



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

This form has two parts –

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

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

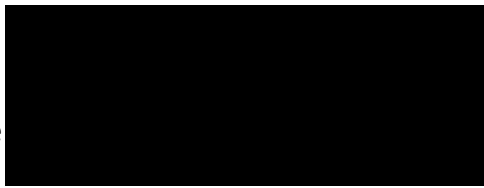
**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*

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

Title	Mr	
First Name	Richard	
Last Name	Pitt	
Job Title (where relevant)	Strategic Planning Director	
Organisation (where relevant)	Terra	
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: HAYFIELD HOMES

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

Paragraph

Policy

GS2; GS4;GS10; PFHP9;
HQH1; HQH2;
CEA2;CEA5; CEA9; CEA15

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 covering letter below.

(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 covering letter below.

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

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

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

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

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

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

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

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

Sharing your personal details

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

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

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

TERRA

Development Plans
Milton Keynes City Council
Civic
1 Saxon Gate East
Milton Keynes
MK9 3EJ

16th of February 2026

Sent by email to: ncp.engagement@milton-keynes.gov.uk

Dear Sir/Madam,

RE: REPRESENTATIONS TO THE MILTON KEYNES CITY PLAN 2050 REGULATION 19 LOCAL PLAN

This document comprises the representations of Terra to the Regulation 19 (“Reg 19”) Plan Making Stage version of the Milton Keynes Local Plan consultation. These have been prepared in relation to land at Wavendon Fields, Newport Road, Wavendon, which we have recently secured an interest in.

Terra is an experienced and trusted Land & Development company with a vast amount of experience in land development and the housebuilding industry, making us extremely well placed to evaluate, secure and gain significantly enhanced value. As part of the award-winning Real Estate Capital Holdings group, we leverage our internal partnerships to deliver planning consents that housebuilders and developers actively seek. Our approach is built on trust, collaboration, and a commitment to ensure landowners, stakeholders, and every community benefits from our expertise.

I. 2024 – Strategic Housing Land Availability Assessment and Site Selection Methodology

- I.1 The 2024 Strategic Housing Land Availability Assessment (SHLAA) identified the site (Figure 1 below) as Site ID 110521 (Appendix 5). The SHLAA confirmed that the site is suitable, deliverable and available. It was also considered to be achievable in forming an extension to an existing strategic allocation.
- I.2 In paragraph 2.19 of the SHLAA, it is identified that those sites which were considered to be suitable (such as this one) would be subject to more detailed work to determine the exact number of homes that could be delivered but, it was “*anticipated that the majority would be able to come forward in their entirety*”.



TERRA

Figure 1. Site Location Plan

- I.3 However, in the Submission Version of the plan, the site has not been identified for allocation at all, this is despite its position immediately adjacent to Strategic Allocation GS22 'South East Milton Keynes Strategic Urban Extension' (Figure 2). That allocation is supported by a Supplementary Planning Document which was adopted in 2022. The SPD contains a concept plan which illustrates proposed development adjacent the Western and Southern boundaries of our (Figure 3). There is nothing within the SPD to suggest that our site could not form an appropriate and complementary part of the broader strategic development.
- I.4 The site is not subject to any technical constraints which would cause an 'in principle' objection to the delivery of the site. It also sits to the South of the proposed 'Wavendon Strategic Buffer'. It is therefore unclear what further work, if any, the Local Authority have undertaken to determine the suitability of the site and what site selection methodology has been followed in order for it to be excluded from receiving an allocation.

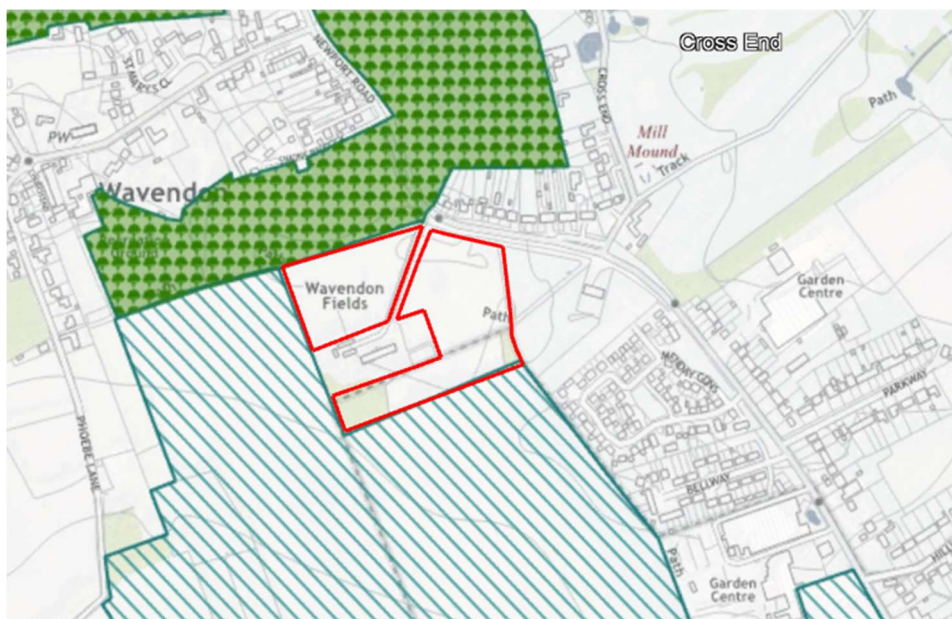


Figure 2 – Extract from interactive policies map showing the 'Wavendon Strategic Buffer' to the North of the site and the South East Milton Keynes Urban Extension wrapping around the Southern and Western boundaries.

TERRA

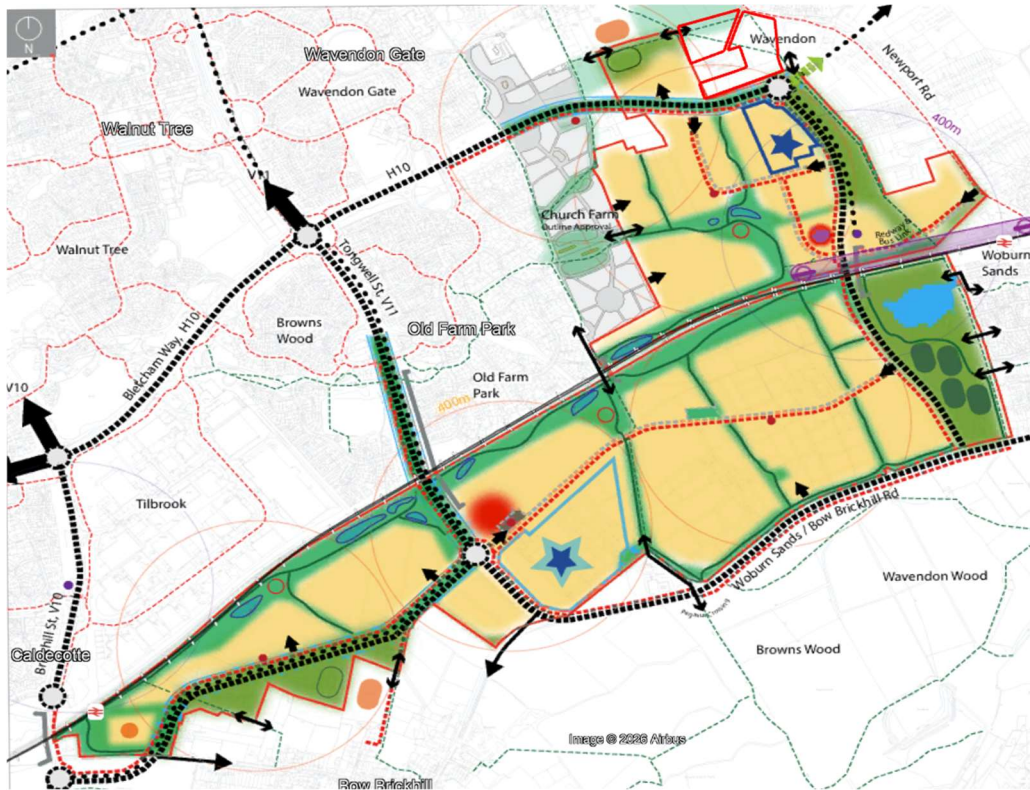


Figure 3 – Concept plan from the 2022 South East Milton Keynes Strategic Urban Extension SPD.

RESPONSE TO DRAFT LOCAL PLAN

2. Draft Policy GS2 – Strategy for Homes

- 2.1 Terra do not support the plan period over which total housing need is derived from. The Council have started the plan period from April 2022, which is four years prior to the submission of the plan for examination. When using the standard method, Councils should be looking forward from the point at which the assessment is made, with past supply wrapped up in the affordability adjustment. As such the approach being taken by the Council does not align with national policy.
- 2.2 The starting point for the housing requirement should be 2025/26. Based on the outcome of the current standard method of 1,799 dwelling per annum (dpa) this will require the Council to identify sufficient land to deliver a minimum of 44,975 homes by 2045/46. Therefore, Terra suggests that GS2 should be amended accordingly.
- 2.3 In addition to amending the period over which housing needs are considered, the Council should also include the annual housing requirement of 1,799 dwellings per annum as well as the total figure over the whole plan period.
- 2.4 Over the plan period 2022 – 2050, the Council expects to deliver 59,250 homes – roughly 9,000 homes more than the requirement over that period. However, 7,161 of the proposed supply is in the period 2022/23 to 2024/25 and which should, in Terra's opinion, not form part of the supply of homes for this plan. Therefore, Draft Policy GS2 should be altered in order to reflect this.
- 2.5 As outlined in Policy GSI Our spatial strategy, the City of Milton Keynes will be where the majority of development to meet our identified needs will be provided. As this currently stands, whilst the Council can demonstrate that they have an over supply of housing, there is an overreliance on large/strategic sites. This comes with risks relating to viability, in terms on the scale of infrastructure required and issues concerning delays in commencing these larger projects. In contrast, smaller sites in sustainable locations can be delivered quickly and help the Council with the housing supply during the early years of the plans whilst larger schemes are coming forward.
- 2.6 The allocation of smaller sites should be recognised as a priority and supports small and medium house builders to ensure that they benefit from having their sites identified for development. Allocations within a Local Plan take away some of the risk from a development by providing greater certainty of that site coming forward. The effect of this is that it allows the

TERRA

SME sector to grow, delivering homes to increase the range of new homes available. In turn, this would align with and follow the National guidance of the NPPF outlined in Paragraph 73, which states:

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a. *Identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved*
- b. *Seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom build housing*
- c. *Use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;*
- d. *Support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes*
- e. *Work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

2.7 Therefore, in order for the plan to be consistent with National Policy, the Council should seek to promote the delivery of smaller sites through allocations within the Local Plan.

3. Policy GS4 Strategy for People-Friendly and Healthy Places

3.1 Terra supports the requirement for developments over 10 dwellings to provide or contribute to community facilities (provided they are CIL regs 122 compliant) and infrastructure, as well as prioritising active travel modes to create a space that is safe, attractive, and promotes social inclusivity via well-designed and affordable housing.

3.2 The site Terra are promoting would provide accessible and well-designed housing that would provide a policy compliant level of affordable housing.

4. Policy GS10 Movement and Access

4.1 Terra agrees with the provision of mitigation measures submitted via a Transport Statement or Travel Plan to be in place where a development causes a high impact on the highway network. The requirement for a development to provide safe and suitable access for all users is supported by Terra.

4.2 The site which Terra are promoting not only benefits from direct access to the Newport Road and good proximity to local facilities, it also a convenient walking and cycling distance to Woburn Sands railway station. It is currently proposed that existing station will be replaced by a new station as part of the East West Rail (EWR) project. This nationally significant infrastructure project is proposed to deliver faster and more frequent services between Oxford and Cambridge, via Milton Keynes. When complete it is estimated that Woburn Sands will have five trains per hour during peak times.

4.3 Whilst draft, the emerging NPPF recognises the appropriateness of locating development near to railway stations which can provide a high level of connectivity to services and jobs.

4.4 Given the important significance of the EWR project, it appears a significant oversight that there is not a specific policy which relates to it nor, that its role in helping to shape and facilitate a spatial strategy and development opportunities recognised more explicitly.

5. Policy PFHP9 Amenity for Healthy Buildings and Spaces

5.1 The requirement for all new residential developments to comply with NDSS standards is not supported by Terra. The requirement for NDSS compliance on all new dwellings lacks flexibility and does not comply with National Guidance. There is also a lack of evidence surrounding this compliance requirement. Therefore, it not been justified and should be removed from the Local Plan.

TERRA

6. Policy HQH1 Healthy Homes

- 6.1 This policy states that on housing sites of 10 or more homes, the mix of housing types and size must reflect with the Council's latest assessment of housing. This lack of flexibility to take into account other evidence that may suggest a more appropriate mix would better meet the need for homes in the specific area the site is being developed, is not supported by Terra.
- 6.2 Whilst it is understood that there is a need for a mix of house types, tenures and sizes, it is important that such a policy is flexible and ensures that delivery of housing is not stalled due to overly prescriptive requirements that do not consider the scale and viability of sites. Terra request that the Council ensure that the Policy is flexibly applied to make allowance for home builders and developers to provide alternative housing mixes as required by the market.
- 6.3 Therefore, the policy should be reworded to allow for flexibility when it comes to mix of housing. Terra suggests that it should be altered to read as follows:
- A. *Development proposals resulting in the creation of 10 or more new homes must meet identified needs. The mix of tenure, size and type of homes must:*
1. *Reflect the Council's latest assessment of need, as well as other recent evidence; and*
 2. *Create and/or maintain mixed and balanced communities.*
- 6.4 This alteration will allow decision makers to take into account a wider range of evidence recognising that the council's assessment of housing need is just a snapshot in time and that there may be changes in need after its publication.
- 6.5 5% minimum Market homes to meet M4(3) regulations and 10% minimum Affordable homes to meet M4(3) regulations within developments of over 10 dwellings is partially supported by Terra, in principle. However, the Council should be aware of National Building Regulation requirements and be conscious not to double count.
- 6.6 It should also be noted that if the Council are to implement such a policy in the way outlined within their draft plan, they should allow reflection of this within cost viability assessments. The implementation of such a policy may be a challenge from a viability and deliverability perspective, meaning that further flexibility would be favoured with regards to this policy in order to address these concerns. This is especially important given the mandatory delivery of 10% BNG throughout the UK affecting how viable and deliverable a scheme can be.

7. HQH2 Affordable Housing

- 7.1 Terra supports the use of adjusted rates of affordable housing provision based on different value areas.
- 7.2 The consideration of robust viability evidence for development proposals that cannot meet the required affordable housing requirement is supported by Terra. This is particularly important when it comes to smaller sites put forward for development by SME housebuilders. This is especially important given the mandatory delivery of 10% BNG throughout the UK affecting how viable and deliverable a scheme can be.

8. Policy CEA2 Green Roof and Walls

- 8.1 Policy CEA2 states that where feasible green roofs should be provided on apartment and dwellings with flat roofs or gentle roof pitches. The Council note some of the problems with regard to providing green roofs, including how green roofs will work alongside the provision of solar panels, which the Government have confirmed will be a requirement of the Future Homes Standard.
- 8.2 Given the difficulties presented by providing green roofs, Terra suggests that this policy is currently too prescriptive and should be altered to state that the provision of green roofs in appropriate situations will be encouraged and be viewed favourably in the decision-making process.

TERRA

9. Policy CEA5 Water Efficiencies

9.1 The proposed restriction on water use to 93 litres per person per day is unduly onerous and is not consistent with national requirements. By Building Regulation standards, the current restriction is 125 litres per person per day (LPPPD) with an optional uplift / reduction to 110 litres per person per day. The 'Water Ready' report published earlier this year by the Future Homes Hub outlines a framework for new homes to achieve 90 LPPPD by 2035. A restriction to 93 LPPPD is considered unreasonable. The Policy should instead be written to reflect national regulations. Terra consider the Policy is reworded as follows:

- A. *Proposals for residential development must achieve using a fixtures and fittings approach, unless superseded by a more stringent national policy or Building Regulations requirement, a 110 litres per person per day water efficiency standard for mains supplied water/potable water.*
- B. *Where feasible and viable, non-residential development proposals must achieve full credits within the four water categories (WAT01, WAT02, WAT03 and WAT04) of the BREAAAM standard, with a minimum score of three credits within WAT01 Water Consumption category, or an equivalent standard set out in any future update to BREAAAM.*

10. Policy CEA9 Biodiversity and Habitat Networks

10.1 Terra would suggest that the Council give consideration as to whether a policy on BNG is required given that the process for considering and delivering BNG is set out in legislation and regulation.

10.2 If the Council do retain the policy, Terra would recommend that part C is removed as this effectively repeats the Biodiversity Gain Hierarchy which is already defined in legislation and National guidance. Therefore, it is unnecessary and should not form part of the decision-making process for a planning permission.

11. Policy CEA15 Managing Flood Risk

11.1 Terra are concerned that this Policy does not reflect the updated Planning Practice Guidance ("PPG") (updated 17 09 2025) relating to sequential testing. Within Policy CEA15, (E) states that Development proposals on land that has not been subject to a plan-making Sequential Test will be required to undertake a flood risk sequential test using the Council's latest published Strategic Flood Risk Assessment. However, this is not in compliance with the updated PPG, which states that a proportionate approach should be taken, applying NPPF Paragraph 175.

11.2 The PPG makes clear that where a site-specific flood risk assessment demonstrates clearly that the proposal would ensure that occupiers and users would remain safe from surface water flood risk for the lifetime of the development (without increasing flood risk elsewhere) a sequential test is not required. Terra therefore request that, if the Policy is to be retained, then it be amended to reflect the updated PPG.

12. Conclusion

12.1 Terra requests that these representations are taken into account. As recognised by the Council in the most recent SHLAA, the site at Wavendon Fields is suitable, available and deliverable. The site is not subject to any technical constraints. The site benefits from proximity to the proposed South East Milton Keynes Urban Extension and Woburn Sands railway station; a station which will have a significantly enhanced role with the progression of East West Rail. The site would also comply with Paragraph 73 of the NPPF in providing a site suitable for small and medium builders which can deliver quickly. For all these reasons, it is recommended that the Council include the site within the emerging Plan as an allocation for residential development.

Yours Sincerely,



Richard Pitt
Strategic Planning Director

