



## MK City Plan 2050 – Sainsbury's response to the Reg19 Consultation

From [REDACTED]  
 Date Mon 12/22/2025 1:25 PM  
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 MK Reg 19 Repls Dec 25.pdf;

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Dear Sir or Madam,

On behalf of Sainsbury's Supermarkets Ltd, we submit representations to the Regulation 19 MK City Plan 2050.

The representations relate to the former Argos Headquarters at 489–499 Avebury Boulevard.

The representations reiterate the ongoing deliverability and development potential of the former Argos Headquarter site. The recommended modifications ensure that the Regulation 19 draft is fully aligned with current evidence, consistent with national policy, and capable of supporting the sustainable regeneration in Central Milton Keynes.

The table below summarises our suggested changes to relevant policies.

Policy	Issue Identified	Proposed Modification
<b>CMK1</b>	Flexibility for mixed-use development should be retained	No modification requested, but continued flexibility is important
<b>CMK2</b>	Height, massing and density expressed too rigidly	Insert text confirming height/massing/density should be design-led and informed by relevant assessments
<b>CMK3</b>	15-storey height cap unjustified and overly restrictive	Amend wording to confirm that the Building Height Thresholds shown on the Policies Map are indicative and that taller buildings will be acceptable where supported by robust assessment
<b>CEA1</b>	Ambiguity around demolition vs retrofit	Clarify that demolition is acceptable where retention is unfeasible or inconsistent with sustainable development or other key policy objectives

Policy	Issue Identified	Proposed Modification
<b>CEA11</b>	On-site urban greening unrealistic on constrained CMK sites	Allow alternative or off-site compliance mechanisms where justified
<b>Other policies</b>	Need for flexibility	Ensure policies allow site-specific solutions

SSL welcomes continued engagement with Milton Keynes Council and would be pleased to meet with officers to discuss these representations further.

Please can you confirm in writing that these representations have been duly made.

If you require any further information, please do not hesitate to contact me.

Kind regards,

Yours faithfully,

Sean

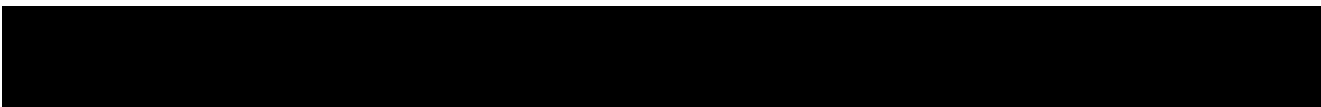
**Sean McGrath BA (Hons) MSc MRTPI**

Director



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MK9 3EJ

22 December 2025

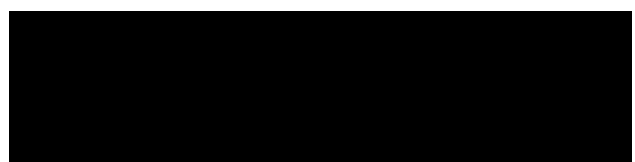
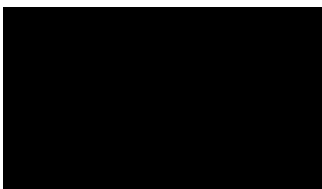
Dear Sir or Madam,

**REGULATION 19 REPRESENTATIONS - MILTON KEYNES CITY PLAN 2050  
FORMER ARGOS HEADQUARTERS, 489–499 AVEBURY BOULEVARD, MK9 2NW  
SUBMITTED ON BEHALF OF SAINSBURY'S SUPERMARKETS LTD (SSL)**

1. On behalf of Sainsbury's Supermarkets Ltd (SSL), we submit representations to the Regulation 19 draft of the Milton Keynes City Plan 2050 in respect of the former Argos Headquarters at 489–499 Avebury Boulevard.
2. SSL has consistently engaged with the Local Plan process at the Call for Sites and Regulation 18 stages. These Regulation 19 comments seek to ensure that the draft policies remain justified, effective and consistent with national planning policy. Paragraph 130 of the Framework confirms that policies should seek to optimise the development capacity of sites for housing, but some policies as drafted do not do this, and so the Plan is unsound.
3. Since the previous consultation stage, Galliford Try Investments (GTI) has submitted a planning application for the comprehensive redevelopment of the site (LPA ref. PLN/2025/1626). This application proposes demolition of the existing redundant 5–6 storey building and construction of a part 18, part 13 and part 10 storey residential-led development delivering 350 homes. The submission includes detailed townscape, visual, daylight/sunlight, microclimate, heritage, noise, sustainability and whole-life carbon assessments. These documents clearly demonstrate that the scale and density proposed are appropriate for the site and that any impacts can be acceptably mitigated.

**Site Background and Development Context**

4. The former Argos Headquarters has been vacant since 2023 following SSL's integration of Argos and the transition to hybrid working patterns. The building was marketed for over two years with very limited interest from commercial occupiers and is now redundant for its previous purpose.
5. The site is highly accessible and in a sustainable location in the heart of Central Milton Keynes (CMK), immediately adjacent to the Almere development (up to 18 storeys) and within an emerging cluster of taller, high-density buildings. It benefits from excellent public transport links, walkable access to services, and strong active travel connections.



6. The feasibility and design work undertaken for the live application (LPA ref: PLN/2025/1626) clearly demonstrate that the site can support a comprehensively planned, residential-led redevelopment of significant density, with associated enhancements to the local townscape and public realm.

### **Representations on the Regulation 19 Draft Policies**

#### Policy CMK1 – Central Milton Keynes Development Framework Area

7. The policy identifies the Midtown Quarter for a diverse range of uses. This approach is compatible with a residential-led redevelopment of the former Argos Headquarters site, which can provide enhanced public realm and the activation of frontages, as shown in the current planning application.
8. No specific modifications are sought, but the general flexibility for mixed-use development should be retained to ensure the policy remains effective over the plan period.

#### Policy CMK2 – Placemaking Principles

9. The policy includes a series of placemaking considerations and an indicative density for Midtown of around 425 dwellings per hectare. The live application demonstrates that this level of density can be successfully delivered on the site.
10. However, aspects of the policy relating to height, massing and density would benefit from clearer recognition that these parameters should be determined through a design-led assessment, informed by detailed townscape, visual, environmental and microclimate work.

#### *Recommended modification:*

11. Add wording confirming that building height, massing and density are to be established through a design-led process supported by appropriate assessments.

#### Policy CMK3 – Skyline and Tall Buildings Strategy

12. The former Argos Headquarters site is identified as being within a zone where building heights of up to 15 storeys are supported. This is inconsistent with:
  - The Framework which seeks to optimise the development of accessible town centre sites and promotes a design led approach to development;
  - The immediately adjacent Almere development which provides up to 18 storeys;
  - The identification of adjoining parcels for up to 20 storeys;
  - The site's highly accessible central location; and
  - The detailed evidence presented in the live planning application demonstrating that built form up to 18 storeys can be comfortably accommodated with appropriate mitigation.
13. Furthermore, the justification for limiting this part of Midtown to 15 storeys is unclear. The evidence base does not set out a compelling rationale as to why this area cannot appropriately accommodate buildings of up to 18 storeys, particularly given the surrounding context and the acceptability of comparable schemes. As a result, it appears that the height zones have been defined without sufficiently demonstrating why incremental increases in height over 15 storeys would be unacceptable in this location.

14. A rigid height cap of 15 storeys is, therefore, not justified or effective. Without justification, Policy CMK3 seeks to restrict the development potential of sites. A more flexible, design-led approach is required to ensure the Plan is positive and allows the development potential of well-located sites to be optimised, particularly given the strategic role of CMK in accommodating future growth.

*Recommended modification:*

15. Amend the policy to clarify that the height parameters are indicative, and that additional height may be acceptable where supported by robust assessment addressing townscape, visual impact, microclimate, daylight/sunlight, amenity and design.

Policy CEA1 – Sustainable Buildings (Whole-Life Carbon)

16. The redevelopment of the site has been informed by a detailed whole-life carbon assessment comparing reuse/retrofit and demolition/rebuild scenarios. As evidenced in the live application, retention of the existing building is neither feasible nor capable of delivering a sustainable, residential-led development due to structural, layout and performance limitations.
17. To avoid ambiguity, the policy should recognise that demolition is justified where retention is unviable or incapable of achieving sustainable development outcomes.

*Recommended modification:*

18. Add wording confirming that demolition will be acceptable where a whole-life carbon assessment demonstrates that reuse is unfeasible, or does not achieve sustainable development outcomes or other policy objectives such as optimising the development potential of sites to meet housing needs.

Policy CEA11 – Urban Greening, Trees and Woodland

19. The redevelopment strategy for the site includes significant greening measures including amenity terraces, green roofs and enhanced street-level planting. However, the constrained nature of CMK blocks means that full on-site compliance with all urban greening requirements may not always be achievable.

*Recommended modification:*

20. Clarify that alternative or off-site contributions may be considered where on-site delivery is demonstrated to be unfeasible due to site-specific constraints.

Other Energy, Sustainability, Noise and Design Policies

21. The live planning application addresses all relevant matters relating to energy, microclimate, noise, public realm design and operational considerations. These policies should remain flexible to allow site-specific solutions, particularly for tall buildings and high-density developments.
22. No specific wording changes are sought, but flexibility should be retained.

**Summary of Recommended Modifications**

23. These representations:
  - Reiterate that the Former Argos Headquarters is suitable, available and deliverable for a residential-led development;

- Confirm that taller built form (up to 18 storeys) can be accommodated appropriately, as evidenced through the live application;
- Highlight where elements of the Regulation 19 draft remains overly restrictive (particularly regarding building height); and
- Recommend modest, but essential modifications to ensure flexibility, soundness and alignment with the design-led approach required by the NPPF and the need to optimise the development potential of sustainable sites.

24. The key policy issue is the height limitation of 15-storeys through Policy CMK3. This does not reflect the established townscape context, the adjacent 18-storey Almere development, or the evidence submitted within the live application (LPA ref: PLN/2025/1626) demonstrating that taller building forms can be accommodated with appropriate mitigation. Supporting a design-led, assessment-based approach to development is necessary to ensure the Plan is sound.

25. The table below summarises our suggested changes to relevant policies.

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## **Conclusions**

26. These representations reiterate the ongoing deliverability and development potential of the former Argos Headquarter site. The recommended modifications ensure that the Regulation 19 draft is fully aligned with current evidence, consistent with national policy, and capable of supporting the sustainable regeneration in Central Milton Keynes.
27. SSL welcomes continued engagement with Milton Keynes Council and would be pleased to meet with officers to discuss these representations further. Please contact me if any further information is required.

Yours faithfully



**Victoria Chase**  
**Associate Director**

