


**Appendix 3****MILTON KEYNES CITY COUNCIL'S CITY PLAN 2050 REGULATION 19  
CONSULTATION****REPRESENTATIONS SUBMITTED ON BEHALF OF CATESBY ESTATES PLC****RE; WEST OF FAIRFIELDS (WESTERN EXPANSION AREA EXPANSION LAND)**

	<b>Milton Keynes City Plan 2050</b> Proposed Submission Stage Representation Form	<b>Ref:</b> <b>(For official use only)</b>
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**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

Mr

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First Name

Michael

Last Name

Knott

Job Title

Regional Lead – Midlands  
and South

(where relevant)

Organisation

Stantec

(where relevant)

E-mail Address

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

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**Part B – Please use a separate sheet for each representation**

Name or Organisation: Stantec on behalf of Catesby Estates Plc

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

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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

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

Catesby is supportive of the 'Our Ambition' set out on page 7 of the draft plan. It provides a positive and commendably bold statement regarding the growth of the City to 2050. That being said, as set out throughout our representations, and Regulation 18 representations, we have concerns that the draft plan may not achieve the ambition and objectives set out.

It is also disappointing that the 'Our Ambition' has not reflected the important national and regional role of MK, in terms of its contribution to the economy and connectivity across the region, including within the Oxford to Cambridge growth corridor.

Turning to the objectives, it is noted that these have been expanded since the Regulation 18 consultation to add five objectives associated with CMK. The remaining objectives remain largely as proposed previously and Catesby remains generally supportive, particularly of objective 9. There is an evident alignment between the proposed objectives and the objectives for achieving sustainable development set out in paragraph 8 of the NPPF.

Development at West of Fairfields site can support the achievement of the draft objectives, as summarised below and throughout the representations:

- 1) This objective is aligned with chapter 8 of the NPPF, not least paragraph 96. WoF comprises an extension to the Western Expansion Area, comprising substantial new green and blue infrastructure and supporting community infrastructure to facilitate the creation of a 'walkable' community.
- 2) This objective is broadly aligned with paragraph 117 (a) of the NPPF which identifies that priority should be first given to pedestrian and cycle movements. It will be critical that the policies which flow from this objective ensure that a design balance is taken to ensure that design requirements are clear and understandable. In line with the second part of paragraph 177 (a) of the NPPF, it is advised that the objective reflects the strategy concerning public transport and mobility hubs. This includes opportunities at sites such as WoF which can be connected into networks coming forward as part of the Western Expansion Area to enhance non-car connectivity to CMK.
- 3) Catesby is broadly supportive of this. As set out in the WoF Design Concept, a range of facilities, including a children's play area, proportionate to the development would be provided. The site is adjacent to Western Expansion Area 11 (Fairfield), and the proposals incorporate opportunities to extend sustainable connection options.
- 4) This objective is broadly aligned with paragraph 161 of the NPPF which sets out that "*the planning system should support the transition to net zero by 2050*". It is noted that the targets are above those within the NPPF. As commented upon a Regulation 18 stage, any planning policies that stem from this objective must be well-reasoned and robustly costed to ensure that development remains viable and the impact on housing supply and affordability is considered. Catesby has commented further in this regard in response to relevant policies within the draft plan.
- 5) Catesby is supportive of this objective which is broadly aligned with the first part of paragraph 164 (b) of the NPPF. Catesby has commented further in this regard in response to relevant policies within the draft plan.
- 6) Catesby is supportive of this objective which is broadly aligned with the need to use natural resources prudently and minimise waste and pollution with paragraph 8 (c) of the NPPF. Catesby has commented further in this regard in response to relevant policies within the draft plan.
- 7) Development at WoF will incorporate substantial areas of natural greenspace, including strategic green and blue infrastructure guided by the existing landscape framework.
- 8) Catesby is broadly supportive of this objective and consider that it is a cross-cutting objective. It is however unclear how it can be tangibly monitored.
- 9) Catesby is supportive of this objective which is aligned with paragraph 61 of the NPPF. In contrary to the suggested agreed capacity within the SHLAA, WoF can support the delivery of this objective through the delivery of at least 700 new homes.

- 10) Catesby is broadly supportive of this objective.
- 11) As stated in objective 3, West of Fairfields will incorporate infrastructure requirements as necessary to support the delivery of development. Catesby have commented further on this regard in response to Policy INF1.
- 12) Catesby is supportive of this objective.
- 13) Catesby is broadly supportive of this objective however as commented throughout this representation MKCC should ensure that there is compatibility with the broader objectives of the draft plan, particularly considering the scale of growth proposed at CMK.
- 14) Catesby is broadly supportive of this objective.

At Regulation 18 stage Catesby expected a clear monitoring framework to be published as part of the Regulation 19 representation. Appendix M of the draft plan sets out a framework for monitoring.

Considering the above, we have the following comments on suggested amendments.

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.

#### Objective 2:

This objective should also reference connectivity to mobility hubs and public transport stops. The links between street and neighbourhood scale connectivity and public transport will be fundamental in securing their use and long-term viability. This would also complement the delivery of objective 5:

Suggested modification shown in bold.

*Create streets and neighbourhoods that prioritise walking, cycling and wheeling for access to **mobility hubs, public transport stops**, shops, services, community facilities, and parks and open space.*

#### Objective 4:

It is critical that any policy requirements linked to this objective are effective, justified, and consistent with national policy. This includes consideration of viability of such standards and whether they will impact upon deliverability. Catesby have provided separate comments in response to these policies.

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="GS1"/>	Policies Map	<input type="text" value="X"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
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4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
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4.(3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>
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5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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

The spatial strategy is explained within paragraphs 5 – 22 inclusive of the draft plan and this explanation is supported by the 'Our Growth Strategy' Topic Paper. As noted within the supporting text of the draft plan, the spatial strategy is consistent with paragraph 124 of the NPPF which seeks to ensure that strategic policies set out a clear strategy which makes as much use as possible of previously developed or 'brownfield' land.

In principle, Catesby is supportive of the proposed spatial strategy set out within Policy GS1, this includes the amendment made to the proposed Policies Map to extend the defined city boundary to include proposed allocations. Catesby agrees with the key principles identified at paragraph 6 of the draft plan, which include the following:

- Taking an infrastructure first approach
- Maximising the impact on reducing carbon emissions and tackling the impacts of climate change
- Delivering affordable homes
- Delivering economic growth and high-quality jobs
- Creating a vibrant and thriving Central Milton Keynes
- Align growth with the establishment of a new metro system
- Protecting the defining character of Milton Keynes City

However, it is considered that the delivery of market housing should also be reflected within the priority.

To ensure a sufficient mix and supply of homes, the draft plan also identifies a series of strategic city extensions which it is suggested are capable of connecting into the existing city network and provide supporting infrastructure. As noted by paragraph 77 of the NPPF, the

supply of large numbers of new homes can often be best achieved through planning for larger scale development. Further specific comments regarding parts a – e of paragraph 77 of the NPPF are considered in responses to policy GS2.

Notwithstanding our general support, we are concerned that the draft plan continues to place a substantial focus on maximising opportunities in the City which, based on the evidence available, is not considered to be effective or justified.

It remains that as per paragraph 11 of the draft plan, 63% of the additional growth that the draft plan is seeking to allocate is within the existing built-up area of Milton Keynes City. As commented upon in response to policy GS2, whilst the source of this supply has shifted slightly, the overall percentage contribution has not changed since the Regulation 18 consultation. We therefore remain concerned that MKCC have overestimated opportunities available and deliverable within the existing built-up area. Please see our representation to Policy GS2 for further details.

Further comments regarding the proposed housing requirement and supply is set out in a separate response form concerning Policy GS2.

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.

Identification of our client's Site, West of Fairfields (Western Expansion Area Expansion Land – SHLAA Ref. 110007), as an allocation, or otherwise as a reserve site, within the City Plan 2050 for the following:

- Approximately 700 new high-quality homes alongside the WEA;
- Supporting community infrastructure,
- Extended sustainable connection options to the WEA;
- Substantial new green and blue infrastructure, including extensive public open space closely
- A strong transitional edge influenced by the WEA and the Weald villages to reduce potential effects on the character of the wider area;
- Biodiversity enhancements, shared community assets, and an area of parkland for recreation alongside landowners and the Calverton Residents Association.

Further details regarding the proposal are contained in response to Policy GS2 and the supporting Appendices.

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="GS2"/>	Policies Map	<input type="text" value="X"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
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4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
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4.(3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>
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Policy GS2 sets out that the draft plan proposes a housing requirement set at the current (HEDNA October 2025) local housing need figure of 1,799 homes per annum (50,372 homes for the plan period 2022-2050).

The draft plan proposes a housing supply of 59,779 over the plan period equating to a 19% supply buffer.

Taking these in turn.

**1) Housing Requirement**

Since the Regulation 18 consultation, the minimum local housing need and upper end housing need figure have both decreased from 53,245 and 63,000 homes to 50,372 and 61,716 respectively. The HEDNA (October 2025) at paragraph 18 establishes from the housing need scenarios that in order to accommodate the Council's growth target, a supply of 61,716 dwellings would be required. As presented in figure 3 of the HEDNA, dwelling growth of 50,372 to 2050 will only represent a population projection in 2050 of 382,297 and supported jobs growth of 54,903. Whereas a supply of 61,716 would represent a population projection in 2050 of 410,000 (MK Strategy 2050 target) and supported jobs growth of 73,849. This would result in a greater alignment with the upper end of the HEDNA jobs growth range as the meeting. Further comments regarding jobs growth alignment is set out in response to Policy GS3.

Whilst the Council are identifying a proposed supply at 59,779, which Catesby supports, this is 1,937 lower than the growth target supply assuming all supply is delivered by 2050. The HEDNA does not appear to test what the outcome of dwelling growth at 59,779 over the plan period could be. The Sustainability Appraisal (November 2025) disappointingly also does not

reflect on the different implications on jobs growth when appraising the economy and employment effects at section 6.8.

At Regulation 18 stage, the growth strategy ambition was largely framed as solely achieving the population target of 410,000. Paragraph 7 of the draft plan has removed explicit reference to the population target however reference remains to the growth aspirations. Strategy for 2050, which was adopted in January 2021 and refreshed in January 2025<sup>1</sup>, as stated in paragraph 5 of the draft plan, has established the ambition for growth in the draft plan.

The Strategy for 2050 sets the population target of 410,000 people within Milton Keynes, and 500,000 in Greater Milton Keynes by 2050 however makes clear on page 40 that the intention is to plan to achieve the higher end of jobs growth by creating the right conditions for growth including:

- Delivery of the Mass Rapid Transit system
- Achieving a new undergraduate university in the city centre
- Promote the growth of existing businesses alongside national and international inward investment
- Target investment in green and environmental business
- Developing SME networks
- Delivering housing ambitions

Paragraphs 5.2.2 – 5.2.9 (inclusive) of the SA discuss the quantum of growth to be accommodated in the draft plan.

Paragraph 69 of the NPPF states that “*The [housing] requirement may be higher than the identified need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment*”.

Paragraph 040 (Ref ID: 2a-040-20241212) of the PPG expands upon this stating “*authorities should consider the merits of planning for higher growth if, for example this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination*”.

Alongside the clear direction of travel for growth established within the Strategy for 2050, the city, as summarised in paragraphs 26 – 33 (inclusive) of the draft plan, is a high performing economy with positive future economic aspirations. Coupling these with local and national infrastructure programmes such as the MRT and East West Rail and strong past and project employment growth, it is disappointing that the draft plan has decreased its level of ambition by decreasing the overall level of housing supply and failing to accommodate all employment needs.

First, Catesby agrees with the conclusion at paragraph 5.2.3 of the SA that there is no case for a housing requirement set below local housing need.

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<sup>1</sup> [Strategy for 2050 FULL VERSION - Jan 2025\\_LR.pdf](#)

Second, Catesby agrees with the conclusion at paragraph 5.2.8 that “*setting a housing requirement above local housing need remains a possibility to reflect growth ambitions, unmet need (risk) and/or affordable housing need*”. As noted above, there are clear reasons which support the identification (and supply) of a higher housing requirement and employment land needs on the basis of growth ambitions, and indeed level of supply on the basis of these reasons.

Regarding unmet need, whilst the Duty to Cooperate legal requirement is due to be revoked, and as confirmed by the recent Written Ministerial Statement<sup>2</sup> has not been saved, as per paragraphs 24- 28 of the NPPF, maintaining effective cooperation is relevant in considering the soundness of the draft plan. Paragraph 5.2.6 of the SA notes that particularly in regard to Buckinghamshire, there is the possibility of not being able to provide for LHN.

In spite of the aforementioned conclusion within the SA, there does not appear to be consideration of setting the housing requirement above local housing need. There has also not been any consideration of a supply scenario which could deliver the supply aligned with the HEDNA suggestions. Instead, as noted in paragraph 4.2 of the Growth and Infrastructure Topic Paper, is it suggested that the proposed growth strategy matches MKCC’s ambition for growth.

This aligns with the HEDNA conclusions regarding the sufficient supply of 61,716 dwellings, or as the Regulation 18 consultation proposed, a supply of 62,800 dwellings. Catesby, therefore, whilst supporting the proposed housing requirement and additional supply buffer in principle, consider that MKCC should increase the housing requirement and identify additional supply, not least for the reasons set out below when considering the proposed supply, including one which identifies sites such as West of Fairfields.

## 2) Housing Supply

Table 1 of Policy GS2 identifies the sources of housing land supply between 2022 – 2050.

As noted above, the proposed supply within the draft plan has decreased since the Regulation 18 consultation. The table below identifies the differences, with the difference shown by a red, amber, green system.

Type	Reg 18	Reg 19	Difference
Completions and commitments 2022 - 2050	29,075	22,705	-6,370
CMK and Campbell Park	11,000	16,000	+5,000
Central Bletchley	1,000	1,184	+184

<sup>2</sup> [Written statements - Written questions, answers and statements - UK Parliament](#)

Transport Hubs / Metro Corridors	2,500	2,500	0
Walton Campus SBS	1,600	450	-1,150
Wolverton Railway SBS	400	400	0
Eastern SCE	7,500	7,750	+250
East of Wavendon SCE	3,000	2,250	-750
South of Bow Brickhill SCE	1,500	1,300	-200
Levante Gate SCE	1,250	1,250	0
Shenley Dens SCE	1,000	1,000	0
Small opportunity sites (Windfall)	3,000	2,990	-10
Total	62,825	59,779	-3,046

As confirmed within the Consultation Statement supporting the Regulation 19 consultation, the only amendments to Policy GS2 (beside the decrease in supply) have been a suggested streamlining of delivery mechanisms, renaming of the transport hubs supply mechanism, increased allocations for CMK, and additional provisions for Travelling Showpeople.

We therefore remain concerned with the overall effectiveness and justification of the proposed supply for the following reasons in no particular order:

- Whilst permissible as noted in paragraph 004 (Ref ID: 3-004-20190722) of the PPG, MKCC have utilised two separate methods for the assessment of land availability. This approach has led to a lack of clarity regarding the supply position without clear justification as to why such approach was pursued. For consistency with national policy, the Council should set out why the dual-assessment approach has been undertaken and how it results in a robust supply position.
- The breakdown of the completions and commitments between 2022 and 2050 is unclear within the evidence base material published. Table 1 of Policy GS2 indicates **22,705** homes as Completions and Commitments 2022-2050 (as of 1 April 2024). However, Figure 1 of the SHLAA (November 2025) indicates existing completions and commitments of **23,342**. Further, Appendix 1 of the SHLAA (Existing Commitments) indicates a total **18,247**.

Paragraph 5.3.5 of the SA notes that the **22,705** completions and commitments figure is less than in 2024 because CMK commitments are now included in the 16,000 CMK supply.

The proposed supply from this mechanism dropped by 6,000 from Regulation 18 stage which is almost double the commitments and completions set out within Appendix 8 of the SHLAA (3,329).

Whilst the CMK supply is discussed below, part 1 of Appendix 8 (Potential Sites within CMK and Campbell Park) indicates a total of **3,329** existing commitments and completions. These are not contained within Appendix 1 of the SHLAA and therefore do not contribute to the total **22,705** listed in Table 1 of the draft plan.

Nevertheless, even when combining the figures from Appendix 1 and Appendix 8 of the SHLAA, it results in a total existing commitments and completions of **21,576**.

In summary, the reason for the discrepancies is unclear, and as such it inhibits clarity and the ability to scrutinise the effectiveness of this supply. To ensure that the existing commitments and completions supply is justified and effective the Council should provide clarification within the evidence base so that it is explicitly clear what level of supply is provided and where from the completions and commitments.

- The CMK and Campbell Park delivery mechanism has changed from 11,000 to 16,000 from Regulation 18 to Regulation 19 stage. As noted within paragraphs 2.1 and 2.2 of the SHLAA, a separate growth study was commissioned to focus on CMK and Campbell Park. This is presented in Appendix 8 of the SHLAA which, as summarised by paragraph 2.28 of the SHLAA, contains a mix of sites with extant planning permissions or allocations, sites submitted through the call for sites process, and identified vacant or undeveloped land. No sites with existing buildings on were considered unless they were promoted by the landowner. This clarification provides answers to queries raised at Regulation 18 stage and is welcomed.

As noted above, the total existing commitments is 3,329 dwellings. Paragraph 2.30 of the SHLAA identifies that 11 sites within Appendix 8 of the SHLAA are allocations within Plan:MK. It is therefore not clear whether or not these are considered as part of the first delivery mechanism of supply (Completions and Commitments) or not. Based on the SHLAA noting that these extant allocations have been reassessed in terms of their level of supply, it is assumed not.

Paragraph 2.31 of the SHLAA confirms that in total 46 remaining sites were considered deliverable and/or developable in CMK and Campbell Park. These sites were the subject of a residential capacity assessment considering 5 scenarios using differing densities. It is assumed these are set out in Appendix 8.1 however it is not explicitly made clear.

Nevertheless, Appendix 8.1 indicates that the total capacity varies between **13,861** (Scenario 5) and **18,550** (Scenario 1). As made clear in paragraph 2.34 and Appendix 8.1 of the SHLAA, excluding the central business district (20%), it has been assumed that 100% of the site area would be for residential use.

We are concerned that this level of supply is unachievable for the following reasons:

- An assumption that 100% of any site area is developable and can be used for residential use is unrealistic in the context of other proposed policies such as the placemaking principles outlined in the CMK Growth Study Masterplan Framework.
- Appendix 8 of the SHLAA highlights that heritage is a constraint that needs to be assessed to inform the scale and design of a site parcel. Whilst a Heritage Impact Assessment for CMK has been made available as part of this consultation that has recommended revisions to the Tall Buildings Strategy, it is not clear how the capacity assessment work has taken this into account on a site-specific basis.
- Appendix 8 of the SHLAA also highlights that a large proportion of the sites are on existing surface level car parks. Whilst Catesby is supportive of MKCC's intent to reinvigorate the City Centre, as noted in Appendix 8 of the SHLAA if multiple sites of the same nature (i.e., on surface level car parking) come forward, the re-provision of car parking where necessary will likely need to be considered at a more strategic level. The CMK Topic Paper however only notes in paragraph 4.12 that a parking strategy will be developed to manage the change. This suggests that the work has not been done yet.
- It is not clear how MKCC have established the housing trajectory and how this breaks down across the 46 remaining sites considered deliverable or developable in the context of the above.
- Metro Corridors (previously Transport Hubs) have a proposed supply of 2,500 homes. Catesby welcomes the clarification provided as part of the Regulation 19 consultation, particularly the information contained within Appendix 9 of the SHLAA. Appendix 9 indicates an agreed capacity of 2,958 units on suitable Metro Corridor sites, including some with extant permissions. Notwithstanding the above, it is assumed that the supply figure accounts for all units located on sites owned by MKCC or MKDP, which totals ~2,500.

The SHLAA at paragraph 2.40 references that "*the assessment concludes that the 27 sites provide an opportunity for between 2,221 and 3,703 new homes subject to density assumptions*". First it is not entirely clear what is meant by '*the assessment*' or where the assessment is available. Second, it is noted that a number of the sites would require a change to designated wildlife or transport corridors. Despite being shown on the policies map, '*Transport Corridors*' are not defined within the draft plan. It is not clear whether those changes to wildlife and transport corridors have been made as part of the draft plan and therefore whether the suitability constraints can be overcome.

In light of the above, we question whether MKCC is being too ambitious regarding the sites that can be realistically delivered across the Metro Corridors. It is not entirely clear which of the sites listed in Appendix 9 that the MKCC is assuming delivery from and

whether this supply is justified. Therefore, more site-specific detail is encouraged to provide clarity on land supply.

- Paragraph 78 of the NPPF identifies that “*strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites*”. In this context, Catesby welcomes the inclusion of the Housing Trajectory in Annex A of the draft plan. In response to Policy GS1, Catesby reference paragraph 77 of the NPPF which concerns larger scale development. Part d notes that “*make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites...\_*”.

At Regulation 18 stage, Catesby queried the level of information available regarding delivery trajectories. In this context, Catesby continues to query why the build out rates assumed within the Whole Plan Viability Study (‘WPVS’) are lower than those set out in Annex A of the draft plan for the strategic sites.

In addition to the above, at Regulation 18 stage, Catesby submitted a comprehensive response to the consultation focusing on the SA (2024) which encouraged MKCC to revisit the assessment of the Western Expansion Area extension ‘long-list’ option considering:

- Which SHLAA parcels form the long-list option;
- Justifying the difference in scoring of objectives, such as Objective 3;
- Considering the connectivity between West of Fairfields and planned or delivered community facilities and amenities as part of Areas 10 and 11 which appear to have been overlooked; and
- Setting out why the Western Expansion Area extension was not included as a Reasonable Alternative.

Despite this, at paragraph 5.3.12 of the SA (2025) it states, “*the Interim SA Report (2024) discussed the following strategic greenfield site options in turn*”. Paragraph 5.3.13 expands further noting that three options were ruled out. These are North of Newport Pagnell, MK North New Settlement, and Hardmead New Settlement. Fundamentally, however Catesby’s site at West of Fairfields referred to in the SA (2024) as Western Expansion Area (WEA) Extension has been overlooked and not mentioned once.

Instead, the SA (2025) continues to use the same strategic greenfield options to inform the reasonable alternative growth scenarios. As stated at Regulation 18 stage, it is surprising that site options which have issues or doubts have continued to proceed as reasonable alternatives for the purposes of the SA. For example:

- West of Olney, which at Regulation 18 stage was identified having several technical concerns and consist of sites that would likely be too small and disconnected to be a strategic growth option, and at Regulation 19 stage being identified as “*challenging from a suitability perspective*” in paragraph 5.3.12 of the SA.

- East of Wavendon, which at Regulation 18 stage was identified as having highways and heritage concerns, and at Regulation 19 stage as having delivery challenges and uncertainties in paragraph 6.15.3 of the SA.
- Levante Gate, which at Regulation 18 stage performed relatively poorly against the SA framework as a standalone site.

In this context, it is Catesby's view that not all reasonable alternatives have sufficiently been appraised, including their site at West of Fairfields (otherwise known as Western expansion area extension).

The SHLAA (2025) assessment of Catesby's site is largely the same as consulted upon in 2024. Catesby continues to maintain support that the site is deliverable and developable. However, our Regulation 18 comments are repeated below as no further clarity has been made available.

First, there is no justification why;

- West of Fairfields has not been identified as both a Reasonable Alternative and subsequently a strategic allocation with the draft plan;
- Catesby's site has a capacity of 385 homes as opposed to the circa 700 that it has been promoted for.

Second, considering the SHLAA assessment, it appears that three constraints have been identified. These are:

1. That the northern section of the Site has no suitable access point either from Calverton Road or the WEA.
2. The western half of the northern section of the Site forms part of the linear park associated with the WEA which is needed to fulfil the recreation open space and biodiversity mitigation calculations for development of WEA.
3. The Site falls within the Calverton Clay Plateau Special Landscape Area designation.

Taking these in turn;

1. West of Fairfields would be served by an extension to the existing Milton Keynes grid road structure into the Site to link with Calverton Lane and MK WEA. Within the Site, a network and hierarchy of streets will serve the development and provide access to a new cricket pitch, pavilion and parkland area.
2. It is not clear what is meant by this. The West of Fairfields site falls outside, but adjacent to Area 11 of MK WEA. Moreover, the western half of the northern part of the Site is furthest away from MK WEA development.
3. Please see our response to Policy CEA12. Moreover, the Site's location within a proposed Special Landscape Area designation does not preclude it from being

identified as developable. The draft plan indeed proposes draft allocations within proposed Special Landscape Area's, including Shenley Dens which is within the same Special Landscape Area. A separate Landscape and Visual Comparative Study has been submitted as part of this representation providing further assessment in this regard (see **Appendix 5**).

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.

To ensure that Policy GS2 is sound, the Council should;

- a) Increase the housing requirement, or at a minimum proposed supply, to, at least, 61,716 based on the economic growth ambitions.
- b) Confirm that the proposed supply is justified, particularly within CMK and metro corridors.
- c) Identify additional supply of deliverable sites subject to (a) and (b) above, including our client's site SHLAA Ref. 110007 West of Fairfields (otherwise referred to as Western Expansion Area Expansion Land).

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

Paragraph  Policy  GS3 Policies Map

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

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

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

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

As noted in representations to policies GS1 and GS2 Catesby is supportive of MKCC's economic aspirations and role as a high-performing economy within the UK.

Table 3 and paragraph 38 of the draft plan set out the forecasted net requirement in hectares for office, industrial and warehousing development over the plan period using the middle scenario. Paragraph 7.33 of the Economic and Cultural Prosperity Topic Paper suggests that the middle scenario corresponds with the local housing need requirement of 1,799.

Suggested employment needs are:

- Office (including R&D) 66 ha
- Industrial (E(g)iii and B2 - 57 ha

- Warehousing and logistics 310 ha

The HEDNA (October 2025) at paragraph 18 establishes from the housing need scenarios that in order to accommodate the Council's growth target, a supply of 61,716 dwellings would be required. This would also result in a greater alignment with the upper end of the HEDNA jobs growth range, providing 73,849 supported jobs growth over the plan period compared to 54,903 using the local housing need figure of 1,799 as per figure 3 of the HEDNA.

Policy GS3 seeks to utilise the middle scenario which, when aligning jobs and workforce growth, results in a slight under provision against local housing need. Whilst Policy GS3 therefore provides a strategy for economic prosperity, including for smaller businesses, it is clear that the forecasted employment needs, which may be below those required to achieve the growth target, are not being addressed in full as confirmed by the Land Availability Assessment of Employment Sites Methodology (October 2025).

As noted in paragraph 101 of the HEDNA, in order to achieve the upper end of the MK Strategy 2050 job ambition, which has been noted as an important factor in the growth strategy for the city, it will require additional workforce either through adjustments to commuting patterns, increasing economic activity rates, or supporting additional growth in the local working age population.

The current strategy will not result in sufficient supported jobs growth from corresponding housing supply or meet anticipated employment needs over the plan period.

At Regulation 18 stage, Catesby recommended that MKCC include the identified employment requirements within Policy GS3. This has not been amended as part of the Regulation 19 consultation. It is not clear why a different approach is taken for employment land compared to the housing requirement.

Despite using ha for the total requirement figure, Part A 1 of Policy GS3 sets out the supply in sqm. For consistency, to ensure it is unambiguous, MKCC should amend Policy GS3 using consistent metrics.

Catesby is therefore concerned that Policy GS3 is not sound.

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.

- Incorporate identified employment needs within the policy wording.
- Amend the figures to use a consistent metric for floorspace / ha required.
- Identify the required additional employment land to meet the identified needs. This should correspond with housing supply as per broader representations.

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

Paragraph  Policy  GS4 Policies Map

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

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

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

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

Catesby is supportive of Policy GS4 subject to our comments on other policies within the draft plan.

As set out across this representation, Catesby's proposals for the West of Fairfield, including its relationship and connectivity with the Western Expansion Area would achieve the requirements of Policy GS4.

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.

N/A

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="GS6"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

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

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

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

In Catesby's view, Policy GS6 would establish a more restrictive approach to proposals for development in the "open countryside" when compared to national policy, in particular paragraph 187 (b) of the NPPF which focuses on character and beauty, not openness.

It is therefore considered unsound. We recommend that it be amended accordingly.

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.

Either delete the proposed policy or amend accordingly as below:

Delete current A and B and replace as follows:

*A. Land outside of settlement boundaries as defined on the Policies Map is designated as Open Countryside and will be recognised for its intrinsic character and beauty, in accordance with national policy.*

*B. Development proposals in the countryside will, in general, only be supported for the types of development set out below taking into account the requirements of Policy CEA12:*

*..... list current requirements as sub part of Part B + an additional point stating “**other development which is deemed appropriate in accordance with national policy**”.*

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="GS10"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

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

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

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

Catesby is broadly supportive of Policy GS10.

Part A of Policy GS10 sets out where proposals will not be supported on highways grounds. Whilst is largely aligned with national policy, it is not clear why the wording seeks to paraphrase paragraph 116 of the NPPF. The Consultation Statement supporting the Regulation 19 consultation asserts that this “sets a firmer tone”. In our view, the approach pursued by MKCC increases the complexity of reviewing policy requirements and the wording should mirror that of national policy.

Regarding Part B, it is considered that this should be made more flexible as all requirements may not be possible subject to site-specific considerations. For example, there may not be public rights of way on or adjacent to all sites.

Regarding Part B 3 and 7, these points are duplicated.

Regarding Part B 6, as set out elsewhere, we encourage the Council to define '*interchange hubs*' within the draft plan to provide clear guidance.

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.

- Amend Part A so that it is consistent with national policy.
- Define '*interchange hubs*' within the draft plan.
- Delete either Part B 3 or 7 and amend the wording as below:

*"Where applicable, safeguard and, where possible, enhance access to public rights of way"*.

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="GS20"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

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

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

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

Whilst not specifically concerning Policy GS20, Catesby's site at West of Fairfields will connect into and expand the benefits being delivered as part of the Western Expansion Area as set out throughout this representation.

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.

N/A

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

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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

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

In principle, Catesby supports the inclusion of a separate infrastructure policy and welcomes its inclusion as part of the Regulation 19 consultation.

Given the Infrastructure Delivery Plan and benchmarks set out a moment in time, the policy wording should reflect that this and that site-specific discussions should inform requirements as and when sites are being brought forward.

There is a minor typological error in that Part D is duplicated.

Regarding Part F, Catesby is supportive of future management and maintenance being of green and blue infrastructure, community buildings and flood and water management infrastructure being incorporated into planning obligations as it may not be known until commencement who will take on the long-term control of these assets. Any earlier requirements may have unintended consequences on the deliverability of the plan. For West of Fairfields, it may be that the management and maintenance follows the strategy adopted as part of the Western Expansion Area.

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.

Policy wording should be amended to reflect site-specific policy allocations, including requirements for joint or shared infrastructure and how this is reflected within phasing strategies.



- An over-reliance on CMK may impact on the provision of affordable housing that can be delivered within the plan-period. This is particularly relevant considering the differing housing viability areas within the draft plan, including CMK having a requirement of only 10%.
- An over-reliance on CMK may not deliver the type and size of units identified by the HEDNA and summarised in table 11 of the draft plan.

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.

Overall, we consider the MKCC should either:

- i) Publish sufficient robust evidence which provides justification that the proposed approach to CMK is sound.

Or

- ii) MKCC revisit the proposed supply for CMK and identify additional sites, including Catesby's site at West of Fairfields, which can make an important contribution towards new housing in Milton Keynes.

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

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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

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

We are supportive of the principle of draft policy PFHP1. Healthy place-making principles are embedded within the vision and proposals for West of Fairfields.

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.

N/A

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

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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

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

It is considered that Policy PFHP3 should be modified to remove elements of this policy that are either duplicated elsewhere within the draft plan. The focus of the policy should therefore change from new local centres to new general convenience stores.

For example:

Part A is covered within site-specific allocation policies.

Part C is covered within site-specific allocation policies.

Part D is covered within site-specific allocation policies.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy should be amended as set out above.

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

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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

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

Catesby is generally supportive of the principle and approach set out in draft Policy PFHP4.

Regarding Part A, it is considered that further clarity could be required within this policy requirement and how it interacts with Part C of the Policy.

Part A references the need to contribute to “*the protection and provision of allotments and urban food growing*” whilst Part C sets out that “*all residential development must provide facilities for on-site food growing*”.

It is not clear what the difference is between urban food growing and on-site food growing and therefore why a different phrase has been used.

Part C also references the provision of ‘*adequate private garden space*’. First it is not clear what is considered to be adequate. Therefore ‘adequate’ should be deleted or a specific standard should be set out for clarity in Annex B and C of the draft plan. Second, it may not be feasible to incorporate food growing facilities within all private garden space or maintain this provision. It should therefore be deleted.

For further clarity we suggest that MKCC amend Part A and C as per our comments in part 6 of this form.

Part D of the draft policy applies a ratio of 20 allotments per 1000 households. It is noted within paragraph 6.17.1 of the Nature, Green and Blue Infrastructure Study (August 2023) that there are no national standards for allotments and other food growing areas. Moreover, the same paragraph indicates that the demand for allotments and other food growing areas varies and

therefore the 0.25ha per 1000 population can be applied as a starting point in estimating future demands.

The Milton Keynes IDP (November 2025) indicates that Sub Area Profile 7 (West), where West of Fairfields is located, benefits from 9.43 ha of existing food growing areas, with an estimated population of 28,876 by 2050 (18,140 current population + 10,736 population increase).

Whilst this is not disseminated by different sub-categories (Allotments / Orchards / Community growing areas), based on the standards within Part D, there is already suggested to be a surplus of food growing areas provision by ~2.22ha. Therefore, the evidence suggests that the demand for food growing areas in the South East would be less than 0.25ha per 1000 population noting the existing provisions. Even when adding in an additional population of ~2,380 (700 homes x 3.4), without any new provision there would be a surplus of 1.62ha or the equivalent provision of 0.30ha per 1000 population.

As such, it is not clear if the allotment provision requirement is justified for all major residential development proposals.

It is noted that Part D also requires provision of areas for on-site community orchards which is noted as a sub-category of food growing areas, but no standards are set out. Catesby is therefore concerned that requirements, which may not be justified as currently presented, will also double count space food growing space requirements in sites by requiring separate allotments and orchards.

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.

It is suggested that the policy wording is amended so the policy would read as below.

- A. Development proposals will be supported where they would contribute to an improvement in the food environment; for example through:*
- *The protection and/or provision of food growing areas.*
  - *Reducing areas within food deserts.*
  - *Restricting the development of hot food takeaways and fast food outlets in areas of high childhood obesity.*
- B. All residential development should provide facilities for on-site food growing for residents through:*
- *The provision of private garden space or private balcony provision.*
  - *The provision of shared areas to support food growing facilities such as roof-tops or unsheltered areas.*

*C. Where evidence demonstrates a shortfall in provision, major residential development proposals must provide designated food growing areas (as defined in Annex B and C) to the equivalent ratio of 0.25ha per 1,000 population. Where this is demonstrated to not be feasible or viable, an off-site contribution will be sought.*

*Development proposals will not be permitted where ....*

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

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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

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

Catesby is supportive of policy PFHP5 which appears broadly consistent with the NPPF and the principles of good design, subject to the below;

Part A could be made more concise as per the suggestion in part 6 of this representation.

Part B 3 of the draft policy should also consider townscape given the substantial focus on previously developed sites within the draft plan.

It is also considered that Parts B and C could be combined to provide greater clarity to the decision-maker as per the suggestion in part 6 of this representation.

It is also suggested that the sequencing of the policy reverts given that design codes may not be applicable in all cases however the urban design principles will be. Catesby have also provided separate representations regarding site-specific design codes and masterplan frameworks.

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.

*A. Development proposals will be permitted where they are based on a thorough assessment of the site, its context, and surrounding character and informed by the following urban design principles:*

- 1. Respond positively to the site and surrounding context;*
- 2. Create a place with a locally inspired or otherwise attractive, positive, and distinctive character;*
- 3. Respond positively to the landscape and townscape characteristics of the site, where retaining established and healthy landscape and townscape features;*
- 4. Insert points 1-9 from part C as drafted.*

*B. Development proposals should also accord with any **relevant** approved area-based or site-specific Design Code ~~for the site or wider area.~~*

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

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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

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

Catesby is broadly supportive of draft policy PFHP6.

Paragraph 220 of the draft plan states that “*Designs for new or enhanced streets should demonstrate how they deliver against the 10 healthy street indicators*”. However, the policy wording does not use the corresponding indicators and instead introduces different indicators. Notwithstanding our specific comments, below, it may be more appropriate if the policy wording therefore included specific reference to the health street indicators, for example how policy T2 of the London Plan does.

It is noted that a definition of streets for the purpose of the policy has been added to paragraph 221 within the supporting text of the draft plan. However, this does not define ‘*multi-modal movement network*’. A definition should be added within the glossary for this. Furthermore, the policy wording should be consistent in using the phrase multi-modal movement network rather than just movement network which may have a different meaning if not defined.

Regarding the current policy wording, as stated at Regulation 18 stage, as currently worded, the policy requires all 11 principles to be met in all circumstances which may not be possible subject to the site-specific circumstances. For example, not all streets, as defined by MKCC will have the capability to incorporate ‘*street trees, planting, and multifunctional SuDS*’.

Notwithstanding the comments above;

Regarding point A.3 not all sites may be capable of delivering multi-functional SuDS.

Regarding point A.4, whilst private garden and balcony space will be defined through secured boundary treatments, it will not be suitable for all sites to incorporate secure boundary treatments for front of plot spaces which interact with the streetscape. Moreover, not all public

space may be defined by secure boundary treatments, for example public squares will not be fenced off.

Regarding point A.5, it is not clear why a consistent building line and height of buildings should be required. In our view, this will be informed by the surrounding character assessment required as part of policy PFHP5.

Regarding point A.10 it is not clear what intervals are considered 'regular' within the policy wording. The Healthy Streets indicators provides specific guidance on different standards.

Therefore, the policy is not considered effective and positively prepared.

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.

Add multi-modal movement network to the glossary.

We would encourage MKCC to increase the flexibility of the policy to ensure it is effective and positively prepared.

Two options are therefore set out below.

Option 1:

Amend paragraph 220 of the supporting text and amend the policy wording to state:

**Development proposals should demonstrate how they will deliver against the ten Healthy Streets indicators.**

Option 2:

Delete the wording "Designs for new or enhanced streets should demonstrate how they deliver against the 10 Healthy Street indicators" within paragraph 220 and amend the policy wording as follows:

- A. Development proposals will be permitted where they meet the following principles  
**subject to site-specific considerations:**

*A.3 Street trees, planting and ~~multifunctional~~ SuDS, are incorporated to soften the streetscape, improve air quality, increase biodiversity and ensure that the public realm is not dominated by hard surfaces, parked cars and bin storage / collection points.*

*A.4 Public and private areas are clearly defined through the use of attractive boundary treatments. Private area boundary treatments should be made secure where appropriate.*

*A.5 Building line and height is informed by the character assessment required by Policy PFHP5 and proposed width of the space to create and sense of enclosure that is appropriate to the function and character of the street.*

*A.10 Provision is made for shade and shelter, including street trees, with space and facilities to play and rest being included along key pedestrian routes.*

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

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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

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

Catesby is broadly supportive of Policy PFHP7 subject to the below which appears to seek to expand and develop on the adopted policy D3 of Plan:MK.

In general, it is considered that the policy should be made more flexible as it currently expects all development proposals to meet all objectives and principles.

Regarding the policy wording Part A1 requires development to enhance or create a positive character. Considering other policy requirements, we consider that this criterion is already covered or would be more effectively covered in policies PFHP 5 and 6. For example, PFHP5 at part B currently requires "*a place with a locally inspired or otherwise attractive and distinctive built form character*" whilst PFHP6 at point 7 references the creation of a cohesive and harmonious character through the composition of buildings.

There are therefore three different policies requiring developments to deliver an:

- i) Attractive and distinctive built form character (PFHP5)
- ii) Cohesive and harmonious character (PFHP6)
- iii) Positive character (PFHP7)

This is not taking into account any site-specific considerations, design codes, design guides, or framework masterplans. Therefore, to ensure that the decision maker is clear we encourage MKCC to delete Part A.1 and cover it in policy PFHP5.

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.

A. **Where applicable**, development proposals will be permitted where they meet the following objectives and principles **subject to site-specific considerations**.

Delete point 1.

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

Paragraph  Policy  Policies Map

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

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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

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

It is noted that PFHP9 is a new policy compared to the Regulation 18 consultation.

Paragraph 135 (f) of the NPPF references that planning policies should “*create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users*” and also references footnote 51. Paragraph 198 of the NPPF considers the likely effects of pollution on health, living conditions and the natural environment.

In this context, Catesby is broadly supportive of the principle of policy PFHP9, subject to the below.

In general, Part 1 of the policy does not reflect any site-specific considerations which may affect the feasibility of delivering all criteria set out within the policy wording. This should be amended to ensure that the policy is effect and positively prepared.

Where thresholds of impact / harm are identified within the policy wording e.g., A.2 / A.5, it is considered that additional guidance or standards should be referred to so that it is clear what may be considered acceptable as it is likely that different sites will have different parameters within which standards can be complied with or designed into the scheme. For example, West of Fairfields may have greater opportunities concerning privacy compared to urban regeneration projects with a greater degree of existing properties in proximity.

Regarding A.4 and as stated in response to PFHP4, when referring to external space, as with the technical standards set out in Annex B and C of the draft plan, specific standards for private garden and balconies should be set out for clarity.