer to 49(a) above.*

- 2.89 Section E of the policy states that minor development proposals will be required to demonstrate how prevailing air quality and potential impacts upon air quality have been considered, and how air quality will be kept to an acceptable standard through avoidance and mitigation, if: The site is within 50 metres of a major road or heavily trafficked route, including A4146 etc. etc.
- 2.90 The list of roads identified should be definitive. Without a definitive list, Applicants could get caught out if the Council determine that a road not cited within the list is a “*major road or heavily trafficked route*”. This not only applies to air quality and odour but also noise and vibration (section 9) which also mentions ‘major’ roads.

**Question 53(a) – Policy CEA11 Urban greening, trees and woodland**

*Do you agree with the draft policy?*

- 2.91 Partly.

**Question 53(b) – Policy CEA11 Urban greening, trees and woodland**

*Please say why you gave the answer to 53(a) above.*

- 2.92 There appears to be no justification for using Urban Greening Factor in Milton Keynes, which is a London Plan tool. It is also overly onerous to apply this requirement to *all* developments (Criteria A) as guidance recommends that it is first applied to major developments. The requirement is also not appropriate to apply to change of use developments, it should be clarified that this is only applicable to new build.
- 2.93 There also appears to be no justification for all new residential and commercial development proposals within defined settlement boundaries must meet the urban tree canopy cover standard of at least 19%.

**Question 62(a) – Policy ECP5 Heritage**

***Do you agree with the draft policy?***

2.94 Partly.

**Question 62(b) – Policy ECP5 Heritage**

***Please say why you gave the answer to 62(a) above***

*Policy ECP5 A*

- 2.95 The term ‘sustain,’ whilst in-line with NPPF terminology, is not in-line with the Statutory Duty in Sections 66 and 72, which discuss the desirability of ‘preserving’ listed buildings and conservation areas respectively. The policy text should be updated to reflect the statutory duty and replace ‘sustain’ with ‘preserve.’
- 2.96 The inclusion of nos. 1-4 and nos. 5-7 within the same list indicates that all assets have the same level of protection and importance. The policy should make a clearer distinction between designated and non-designated heritage assets.
- 2.97 The New Town Register has only been partially published, and we understand that a second phase of the Register is to be published. In order for assets on the MK New Town Register to be considered as part of proposals, the Register should be published and adopted in full. There should be evidence within the published version that the decision-making for assets’ inclusion on the Register has been part of a robust and thorough process. Clear reasons for the inclusion of each asset should be provided, and the extent of the area of inclusion should also be made clear.

*Policy EPC5 B*

- 2.98 B3 and B5 are repetitive in outlining how any heritage harm can be outweighed by the public benefits of the scheme. In addition, it is for the Planning Statements to provide the balance of the heritage impacts and the public benefits, which can include the economic, social and environmental benefits. The Heritage Assessment can provide a balance of heritage harm against benefits. However, a wider planning balance should only be undertaken in the Planning Statement.
- 2.99 The purpose of the Heritage Assessment is to provide conclusions on the overall heritage impacts of a scheme. This can and should include the heritage benefits afforded by proposals, but it is not within the remit of a Heritage Assessment to provide the planning balance required as part of paragraph 208 of the NPPF, or the balanced judgement required as part of paragraph 209.
- 2.100 B3, B5, and B6 should be updated to reflect this, possibly moved into a new section to remove the impression that this information should be contained within heritage reports.

*Policy EPC5 C*

- 2.101 There will be instances in which some of this information can be conditioned. The wording of this policy indicates that this information should always be provided at application stage, and this is too prescriptive.
- 2.102 It is unclear what the reference to '2.a' is intended to link to.
- 2.103 The policy should be amended to reflect that information can be sought through condition. Amendments should also be made to '2.a' to align with the relevant policy section

*Policy EPC5 D*

- 2.104 The NPPF (paragraph 206) makes clear that substantial harm should be 'exceptional' for Grade II Listed Buildings and Registered Parks and Gardens, and 'wholly exceptional' for "assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites".
- 2.105 The policy should be amended to clarify the difference in the policy test for different assets, in line with the NPPF. The policy is not in line with the NPPF as the word 'demonstrably' is not included within paragraph 208 of the NPPF, and the requirement is for the harm to be 'weighed against' the public benefits.

*Policy EPC5 E*

- 2.106 The policy is not in line with the NPPF as the word 'demonstrably' is not included within paragraph 208 of the NPPF, and the requirement is for the harm to be 'weighed against' the public benefits. The policy wording should be amended to reflect Paragraph 208 of the NPPF.

*Policy EPC5 F*

- 2.107 This is not compliant with NPPF paragraph 209, which requires a 'balanced judgement ... having regard to the scale of any harm or loss and the significance of the heritage asset.' There is no requirement for benefits to outweigh harm to non-designated heritage assets. The wording of the policy should be revised to be compliant with paragraph 209 of the NPPF.

*Policy EPC5 G*

- 2.108 This does not reflect the guidance in paragraph 209 of the NPPF which requires a balanced judgement as discussed above. The wording of the policy should be revised to be compliant with paragraph 209 of the NPPF.

*Policy EPC5 H*

- 2.109 In addition H2 and H3 should only concern listed buildings, as there is no need to apply for permission to undertake internal works for non-designated heritage assets that do not require planning permission. The policy should be amended to reflect that H2 and H3 are only applicable to listed buildings.

*Policy EPC5 I*

2.110 Guidance on enabling development is provided by Historic England (GPA4 - Enabling Development and Heritage Assets – 2020). That guidance uses the term ‘conservation deficit’ as the gap between the value of a site and the costs of repair. The policy should replace ‘heritage deficit’ with ‘conservation deficit’ to reflect Historic England guidance.

*Policy EPC5 J*

2.111 Criteria J3 and J4 are specific to the design of development whereas this policy is focussed on protecting heritage assets during the course of construction. Criteria J3 and J4 should be omitted.

### **3 Conclusion**

- 3.1 These representations have been prepared as the corporate view of Smith Jenkins Planning & Heritage to the current MK City Plan 2050 Regulation 18 Plan in response to several of the key development management policies which will affect our clients bringing forward development proposals in the City.
- 3.2 We trust that these comments will be duly considered as the preparation of the Plan progresses.

## **APPENDIX 1**

## **HGV Parking Task and Finish Group – Capacity Workstream**

### **Submission to Ministry of Housing, Communities and Local Government Consultation on the Proposed Reforms to the National Planning Policy Framework ('NPPF24') and Other Changes to the Planning System**

**Deadline: 24 September 2024**

#### **Background**

A thriving logistics industry, and particularly road haulage, is vital to achieving the Government's Five Missions. Safe, secure HGV parking forms an essential part of our national transport infrastructure the industry needs to do the job the country needs it to do. It is vital in our national efforts to recruit and retain HGV drivers, improve driver welfare, reduce freight crime, protect the UK supply chain, support economic growth and continue to guarantee road safety.

Recent surveys published by the Department for Transport (DfT), including the 'Future of Freight Strategy' have identified a national shortage of HGV parking across the UK, with many regions at critical levels of capacity for both on-site (Roadside services; Motorway Service Areas; and truck stops) and off-site locations (Laybys, industrial sites and other roadside parking). The limited access to on-site HGV parking and supporting infrastructure, significantly impacts on the ability of the Sector to fulfil the above objectives. It is also reported that HGV drivers' view of the quality of facilities, in terms of security, sanitation and other welfare facilities, is low.

The HGV Parking Task and Finish Group (TFG) was created on the instruction of Secretary of State for Transport - following lobbying by the Road Haulage Association (RHA) for a taskforce to address key issues preventing the improvement of both capacity and standards of lorry parking across the country.

After convening in February 2024, it was determined by the TFG that planning policy and the interactions between policy, applicants and decision makers is the most significant limiter on expanding on-site HGV parking capacity. The NPPF24 consultation represents an opportunity to outline the TFG's proposed reforms that will help ensure the delivery of this vital infrastructure to support the road haulage and roadside service sector as part of the mission to secure the highest sustained economic growth in the G7 – with good jobs and productivity growth in every part of the country.

As a group of key stakeholders, the TFG also looks forward to the opportunity to contribute to other planning policy reforms as the Government brings them forward.

**The TFG's Key Recommendations are outlined below:**

**NPPF24 Amendments:**

- The introduction of 'Grey Belt' definition into the NPPF24 is welcomed, to enable the release of strategic land to facilitate development in the freight and roadside sector. This could be supported by a standard methodology, subject to amendment of the proposed new Paragraphs 144, 153, 155 and 157 as outlined below.
- Agree to the proposed amendments to 86b and 87, as a welcome recognition of the importance of freight to the UK economy.
- Amendment to Para 111 (former 113) of the NPPF24 relating to the delivery of lorry parking facilities to account for key factors that influence the 'needs case';
- Amendment to footnote 47 which supports Para 108(c) (former 110(c)) – making reference to Circular 01/2022 'Strategic Road Network and the Delivery of Sustainable Development';
- Support amendments to paragraph 164 of the NPPF24 and the development of renewable and low carbon technologies, which can support growth in this Sector, while recognising the need for further government action.

**Wider Reforms:**

- Providing a central source of information for the collation of policies/evidence/studies/strategies relating to the need for HGV provision – hosted on GOV.UK;
- A model local plan policy for to support the development of essential parking infrastructure in the haulage and roadside sector. This policy should give significant weight to new and extended sites in providing facilities for drivers in areas of identified need.
- Local planning authorities to identify sites for lorry parking within local plans. If sites are not selected at the time a local plan is adopted, for national planning policy to provide a clear decision taking framework to provide to increase planning weight for lorry parking and/or infrastructure that supports delivery.
- Provide decision makers with a policy making framework for decision taking, with opportunities for CPD/ training to support.

## **Introduction**

The Future for Freight Plan<sup>1</sup> sets out that there is a disconnect between an industry that is not equipped to properly engage with the planning process, and local planning authorities that lack the support to understand the needs of a changing and innovative freight and logistics sector; in the context of other planning requirements/constraints. The Plan identifies that this leads to increased complexity, cost and time for promoters.

The Planning System is vital to meeting the needs of hauliers and addressing current deficiencies in capacity. However, many applications for HGV parking infrastructure are refused at first instance and determined at appeal – resulting in delays to delivery and significantly increased costs. This is because, despite clear policy in favour of approving appropriate HGV parking applications, insufficient weight is given to that policy in favour of other concerns.

Without significant reforms of planning policy to re-emphasise the essentiality of HGV parking designed to get more applications approved at first instance, the effectiveness of all other measures undertaken by industry or government will be significantly reduced. To that end many of the proposed reforms in NPPF24 are to be welcomed, however additional proposals have been included below which should also be considered.

Local Plans are critical to the allocation of land for infrastructure to support the sector.

### **NPPF24 Consultation Response:**

We consider that amendments to Chapters 5, 7 and 9 (including Annex 2) in the NPPF24 Consultation Draft can support delivery in this Sector. Our comments are outlined below:

***Question 12: Do you agree that the NPPF24 should be amended to further support effective co-operation on cross boundary and strategic planning matters?***

The Consultation proposes amendments to the NPPF24 to allow ***for greater collaboration between authorities, to ensure that the right engagement is occurring on the sharing of unmet housing need and other strategic issues, where plans are being progressed.***

The provision of HGV parking, as part of strong and secure network that forms an essential part of our national transport and logistics infrastructure is a nationally significant issue. The National Lorry Parking Survey and National Highways' Lorry Parking Demand Assessment identify key routes where a cross-authority strategic approach is required.

Once strategic gaps have been identified for development in the roadside sector; where they involve cross boundaries, consultation with National Highways and neighbouring authorities

---

<sup>1</sup> <https://www.gov.uk/government/publications/future-of-freight-plan>

should take place. Where 'need' exists - it should be a requirement that the Local Plan should seek to address it. This could be achieved through the identification of 'broad locations of growth.

**Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?**

A strong network of safe secure lorry parking is needed across the country, and particularly serving the strategic road network. Under current policy, HGV parking facilities may require a Green Belt location. The essentiality of logistics to the UK economy and the safety and welfare of all road users should be enshrined in national policy.

The TFG therefore support the introduction of 'Grey Belt' land, which includes Previously-Developed Land (PDL) within the Green Belt; and Green belt parcels that contribute minimally to its five primary purposes.

It is noted that Green Belt Reviews tend to assess parcels around the urban edge and larger parcels within the main body of Green Belt. Our main concern is ensuring that future studies also enable the release of strategic land, which can be achieved through a standard methodology for assessment.

Para 144 introduces a sequential approach to Green Belt release, prioritising PDL in sustainable locations first, before considering Grey Belt land in 'sustainable locations', and finally, other 'sustainable locations' within the Green Belt.

Serving the SRN, sites for the delivery of roadside services (in particular) are influenced by connectivity to the road network, rather than existing settlements. Therefore, we consider that para 144 should be amended and/or an exemption added - to recognise the locational requirements of this sector, which as mentioned above may require a Green Belt location. This could be achieved by adding the old formulation 'or can be made sustainable' *or a new footnote.*

**Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?**

We welcome the Government's recognition of the important role that other types of development play in supporting social and economic objectives, and welcome the support for releasing Green Belt land to meet the needs of the logistics sector in providing drivers the opportunity to stop and rest when using the strategic road network. This is a unique challenge. NPPF24 Paragraph 153 recognises that other forms of development are also not inappropriate development, which includes 'local transport infrastructure which can

demonstrate a requirement for a Green Belt location'. However, roadside services often meet a need which is strategic rather than localised, and therefore does not benefit from being 'appropriate' development in the Green Belt. We would welcome clarity on the definition of 'local transport infrastructure' and an extension of this to roadside facilities in areas where there is identified need.

As set out elsewhere in this response, the issue of 'need' in the roadside sector is debated at length (often at public inquiry, to significant cost and time delay to applicants), and further clarity is required on this matter.

Paragraph 155 is designed to deliver public benefits from development for non-housing related development. This requires 'necessary improvements to local or national infrastructure'. In the absence of consideration of whether roadside services are 'national' or 'regional' infrastructure projects in themselves, clearer guidance is required on how Paragraph 155 b) can be addressed in circumstances when an application or allocation is for development of roadside facilities. There are inherent public benefits delivered from construction of new or expanded roadside facilities because the principal purpose of development is providing a road safety function. The public benefits are often considerable.

However, the NPPF does not give due recognition to the significant costs that developers or operators must meet to deliver these public benefits. These are costs that take many years to recover, and the viability of this development type must be considered as part of this process.

We have significant concerns about the application of Paragraph 155 c) to provide accessible public green spaces on sites released from the Green Belt. In respect of roadside services, development is very expensive, and sites are scarce. Site selection is based on the proximity to the Strategic Road Network, and are competing with other development types, including housing. It can therefore be difficult to secure adequate land to deliver roadside facilities due to viability. The requirement to provide green spaces as part of the development is an added burden to operators in terms of cost, and on-going maintenance of such spaces. Roadside sites are sometimes in isolated locations (due to the function of the SRN), and therefore would not be within close proximity of large centres of population. There would be minimal benefit in these instances of having on-site publicly accessible open spaces. We would question how off-site provision is reasonably related to the development in these circumstances.

While we welcome the consideration of viability on this matter (Paragraph 157), it would be simpler to remove this as a requirement from this development type from the beginning rather than undertaking a viability assessment at the point of making a planning application (which adds further time and cost to the process)

**Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?**

**Question 63: Are there other sectors you think need particular support via these changes? What are they and why?**

A more comprehensive policy framework for freight and roadside services will improve the decision-making process by providing clarity on the importance of facilities - to support the welfare of drivers on the SRN. A strengthened national planning policy framework would improve the situation; as guidance is currently limited to paras 110(c) (now 108(c)); 113 (now 111) and 155 (now 153); and in terms of plan-making, Local Plans are mostly silent on roadside facilities and do not set out a clear policy framework for the delivery of new facilities or the expansion/upgrading of existing facilities.

The TFG welcomes the in Paragraphs 86 b) and 87, particularly the specific inclusion of freight and logistics. We would welcome further clarification that the provision of HGV parking is viewed as essential to support the supply chain and economic growth.

#### **A. Review of past DfT Policy on provision of lorry parks on Motorways**

It is helpful to review superseded roadside policy in respect of HGV parking - in terms of the way that past policy provided guidance for decision takers, on the determination of planning applications. This focuses on DfT policy rather than planning policy. Planning Policy Guidance Note 13, Transport (PPG13) <sup>2</sup>made no reference to the provision of lorry parking.

In 1992, the Government deregulated the Motorway Service Area market to enable more competition in the market, and increase the speed of delivery of new sites. To enable speedier delivery and broaden the range of type of sites developed, Department of the Environment Circular 23/92, Motorway Service Areas, set out the Government's vision for delivery of new roadside facilities. Paragraph 1 of the Circular states: *"This Circular advises on the particular considerations that local planning authorities should address in determining planning applications for new Motorway Service Areas (MSAs) and in drawing up relevant development plan policies."*

Unlike current policy, the Circular set out specific advice to LPAs in determining planning applications which is clear concerning the weight to be given to planning applications where there is an absence of existing facilities. Paragraph 10 addressed planning applications in Green Belts, and states:

---

<sup>2</sup>

[https://webarchive.nationalarchives.gov.uk/ukgwa/20120919201915mp\\_/http://www.communities.gov.uk/documents/planningandbuilding/pdf/1758358.pdf](https://webarchive.nationalarchives.gov.uk/ukgwa/20120919201915mp_/http://www.communities.gov.uk/documents/planningandbuilding/pdf/1758358.pdf)

*10. In Green Belts, there is a general presumption against inappropriate development. In line with PPG2, approval should not be given for an MSA within a Green Belt except in very special circumstances. One of the material considerations which could justify such an exception however could be the lack of any signed MSAs. The greater the interval between the proposed site and any existing facility the more weight should be placed on the needs of motorway users.*

Paragraph 11 goes on to address development in the Open Countryside. This states:

*11. PPG on the Countryside and the Rural Economy is relevant to MSAs in the countryside. The guiding principle for general development in the wider countryside is that it should benefit the rural economy and maintain or enhance the environment. In the case of motorway service areas, the needs of motorists must also be taken into account. But all new development, including MSAs, in rural areas should be sensitively related to existing settlement patterns and to the historic, wildlife and landscape resources and to the landscape quality of the area. Building in the open countryside, away from existing settlements or from areas allocated for development in development plans, should be strictly controlled. MSAs should be unobtrusive in the landscape.*

The Circular went on to give further advice on the siting and design of proposals, including the inclusion of site allocations in development plan documents.

A further Circular was issued in 1994 (Department of Transport Roads Circular 1/94) which added requirements on spacing and minimum parking numbers. However, of more significance in the determination of applications was the publication of HA269 (MSA Policy Statement) in 1998 as announced in the House of Lords by Lord Whitty<sup>3</sup>. Lord Whitty was concerned about striking a balance between the needs of motorists and protection of the countryside from unnecessary development. The focus of HA269 was to complete the 30 mile network of services. HA269 provided specific guidance to local planning authorities in determining planning applications, and Paragraphs 4 and 5 of the Statement are particularly helpful in this regard

*4. That policy change generated a large number of MSA planning applications but has had limited success in encouraging new operators to enter the MSA sector. For the future therefore the Government wishes to concentrate on completion of the "thirty mile" MSA network on those relatively few stretches of motorway where this has not already been achieved. This does not amount to a presumption in favour of MSA proposals which would contribute to the "thirty mile" network; they will continue to be subject to the normal operation of the land use planning system. Planning authorities will, however, be expected to give greater weight to the needs of motorists in these cases.*

---

<sup>3</sup> <https://api.parliament.uk/historic-hansard/written-answers/1998/jul/31/motorway-service-areas>

5. *Planning permission for infill MSAs between “thirty mile” sites should be granted only exceptionally and where a clear and compelling need and safety case for the MSA has been established. Individual cases will need to be treated on their merits and it is not possible to prescribe a comprehensive list of the factors which it might be appropriate to consider in every case. There are, nevertheless a number which are likely to be of importance in virtually all cases. Planning authorities will therefore be expected to have considered at least:*

- *the distance to adjoining MSAs;*
- *evidence (such as queuing on the MSA approach roads or lack of parking spaces at times of peak demand) that nearby existing MSAs are unable to cope with the need for services;*
- *a higher than normal incidence of accidents attributable to driver fatigue;*
- *evidence of a genuine need for the proposed services rather than simply demand: it will not be sufficient to show merely that drivers would use an MSA if it were to be built – there should be evidence of a genuine safety-related need;*
- *whether the MSA is justified by the type and nature of the traffic using the road; the need for services may, for example, be less on motorways used by high percentages of short distance or commuter traffic than on those carrying large volumes of long distance movements.*

It is evident that greater guidance was available to LPAs previously in determining applications than is currently presented in national planning policy. Given the importance of safe, secure HGV parking to the national logistics infrastructure which supports the UK supply chain and economic growth, it is clear additional guidance is required to ensure that building and maintaining infrastructure is given sufficient weight in the minds of decision makers.

## **B. Proposed Amendments to National Planning Policy Framework 24**

Policy on Lorry Parking in the NPPF24 is set out in Paragraph 111 (former 113) , as follows:

*113. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.*

The paragraph was introduced in 2018 and has remain as originally drafted. It is noted that the paragraph is narrow in focus, and does not expand on the national and regional need for HGV parking. The paragraph does not fully address the welfare needs of drivers; the need to minimise travel distances; logistics needs and requirements; the benefits of providing suitable facilities; and minimising the risk of crime. The TFG proposes amended wording for Para 111 to address some of these issues.

Recommendation: Incorporate the below amended Para 111 into the National Planning Policy Framework

111. Planning policies and decisions must recognise the requirement for providing safe and secure overnight lorry parking facilities to support road safety for all road users, the UK supply chain and wider economic growth, particularly in proximity to distribution centres and the strategic road network; taking into account any local, regional or national shortages; logistical requirements; opportunities to drive zero emissions transport; and support the welfare needs of drivers.

Another key policy relevant to lorry parking is the *Department for Transport Circular 01/2022, the Strategic Road Network and the delivery of sustainable development*<sup>4</sup>. Published in December 2022, replacing DfT Circular 01/2013, it provides guidance on how National Highways will engage with the planning system and factors, which can influence the interpretation of 'need' in this sector. However, as a DfT policy it is only a material consideration in the determination of planning applications, the weight given to it both varies greatly from application to application and is often insufficient when weighed against other considerations. Incorporation into national planning guidance through a reference in the NPPF would strengthen its relevance. Footnote 47, which is contained within s. 108 e) of NPPF24 which speaks to the development process for planning policy and engagement with relevant stakeholders, would be the most relevant location.

Recommendation: Incorporate the below amended Footnote 47 into s.108 e) of the National Planning Policy Framework.

*Footnote 47. Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services as outlined in Circular 01/2022 should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects).*

**Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?**

Roadside facilities will play a significant role in facilitating the delivery of net zero for the freight and logistics sector (as recognised by para 77 of Circular 01/2022), with a major obstacle surrounding access to grid capacity and the associated costs. Therefore, whilst the TFG supports the amendments to para 164(a) of the NPPF24, which gives *significant* weight

---

<sup>4</sup> <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development>

to proposals which contribute to energy generation and a net zero future, ensuring the availability of grid capacity is essential, and will require action from Government and other relevant stakeholders to ensure this is achieved.

### **Additional Planning Policy Review and Reforms**

The below addresses matters outside the specific remit of the NPPF24 consultation which have been identified by the TFG as key issues that require further government and industry action to resolve if lorry parking capacity is going to be increased.

#### **A. A Central Source of Relevant National Policies**

In addition to the NPPF, other guidance or policy is also located in the following documents:

- Circular 01/2022 (02/2013 Update) 'The Strategic Road Network and the Delivery of Sustainable Development'
- National Networks Policy Statement<sup>5</sup>;
- Future of Freight: a long-term plan<sup>6</sup>;
- National survey of lorry parking (2022) (part 1)<sup>7</sup>;
- National survey of lorry parking (part 2) (May 2023)<sup>8</sup>;
- Written Statement to Parliament – Planning reforms for Lorry Parking, 8th November 2021, The Rt Hon Grant Shapps MP<sup>9</sup>;
- National Highways: connecting the County 'Our long-term strategic plan to 2050'<sup>10</sup>

However, these are not located in a single place to be easily identified by policy makers or decision takers. A central source of information, for example a page on gov.uk, which sets out relevant policies will enable more informed decision taking, and enable the industry to be better equipped to engage with the planning process. It will equally enable policymakers to access information in reviewing and amending planning policy.

Recommendation: to provide a central source of information for local planning authorities, applicants, and industry more widely to access relevant information, including policy, in the determination of planning applications for HGV parking facilities.

---

<sup>5</sup> <https://www.gov.uk/government/publications/national-networks-national-policy-statement>

<sup>6</sup> <https://assets.publishing.service.gov.uk/media/62b9a2ec8fa8f53572e3db68/future-of-freight-plan.pdf>

<sup>7</sup> <https://www.gov.uk/government/publications/national-survey-of-lorry-parking-part-one-2022>

<sup>8</sup> <https://www.gov.uk/government/publications/national-survey-of-lorry-parking-2022-part-2>

<sup>9</sup> <https://questions-statements.parliament.uk/written-statements/detail/2021-11-08/hcws379>

<sup>10</sup> [https://nationalhighways.co.uk/media/ob1lqvqr/cre22\\_0150-masterplan-national-highways-ris3\\_final-1.pdf](https://nationalhighways.co.uk/media/ob1lqvqr/cre22_0150-masterplan-national-highways-ris3_final-1.pdf)

## **B. Local Transport Plans**

In 2010 the Government abolished Regional Spatial Strategies (RSS), removing strategic planning at a regional level. With no spatial strategy for England, any joined-up strategic planning relies on cooperation between LPAs. The development and delivery of HGV parking and motorway, or other roadside, service areas are not Nationally Significant Infrastructure Projects<sup>11</sup>. Local Transport Plans<sup>12</sup> can provide some strategic level direction for delivery of lorry parks. The Transport Plan Act 2000 requires all Local Authorities to publish a Local Transport Plan. LTPs contain policies and implementation plans that develop and deliver a transport network that works for all road users. These can be cross boundary documents and be produced by more than one highway authority (highway authority is normally the County Council or Unitary Authority). These will set policies that should be considered in the Local Plan making process.

The **Kent Local Transport Plan 4 (2016-2031)** has been examined as a case study, and does include a policy for the provision of overnight lorry parking. This identifies that Kent has a high demand for lorry parking spaces, and that the need for lorry parking should be met in a network of small lorry parking sites at suitable locations across Kent. The policy does not define 'small' in this context but could be read in the context of previous policy which identified the need for a very large single site. Unfortunately, this context is not given, and 'small' can be interpreted in several ways.

Further work by the TFG will be undertaken to review additional Local Transport Plans to better assess the national picture.

## **C. Local Plans**

Local Plans are the primary tool for the identification of sites for lorry parks within any Local Planning Authority. However, despite the importance of the UK freight network to the wider economy, very few local plans even mention lorry parking

The National Lorry Parking Survey Part 2 (2023)<sup>13</sup> undertook surveys of sites in four specific areas, identified as being generally reflective of the whole country in terms of lorry usage. A desktop review has been performed of local plans along these routes to assess if and how lorry parking is considered. Metropolitan Borough Councils (MBCs) were also surveyed, given their significance to the UK supply chain and wider economy. Tables of these reviews are included at Appendix 1, and the findings summarised below:

---

<sup>11</sup> Footnote 46 of the NPPF states that most proposals for roadside services are unlikely to be nationally significant infrastructure projects).

<sup>12</sup> <https://www.legislation.gov.uk/ukpga/2000/38/part/II/crossheading/local-transport-plans-and-bus-strategies>

<sup>13</sup> <https://www.gov.uk/government/publications/national-survey-of-lorry-parking-2022-part-2>

- In Route 1 Midlands, there are 9 Local Planning Authorities (LPAs) of which two have lorry parking policies.
- In Route 2 East of England, there are 6 LPAs of which one has lorry parking policies.
- In Route 3 North West of England, there are 6 LPAs of which one has lorry parking policies.
- Route 4 South East of England is entirely contained within the county of Kent. Given the significance of Kent to national road freight and logistics, a review was taken of the entire county. Of the 13 LPAs, only 2 have policies in their local plans concerning lorry parking.
- Of the 36 MBCs, there are 33 Local Plans of which nine contain lorry parking policies.

In summary, across 70 LPA areas in the Longitudinal Study Areas, 15 LPAs have policies concerning lorry parking or provision of parking for HGVs. In one of those LPAs (Dover), the policy specifically states that no new sites will be permitted.

In the absence of National Development Management Policies, LPAs should be advised to include a policy that supports the development of new and extended roadside services and lorry parks. This should also reflect the wording of the Circular to determine the size of a site, and support the creation of off-line facilities. Policies should also address the potential closure of facilities, and be clear that redevelopment of sites will only be acceptable either in exceptional circumstances or where a replacement or improved facility can be provided instead.

It had been the intention of the TFG Workstream to develop a model of best practice that Local Planning Authorities could use to develop policy in this area. However, with only 1 in 5 Local Plans referencing truck parking and the development of roadside services; and the limited number of policies in existence, they do not form the basis of model policies that can be identified as best practice without government intervention.

Recommendation: Consideration for a model local plan policy to support the development of essential parking infrastructure in the haulage and roadside sector. This policy should give significant weight to new and extended sites in providing facilities for drivers in areas of identified need.

#### **D. Site Selection**

Selection of sites is a function of the identified need for a facility, which in itself is a result of the geographical location of key freight generators and quantum of HGV traffic utilising the SRN in a specific location. The presence (or absence) of existing facilities is a criteria in the selection of a site, given that sites are mainly brought forward by the private sector.

Two specific areas that limit the availability of sites, and therefore influence site selection are capital construction costs and the cost of planning process.

The capital cost of building an overnight lorry park with suitable rest stop facilities is a substantial cost which requires a long-term view in which to see a financial return on investment. The size of a site therefore needs to be large (c. excess of 200 spaces) to cover the ongoing operating costs of running such facilities (including security, hot food & drink offers, cleaning of showers etc).

To create a new lorry park with dedicated slip roads and overbridge is financially unviable. Sites therefore tend to be restricted to land adjacent to existing junctions off the Strategic Road Network. This means sites have competition for available land with storage, distribution and office uses which have greater financial viability leading to increased land values at these locations. This is also the Case for land adjacent to existing employment parks and/or established business centres. In areas such as Kent where sites are constrained by land designations (Green Belt, National Landscapes etc), sites are also in competition with residential development, which has a significantly higher land value than can be achieved by a dedicated lorry park.

The planning application process is also extremely expensive for lorry parking sites in terms of surveying, and mitigation and is seen as too much of a risk for the private sector to take on when considering the low returns of a site once built. The cost of working up a planning application for a lorry park can be in the region of £300,000 before potential appeals and judicial reviews are considered. This would be a large 'sunk cost' if planning was refused.

Site selection is a function of need for spaces, access to the SRN and land availability. For the private sector to identify and bring forward sites, there needs to be certainty about delivery and commercially viable. The ability to deliver relies on obtaining an implementable planning permission, over which there is limited certainty. The majority of sites that come forward for development are not allocated sites in a Local Plan but have been identified by the private sector responding to the requirements of the market. As such, there is uncertainty that planning permission will be granted, as applicants rely on 'material considerations' to overcome any objections that arise to applications that are not in accordance with an up to date development plan.

Recommendation: Local planning authorities to identify sites for lorry parking within local plans. If sites are not selected at the time a local plan is adopted, for national planning policy to provide a clear decision taking framework to provide to increase planning weight for lorry parking and/or infrastructure that supports delivery.

## E. How to Deal with Planning Applications

Utilising HA269 as a reference point, Paragraph 5 of that policy statement set out factors that, at the very least, should be considered in determining applications. These factors were<sup>14</sup>:

- *the distance to adjoining MSAs;*
- *evidence (such as queuing on the MSA approach roads\* or lack of parking spaces at times of peak demand) that nearby existing MSAs are unable to cope with the need for services;*
- *a higher than normal incidence of accidents attributable to driver fatigue\*;*
- *evidence of a genuine need for the proposed services rather than simply demand: it will not be sufficient to show merely that drivers would use an MSA if it were to be built – there should be evidence of a genuine safety-related need;*
- *whether the MSA is justified by the type and nature of the traffic using the road; the need for services may, for example, be less on motorways used by high percentages of short distance or commuter traffic than on those carrying large volumes of long-distance movements\*.*

It is noted that the distance between services within current guidance (Circular 01/2022) is a maximum. The following factors, are also material have evolved through recent policy and guidance; beyond those listed above:

- National and/or local shortage of HGV provision
- Issues of crime and social behaviour linked to inappropriate parking of lorries
- The installation of latest technology to enable a reduction of environmental emissions
- Role of existing services to SRN

The framework below could form the basis for a matrix that enables clear decision taking, having regard to the key matters that should be considered in determining a planning application for a lorry park.

Recommendation: Provide decision takers with a policy making framework for decision taking, with opportunities for CPD/ training to support.

---

<sup>14</sup> We have placed \* against those factors that are no longer relevant in terms of decision taking.

**Appendix**

**Table 1:** Local Plan policies by LPA for Route 1 Midlands

LPA	Lorry Parking Policy	Local Plan	Emerging LP?
<b>Route 1 Midlands</b>			
Stafford	<b>T1 Transport</b>	The plan for Stafford Borough 2011-2031 (2014)  The plan for Stafford Borough Part 2 (2017)	Yes
South Derbyshire	<b>S6 Sustainable Access</b>  <b>INF2 Sustainable Transport</b>	Local Plan for South Derbyshire Part 1 (2016) and 2017.	Issues and Options stage
Cheshire East	n/a	Local Plan Strategy 2010-2030 (2017)  Site Allocations and Development Policies (2022)	No
Newcastle-under-Lyme and Stoke-on-Trent	n/a	Newcastle-under-Lyme and Stoke-on-Trent core spatial strategy (2009)	Yes

		Saved Policies of the Newcastle under Lyme Local Plan (Adopted 2003)	
Staffordshire Moorlands	n/a	Staffordshire Moorlands Local Plan (2020)	No
East Staffordshire	n/a	East Staffordshire Planning for Change 2012-2031 (2015)	No
Derbyshire Dales	n/a	Derbyshire Dales Adopted Local Plan (2017)	No
Derby	n/a	Derby City Local Plan - Part 1 Core Strategy January (2017)	Draft plan expected June 2024
North-West Leicestershire	n/a	The Northwest Leicestershire Local Plan (2021)	Yes

**Table 2:** Local Plan policies by LPA for Route 2 East of England

LPA's	Lorry Parking Policy	Local Plan	Emerging LP?
<b>Route 2 – East of England</b>			
Babergh / Mid Suffolk	<b>T13 Lorry Parking in Hadleigh</b>  <b>T14 Lorry Parking in Sudbury</b>	Babergh and Mid Suffolk Joint Local Plan Part 1 (November 2023).	Part 2 Call for sites concluded Feb 2024.
East Suffolk	n/a	East Suffolk Council – Suffolk Coastal Local Plan (September 2020)  East Suffolk Council – Waveney Local Plan (March 2019)	No
Colchester	n/a	Colchester City Local Plan 2013-2033 (2021)  Colchester City Local Plan 2017-2033 Section 2 (2022)	No
West Suffolk	n/a	Former Forest Heath area Core Strategy (2010)  Former SEBC area Core Strategy (2010)	Yes

		Joint Development Management Policies Document (2015)	
East Cambridgeshire	n/a	Local Plan 2015 (as amended 2023)	No
South Cambridgeshire	n/a	South Cambridgeshire Local Plan (2018)	Yes – Greater Cambridge Local Plan - awaiting draft version in 2024.

**Table 3:** Local Plan policies by LPA for Route 3 North West

LPA's	Lorry Parking Policy	Local Plan	Emerging LP?
<b>Route 3 – North-West</b>			
Warrington	<b>Policy INF1 – Sustainable Travel and Transport</b>	Warrington Local Plan 2021/22 – 2038/39 (2023)	No
Flintshire	n/a	Flintshire Local Development Plan 2015 - 2030 (2023)	No
Cheshire West and Chester	n/a	Cheshire West and Chester Local Plan (Part Two) Land Allocations and Detailed Policies (2019)	No
Wirral	n/a	Unitary Development Plan (2000)	Yes
Halton	n/a	Delivery and Allocations Local Plan (2022)	No
Cheshire East	n/a	Local Plan Strategy 2010-2030 (2017)  Site Allocations and Development Policies (2022)	No

**Table 4:** Local Plan policies by LPA for Kent

LPA	Lorry Parking Policy	Local Plan	Emerging LP?
<b>Kent</b>			
Ashford	<b>Policy TRA9</b>	Ashford Local Plan (2019)	No
Dover	<b>Policy DM14</b>	Adopted Core Strategy (2010)	Yes
Canterbury	n/a	Canterbury District Local Plan (2017)	Yes
Tonbridge & Malling	n/a	Core strategy (2007) Development Land Allocations (2008)	Yes
Dartford	n/a	Core strategy (2011) Development Policies Plan (2017)	Yes
Maidstone	n/a	Maidstone Borough Local Plan (2017)	Yes
Medway	n/a	Medway Local Plan (2003)	Yes
Sevenoaks	n/a	Core Strategy (2011) Allocations and Development Management Plan (2015)	Yes
Gravesham	n/a	Gravesham Local Plan Core Strategy and Policies Map (2014)	No

		Gravesham Local Plan First Review (1994) – saved Policies	
Thanet	n/a	Thanet District Council Local Plan (2020)	No
Swale	n/a	Bearing Fruits 2031 -The Swale Borough Local Plan (2017)	No
Folkestone & Hythe	n/a	Core strategy review (2022) Places and Policies Local Plan (2020)	No
Tunbridge Wells	n/a	Local Plan (2006), Core strategy (2010), Site Allocations Local Plan (2016)	Yes

**Table 4:** Local Plan policies by LPA for Metropolitan Borough Councils

MBC's	Lorry Policy	Parking Local Plan / Transport Plan	Emerging LP?
<b><u>Barnsley</u></b>	N/A.	Barnsley Local Plan 2019  Barnsley Borough 'Moving from A to B' (TP)	No
<b><u>Birmingham City</u></b>	N/A.	The Big City Plan: Part 1 & 2.	Yes
<b><u>Bolton</u></b>	N/A.	Bolton's Core Strategy Development Plan – 2011  Bolton's Allocations Plan 2014	No
<b><u>Bradford</u></b>	Policy Freight	TR6: Bradford Council Core Strategy Development Plan (DPD) 2023	No

<b><u>Bury</u></b>	N/A.	Bury Local Plan – Policy Directions (2018)	Yes
<b><u>Calderdale</u></b>	N/A.	Local Plan – Calderdale Council (2023) Calderdale Transport Strategy (2016)	No
<b><u>Coventry City</u></b>	AC7: Freight	Final Local Plan (2017) Coventry Transport Strategy (-)	No
<b><u>Doncaster</u></b>	Policy 15: Lorry Parking (Strategic Policy)	Doncaster Local Plan (2021) Doncaster Infrastructure Strategy (2019)	No
<b><u>Dudley</u></b>	N/A.	Local Development Scheme (2023)	Yes
<b><u>Gateshead</u></b>	N/A.	Core Strategy and Urban Plan for Gateshead and Newcastle Upon Tyne (2015)	Yes
<b><u>Kirklees</u></b>	N/A.	Kirklees Local Plan – Strategies and Policies (2019)	No
<b><u>Knowsley</u></b>	N/A.	Knowsley Local Plan: Core Strategy (2016)	No
<b><u>Leeds City</u></b>	T29/T29a	Core Strategy for Leeds (2019)	No
<b><u>Liverpool City</u></b>	N/A.	Liverpool Local Plan (2022)	No

<b><u>Manchester City</u></b>	8 Objective 2 – Economy and City Centre	Manchester’s Local Development Framework – Core Strategy (2012)  Greater Manchester Transport Strategy 2040 (2021)	No
<b><u>Newcastle-upon-Tyne</u></b>	N/A.	Core Strategy and Urban Core Plan for Gateshead and Newcastle upon Tyne, 2010-2030 (2015)  Newcastle-upon-Tyne Development and Allocations Plan (DAP) (2020)	Yes
<b><u>North Tyneside</u></b>	N/A.	North Tyneside Local Plan (2017)	Yes
<b><u>Oldham</u></b>	N/A.	Oldham Draft Local Plan (2023)	Yes
<b><u>Rochdale</u></b>	N/A* (Referenced)	Rochdale Core Strategy (2016)  Rochdale Transport Strategy (2014)	No
<b><u>Rotherham</u></b>	Policy CS18: Freight  Policy SP30  * (No clear mention / only on standards or security)	Rotherham Local Plan – Core Strategy 2013-2028 (2014)	No
<b><u>Salford City</u></b>	N/A.	Salford Local Plan: Development Management Policies and Designations (2023)	Yes

<b><u>Sandwell</u></b>	N/A.	Regulation 18 Draft Sandwell Local Plan (2023)	Yes
<b><u>Sefton</u></b>	N/A.	A Local Plan for Sefton (2017)	No
<b><u>Sheffield City</u></b>	N/A.	Sheffield City Council – Transport Strategy (2019)  Core Strategy (2009)	No
<b><u>Solihull</u></b>	N/A.	Solihull Local Plan (2013)  Solihull Connected – Transport Strategy (2023)	No
<b><u>South Tyneside</u></b>	-	-	-
<b><u>St Helens</u></b>	N/A.	St. Helens Borough Local Plan up to 2037 (2022)  Merseyside Transport Plan (2011)	No
<b><u>Stockport</u></b>	N/A.	One Stockport Local Plan (2022)  One Stockport Economic Plan (2022)	No
<b><u>Sunderland City</u></b>	Policy 37: Freight	LTP3: The Third Local Transport Plan for Tyne and Wear 2011-2021 (2011)  Local Plan – Local Development Scheme 2018-2020	No
<b><u>Tameside</u></b>	-	-	Yes
<b><u>Trafford</u></b>	L4.17 – Lorry Management	Trafford Local Plan: Core Strategy (2012)	No

	Schemes and Parking		
<b><u>Wakefield</u></b>	N/A.	Core Strategy – Wakefield, Volumes 1 & 2 (2024)	No
<b><u>Walsall</u></b>	N/A.	Walsall Local Plan (2011) Site Allocation Document (SAD)	No
<b><u>Wigan</u></b>	Wigan	Wigan Local Plan Core Strategy (2013-2026) (2013)	No
<b><u>Wirral</u></b>	Policy WS 9.5 – Overnight Lorry Parking	Wirral Draft Local Plan 2021-2037	No* (Paywall and only draft available)
<b><u>Wolverhampton</u></b>	-	-	Yes



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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)**

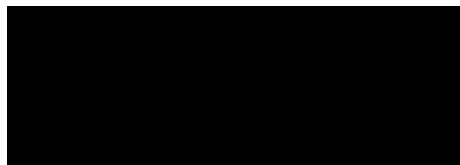
*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*

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

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Rebecca"/>	<input type="text"/>
Last Name	<input type="text" value="Doull"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Associate"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Smith Jenkins Planning &amp; Heritage"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

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? – General comments**

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.

### **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-notices/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.*



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Rebecca"/>	<input type="text"/>
Last Name	<input type="text" value="Doull"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Associate"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Smith Jenkins Planning &amp; Heritage"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

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? – General comments**

Paragraph

Policy

CEA7

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.*

### **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.*



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Rebecca"/>	<input type="text"/>
Last Name	<input type="text" value="Doull"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Associate"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Smith Jenkins Planning &amp; Heritage"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

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? – General comments**

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.

### **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.*



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Rebecca"/>	<input type="text"/>
Last Name	<input type="text" value="Doull"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Associate"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Smith Jenkins Planning &amp; Heritage"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

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? – General comments**

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.

### **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.*

**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	Mrs	
First Name	Rebecca	
Last Name	Doull	
Job Title (where relevant)	Associate	
Organisation (where relevant)	Smith Jenkins Planning & Heritage	
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? – General comments**

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.

### **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.*



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Rebecca"/>	<input type="text"/>
Last Name	<input type="text" value="Doull"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Associate"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Smith Jenkins Planning &amp; Heritage"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

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? – General comments**

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.

### **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-notices/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.*



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Rebecca"/>	<input type="text"/>
Last Name	<input type="text" value="Doull"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Associate"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Smith Jenkins Planning &amp; Heritage"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

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? – General comments**

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.

### **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-notices/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.*



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Rebecca"/>	<input type="text"/>
Last Name	<input type="text" value="Doull"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Associate"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Smith Jenkins Planning &amp; Heritage"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

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? – General comments**

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.

### **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-notices/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.*



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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	Mrs	
First Name	Rebecca	
Last Name	Doull	
Job Title (where relevant)	Associate	
Organisation (where relevant)	Smith Jenkins Planning & Heritage	
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? – General comments**

Paragraph

Policy

PFHP4

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.

### **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-notices/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.*



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Rebecca"/>	<input type="text"/>
Last Name	<input type="text" value="Doull"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Associate"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Smith Jenkins Planning &amp; Heritage"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

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? – General comments**

Paragraph

Policy

Policies Map

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

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

Yes

No

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

Please refer to accompanying Statement for full details.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will

make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Statement for full details.

(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 matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local 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.

### **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-notices/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.*