



19th December 2025

Our Ref: 333102427

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

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

Dear Mr [REDACTED]

MILTON KEYNES CITY COUNCIL'S CITY PLAN 2050 REGULATION 19 CONSULTATION

REPRESENTATIONS SUBMITTED ON BEHALF OF CATESBY ESTATES PLC

RE; SOUTH OF BOW BRICKHILL STRATEGIC CITY EXTENSION

We write on behalf of our client, Catesby Estates Plc ('Catesby'), in response to the MK City Plan 2050 Regulation 19 Consultation.

Catesby Estates has over 20 years of knowledge and experience in strategic land promotion and infrastructure delivery. Catesby Estates' parent company, Urban&Civic was acquired by the Wellcome Trust in January 2021 and consolidated the position of Urban&Civic as the leading Master Developer in the UK and further strengthened the already substantial financial backing of Catesby Estates.

At Catesby Estates, they believe the key to their success is their collaborative approach and commitment to delivery sensitively designed housing developments tailored to the character of the local area and providing real community benefits.

Catesby is supportive of MKCC bringing forward the City Plan 2050 ('the draft plan') and welcome MKCC's desire to want to work with local people, businesses, and organisations as part of the plan-making process. As stated in our representations to the Ambition and Objectives consultation and Regulation 18 consultation, the City Plan 2050 should play a crucial role in planning for the future growth of the City.

This representation concerns land forming part of the South of Bow Brickhill Strategic City Extension ('hereafter referred to as 'the Site' or 'South of Bow Brickhill SCE') contained with Policy GS17 of the draft plan. Whilst this representation is submitted solely on behalf of Catesby, the following documents listed in table 1, which have been prepared in collaboration with The Bedford Estates, are submitted as supporting evidence. For context, they were also submitted alongside our Regulation 18 representations. Our client and The Bedford Estates are proactively collaborating to bring forward a comprehensive development opportunity for the proposed strategic site allocation.

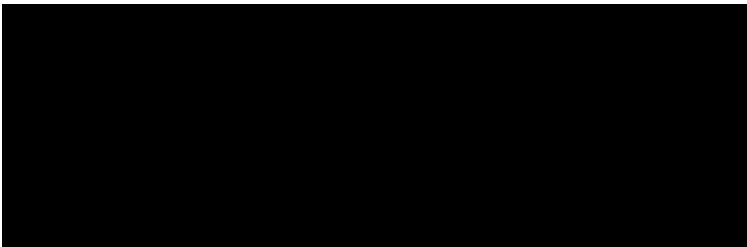


Table 1: Shared Supporting Appendices

Supporting Document	Appendix Ref.	Prepared by
Site Location Plan	1	Stantec
Land Control Plan	2	Stantec
Vision Document	3	Stantec
Concept Masterplan	4	Stantec
Transport and Highways Technical Note	6	Stantec
Landscape and Visual Appraisal Technical Note	7	Stantec
Flood Risk and Drainage Technical Note	8	JNP Group

The Site will provide the following benefits, in line the draft policy requirements;

- A natural extension to the City of Milton Keynes;
- Approximately 1,300 new houses across a mix housing types, size, and tenure, including contributing to addressing MKCC’s affordable housing needs;
- A new local centre incorporating on-site community amenities and facilities as required;
- Land for a new on-site primary school and potential for additional education facilities as demonstrated as necessary;
- Substantial areas of natural greenspace, including strategic green and blue infrastructure and retained view corridors;
- Dedicated formal and informal pedestrian links that connect with off-site redways, public rights of way, and public transport stops;
- Buffering to existing Bow Brickhill village; and
- Two road access points at the north and west of the site connected via bus, cycle, pedestrian and vehicular routes.

The Site consists of the Milton Keynes City Council (‘MKCC’) Strategic Housing Land Availability Assessment (‘SHLAA’) parcels listed below in addition as illustrated in **Appendix 1 – Site Location Plan** and **Appendix 2 – Land Control Plan**.

Table 2: SHLAA parcels forming part of South of Bow Brickhill SCE within the MKCC SHLAA.

Promoter	MK SHLAA Site IDs
Catesby Estates	110361 Land East of Brickhill Street, Bow Brickhill
The Bedford Estates	110360 Land South of Bow Brickhill, Milton Keynes

The Council's Appendix 5 SHLAA appraisal within assesses both parcels independently with the following, summarised, conclusions (see table 3):

Table 3: MKCC SHLAA Summary

MK SHLAA Site IDs	Suitability	Achievability	Deliverability
110361 Land East of Brickhill Street, Bow Brickhill	Suitable	Achievable – the site would only be suitable as a wider strategic extension to Milton Keynes – this type of growth is outlined as being viable within the Viability Study and given there have been no major infrastructure constraints outlined to the delivery of an allocation in this location, it is deemed achievable.	Deliverable and Developable
110360 Land South of Bow Brickhill, Milton Keynes	Suitable	Achievable – the site would only be suitable as a wider strategic extension to Milton Keynes – this type of growth is outlined as being viable within the Viability Study and given there have been no major infrastructure constraints outlined to the delivery of an allocation in this location, it is deemed achievable.	Deliverable and Developable

The SHLAA also highlighted the following constraints commentary:

- That both parcels are designated as open countryside and fall within the proposed Brickhills Special Landscape Area and would need to be buffered from the Greensands Ridge to mitigate impacts.
- That from a highways perspective, our clients parcel would require two full forms of access one to the north and one to the south. It is noted that an assessment of this along with adjoining sites which could come forward as a wider site allocation will be required in order to consider if the remaining sections of Brickhill Street require dualling.

Whilst the Bedford Estates parcel would be required to come forward as part of a wider strategic allocation. Moreover, an assessment would be required in order to consider if the remaining sections of Brickhill Street required dualling as part of a wider site allocation;

- That our clients parcel abuts the settlement boundary of Bow Brickhill and would require a suitable buffer;

- That both parcels have a small amount of land within a Biodiversity Opportunity Area;
- A minor surface water flood risk flow path runs across the Bedford Estates parcel and would need mitigating; and
- The northern part of our client's parcel abuts the settlement boundary of Bow Brickhill and development would need to incorporate a suitable buffer to avoid coalescence and retain Bow Brickhill's rural setting.

Positively, the draft plan continues to propose to allocate the Site within Policy GS17. **Overall, we are supportive of this conclusion to allocate the Site and agree that any constraints can be adequately mitigated as part of the planning process.** In this context, we would welcome the engagement with MKCC ahead of the examination to work towards a Statement of Common Ground.

This representation is therefore submitted detailing the comprehensive and collaborative approach taken to South of Bow Brickhill Strategic City Extension. Our client has worked closely, and continues to do so, with the Bedford Estates to prepare an evidence-based masterplan and vision for the development opportunity which is submitted alongside this letter (**Appendix 3 – South of Bow Brickhill Vision and Appendix 4 – South of Bow Brickhill Concept Masterplan**). Moreover, the technical notes listed above are submitted in support of the promotion of the Site. These technical notes detail the initial technical considerations completed jointly to date. A further assessment of expected capacity considering Regulation 19 proposed infrastructure requirements has also been undertaken but not submitted as part of this representation.

We welcome MKCC's Regulation 19 consultation for the City Plan 2050 and the ambition to continue to bring transformational change that helps growth to be virtuous and beneficial to the communities living in Milton Keynes today and tomorrow.

We are acutely aware of the importance of proactive plan-making to identify and address key issues and challenges to the area, not least housing delivery and placemaking. Notwithstanding the national government's consultation on the proposed reforms to the accelerate growth and housebuilding¹, including to the National Planning Policy Framework ('NPPF'), which was launched after the MKCC Regulation 19 consultation, paragraph 15 of the NPPF it is clear that the planning system should be genuinely plan-led, and that up-to-date plans should provide a positive vision for the future of the area, a framework for meeting housing needs, and addressing other economic, social, and environmental priorities, alongside being a platform for local people to shape their surroundings.

In light of the recently launched consultation on the NPPF and other changes to the planning system², for clarity, this representation contains references to the NPPF dated December 2024. It is understood that based on the NPPF consultation material, the City Plan 2050 will be subject to examination under the 2024 December NPPF.

In the context of paragraph 15 and 16 of the NPPF, we are broadly supportive of the intentions of the plan, however, have concerns regarding elements of the strategy pursued and the evidence base material available to justify the draft plan, including:

- Misalignment of draft local plan housing requirement and proposed supply with the Council's growth aspirations as noted within the HEDNA (October 2025), and therefore a shortfall of housing land supply to meet the target;

¹ [Letter from the Secretary of State to stakeholders: Next phase of reforms to accelerate growth and housebuilding](#)

² [National Planning Policy Framework: proposed reforms and other changes to the planning system](#)

- A disproportionate focus on development within the City, and a continued lack of detailed and site-specific evidence base to accompany the ambitious Central Milton Keynes targets;
- Discrepancies between evidence base and policy requirements;
- Unclear application and evidencing associated with infrastructure requirements associated with South of Bow Brickhill SCE, including proposed housing trajectories and joint infrastructure requirements with Levante Gate; and
- Overly prescriptive policy requirements which may have unintended consequences on overall delivery.

This representation comments further, following the structure of the draft plan, on the above points, in **Appendix 5**, alongside this cover letter. A summary of the acronyms referenced within the representations is set out at the end of this letter.

Comments have been provided for the following sections / draft policies:

- Ambitions and Objectives
- Policy GS1 – Our Spatial Strategy
- Policy GS2 – Strategy for Homes
- Policy GS4 – Strategy for people-friendly and healthy places
- Policy GS5 – Our retail hierarchy
- Policy GS6 – Open Countryside
- Policy GS10 – Movement and access
- Policy GS17 – South of Bow Brickhill Strategic City Extension
- Policy INF1 – Infrastructure first principles
- Policy INF2 – Infrastructure planning and delivery principles for strategic allocations
- Policy PFHP1 – Delivering healthier places
- Policy PFHP3 – New Local Centres
- Policy PFHP4 – Delivering a healthier food environment
- Policy PFHP5 – Designing people-friendly places
- Policy PFHP6 – Designing healthy streets
- Policy PFHP7 – Well-designed buildings and spaces
- Policy PFHP9 – Amenity for healthy buildings and spaces
- New Design Codes
- Policy HQH1 – Healthy homes
- Policy HQH2 – Affordable homes
- Policy HQH3 – Supported and specialist homes
- Policy CEA1 – Sustainable buildings
- Policy CEA2 – Green roofs and walls
- Policy CEA5 – Water efficiency
- Policy CEA7 – Mitigating wider environmental pollution
- Policy CEA8 – Provision and protection of accessible open space
- Policy CEA9 – Biodiversity and Habitats Network
- Policy CEA10 – Protection and enhancement of environmental infrastructure network, priority species and priority habitats
- Policy CEA11 – Urban greening, trees and woodland
- Policy CEA12 – Conserving and enhancing landscape character/ Special Landscape Areas
- Policy CEA13 – Sustainable drainage systems (SuDs) and integrated flood risk and water management
- Policy CEA14 – Protecting and enhancing watercourses
- Policy CEA15 – Managing Flood risk
- Policy HE1 – Heritage

In addition to the above, we consider that there are formatting and typographical improvements which would enhance the readability, navigability and accessibility of the draft plan, including a clearer contents page and policies list.

Overall, Catesby broadly support MKCC's aspirations however recommend that there are aspects of the draft plan that require main modifications to ensure that the draft plan can pass the tests of soundness

outlined within paragraph 36 of the NPPF. South of Bow Brickhill as a Strategic City Extension to Milton Keynes should remain an allocation

National government policy on planning and housebuilding has been a clear and central focus across the preparation of the City Plan 2050, not least with consultations being launched during both Regulation 18 and Regulation 19 consultations on the NPPF.

In a statement made on 30th July 2024³, the then Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government set out the government's intentions for sustained economic growth through the housing and planning system to improve affordability, turbocharge growth, and build new homes.

Further to this, on the 16th December 2025⁴, the Minister of State for Housing and Planning set out details of the next phase of planning reforms alongside a comprehensive pack of support for small and medium-sized housebuilders. This includes new draft decision-making policies designed to make development management more certain, consistent, and streamlined.

We consider that Milton Keynes is well-placed to be at the forefront of delivery, capitalising on its unique history, and success as a new town. South of Bow Brickhill Strategic City Extension can form an important component of delivering this ambition, and a multitude of benefits referenced throughout this representation.

This representation demonstrates the cohesive and comprehensive approach pursued as part of the promotion of South of Bow Brickhill Strategic City Extension. The Site, as expressed in the supporting material to this representation, represents a strategic opportunity for this part of Milton Keynes to continue its sustainable expansion and support achieving the ambitions and objectives contained within the City Plan 2050.

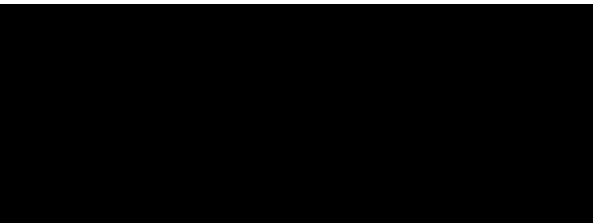
We trust that this representation will be taken as duly made and would welcome confirmation of receipt. Should you have any questions or wish to discuss, please do not hesitate to contact the writer.

Yours sincerely,

STANTEC UK LIMITED



Connor Sheffield
Associate Planner



³ [Written statements - Written questions, answers and statements - UK Parliament](#)

⁴ [Written statements - Written questions, answers and statements - UK Parliament](#)

Acronyms:

Catesby Estates Plc	Catesby
Milton Keynes City Council	MKCC
MK City Plan 2050	The draft plan
National Planning Policy Framework – December 2024	NPPF
South of Bow Brickhill Strategic City Extension	SoBB SCE
Housing and Economic Development Needs Assessment	HEDNA
Whole Plan Viability Study	WPVS
Central Milton Keynes	CMK
Sustainability Appraisal	SA
Infrastructure Delivery Plan	IDP
Strategic Housing Land Availability Assessment	SHLAA
Integrated Water Management Study	IWMS
Strategic Flood Risk Assessment	SFRA
Infrastructure Investment Strategy	ISS

Appendix 1: Site Location Plan

Appendix 2: Land Control Plan

Appendix 3: South of Bow Brickhill Strategic City Extension Vision

Appendix 4: South of Bow Brickhill Concept Masterplan


Appendix 5: Response to Regulation 18 Questions

Appendix 6: Transport and Highways Technical Note

Appendix 7: Landscape and Visual Appraisal Technical Note

Appendix 8: Flood Risk and Drainage Technical Note

Appendix 5**MILTON KEYNES CITY COUNCIL'S CITY PLAN 2050 REGULATION 19
CONSULTATION****REPRESENTATIONS SUBMITTED ON BEHALF OF CATESBY ESTATES PLC****RE; SOUTH OF BOW BRICKHILL STRATEGIC CITY EXTENSION**

	Milton Keynes City Plan 2050 Proposed Submission Stage Representation Form	Ref: (For official use only)
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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 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	<input type="text" value="Michael"/>	<input type="text"/>
Last Name	<input type="text" value="Knott"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Regional Lead – Midlands
and South"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Stantec"/>	<input type="text"/>
E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>

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.

The proposals at SoBB SCE can support the achievement of the objectives of the plan as summarised below:

- 1) This objective is aligned with chapter 8 of the NPPF, not least paragraph 96. SoBB SCE comprises a mixed-use comprehensive development which will be well-designed to encourage greater physical activity, social interaction throughout the development, and healthier lifestyles.
- 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 SoBB SCE which can connect into, and enhance, the non-car connectivity to CMK.
- 3) SoBB SCE will incorporate infrastructure requirements as necessary to support the delivery of development, including education provision and a local centre. Catesby has commented further in this regard in response to Policy GS17.
- 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) SoBB SCE 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. SoBB SCE will support the delivery of this objective through the delivery of at least 1,300 new homes.
- 10) Catesby is broadly supportive of this objective.
- 11) As stated in response to objective 3, SoBB SCE will incorporate infrastructure requirements as necessary to support the delivery of development, including education

provision and a local centre. Catesby has commented further in this regard in response to Policy GS17 and 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. SoBB SCE will incorporate a local centre providing opportunities for leisure within the neighbourhood scale. Sustainable connections to CMK and other key centres such as Bletchley town centre will integrate the Site with broader leisure opportunities increasing local investment.

The Vision Document, which was also submitted at Regulation 18 stage, at **Appendix 3** provides further details on the proposals at SoBB SCE.

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 policies 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 additional sites within the draft plan.

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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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.

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.

Whilst the Council is 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 2025¹, 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

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.

2) Housing Supply

Table 1 of Policy GS2 identifies the sources of housing land supply between 2022 – 2050. First Catesby is supportive of the identification of South of Bow Brickhill Strategic City Extension for 1,300 homes. A separate response form has been submitted concerning the site-specific policy at GS17.

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

¹ [Strategy for 2050 FULL VERSION - Jan 2025_LR.pdf](#)

Central Bletchley	1,000	1,184	+184
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.

Catesby have commented further in this regard regarding their other interests within the plan area.

However, regarding SoBB SCE, at Regulation 18 stage, Catesby sought further engagement with MKCC to further develop the expected delivery rates for the Site. Whilst this had not been forthcoming ahead of the Regulation 19 consultation, Catesby agrees that SoBB can be delivered within the plan period. However, Catesby have the following comments:

- It is considered that delivery on-site could be earlier than 2032/33 as assumed by MKCC.
- As commented in response to Policy GS17, Catesby is unclear how it has been assumed that Levante Gate can come forward in advance of the South of Bow Brickhill (2028/29 and 2032/33 respectively) given the interrelationship of infrastructure requirements. Not least education provision which is to be provided for on South of Bow Brickhill whilst accommodating demand generated

from Levante Gate. The SA (2025) appears to positively score Levante Gate on the basis of it being able to deliver early (see paragraph 6.10.3 of the SA).

- 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.

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) Consider increasing the housing requirement, or at a minimum, the proposed supply, to, at least, 61,716 based on the economic growth ambitions.
- b) Identify additional supply of deliverable sites subject to (a) above.
- c) Revise the proposed housing trajectory to ensure that the comprehensive delivery of GS17 and GS18 is justified and consistent with achieving sustainable development.

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 GS4 subject to our comments on other policies within the draft plan, notably those concerning infrastructure provision.

The SoBB SCE concept masterplan has been developed to deliver a people-friendly and healthy place.

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.

Catesby is supportive of the principle of Policy GS5 which includes specific reference in part 4 of Table 8 to newly delivered Local Centres within Strategic Urban and City Extensions.

SoBB SCE will support enhanced connectivity from this part of the City to CMK and nearby Bletchley through improved bus services and an increase population close to the economic offer within the City.

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

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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 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 deleted or 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 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 GS10.

A vision-led approach has been pursued at SoBB SCE as explained further within the supporting Highways and Transport Technical Note.

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 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 identification of SoBB SCE with the draft plan, and the inclusion of a site-specific policy allocation. Catesby would welcome the opportunity to engage further with MKCC ahead of the Local Plan examination.

Catesby has been working, and continue to work, as per the Regulation 18 representations, in collaboration with The Bedford Estate as part of preparing the emerging proposals. This representation is supported by a series of supporting technical documents that were also submitted at Regulation 18 stage, including:

- Appendix 2: Land Holdings Plan
- Appendix 3: Vision Document
- Appendix 4: Concept Masterplan
- Appendix 6: Transport Technical Note
- Appendix 7: Landscape Visual Appraisal
- Appendix 8: Preliminary FRA and Drainage Strategy

This demonstrates that a sensitive landscape-led approach has driven the development of a comprehensive concept masterplan for the proposed allocation. Catesby and The Bedford Estate have engaged with MKCC in preparing the concept masterplan within the draft plan however further comments are provided below.

However, Catesby have the following comments regarding Policy GS17 as set out below which follows the Policy requirements.

Part A:

Catesby is supportive of the proposed allocation, however, consider that the wording could be made more concise and consistent with national policy.

Part B:

It is noted that part B of the policy requires the preparation of a Framework Masterplan and site-based area Design Code that are consistent with the criteria within the policy and approved prior to planning permission being granted.

Paragraph 100 of the draft plan indicates that Framework Masterplans will be prepared in collaboration with the site promoters/developers and will be approved by the Council. We have the following comments in this regard:

- Framework Masterplans are not defined in the draft plan; it is therefore not clear what the expectations are regarding the content of the document?
- Is the expectation that the Council will lead the preparation of the Framework Masterplan?
- What is the proposed timescale for Framework Masterplan for SoBB SCE?
- Does the Framework Masterplan need to be approved by the Council prior to the submission of an application or prior to the grant of planning permission?
- What is the approval process for the Framework Masterplan?
- How do MKCC envisage the Framework Masterplans for SoBB SCE and Levante Gate being integrated based on the projected trajectories for delivery?

Catesby has substantial experience working with MKCC on other sites within the administrative boundary and is keen to continue this proactive engagement. However, it is not clear whether the requirement for a Framework Masterplan is sound at this stage or may have unintended consequences on delivery.

Should MKCC remain insistent that a Development Framework is required, we urge MKCC to ensure that any Development Framework is applied pragmatically and flexibility when determining any future planning applications.

Paragraph 101 discusses specific site-based Design Codes which are required in addition to the Framework Masterplan. These will also be approved by the Council, building upon the Framework Masterplan. Whilst further comments are provided in response to the Design Code section of the draft plan, we have the following comments:

- Who will lead the preparation of the Design Code?
- Subject to the Framework Masterplan timescales, what is the proposed timescale for Design Code which for SOBB SCE?
- Does the Design Code also need to be approved by the Council prior to the submission of an application or prior to the grant of planning permission?

- What is the approval process for the Design Code?

As noted above, whilst Catesby is keen to continue the positive working relationship with MKCC, it is not clear whether the requirement for a site-specific Design Code on top of a Framework Masterplan is sound or an unnecessary requirement that may have unintended consequences on delivery.

Last, while not listed within the policy wording, paragraph 102 of the draft plan sets out that "*Strategic City Extensions will also be informed by site-specific Strategic Green and Blue Infrastructure and Open Space Strategies approved by the Council*". Catesby does not consider this requirement to be sound (unjustified and ineffective) in the context of

- a) a site-specific policy allocation and concept masterplans;
- b) potential Framework Masterplans;
- c) potential Design Codes; and
- d) broader draft plan requirements and the IDP guiding green and blue infrastructure and open space requirements.

Having an additional document that needs approval (at an unknown stage in the process) will further complicate the delivery of the allocations, place greater burdens on both the developer and local planning authority and likely lead to unintended consequences affecting deliverability.

Part C

In principle, Catesby supports the proposed development requirements set out in part C of Policy GS17, subject to the following comments and those made elsewhere within this Regulation 19 representation regarding other policies.

C1:

It is noted that the proposed capacity has decreased since the Regulation 18 consultation. It is our understanding following interim engagement with MKCC prior to the Regulation 19 consultation that this is the result of the alleged landscape constraints. Notwithstanding our comments set out elsewhere, Catesby do not have any objection to the decreased proposed supply as long as the policy wording retains reference to 'around' or 'minimum' considering other infrastructure requirements necessary for the proposed allocation given the additional flexibility this presents as further evidence is developed which may increase the overall capacity of new homes.

C2:

As set out within the supporting South of Bow Brickhill Vision Document and the Landscape and Visual Appraisal Technical Note previously submitted at Regulation 18, a sensitive landscape-led approach has driven the development of the comprehensive concept masterplan for the proposed allocation. As set out in response to Policy CEA12, Catesby is concerned with the soundness of the extent of the special landscape designation for the Brickhills.

C3 / C4 / C5 / C6 / C7 / C8 / C10 Requirements

In principle, Catesby is supportive of the inclusion of the proposed infrastructure within SoBB SCE. The various elements will support the delivery of a comprehensive and well-designed community.

However, as noted elsewhere within these representations, MKCC's approach to proposed allocations at SoBB SCE and Levante Gate SCE, as set out in paragraph 111 of the draft plan, is for the two allocations to be functionally linked, particularly for certain aspects of the infrastructure provision.

Paragraph 111 of the draft plan expands on this stating "*This is particularly the case with respect to secondary school provision to meet the needs arising from new growth in this part of the city, but also in terms of transport infrastructure improvements. For this reason, Framework Masterplans for both sites must be cognisant of the planning for both sites to deliver an integrated and comprehensive approach to infrastructure delivery*".

Whilst in agreement with MKCC for the need to take a comprehensive approach to delivering strategic growth in this part of the city, Catesby has the following concerns regarding the effectiveness of the proposed policy approach, in addition to comments about regarding the practicality of the Framework Masterplan:

- How separate Framework Masterplans for each strategic city extension will ensure an integrated and agreed approach to infrastructure delivery.
- How the loss of developable land within SoBB SCE has been considered or will be taken into account considering the requirements for infrastructure to be delivered within SoBB SCE compared to Levante Gate.
- How the delivery of infrastructure influences the phasing of delivery.
- Whether the infrastructure requirements can pass the statutory tests.

Turning to the specific requirements, Catesby welcomes the additional infrastructure evidence published as part of the Regulation 19 consultation. A high-level review of the IDP establishes that an approach has been taken, as set out in chapter 1 of the IDP, which broadly considers:

- Why – infrastructure is needed to support delivery.
- When – using a baseline of 2022 and considering timeframes between the years 2031 and 2040 and beyond 2050 where appropriate.
- What – type of infrastructure.
- Where – based on thirteen sub-areas.
- How – taking into account the baseline population and infrastructure, known infrastructure projects planned for by the Council and other infrastructure providers, drivers of change, standard benchmarks, and projected increases in population.

Paragraph 1.18 of the IDP then states that infrastructure requirements have been dispersed for the overall city, each sub-area, and each strategic allocation.

SoBB SCE is located within the 'South East' Sub-Area alongside Levante Gate SCE and discussed from pages 126 – 134 of the IDP. Part 3 on page 132 identifies a series of theoretical infrastructure implications based on the strategic allocations. As per paragraph 1.17 of the IDP, the resultant implications are assumed to be the results of applying appropriate standard benchmarks of infrastructure provision to the project increase in population.

Chapter 6 of the IDP then disseminates the infrastructure requirements by strategic allocations for growth which are also set out in Chapter 7 – Project Schedule.

A review of Chapter 6 and 7 of the IDP identifies 42 infrastructure requirements for SoBB SCE within Chapter 6, however only 25 in Chapter 7. The difference is noted to be due to 17 of the requirements being 'city wide' projects where details will be assessed further at a site-specific level.

Considering the 25 projects listed in Chapter 7, these include requirements associated with:

1. Community Centres
2. Indoor Leisure and Recreation
3. Early Years
4. Primary School
5. Secondary School
6. Electrical Energy Distribution
7. Flood Risk Management
8. Water Recycling
9. Water Supply
10. Amenity Greenspace x2
11. Food Growing
12. Equipped Play
13. Natural and Semi-Natural Greenspace
14. Formal Outdoor Play Space
15. Adult Social Care – Supported and Specialist Accommodation
16. Adult Social Care – C2 Provision
17. Social Care – Children, Young People and Families x2
18. Primary Healthcare & Community and Mental Health
19. Active Travel x2
20. Highway and Structures x2
21. Public Transport
22. Waste Management

Despite the requirements being separated in Chapter 6, the requirements are largely set out by sub-area and considered jointly in Chapter 7. This means that there is less clarity on how the sub-area requirements have been split by site and what the funding implications may be by site. For example, Chapter 6 identifies that 100 sqm of dental healthcare space is required on both SoBB SCE and Levante Gate SCE, yet Chapter 7 'HSC.PCM4' identifies that 220 sqm of dental practitioner space is required in the sub-area.

Considering an alternative infrastructure requirement (e.g., Active Travel Tr.AT32) for new and improved pedestrian and cycle infrastructure. Whilst Catesby appreciates the project schedule is only indicative at this stage and specific requirements will be confirmed at a later stage; we have the following comments:

- Tr.AT32 is identified as a sub-area project e.g., related to both SoBB SCE and Levante Gate SCE.
- The project detail options posed under Tr.AT32 considers both at-grade crossings or alternative-grade separated crossings of the A5.
- However, project costs are considered to be set at £2,000.000. Of which it is suggested “*Developer to meet c. 60% of the cost*”. It is not clear which developer this is nor of which strategic site will foot the primary costs considering where the need will be generated (i.e., primarily on Levante Gate SCE) (see also comments regarding the concept masterplan below).
- The delivery timing is suggested to be Post 2030 but it is not clear when within this time frame the infrastructure could be required particularly when considering the assumed housing trajectories.

Regarding the requirements for education provision, particularly secondary provision (Ref. Ed.SS6), it is not entirely clear how the need has been demonstrated based on the evidence available and how this has transpired into the policy requirement.

For the health-related requirements, it is also not clear whether the requirements have been informed by requests by the respective providers or based on general benchmarks for estimated needs by population growth.

In summary, whilst Catesby is supportive of the inclusion of infrastructure with SoBB SCE and consider it essential to the delivery of a sustainable development, there is currently a lack of clarity as to whether the indicative requirements within the IDP are sound.

Catesby considers that a joint detailed Infrastructure Delivery Plan could be prepared at Framework Masterplan stage (if deemed necessary) which is coordinated with other site promoters and clearly establishes how phasing, funding, and delivery is envisioned. Should this not be prepared then MKCC should make clear within Policies GS17 and GS18 what the proposed approach will be to infrastructure (see representations to Policy INF2).

It is noted that paragraph 1.19 of the IDP references an Infrastructure Investment Strategy (‘IIS’). The IIS does not appear available as part of the evidence base and therefore details regarding anticipated funding mechanisms. However, details are provided within the Infrastructure Project Schedule at Chapter 7 of the IDP.

C3 / C4 / C5 / C6 / C7 / C8 / C9 Policy Wording

Subject to the comments above, Catesby has the following comments on the proposed policy wording within the draft plan:

C3 – Catesby is supportive of the policy wording including flexibility of the provision of Early years and primary education facilities relevant to scale and nature of the development proposal.

C4 – Catesby is supportive of the policy wording, including flexibility of the provision of secondary education facilities relevant to scale and nature of the development proposal.

C5 - Catesby is supportive of the policy wording, including flexibility of the provision of primary healthcare facilities relevant to scale and nature of the development proposal. The second part of the wording should be clear that the contributions are '**as appropriate subject to viability**'.

C6 – Catesby is supportive of the policy wording, including flexibility of the provision of the local centre(s) relevant to scale and nature of the development proposal. The current concept masterplan only shows one Local Centre whereas the policy wording is drafted as if more than one will be required. This should be amended appropriately to make clear that only one local centre is required at SoBB SCE.

C7 – For consistency with other requirements, C7 should be amended to clarify what exactly is meant by social infrastructure, services and community facilities and what is required on site. This should be worded to be consistent with other infrastructure provision requirements.

C8 – As noted above, it is not considered sound for a further separate strategy to be required concerning Green and Blue Infrastructure and Open Space in the context of the Framework Masterplan and broader policy requirements, including IDP and open space standards. Policy CEA8 already sets out the open space standards for residential developments, and as demonstrated in the supporting documents, the proposals for South of Bow Brickhill are designed in accordance with the policy. This requirement should be amended to state "**Provision of green and blue infrastructure and open space in accordance with the approved Framework Masterplan and Open Space Standards**".

C9 – As currently worded it is not clear what the criteria is that needs to be complied with, how it is associated with Policy CEA6, and therefore how this requirement is justified.

C10 – Catesby is generally supportive of the proposed wording in C10. However, it is not clear what is meant by '*segregated routes*' and why these are required as the requirement for segregation is not contained within Policy GS4. It is also not clear what the expectations are regarding the provision of '*interchange hubs*'. The draft plan should clearly define what is meant by interchange hubs so that the scale and facilities provided are coherent within the scale of development proposed.

C11 – Catesby is broadly supportive of this criterion however propose that MKCC:

- Clarify the wording to set out what type of survey and assessment is required to ensure that this unambiguous.
- Add '*as appropriate*' after mitigation of impact.
- Separate the built heritage and ecology requirements.

It is noted that the Consultation Statement asserts that 'built heritage surveys' have been omitted however they are retained within Policy GS17.

C12 – Catesby is broadly supportive of this criterion however it is noted that the policy now includes a pre-determination requirement for archaeological evaluation. It is not clear what is meant by ‘*archaeological evaluation*’ and why this requirement is pre-determination and therefore whether the requirement is sound (consistent with national policy and justified).

Concept Masterplan

In general Catesby is supportive of the Concept Masterplan which has evolved between Regulation 18 and 19 consultations.

Catesby is supportive of the flexibility allowed within Part C 10 and the concept masterplan regarding the provision of a new / enhanced access from Brickhill Road / Station Road. As MKCC are aware, Catesby is party to ongoing discussions with the MKCC and East West Rail concerning South East Milton Keynes.

It is advised that the following points are clarified on the concept masterplan:

- What the densities within the high – mid – and low-density areas are.
- Whether MKCC consider the school location to be representative of the space requirements. In Catesby’s opinion it is not, particularly considering that the Whole Plan Viability Plan Report assumed 9.6ha for the school.
- Whether it is an at-grade or grade-separated crossing over the A5 which is sought (see comments above regarding the IDP).
- That the ‘multi use open green space’ includes both amenity green space and natural / semi natural greenspace.
- Where the ‘interchange hubs’ may be preferential considering C10.

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.

Amendments are shown by bold (new text) and strikethrough (deletions).

Part A - *The South of Bow Brickhill Strategic City Extension is allocated for a new, ~~mixed-use,~~ residential-led strategic development to the south of Bow Brickhill and east of Brickhill Road as **indicated on the policies map.***

Part B should be amended to either make clear:

- What the expectations of the Framework Masterplan and Design Code are (if deemed necessary).

- Expanded to make clear how infrastructure delivery across proposed allocations GS17 and GS18 will be coordinated either within or outside of a joint Framework Masterplan / Infrastructure Delivery Plan.

Subject to the above, Part C should be amended as set out within part 5 of this representation.

Concept Masterplan

- Paragraph 110 should confirm that the indicative concept masterplan is indeed only an indicative starting point for further detailed proposals.
- Amendments should be made as per the comments within part 5 of this representation.
- The key should also be adjusted for accuracy, for example see density section which associates the title of the sub-section with the higher tier colour band.

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.

It is noted that INF1 at Part D that Phasing Plans must show how infrastructure requirements will be delivered. In the context of Catesby's wider representations on infrastructure requirements for SoBB and Levante Gate SCE's further clarification would be welcomed as to how this is factored into prospective Framework Masterplans and site-specific allocation policies.

Furthermore, 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. Catesby would welcome further discussions with MKCC on the requirements at SoBB SCE alongside the other parties Catesby is working with in promoting the site.

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.

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.

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

Paragraph Policy Policies Map

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

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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 welcomes the inclusion of Policy INF2, particularly in the context of proposed joint infrastructure requirements for SoBB and Levante Gate SCE. Catesby looks forward to engaging with MKCC in this regard.

There is mention of a proposed overarching Framework Agreement and allocation-wide Infrastructure Delivery Plan. The timing and resourcing of these, relevant to emerging planning applications, should be discussed now, particularly in light of shared infrastructure requirements.

It is noted that Part B of INF2 asserts that "*where this is not possible or cannot be agreed then development proposals must meet their own infrastructure requirements*". Catesby welcomes this however it is critical that MKCC are clear on how strategic pieces of infrastructure, for example secondary school provision, could be accommodated where individual strategic sites do not generate sufficient need in isolation.

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

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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.

We are supportive of the principle of draft policy PFHP1. As illustrated through the supporting material and Vision Document, healthy place-making principles are embedded within the SoBB Strategic City Extension proposals.

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

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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 4 (South East), where SoBB SCE is located, benefits from 5.27ha of existing food growing areas with an estimated population of 19,652 by 2050 (4,710 current population + 14,942 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 ~0.36ha.

However, the IDP suggests that 0.8ha of food growing space would be requirement of SoBB SCE. Again, this is not disseminated by sub-category.

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. If the 1.8ha of additional food growing areas was provided by the two strategic city extensions in the South East, there could be a surplus (based on the standards used within the policy) of 2.16ha or the equivalent provision of 0.35ha per 1000 population.

As such, it is not clear if the allotment provision requirement is justified for all major residential development proposals. Notwithstanding this as part of delivering a people friendly and healthy place, SoBB SCE has allowed for some provision for food growing areas.

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; or if no private space is provided;*
- *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.

D. 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 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 has 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, SoBB SCE may have greater opportunities concerning privacy impacts 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.

Regarding B.1 and B.3 it is considered that these criteria are in effect seeking the same design solution and is therefore unnecessary duplication.

Regarding part C, as set out in supporting paragraph 238, the draft plan sets Nationally Described Space Standards as the minimum for all new homes. Whilst Catesby is supportive of this requirement, which is in accordance with planning practice guidance, paragraph 020 (Ref ID: 56-020-20150327) sets out that local planning authorities should provide justification for requiring internal space policies considering need, viability, and timing.

Taking these in turn, it is not clear where the need evidence is set out. The People Friendly Healthy Places Topic Paper includes two sentences regarding PFHP9 at paragraph 6.29. The HEDNA (October 2024) does not include any reference to the NDSS or space standards.

Regarding viability it is noted that the 2024 WPVS at paragraph 8.14 states that "*In this study the units are assumed to be in-line with, or larger than NDSS*". The 2025 WPVS however does not include any reference to confirm this remains applicable and the section covering 'urban design principles for people-friendly and healthy places' does not reference the new policy.

Regarding timing, it is considered unlikely that this will be an issue given the length of time the NDSS have been published.

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 must create and maintain a good standard of amenity subject to site-specific considerations, considering the following:...

A.2 should refer to technical standards or guidance either within the policy or by footnote to ensure that the policy is sound. For example, BRE guidance BRE 209 3rd edition 2022 'Site layout planning for daylight and sunlight: A guide to good practice' and the Lawson Criteria regarding wind.

Part C – MKCC should justify the setting of the NDSS.

The strategic policies proposed, and potential site-specific design policies contained within either or both Framework Masterplans and Design Codes, will provide sufficient clarity alongside the NPPF and National Design Guide and National Model Design Code.

Page 111 of the Consultation Statement provides further clarity on the expectations of the Design Code which appears at odds with paragraph 242 of the draft plan. For example, the Consultation Statement indicates that it will be for developers to lead preparation whereas the draft plan suggests that MKCC will prepare alongside developers and landowners.

The draft plan should be clear where design codes remain required.

Returning to the draft plan, paragraphs 242 and 243 alongside Table 10 now set out the principles for which Design Codes for specific areas or key sites should focus on.

Notwithstanding our broader comments in relation to the requirement for site-specific design codes, including potential practical questions regarding the preparation and approval of the design codes, it is not clear how the seven proposed principles clearly relate to the 10 characteristics of well-designed places as per the National Design Guide.

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.

For consistency with national policy, the draft plan should articulate how the principles will ensure any design codes prepared, including for the local authority area if required via a supplementary planning document, will be consistent with the National Design Guide and National Model Design Code.

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 the Policy HQH1 subject to the following.

Regarding part A, Catesby is supportive of a policy requirement that seeks to ensure the mix of tenure, size, and type of homes in accordance with the latest evidence base. We would however request that further flexibility is added to the policy to accommodate circumstances where further local evidence demonstrates a suitable alternative mix.

Catesby is, however, unclear how part A.2 is measured or assessed and therefore whether it is effective. We recommend that it is deleted.

Regarding part A.1, it is noted that table 11 provides a summary of the evidence on required housing mix. Whilst this table being included in the supporting text is helpful, its purpose may become redundant should the latest evidence change.

Regarding Part B, the proposed wording should be amended to align with Part A as per our comments in part 6 of this representation.

Regarding Part C, it is considered that the policy requirement could be made more concise so that it is clear for the decision maker. Please see our proposed modification in part 6 of this form.

Regarding Part E, Catesby note the addition of this requirement, requiring developments of 100+ dwellings to provide 5% plots for sale to custom builders as serviced plots. In principle Catesby recognises the importance of self-build and community-led housing requirements.

Ensuring there is provision for self-build and custom build housing is consistent with paragraphs 71 and 73 of the NPPF.

The High Quality Homes Topic Paper (November 2025) at paragraph 4.25 suggests an estimated demand for 1,652 self-build plots over the plan period. This is based on the number of individuals and groups added between 2019 – 2024 (362) minus the average number of plots granted for self or custom build over the same period.

Paragraph 003 (Ref. ID 67-003-20190722) of the PPG sets out guidance on how self-build and custom housebuilding needs can be assessed. The HEDNA (2025) appears to not include any assessment, it is instead only that contained within the Topic Paper referenced above.

Catesby is therefore concerned that the need figure is not justified. Furthermore, it is unclear how the MKCC has arrived at the requirement of 5% for all 100+ unit developments to fulfill that demand. The Self-build and Custom Housebuilding Act (2015) (as amended by the Housing and Planning Act 2016) does not automatically require that a fixed percentage of large development be served as self and custom-build homes, rather it imposes a duty on local authorities to grant sufficient suitable development permissions to meet demand in that base period. For this reason, we do not consider the policy to be justified or consistent with national policy.

Section 8.2.4 of the Viability Study (June 2024) states that two policy options have been considered:

- Option 1 is, on sites of 200 or more units, to seek that at least 5% of the plots will be provided for self- and custom-built housing.
- Option 2 is, on the strategic growth areas allocated within Plan:MK, and any proposals for further strategic residential development, will be required to provide 1 hectare of the site for serviced dwelling plots for sale to custom builders.

The updated Viability Study (October 2025) diverges from the two policy options without any clear reasoning. Paragraphs 8.18 to 8.21 set out the findings which show that land value per hectare would be higher than the benchmark land value. However, this does not account for the complexities of providing self-build homes, including uncertain and longer build times, infrastructure servicing, site-phasing and access. Larger and strategic sites often have tight delivery trajectories, and the disruptions from self and custom build homes could lead to the inefficient use of land.

Notwithstanding the above, from a practical perspective, Catesby is unclear:

- i) How the 5% of the site would be expected to fit into the wider development from a practical and design perspective? From experience, community-led housing in particular is often brought forward by bodies with restricted capital and capacity to deliver to the same extent as large housebuilders.
- ii) How would the 5% interact with the proposed Masterplan Framework, Design Code, and density requirements?

Catesby would welcome the consideration of what may happen in the event of plots not being sold within a 12-month period. However, it is not clear from the evidence base available or policy wording how the scenario would play out with regard to:

- When the 12-month period would start e.g., is it from grant of outline planning permission?
- How the content of the planning permission could or would be amended, particularly from a design perspective or whether MKCC expect that part of the site is subject to a whole new application?
- How the percentage quota of affordable housing provision would be recalculated and thereafter implemented.

The NPPF at paragraph 73 (b) also states that local planning authorities should 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. Whilst the policy as drafted would enable small parts of medium/larger sites to be come forward as self-build and custom build housing in our opinion, the approach proposed by MKCC does not clearly seek to support community-led housing sites coming forward on their own.

In this context, it is considered that Part's D, E, and F are not sound.

Regarding Part G, it is considered that additional flexibility should be incorporated into the policy to accommodate site-specific viability considerations.

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 the policy as follows:

A Development proposals resulting in the creation of 10 or more new homes must provided a mix of tenure size and type of homes that reflect the Council's latest assessment of need, unless it can be demonstrated that an alternative mix meets an identified need.

B. Development proposals that result in the creation of fewer than 10 dwellings should provide a mix of size and type of homes to reflect the latest assessment of need, unless it can be demonstrated that an alternative mix meets an identified need

Delete parts A.1 and A.2 and C.

Part E should be supported by additional evidence as to whether the proposed approach is justified, effective and consistent with national policy, alongside defining self-commissioned homes.

Nevertheless, in the absence of additional evidence or justification, it is considered that the policy wording should be amended to include the following exceptions:

...unless it can be demonstrated that:

- a. *There is no demand for such plots, as evidenced by the Council's Self and Custom Build Register, or*
- b. *The provision would make the development unviable.*

Part G should incorporate the following wording:

*G. Proposals resulting in the creation of 10 or more new homes must provide, **unless demonstrated otherwise by viability evidence**, at least:*

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 HQH2 and acknowledges the urgent need for affordable housing delivery.

SoBB SCE will deliver c. 520 affordable homes across the development (40% of c.1,300 homes total), including those tenures listed in Part 2 of Policy HQH2.

It is noted that Figure 15 of the HEDNA (2025) which summarises the market and affordable housing needs in Milton Keynes over the plan period. This sets the tenure mix in Part 2. However, it is noted that Figure 15 of the HEDNA does not consider what implication a supply above the local housing need may have on affordable housing tenures. It is also noted that this evidence is based on the 2024 HEDNA. To ensure that the appropriate mix is provided, Catesby proposes that Part 2 incorporates the same level of flexibility as Policy HQH1.

Catesby supports the incorporation of review mechanisms within the Policy wording.

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.

2. The tenure mix of affordable homes must be as follows, or in accordance with any updated evidence of need, except where site-specific considerations or the forms of development dictates otherwise:

A

B

C

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 welcomes the changes to Policy HQH3 since the Regulation 18 consultation and is broadly supportive of Policy HQH3 subject to the below.

Whilst Part B allows for on-site provision to not be delivered in the event of feasibility, it currently seeks financial contributions in its place. We have three concerns regarding the current wording.

First, it is not considered that '*not feasible*' is clear for a decision maker and therefore may result in inconsistent application. A series of criteria should therefore be defined, for example that it would result in a number of units that would not be attractive to specialist providers or that it would result in a number of units that would not functionally work within the scheme design.

Second, there is no allowance for viability considerations to be taken into account where neither on-site delivery nor contributions are viable.

Third, it is not clear whether there is a time limit on how long the units would need to stay as dedicated uses should no options for specialist providers or developers be forthcoming.

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 B of the policy to respond to the comments raised in Part 5 of this representation.

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.

As an organisation, Catesby, who are part of Urban&Civic, are led by their approach to sustainability and the structure of the framework of 'five capitals' framework². This approach identifies the key areas to have the most significant potential to make a positive difference.

In this context, the development of SoBB SCE will seek to include innovative and new technologies to support the reduction in carbon emissions and deliver energy efficiency standards above national and local policy requirements, subject to viability considerations.

Catesby is therefore supportive of the principle of policy CEA1 and the acknowledgment of viability implications of the policy requirements. However, Catesby has the following comments:

Overall, a fundamental consideration that MKCC must have regard to is the implications of any targets on viability. Local Plans should be aspirational but deliverable, targets above those that are viable may have unintended consequences on the delivery of new homes and employment provision. The 2025 WPVS in this regard does not appear to contain all relevant costs in a single place as expressed in paragraph 5.51 "*The council has advised that the costs in this regard [whole life-cycle carbon emission and resource] are within the costs set out in the MKCC Carbon and Climate Study (Arup – January 2024 working draft)*".

² [Catesby Estates Sustainability Framework 2023.pdf](#)

Regarding Part C 1, it is noted that the targets are set out using the Target Emissions Rate standards. However, the supporting Climate and Carbon Study recommendations report within section 2.2.2 refers to the section 3.3 of the Analysis Report which uses a different metric.

It is therefore unclear if MKCC have a comprehensive understanding on the costs associated with the emerging policy and if the policy justified on the basis of proportionate evidence.

Regarding Part C 3, it is noted that the policy wording requires all major development to provide 25% of electricity demand through on-site low/zero carbon energy generation. However, the recommendations on page 12 of the Carbon and Climate Study Recommendations Report suggests the following;

*“After fully appraising fabric improvement options, applicants **may** accommodate up to 25% of electricity demand by on-site renewable generation”* (our emphasis).

We are therefore concerned that this requirement is not justified as currently worded.

Regarding Part E, it is noted within the Carbon and Climate Study Recommendations Report that the recommendation is associated with ‘*setting planning conditions*’. Whilst Catesby is supportive of monitoring to ensure that targets are being achieved, it is not currently clear how this may operate in practice or pass the relevant tests. For example;

- How is the 10% identified, particularly on large multi-phase schemes where delivery may extend over a number of years?
- What is meant by ‘*first five years of occupation*’ – is this of the first dwelling, the last dwelling, or just those identified within the 10%?
- Will the requirement be enforceable or reasonable once the houses are sold and are not the responsibility of the developer?

At Regulation 18 stage, Catesby commented that whilst the aspirations of MKCC to identify policy solutions for embodied carbon are commended, based on the evidence available, it was unclear how the draft policy targets would pass the tests of soundness and contribute to a deliverable plan taking into account the three interrelated objectives of sustainable development.

Should MKCC seek to bring in an embodied carbon-related planning policy, we encouraged the policy to take a similar approach as to that within the London Plan regarding whole-life carbon assessments (Policy SI2’). This policy was acknowledged in the Inspector’s Report as a starting point to allow data and good practice to be captured as a pre-cursor for future policy development. Moreover, it does not introduce additional technical standards/targets that may not be justified. No further evidence appears to have been published as part of this Regulation 19 consultation.

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.

Further justification should be provided that the policy requirements are viable and contribute to the plan being sound.

Part C 3 should be amended to change 'must' to 'may'.

Part E should be further justified or deleted.

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 support this draft policy, and the flexibility contained within to ensure that provision is incorporated where feasible and viable. The buildings identified within part A of the draft policy would be most appropriate.

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 is supportive of emerging Policy CEA5 regarding water efficiency.

It is noted that the policy seeks to set standards greater than national Building Regulations standards of 125l/p/d. In this regard paragraph 014 (Ref ID. 56-014-20150327) of the PPG sets out that “*Where there is a clear need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 liters/person/day*”. Paragraph 015 (Ref ID. 56-015-20150327) provides further guidance on how the clear need can be established, namely;

- Existing source of evidence.
- Consultations with the local water and sewerage company, the Environment Agency and catchment partnerships.
- Consideration of the impact on viability and housing supply.

Supporting text paragraph 300 of the draft plan references Anglian Water’s Water Resource Management Plan, however it is not clear whether this is the 2019 or 2024 version.

Furthermore, paragraph 300 of the draft plan identifies 85 l/p/d as the target for residential development, however the policy requirement states 93 l/p/d. As such clarification would be welcomed as to what target MKCC is seeking to achieve above building regulations.

Notwithstanding the above, section 4.3 of the MK Integrated Water Management Study Phase 2 Final Report (October 2025) discusses water efficiency in Milton Keynes. Section 4.3.9 sets out a summary and recommendations of water efficiency. In this regard Catesby has the following observations:

- A different Water Resource Zone is identified compared to paragraph 300 of the draft plan. It is therefore unclear if the correct evidence has been considered as part of the evidence base or if there has been a mistaken typo.
- A proposed target of 93 l/p/d is identified which “*reflects the viability challenge of targeted 85 l/p/d, whilst also improving on the existing Plan:MK policy and the optional building regulations target of 110 l/p/d*”.

It is noted that the WPVR (2025) at paragraph 5.56 and 5.57 considers the costs of the 93 l/p/d target. Based on paragraph 5.57 it would appear that the costs considered within the viability appraisal are those based on achieving 100 l/p/d rather than 93.

The water efficiency targets for non-residential development also do not appear to have been considered within the WPVS (both 2024 and 2025). The IWM Study Phase 2 considers three credits in WAT01, but only on employment sites rather than all non-residential developments.

On this basis, it is concerning whether the true implications on viability have been considered and therefore whether the policy is justified.

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 supporting text in paragraph 300 should be updated to correspond with the evidence and policy requirements accurately.

For Part A, ‘*where feasible and viable*’ should be added to the policy wording or further justification provided on the standard proposed for residential development.

Part B should be justified further with supporting evidence.

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 is supportive of emerging Policy CEA7.

However, Catesby is concerned that the policy may set overly onerous requirements for technical assessment submissions as part of applications where they may not be necessary and material to all applications in question. For example, outline planning applications may not have the level of details available to provide a technical assessment on the impacts of noise, lighting, and water quality.

In accordance with paragraph 45 of the NPPF, we encourage MKCC to adopt a policy approach that makes best use of the local validation requirements within the local list.

Furthermore, it is noted that the policy appears to go further than paragraph 198 of the NPPF. For example, Part I of the policy wording.

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 CEA7 should be amended to take into account the differing levels of information that may be necessary and material for consideration of different types of applications. For example, Part E could change to:

“In accordance with the local information requirements, where applicable proposals must demonstrate how prevailing air quality....”.

Amend Part I to ensure that it is consistent with national policy.

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 policy CEA8 subject to the below.

Regarding Part B, as commented upon in response to Policy GS17, any space standards should be robustly justified and evidenced. Catesby would welcome the opportunity to engage further with MKCC on the site-specific requirements at SoBB SCE.

Regarding Part C, whilst Catesby acknowledges the importance of the management and maintenance of the provision, it may not be possible to confirm the proposed approach depending on the type of application submitted for SoBB SCE. Therefore, this requirement should be amended to reflect that such details may not be available until Reserved Matters or Conditions Discharge stage.

This representation sets out how the landscape-led approach to development of SoBB SCE could maintain and enhance the quality and connectivity of access networks, integrating with active travel routes and recreation routes, into the wider nature, green and blue infrastructure network. A variety of new open spaces and formal outdoor spaces are incorporated into the concept masterplan as key elements to the delivery of a sustainable growth opportunity.

In this context, SOBB SCE would contribute to the wider objectives of the plan, including those centered around creating people-friendly and healthy places.

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.

Ensure that all standards set out in Annex B and C (or site-specific policies where applicable) are robust and justified.

Amend Part C to reflect differing stages of the planning process for example.

“Provision for the future long-term management and maintenance of open spaces and formal outdoor playing pitches will be sought and agreed as part of the planning application process. At relevant stages, this will include:

- 1.
- 2.
- 3
- 4 “

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 CEA9 which seeks an appropriate balance between the statutory 10% Biodiversity Net Gain whilst supporting proposals which can go above this threshold.

Part C of the policy has been amended to reflect the biodiversity hierarchy however it is considered that this should be amended for consistency with national policy.

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 C to be consistent with Paragraph 008 (Ref ID. 74-008-20240214) of the PPG;

C. Development proposals should avoid the loss of habitat present on site. If the loss of habitat is unavoidable, then proposals should follow the biodiversity hierarchy where possible as part of the planning application process:

1. *Enhance existing retained on-site habitats*
2. *Create new on-site habitats*
3. *Create new off-site habitats or purchase off-site units*
4. *Evidence purchase of statutory credits.*

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 principle of policy CEA10 subject to the following:

Regarding Part A, whilst the Nature, Green, and Blue Infrastructure Strategy is part of the evidence base of the draft plan, greater flexibility should be provided to ensure that the requirement is effective and consistent with national policy. The Strategy is capable of being a material consideration but is not part of the Development Plan.

Regarding parts C and G, it is considered that the policy requirements go beyond national policy (paragraphs 192 and 193 of the NPPF).

For example, NPPF paragraph 193b sets out that “*Development on land within or outside a Site of Special Scientific Interest and which is likely to have an **adverse effect** on it, **should not normally be permitted**” however Part C of the draft plan goes beyond this stating that proposals **will not** be permitted unless, whilst using alternative phraseology such as ‘**direct harm**’ (our emphasis). In our view this could unnecessarily complicate the policy interpretation for developers and decision makers.*

Regarding Part I, the policy should make clear that this excludes development proposals which are allocated through 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.

*A. Development proposals ~~must~~ **should seek to protect and enhance the Nature, Green and Blue Infrastructure network in line with Milton Keynes' Nature, Green and Blue Infrastructure Strategy by conserving and enhancing on-site biodiversity and habitat networks within and adjacent to the site.***

Separate out Part C in accordance national policy. For example, having separate parts of the policy concerning SSSI's, National Nature Reserves and irreplaceable habitats. The requirements should then be in accordance with para 193 of the NPPF. For example;

C. Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), will not be supported unless the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.

D. Development likely to result, either directly or indirectly to the loss or deterioration to:

[List] e.g., Irreplaceable Habitats

Will only be permitted if;

- 1. There is no suitable alternative site to accommodate the development'*
- 2. The need and benefits of the development outweigh the adverse impacts on the site.*
- 3. All reasonable possibilities for mitigation have been considered; and*
- 4. Compensatory provision in line with the mitigation hierarchy is secured.*

*I. Development proposals on greenfield sites for 300 homes or more, **excluding those allocated within policies GS14 – GS23**, must consider the economic and other benefits of best and most versatile agricultural land through appropriate surveys and assessments. Where such proposals involve the loss of agricultural land, areas of poorer quality land (grades 3b, 4 and 5 of the Agricultural Land Classification) should be used in preference to higher quality land (grades 1, 2 and 3a of the Agricultural Land Classification), unless other material planning considerations would outweigh the loss.*

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 accordance with site-specific policy requirements and CEA12, policy CEA11 should factor in different site circumstances and landscape characteristics which may have implications on tree planting and canopy coverage. In particular the requirement set out in Part C of the policy.

'Green Cover' should also be defined within the draft plan's glossary.

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 Policy CEA12 to allow for site-specific considerations, particularly in consideration of tree canopy cover.

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 the policy wording for CEA12 is largely the same as at Regulation 18 stage notwithstanding minor changes to Part C and no new evidence has been published as part of this Regulation 19 consultation. As such, Catesby continues to object to Policy CEA12.

This representation is supported by a technical note (**Appendix 7**), which has not been updated in light of no new evidence, providing an analysis of SoBB SCE landscape character and features. In summary the technical note identifies that:

- Contrary to the proposed designation of Special Landscape Areas, it is considered that local landscape designations in Milton Keynes are not necessary as a character-based approach can be used to manage change in the landscape sensitively, as policy CEA12 (Part A) sets out. All Special Landscape Areas (SLAs) are covered by Landscape Character Areas (LCAs) within Milton Keynes. Each of these LCAs have key characteristics (man-made or natural) that create the quality of these areas. Policy CEA12 ensures that any proposals coming forward enhances these key characteristics of the LCA as a whole. The wording for the SLA within Policy CEA12 is a repetition of the requirements of the LCA. To comply with the Policy for the LCA any proposed development would also inevitably satisfy the requirements for the SLA. Therefore, the SLA as a designation which through this draft policy is safeguarding the same elements as the LCA, appears redundant as it is not providing any further stipulation that the LCA is not already providing.

- Furthermore, the policies for the former landscape designation and the proposed SLA do not seek to prevent development, contrary to the basis for the designation, as set out in the Valued Landscapes Review (2022) which mistakenly focused on prevention of development as a test of the effectiveness of the policy.
- If the Council deemed that the designation was necessary, consideration should be given to the extent of that designation. The Special Landscape Qualities listed for the Candidate SLA focus primarily on the elevation, gradient and vegetation of the upper slopes and ridgeline of the Brickhills Greensand Ridge. This reflects the findings of the RLLD that the lower-lying LCA 5b does not merit being taken forward for consideration as a local landscape designation. It is considered that the Brickhills SLA includes land on the lower slopes which is not necessary to include in order to protect the identified distinctive elements of the Brickhills Greensand Ridge.

The assessment and recommendations set out within the technical note have played a crucial role in shaping the proposals for SOBB SCE, including, but not limited to, the following site-specific guidelines:

- Development extent is contained by the 90m contours to protect the distinct character of the Brickhills Greensand Ridge;
- Built development is drawn back from the valley landform to the south east;
- View corridors from the valley floor and lower slopes up the wooded ridgeline are preserved;

Overall, there is therefore potential for residential development within South of Bow Brickhill Strategic City Extension, subject to a sensitive approach.

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.

Special Landscape Areas should be deleted, or, at a minimum, their extents should be revised.

The wording of Policy CEA12 should correspondingly delete Part B.

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 CEA13 which aligns with paragraph 182 of the NPPF.

Paragraph 5.21 of the Climate and Environmental Action Topic Paper states that “A level 2 SFRA has also been completed with no major changes to the strategy having been proposed to the growth strategy, but it will inform more detailed site planning at future stages”. Catesby welcomes that a Stage 2 SFRA has been undertaken to inform the growth strategy and that a proportionate sequential test has been undertaken.

It is noted within paragraph 37 of the Sequential Test (October 2025) concludes that all sites proposed to be allocated have passed the Sequential Test. Furthermore, paragraph 37 indicates that further site-specific information will be available in the level 2 SFRA.

However, there does not appear to have been a stage 2 SFRA published as part of this consultation for comment or review. As such, in the context of paragraph 13.1.3 of the Stage 1 SFRA, it is not clear how the draft plan is consistent with paragraph 171.

Regarding the policy wording of CEA13, it is considered that additional flexibility should be incorporated within Part A as not all requirements will be possible on all sites. Furthermore, some of the information requested may not be possible to be provided subject to the type of application submitted.

MKCC should also seek to avoid duplications between policies CEA13 and CEA15, for example Part A.7 of CEA13 and Part G.4 of CEA15.

MKCC should clarify what is meant by '*strategic scale*' of SuDS systems so that it is clear for developers and decision makers.

As set out throughout the supporting documents submitted as part of this representation, SoBB SCE has responded to the existing context and seeks to incorporate Sustainable Urban Drainage systems into the Site. Green and blue infrastructure corridors are incorporated into the concept masterplan, providing both amenity and flood risk and drainage benefits.

As per Catesby's Regulation 18 representation, this representation is supported by a technical note prepared by JNP Group.

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.

- Part A should be amended to allow flexibility as to when the requirements are applicable.
- Strategic scale SuDS should be defined.
- Ensure that there is no duplication between CEA13 and CEA15.
- The Stage 2 SFRA should be published to support the draft plan.

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 support of the principle of Policy CEA14 subject to the following:

Part A should allow for further flexibility and take a more proportionate approach for the following reasons:

- The current approach may not be appropriate in all circumstances for example it currently does not all for site-specific considerations to be taken into account when formulating the buffer requirements such as drainage ditches or the size and role of the watercourse and how it interacts with broader scheme proposals. Therefore, the policy should either include broader parameters as guidance or require engagement with the relevant authority to agree as part of the pre-application process.
- The current approach may detract from people with restricted mobility from accessing areas of nature near ordinary watercourses.
- No justification appears to have been set out within the supporting text or evidence base for the buffer areas.
- It is not clear what is meant by '*undeveloped*' in the context of page 82 of the NPPF which highlights that amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities are water compatible development.

Part B of the policy assumes that watercourses will have an intrinsic value however this may not be the case and therefore policy wording should reflect this.

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 as follows.

Development proposals should seek to incorporate a minimum set back appropriate to the scale, size, and role of the watercourse as agreed with the Environment Agency, Lead Local Flood Authority, or Internal Drainage Board as the appropriate authority. The minimum set back should not include [insert justified limitations e.g., buildings, private gardens].

Amend Part B as follows:

*“Development proposals adjacent to, or containing, a watercourse (main river or ordinary watercourse), should, **where possible**, protect and enhance...”*

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.

Part E of Policy CEA15 should include either within the policy wording or an Annex which sites have been subject to, and passed, the Sequential Test at plan-making stage. This includes SoBB SCE.

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 see the response to Part 5 of this form.

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 this policy subject to the below.

Regarding Part A. this part of the policy should include flexibility as not all criteria for the contents of a Heritage Assessment will be relevant depending on the site-specific circumstances.

Regarding part A.5, it is not clear how MKCC has justified this requirement, which may fall beyond the scope of all heritage assessments.

Regarding part D, first it is not clear what is meant by "*demonstrate that all feasible solutions to avoid and minimise its loss*". All feasible solutions may rely on subjective judgement and bear the risk of inconsistent application due to different interpretations. Second, it is considered that this test is unduly excessive in comparison to national policy (paragraph 216 of the NPPF).

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 that would affect heritage assets must be accompanied by a heritage assessment. Taking into account site-specific considerations and the development proposals, heritage assessment should:

Part D should be amended to be consistent with the requirements of national policy for non-designated heritage assets.

Any subjective phrases should be clarified through the provision of criteria for judgements.

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:

To expand upon comments made as part of these representations.

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

Sharing your personal details

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

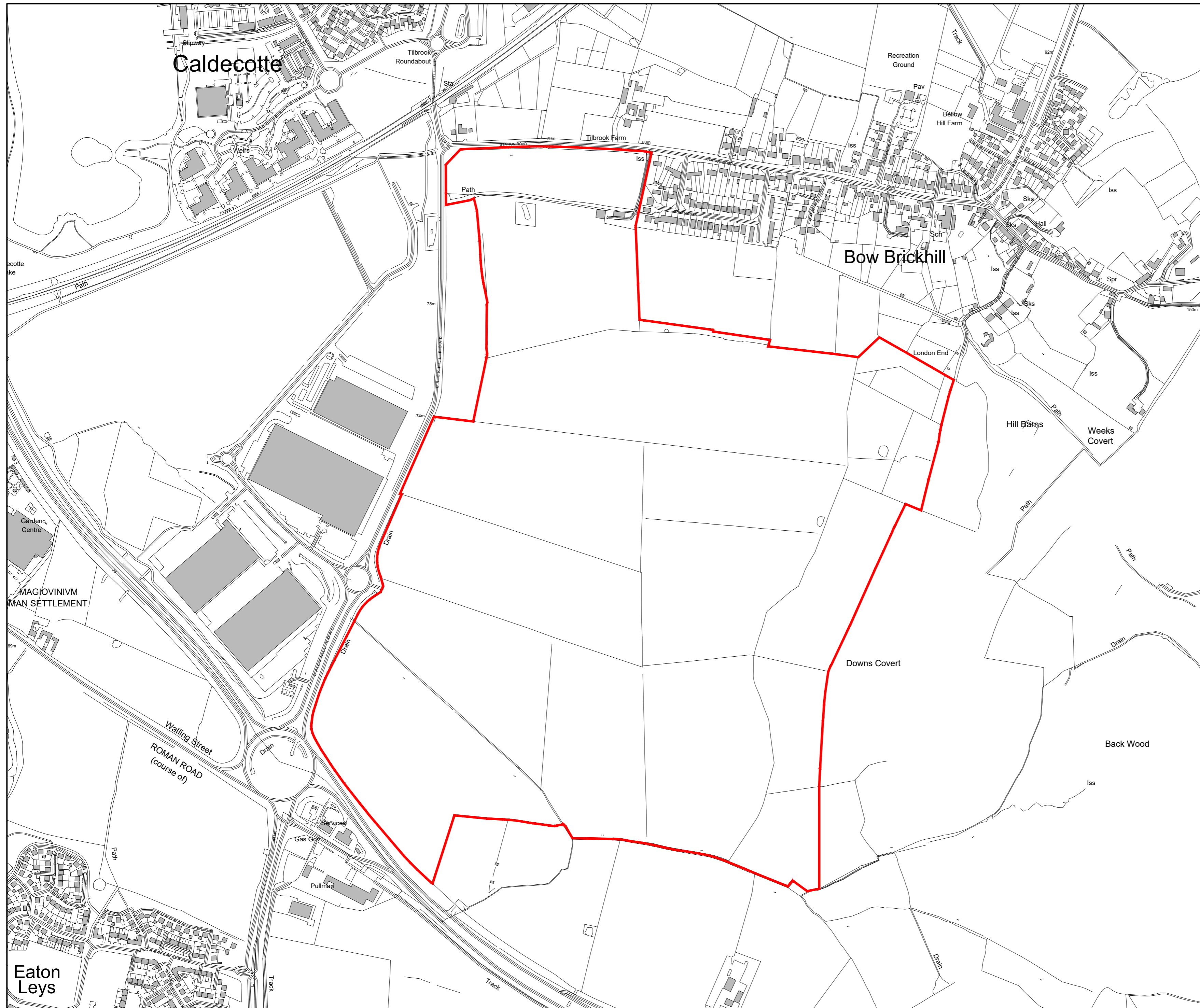
For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notices/milton-keynes-city-council-corporate-privacy-notice>

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

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Revision	Date	Drn	Ckd
A Site Boundary Update and Draft Removed	03.10.24	J.W.	C.S.

 Site Boundary



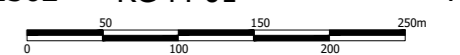
Project
SOUTH MILTON KEYNES



Drawing Title
SITE BOUNDARY PLAN

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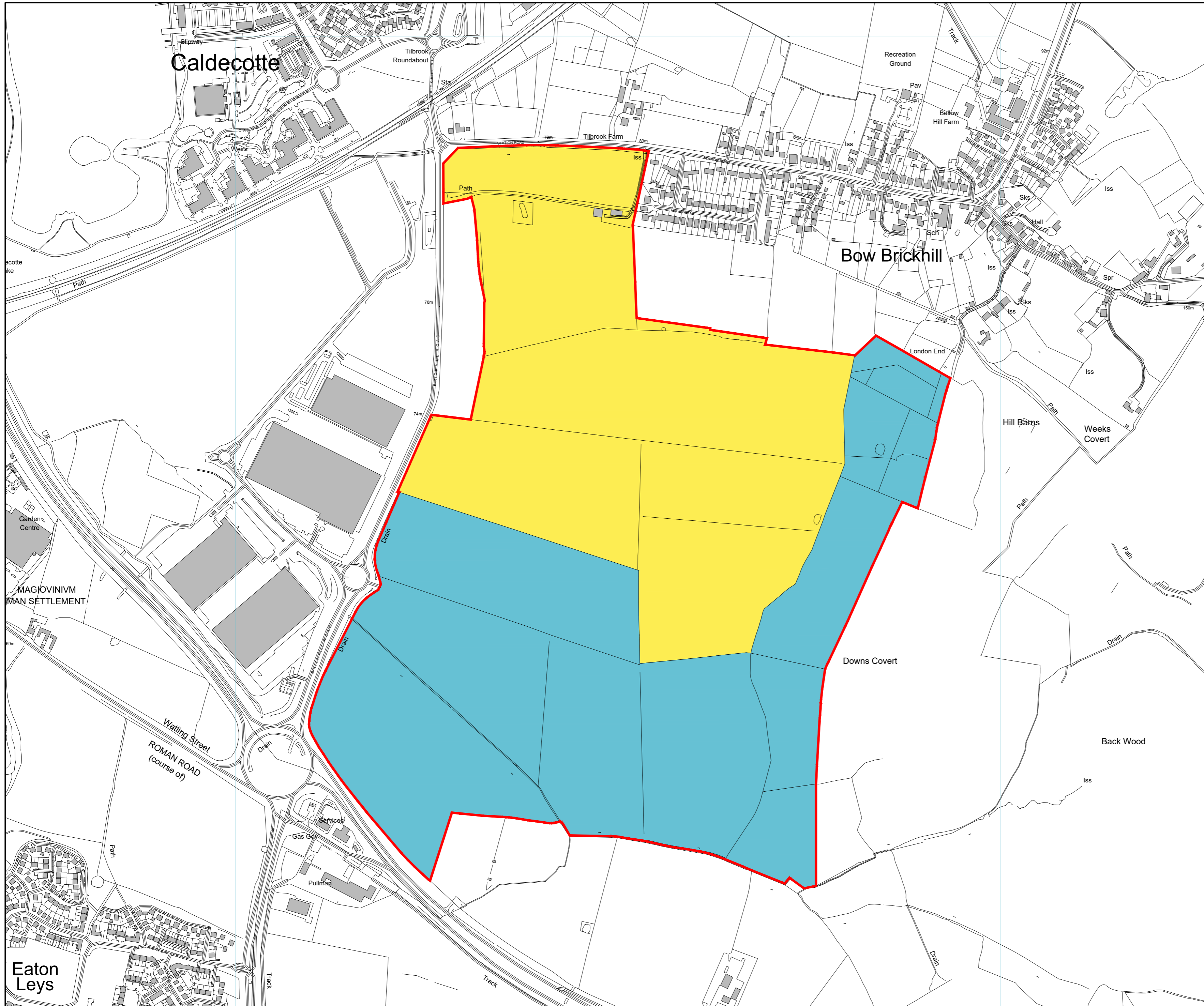
Project No 333101362	Drawing No RG-M-01	Revision A
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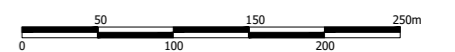
- Site Boundary
- Urban & Civic land
- Bedford Estates Land

Project
SOUTH MILTON KEYNES



Drawing Title
LAND HOLDINGS PLAN

Date 02.10.24	Scale 1:5,000@A2	Drawn by J.W.	Check by N.T.
Project No 333101362	Drawing No RG-M-06	Revision -	



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SOUTH OF
BOW BRICKHILL

Urban & Civic



THE BEDFORD ESTATES

WHY HERE?

Land South of Bow Brickhill is being promoted jointly by Urban&Civic and The Bedford Estate. These parties have ownership and control of a significant portion of the area identified for draft allocation by Milton Keynes City Council (MKCC), as shown below.

This vision for Land South of Bow Brickhill takes a comprehensive approach to the strategic growth of the city to the south.

The collaborative approach being taken by Urban&Civic and The Bedford Estates, including a shared vision, masterplan, and infrastructure delivery strategy, will ensure that a residential led development can be delivered in line with MKCC's aspirations.

The purpose of this document is to establish the guiding principles for future delivery of a new sustainable strategic city extension.

The site is bounded by Brickhill Road to the west, Station Road and Bow Brickhill (village) to the north, Back Wood to the east and the A5 to the south. Land to the south of the A5 is also part of MKCC's draft allocation for the area.



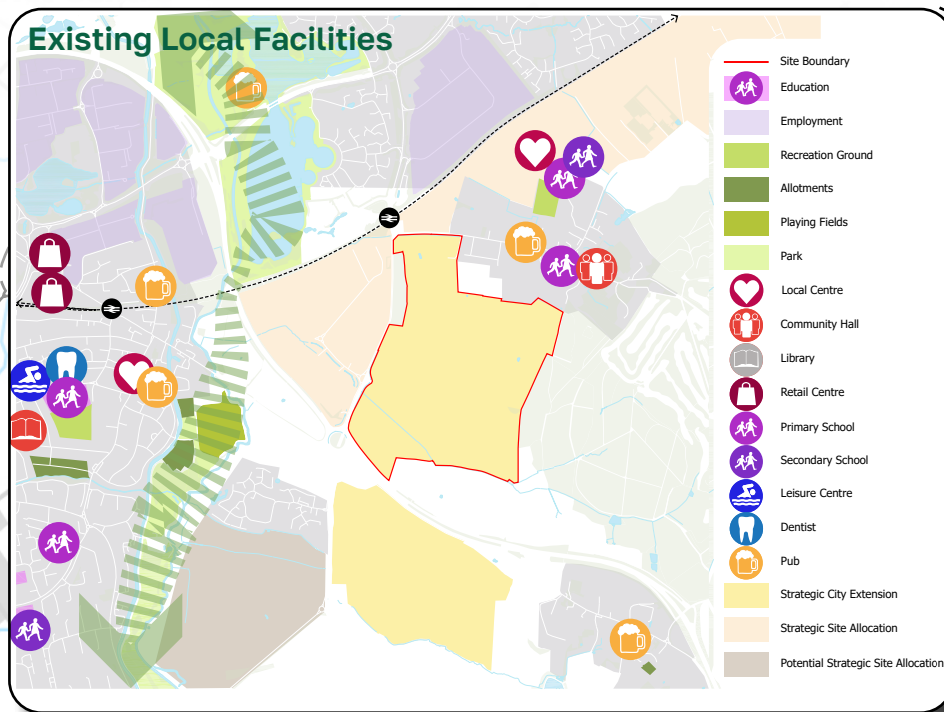


Contributing to the wider growth strategy

Land South of Bow Brickhill comprises of circa 105 hectares of land to the south of the South East Milton Keynes Strategic Urban Expansion area and the settlement of Bow Brickhill. The site is to the north of the A5, and east of Brickhill Road and the strategic employment allocation at South Caldecotte where construction is well-progressed.

Land South of Bow Brickhill provides an opportunity to continue the transformational growth of south Milton Keynes through a sensitive landscape-led masterplan that responds to its surrounding context.

A sustainable mixed-use community with around 1,500 high-quality, sustainable homes of mixed tenure including up to 40% affordable homes are proposed.



Buckinghamshire



A cluster of community facilities form a local centre at the heart of the emerging scheme, including the provision of a new primary school. A Food retail / Cafe is proposed adjacent to the A5 strategic road network.

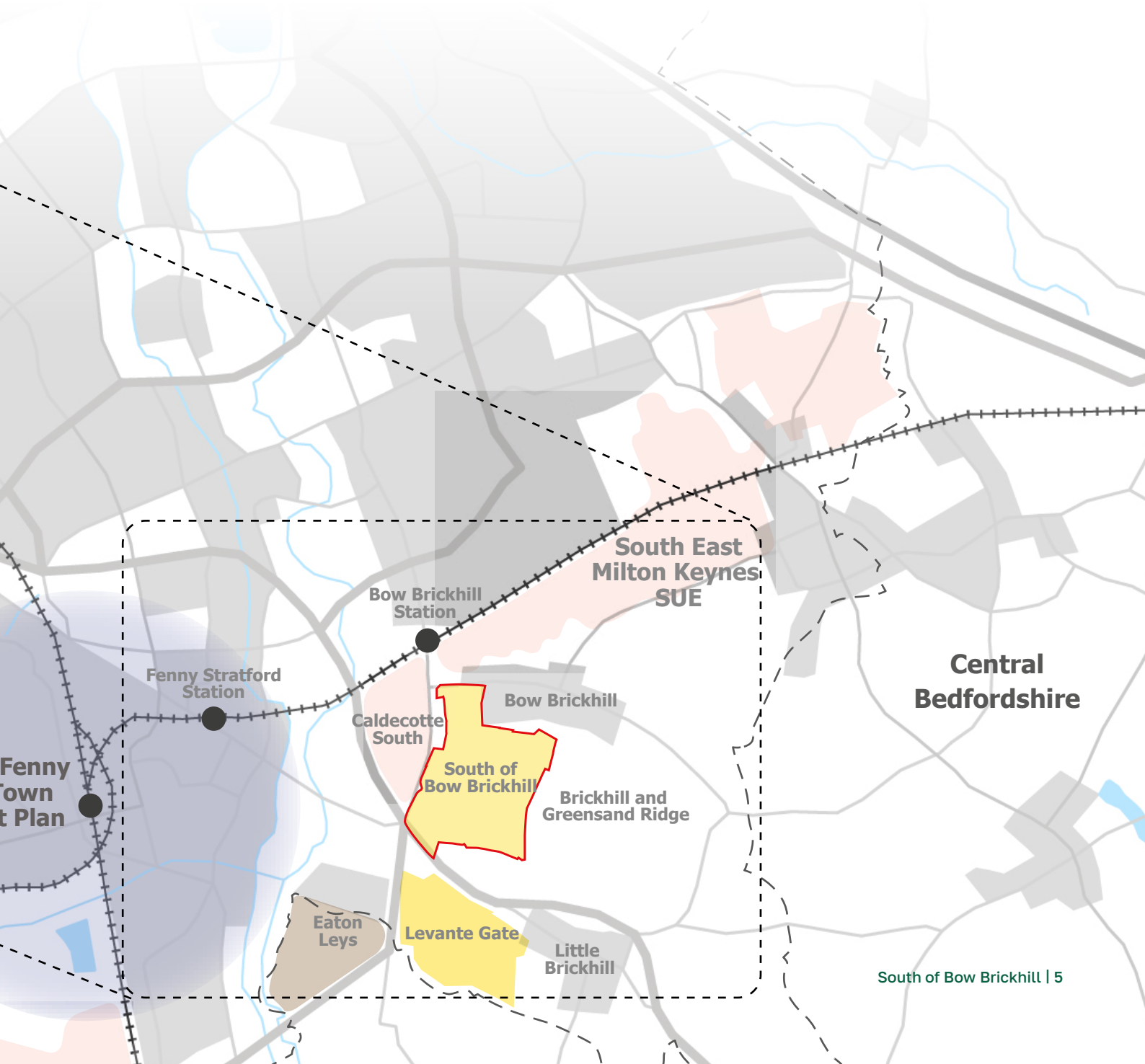
An integrated network of cycle and pedestrian routes provide safe, efficient and green links throughout the Site and to key nearby assets or redway routes. This also includes streets that prioritise walking, cycling and wheeling.

Sustainable urban drainage proposals will seek to manage flood risk and create multifunctional semi-natural spaces with amenity value for the new community.

Two vehicular access points, one in the north and one to the south are designed to facilitate the rerouting of a bus service through the Site, contributing to enhanced accessibility via sustainable modes.

The comprehensive approach taken at **Land South of Bow Brickhill** enables ambitious proposals for a strategic, sustainable extension to the City to come forward and meet MKCC's housing needs without detracting from the surrounding landscape character.

The proposals will also aim to support the once-in-a-generation opportunity to regenerate and reinvigorate nearby Bletchley and Fenny Stratford.

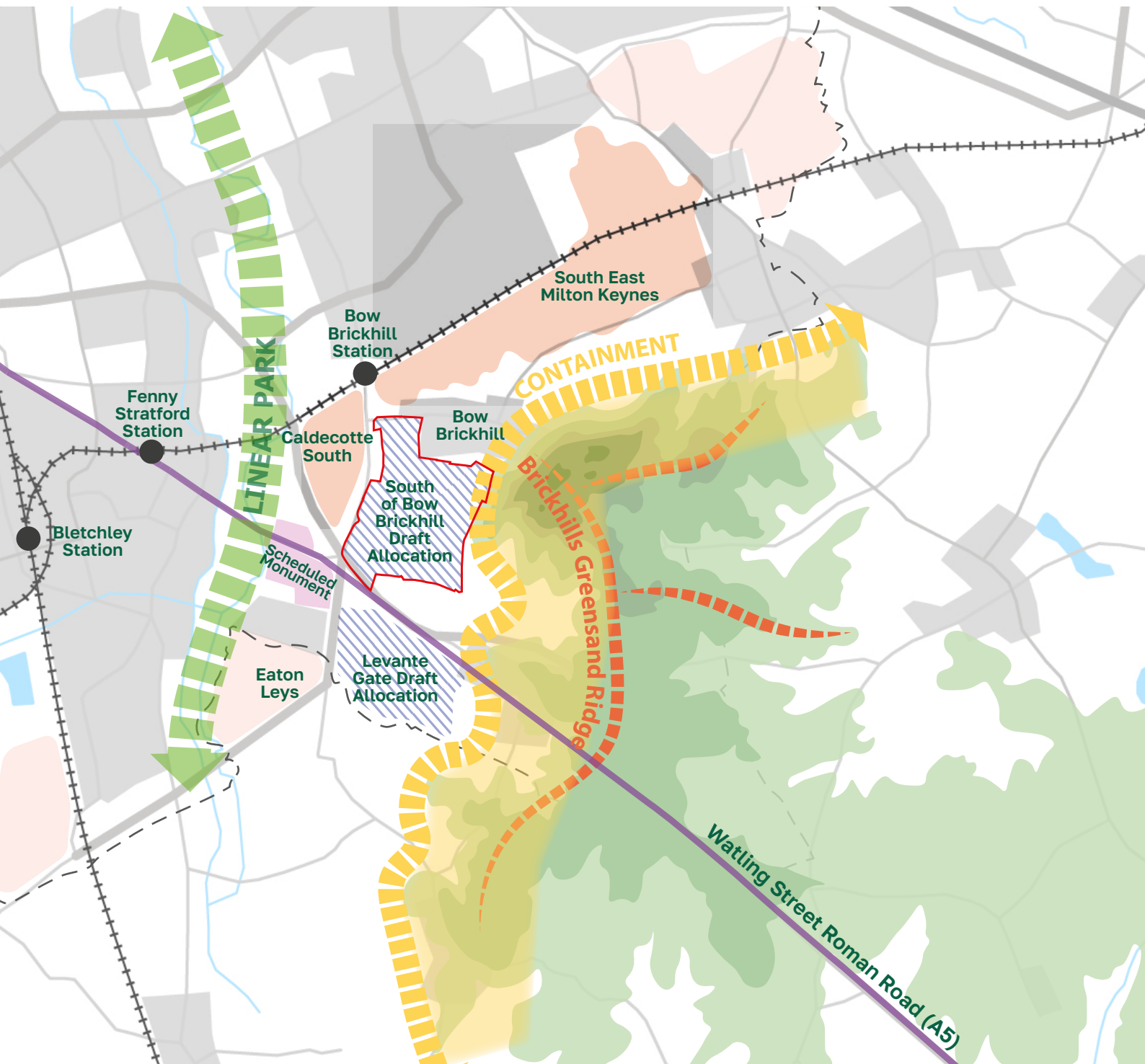


A natural location for growth

The Site is contained by the Brickhills Greensand Ridge, which forms a robust and distinctive natural containment of the wider urban area of Milton Keynes. The alignment of the city's loose grid pattern is partly based on the Roman road Watling Street, which follows the A5 alignment in proximity to the site and extends south-east from the city, ascending the Greensand Ridge, adjacent to the Site. The Site, therefore, forms a logical extension to the city along this primary axis, contained to the east by the Greensand Ridge landscape setting.

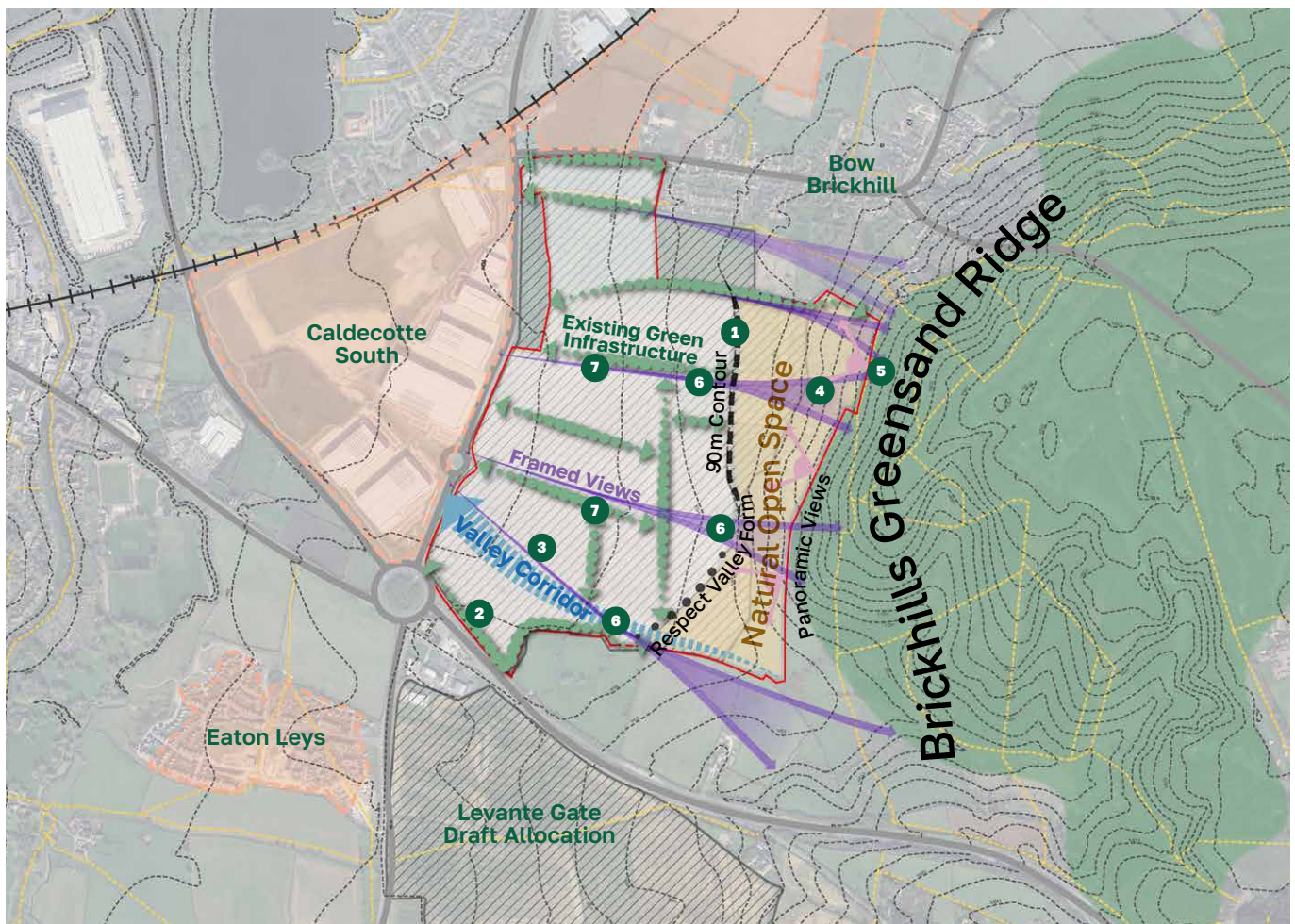
The Site represents the remaining potential area able to accommodate growth before the higher ground is reached.

A sensitive approach to conserving landscape character has guided the proposals. The proposals would retain the open upper slopes of the Greensand Ridge and maintain view corridors to and from the ridgeline. A variety of public green amenity spaces are integrated into the masterplan design, reflecting the influential role of green space throughout Milton Keynes.



Protecting the landscape character

- 1** To protect the distinct character of the Brickhills Greensand Ridge, the 90m contour delineates the eastern development extent. This:
 - Maintains built form height below the legible break in slope up to the ridgeline;
 - Coincides with the extent of the block of mid-20th century extension of the otherwise linear settlement of Bow Brickhill; and
 - Avoids built form protruding into panoramic views out from the ridge.
- 2** Built development is drawn back from the valley landform to the south-east, which is a clear link into the wider landscape.
- 3** The valley form is used as a key corridor for sustainable water management based on a strong legible existing landscape structure, including a watercourse and existing vegetation.
- 4** A natural open space of heathland scrub, grassland and canopy trees on the elevated eastern edge of the Site would provide a notable benefit to residents and could include a range of leisure activities, as well as areas focused on biodiversity benefit.
- 5** The open space would offer panoramic views out over the city, not currently obtained from the wooded ridgeline.
- 6** View corridors from the valley floor and lower slopes up to the wooded ridgeline would preserve the perceptual connection with the Greensand Ridge as a key part of Milton Keynes' setting, which is an important consideration in the published landscape character assessment.
- 7** These view corridors would be provided along the existing field boundary pattern, retaining existing hedgerows and trees.



Understanding the site features

Various technical studies of the existing site features have been undertaken to inform the design concepts presented within this document. These studies cover environmental, planning and engineering matters. The following summary demonstrates that the proposed development is not technically constrained and that no statutory land-based designations (e.g. SSSI's) are present.

Landscape & Vegetation



A number of existing hedgerow and trees run predominantly east/west with one central north/south aligned hedgerow. These features will provide a framework for green links and long views within the proposals.

Topography



Ground levels within the development site range between 73 m AOD and 123 m AOD, generally falling in an east to west direction towards Brickhill Road.

Flooding



The Site is not affected by either tidal or fluvial flooding. There is a very low risk of surface water flooding. The overland flow path associated with the tributary of the River Ouzel, which crosses the southern part of the site, can be accommodated within a blue corridor within the proposals. This watercourse, flows in an east to west direction towards Brickhill Road.

Transport & Movement



The site is very accessible by all modes of transport. Bow Brickhill Railway Station is located on Brickhill Road approximately 100m northwest of the site. Major highways are located adjacent to the site such as the A5 to the south, the future Bow Brickhill Relief Road to the north and Brickhill Road to the west. Existing cycle routes known as redways run to the north and south and existing bus routes pass the Site.

Heritage

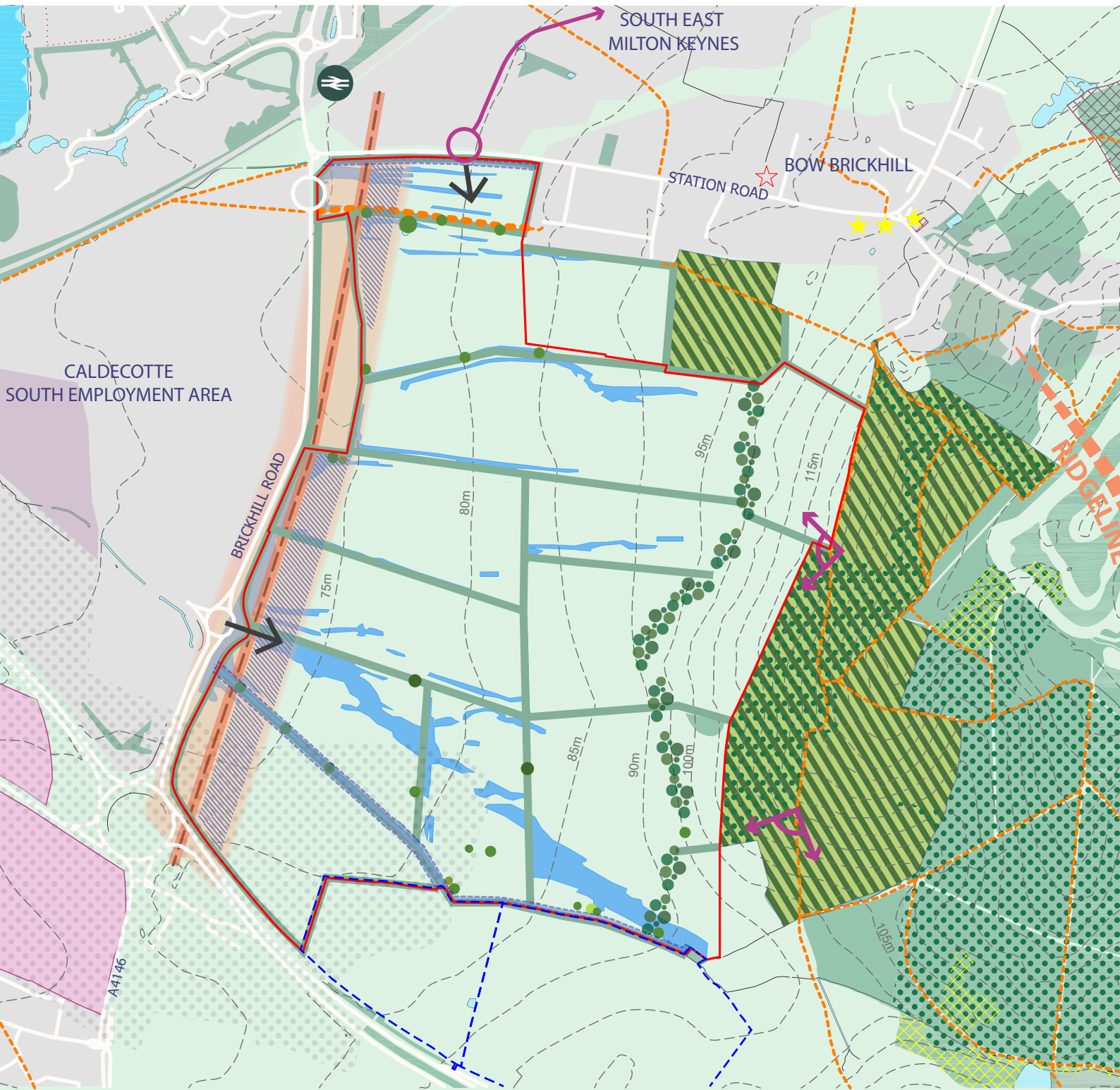


A Roman Scheduled Monument is located within proximity to the south-western boundary of the Site. There is potential for archaeological interest within the south western corner of the site.

Utilities

A high pressure gas main runs along the western boundary. This has an inner and outer consultation zone which can be accommodated within the masterplan proposals. A 33kV cable runs in a similar alignment.





- | | | | | | | | |
|--|---------------------------|--|--|--|---|--|---------------------------|
| | Site Boundary | | Existing Trees | | Viewing Point | | Potential Site Access |
| | Potential Additional Land | | Existing Hedgerows | | Scheduled Monument | | Bow Brickhill Relief Road |
| | Existing Urban Area | | Grade II Listed Building | | Area of Archaeological Potential | | |
| | Bow Brickhill Woodland | | Gas Main with Inner and Outer Consultation Zones | | Lowest part of the Site - potential Zone for attenuation Basins | | |
| | Local Wildlife Sites | | Surface Water Flooding | | 10m Buffer Zone Either Side of Existing Watercourse | | |
| | Ancient Woodland | | Public Rights of Way | | | | |

Objectives for the proposals align with the MK City Plan

To deliver a new Primary School within close proximity to all residents.



Potential delivery of a range of amenities within a local centre to provide for daily needs of residents without the need to travel.



ECONOMIC AND CULTURAL PROSPERITY



To design high quality public spaces and streets which encourage participation from local groups and develop a sense of ownership and pride.



HIGH QUALITY HOMES



To deliver around 1,500 new high quality homes including affordable housing to meet the wider market demand for housing.





To limit development on higher ground by creating a large parkland along the eastern edge. This protects and enhances existing landscape assets and provides a rich landscape setting to the dwellings.



Energy-efficient homes reducing carbon emissions and prioritising low-carbon heating.



To deliver approximately 54 ha of accessible parkland area surrounding the development and a network of green corridors through the urban area which will both create an attractive living environment and enhance existing biodiversity.

CLIMATE & ENVIRONMENTAL ACTION



PEOPLE FRIENDLY & HEALTHY PLACES



To create a walkable neighbourhood achieved through prioritising sustainable modes of movement, the provision of a network of direct footpaths and cycle routes and the close proximity of a rail station.



To create a healthy community with a range of land uses including a local centre, a primary school and a wide range of open spaces supporting food growth & leisure activities.

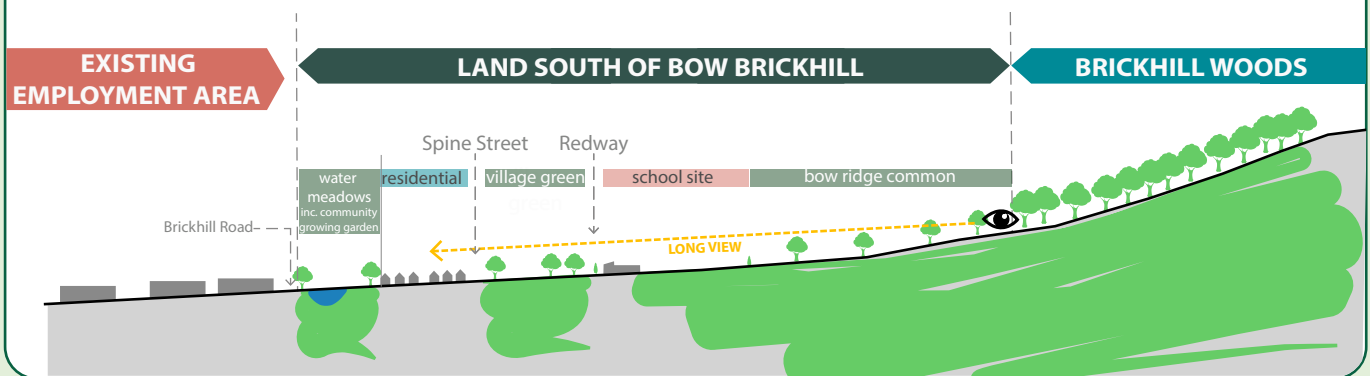
THE PROPOSALS

Developing a concept

Enabling attractive long views to the north/west and south

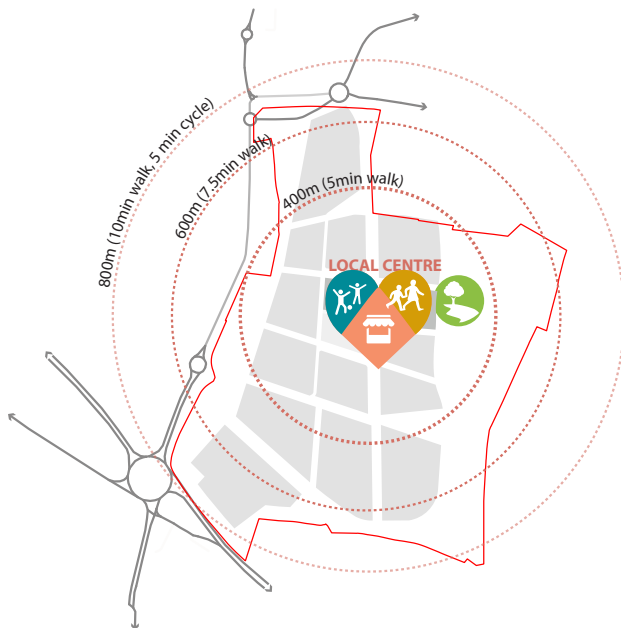
- Built form is limited from above the 90mAOD contour.

- Views from the eastern boundary afford views across Milton Keynes to the west, whilst the wooded hills remain the landscape setting to existing settlement.



Co-location of land uses

- The cluster of facilities, primary school and park are located at the heart of the scheme therefore maximising accessibility for all residents.



Land uses connected by landscape

- The landscape structure creates routes green routes leading toward the community heart from throughout the development.



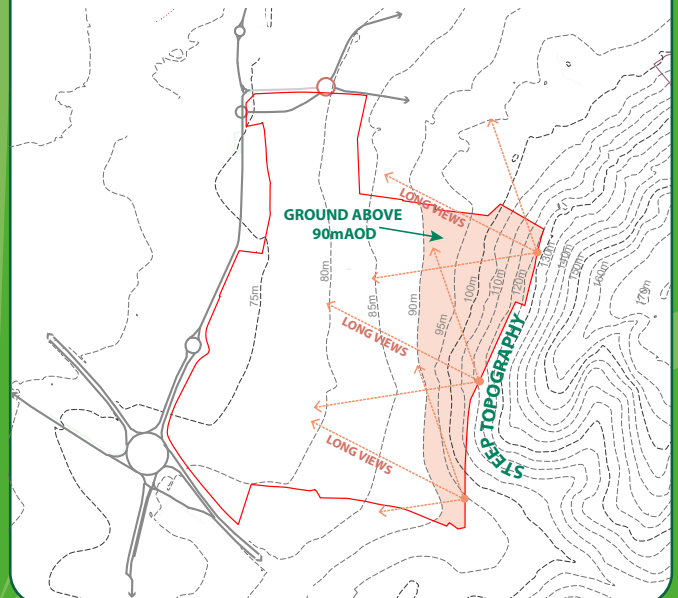
Inherited Landscape

- The grid of hedgerow and associated trees are to be retained and used as a structuring feature for the masterplan block structure.
- The principal north/south and east/west hedgerow retained within attractive green pedestrian/cycle routes.



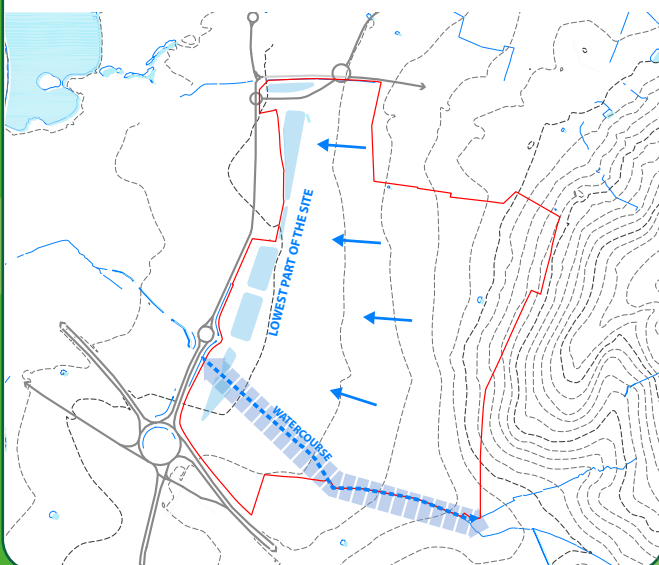
Responding to topography

- Development is contained below the 90m AOD contour.
- High ground maintained as publicly accessible amenity open space with opportunities for long distance views to the west.



Integrating blue infrastructure

- Multifunctional SuDs features in the form of attenuation basins to be incorporated within open space at the lowest part of the site to the west.
- The watercourse maintained within an attractive area of publicly accessible amenity open space which also manages flood risk.



























Prioritising sustainable modes

- Movement between the northern and southern access junctions is achieved most directly via the bus service route and active travel corridors.
- Private vehicles are restricted from following this route by bus gates.



Concept masterplan

-  Site Boundary
-  Vehicular access
-  Existing woodland
-  Bow Brickhill Station
-  Railway
-  Redways
-  Proposed main route
-  Bus only route
-  PRow
-  Pedestrian routes
-  Potential location for food retail/cafe
-  Sustainable transport hub/Local Centre
-  Indicative extent of residential development
-  Drainage attenuation basins
-  Potential area for natural green space (human activity discouraged)
-  Central Park
-  Proposed School
-  Proposed play area/fields
-  Children's play
-  Parkland
-  Key green corridors /active travel links
-  Key panoramic views / views through green corridors
-  Draft Allocation
-  Ordinary Watercourse





South East
Milton Keynes

Bow Brickhill
Relief Road

Bow Brickhill

Draft
Allocation

Potential Future
Expansion

Landscape character areas

The Strategic City Extension at Bow Brickhill will provide a wide variety of spaces across different scales, each fulfilling distinct functions to meet the diverse needs of residents. The collection of spaces will create environments that promote social interaction while supporting a connection to nature.

Bow Ridge Common

Bow Ridge Common is the largest space in the new neighbourhood, with a focus on nature and biodiversity, reflecting its close connection to the neighbouring woodland.

Amidst the natural, wider landscape this area can include amenities such as sports pitches, a NEAP (neighbourhood equipped area for play) and a skate park.

Bow Ridge Common also contains viewpoints, giving residents sweeping views over the new neighbourhood and long vistas across Milton Keynes.

The Water Meadows

The Water Meadows provides a large, continuous green space that links the development's blue infrastructure and plays a key role in connecting the community to Watling Street and Bow Brickhill station. A dedicated active travel route runs along the neighbourhoods edge, promoting active travel.

Additionally, the meadows act as a substantial buffer from nearby roads and commercial areas, enhancing the area's tranquillity.

Community Growing Garden.

Within the Water Meadows lies the Community Growing Garden. The garden offers residents access to allotments and a community orchard supporting local food production.

Village Green

At the village's core is the Village Green, co-located next to the local centre and school.

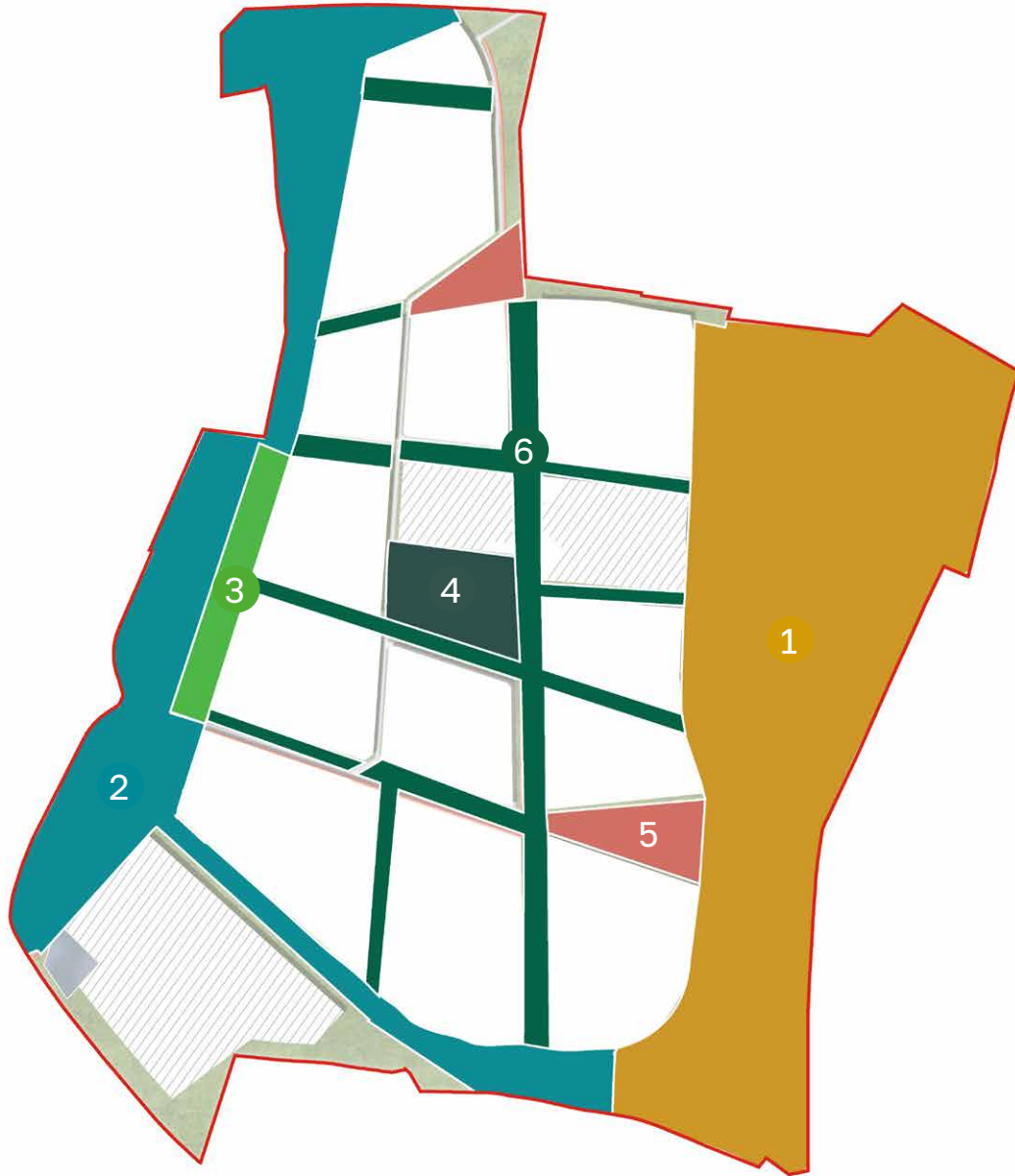
Designed as a lively hub, this space allows for local retail and leisure activities to spill out into the area, creating a vibrant and active focal point for community life. It serves as the heart of the development, offering space for gatherings, relaxation, and social interaction.

Community Greens

The Community Greens consist of two pocket parks nestled within the residential areas, providing more intimate, localised spaces for residents and local play facilities.

Green Stitches

The Green Stitches are green corridors that weave through the development, often incorporating existing vegetation. These stitches provide visual greenery close to homes and help form a green grid that breaks up the built environment, ensuring that nature remains a constant presence throughout the settlement.



- 1** Bow Ridge Common
- 2** The Water Meadows
- 3** Community Growing Gardens
- 4** Village Green
- 5** Community Greens
- 6** Green Stitches

Illustrative landscape masterplan

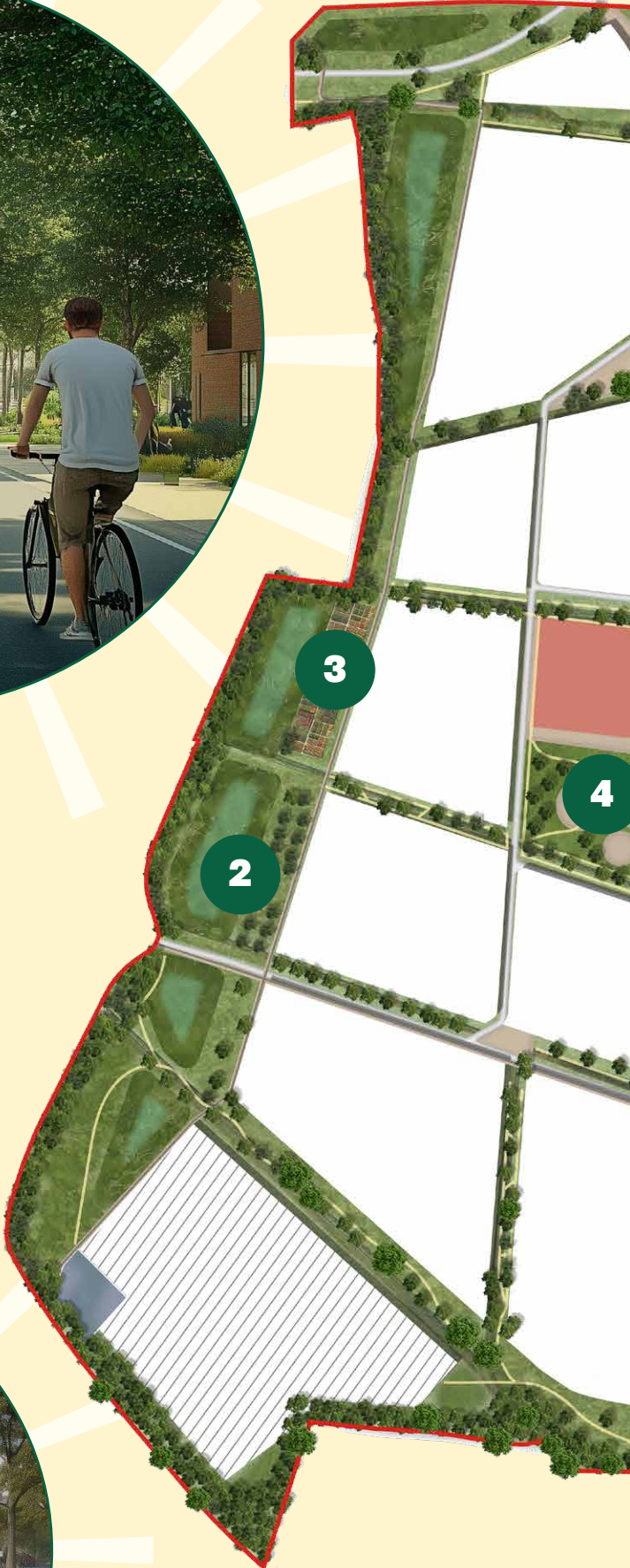
6. Cycle and pedestrian friendly green connections



5. Pocket parks with Local play facilities amongst homes



4. A local centre and park at the heart of the community





1. A new common with sports and play facilities amongst wildflower meadows



2. Linear wetland park

3. Food Growing and Community Orchards



5

1

6

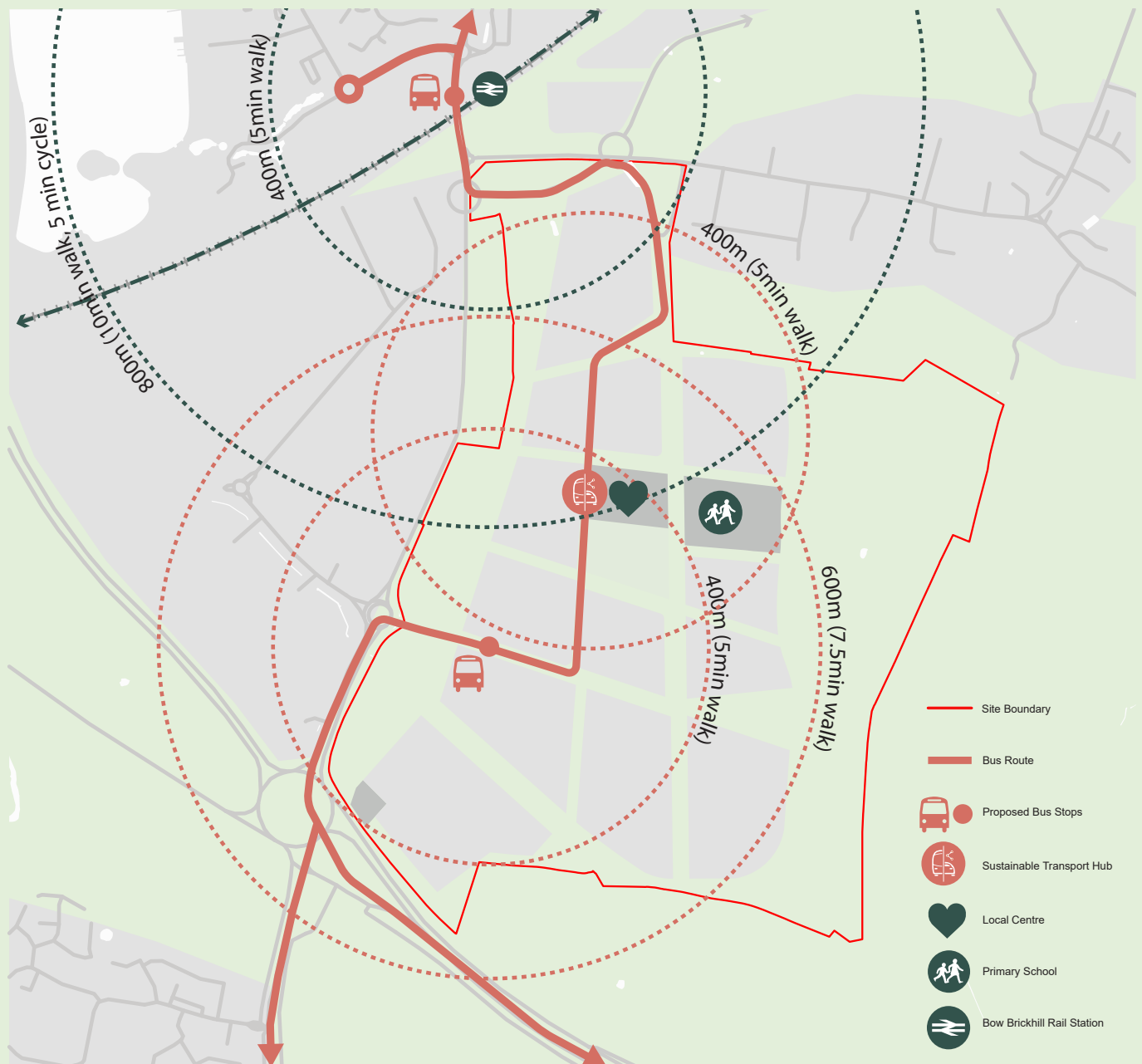
Creating healthy communities with a range of land uses

Our vision is to encourage people to choose more active, healthier and environmentally friendly ways of travel.

The movement strategy seeks to create a well-connected development that fosters wellbeing by prioritising active modes of travel such as walking and cycling. The development will be easy to navigate and will help to support a shift to more sustainable travel behaviours.

The development presents the opportunity to deliver a 'Walkable Neighbourhood' and contribute

to Milton Keynes' strategic movement network. The scheme will be a people-friendly, healthy and inclusive place to support social interaction and healthier lifestyles. A range of convenient and accessible uses will help to support everyday life and encourages sustainable lifestyles to create a successful community.



A well-connected place that prioritises active modes of travel

Walking



Pedestrian routes provide strong connectivity to community facilities within the site and the adjacent area including those provided within the SEMK SUE to the north, making it an attractive choice. A number of circular leisure routes away from the road network through landscaped areas will be provided.

Cycling



Cycling is at the forefront of design with a network of redways to be provided within the site connecting to the existing and proposed wider MK network.

Public Transport



The potential diversion of existing bus services along Brickhill Road, or the introduction of a new service, will allow a provision to run through the Site. A sustainable transport hub will be located adjacent to the local centre. Bow Brickhill rail station is a 5 minute walk from the north of the Site.

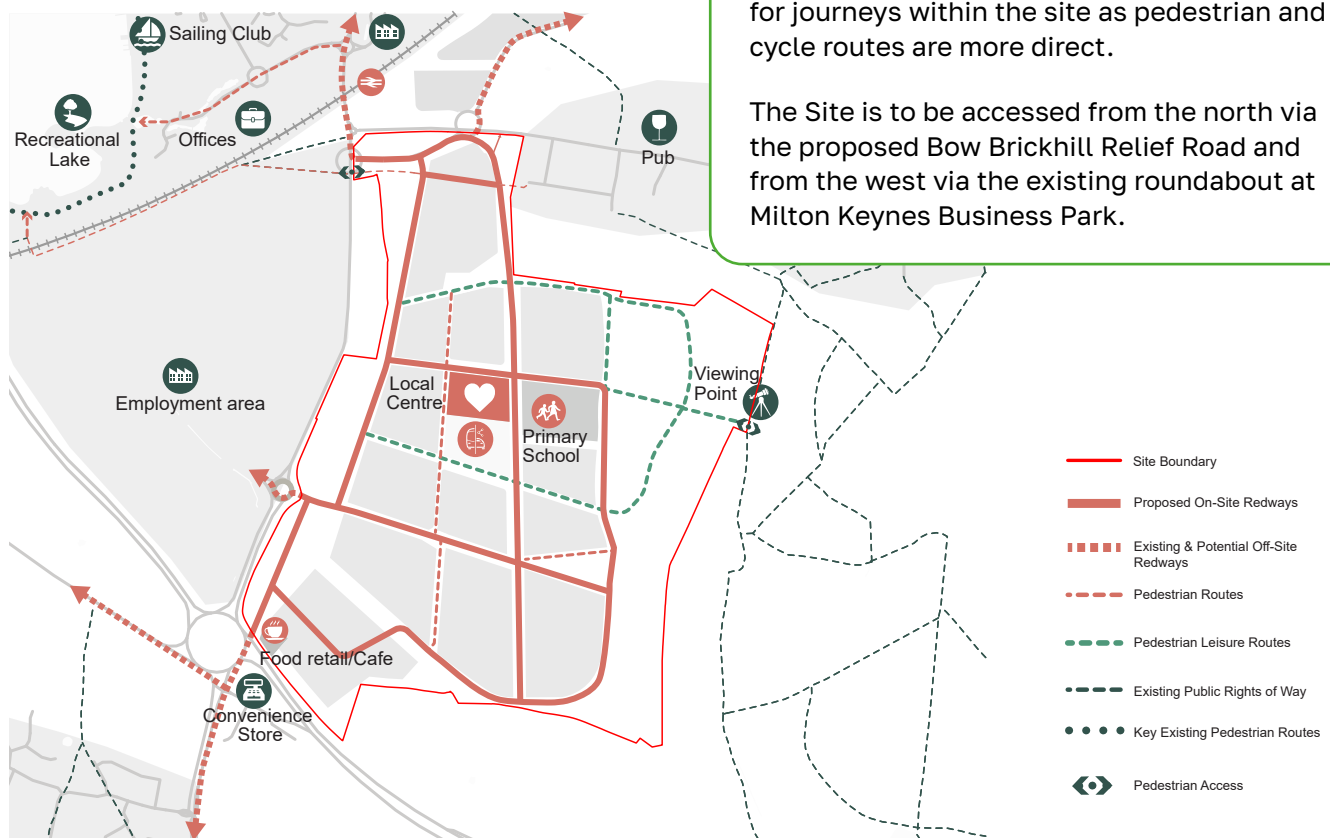
MK Connect, a Demand Responsive Transport service currently in operation in the city, will also serve the Site providing an enhanced public transport offer.

Driving



Driving should be the least attractive choice for journeys within the site as pedestrian and cycle routes are more direct.

The Site is to be accessed from the north via the proposed Bow Brickhill Relief Road and from the west via the existing roundabout at Milton Keynes Business Park.



Pedestrian and Cycle Concept

Provide high quality homes and spaces

Introducing Urban&Civic and The Bedford Estate

Urban&Civic

We are the UK's leading Master Developer having been specifically created 13 years ago to disrupt the established approach to the promotion and delivery of large scale residential led Strategic Sites. Now owned by the Wellcome Trust we are committed to delivering on our purpose, vision and values and achieving our strategic objectives. At the core of our business are the 14 Strategic Sites where we are currently bringing forward, either directly or in partnership, over 16,000 acres of land predominantly within 100 miles of London. As Master Developer, we take responsibility for obtaining planning and delivering the sustainable green, grey and community infrastructure to establish high quality places within which we market fully serviced land parcels to house-builders. The recent acquisition of L&Q Estates will increase our market share and allow us to operate in new areas of operation to deliver much needed sustainable growth.



Houlton, Rugby

A brownfield former telecommunications site extending to 1,170 acres that will deliver 6,200 new homes, 3 primary schools, 1 secondary school, over 1 million square feet of employment floor space, a range of community facilities and over 500 acres of informal green space.



The Bedford Estate

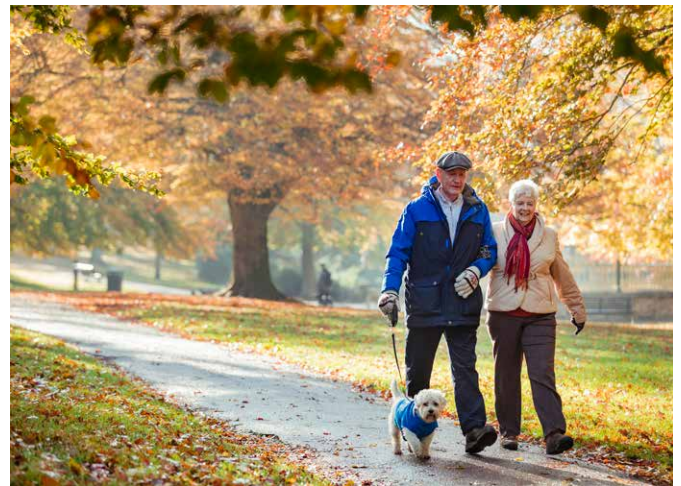
The Bedford Estates owns land in Milton Keynes and neighbouring authorities. The Estate includes residential and commercial properties, managed directly from the property team based in Woburn.

The Estate is experienced in bringing land through the planning system for new development. Examples include commercial, residential and leisure uses.

The Estate believes in excellence in place-making, underpinned by the three pillars of sustainable development. Collaborative working is key to planning for new sustainable places where future generations will be proud to live, work and play.



THE BEDFORD ESTATES



BENEFITS FOR ALL

Delivering a high quality development that provides...



Dedicated formal and informal pedestrian/ cycle links that connect with off-site cycle redways, public rights of way, and public transport stops

Two access points from the north and west of the Site connected via bus, cycle, pedestrian and vehicular routes



Land for a new on-site primary school



Substantial areas of natural greenspace, including strategic green and blue infrastructure and retained view corridors and buffering to the existing Bow Brickhill village



A natural extension to the City of Milton Keynes, around 1,500 new houses across a mix housing types, sizes, and tenures, contributing to addressing MKCC's affordable housing needs

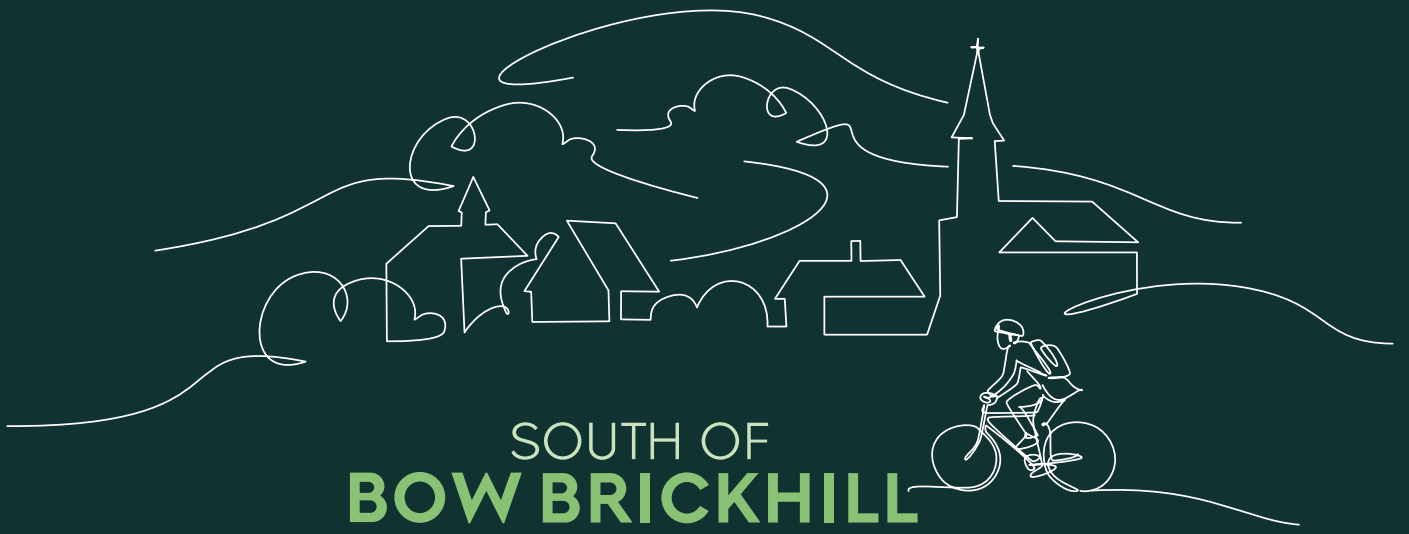


A new local centre incorporating on-site community amenities and facilities



A roadside Food retail / Cafe adjacent to the A5





SOUTH OF
BOW BRICKHILL

Urban & Civic



THE BEDFORD ESTATES

Document Status:	FINAL
Job number / Revision:	333101362 / A08
Author:	MA/RB
Checked by:	MA
Authorised by:	MK
Issue Date:	OCT 2024

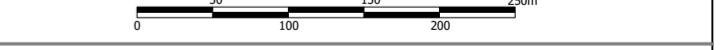


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- | Revision | Date | Drn | Ckd |
|----------|----------|------|------|
| F | 08.10.24 | J.W. | M.A. |
- Site Boundary
 - Vehicular access
 - Existing woodland
 - Bow Brickhill Station
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 - Key green corridors /active travel links
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 - Draft Allocation
 - Ordinary Watercourse

Project
LAND SOUTH OF BOW BRICKHILL

Drawing Title
CONCEPT MASTERPLAN

Date 04.09.24	Scale 1:5,000@A2	Drawn by J.W.	Check by M.A.
Project No 333101362	Drawing No RG-M-Ai01	Revision E	



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TECHNICAL NOTE

Job Name: Land South of Bow Brickhill, Milton Keynes
Job No: 333101362
Note No: 333101362-1001-TN001-Rev B
Date: 12th September 2024
Prepared By: Jemima Odom
Subject: Transport Vision

1 Introduction

- 1.1 Stantec UK Limited (Stantec) have been instructed by Urban&Civic and The Bedford Estates to provide a 'high-level' Technical Note to support the promotion of development at Land South of Bow Brickhill.
- 1.2 The site is identified as a draft strategic extension in the emerging Milton Keynes City Plan 2050. It is split between two parties with Urban&Civic controlling the northern area of the site, and The Bedford Estates controlling the land immediately south. There are around 1,500 dwellings and two vehicular accesses proposed at the site. One access will be on Station Road and a further will be on Brickhill Road. The site location is shown in **Figure 1.1**. A detailed Land Holdings Plan is shown in **Appendix A**.

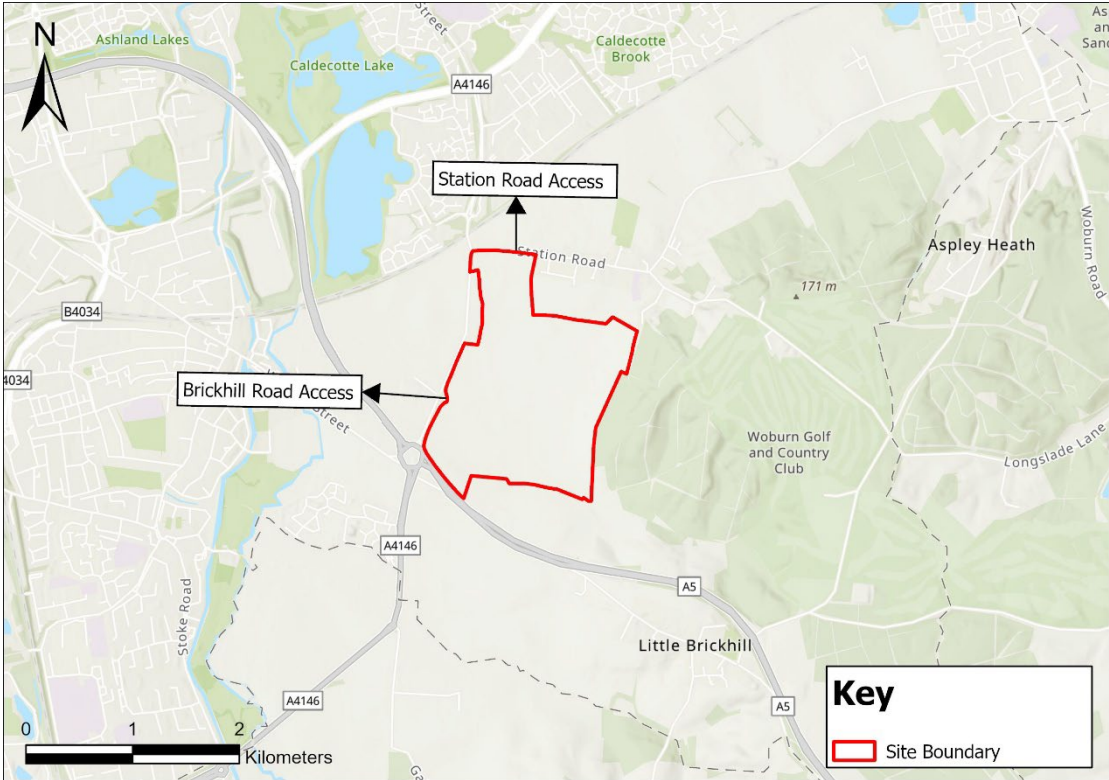


Figure 1.1 Site Location

- 1.3 This Technical Note sets out the access strategy for all modes of transport, accessibility and sustainable travel options, transport principles, planning context and trip generation, distribution and constraints.

DOCUMENT ISSUE RECORD

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This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should

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2 Planning Context

National Planning Policy Framework (December 2023)

- 2.1 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. The presumption in favour of sustainable development is the core objective of the NPPF (paragraph 10 states that “So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”).
- 2.2 In Section 9 ‘Promoting sustainable transport’, paragraph 108 states that “*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
- *the potential impacts of development on transport networks can be addressed;*
 - *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
 - *opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
 - *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.”*
- 2.3 To promote sustainable transport, paragraph 114 states that “*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
- *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - *safe and suitable access to the site can be achieved for all users; and*
 - *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code, and*
 - *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*
- 2.4 Paragraph 115 of the NPPF states “*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*
- 2.5 Additionally, paragraph 117 of the NPPF states “*All developments that generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”*
- 2.6 In accordance with the NPPF, and due to its proximity to existing public transport services and the redways network, this development provides opportunities for travel by sustainable modes

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by providing proportionate and relevant means to promote and accommodate travel by walking, cycling and public transport.

2.7 Proposed reforms to the National Planning Policy Framework (2024)

- 2.8 The proposed changes to the NPPF were introduced in July 2024 and aim to achieve sustainable growth by revising planning policies. Key reforms include increasing planning fees, updating local plan intervention criteria, and setting new thresholds for Nationally Significant Infrastructure Projects (NSIPs). The changes also focus on housing delivery, with adjustments to housing need calculations, protection from “out of character” developments, and Green Belt alterations. These reforms are intended to streamline the planning process and meet development needs across England.
- 2.9 The proposed changes in transport policies emphasise sustainable and integrated transport solutions. Key proposals include prioritising the development of infrastructure for electric vehicles (EVs) and enhancing public transportation networks to reduce reliance on private cars. The framework also encourages the creation of pedestrian-friendly and cycling-friendly environments to promote active travel. Additionally, there is a focus on improving connectivity between different modes of transport to facilitate seamless travel experiences.
- 2.10 A specific change is to paragraph 112 which now incorporates a “vision-led” approach for assessing sites that may be allocated for development. This aims to promote sustainable transport modes. Paragraph 113 is also proposed to be updated so that development should only be refused if impacts are severe in all tested scenarios. These changes aim to support a greener, more efficient, and inclusive transport system.
- 2.11 The proposals for the site will uphold the sustainable and integrated transport principles embedded in the proposed NPPF reforms.

Planning Practice Guidance

- 2.12 Planning Practice Guidance (PPG) ‘*Transport evidence bases in plan making and decision taking*’ discusses how the impact of land allocations should be considered in assessing the transport implications of Local Plans.
- 2.13 This involves providing estimates of the person trips (for all types of transport) that are likely to be generated by a potential development, a description of the type of development / land uses proposed and, typically:
- A location plan
 - The likely scale of development – such as the number of residential units
 - The likely proposed access to existing transport infrastructure for all types of travel, and
 - The potential for securing travel planning benefits and enhanced sustainable transport provision
- 2.14 This guidance has been used as a basis upon for the preparation of this Technical Note and will need to be applied to further progression of the site.

Decarbonising Transport: A Better, Greener, Britain

- 2.15 The Department for Transport (DfT) published this Plan in 2021 that sets out a post-pandemic programme that will reduce carbon consumption and promote sustainable transport use. DfT aim to fulfil this vision through two key actions: ‘Decarbonising all forms of transport’ and ‘Multi-modal decarbonisation and key enablers’.

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- 2.16 The DfT want to achieve the 'Decarbonisation of all forms of transport' by:
- Increasing walking and cycling
 - Zero emission buses and coaches
 - Decarbonising our railways
 - A zero-emission fleet of cars, vans, motorcycles and scooter
 - Accelerating maritime decarbonisation, and
 - Accelerating aviation decarbonisation.
- 2.17 'Delivering decarbonisation through places' is an element of this guidance that can be accomplished through sustainable development. The Plan places emphasis on "*embedding transport decarbonisation principals in spatial planning and transport policy*" by "*ensuring that new developments are designed in a way that promotes sustainable choice*".
- 2.18 This Technical Note has been prepared to support the principles outlined in this DfT Plan by outlining opportunities for the development to support the aims of the plan.

Plan: MK 2016-2031 (Adopted March 2019)

- 2.19 Plan: MK was adopted by Milton Keynes City Council in March 2019 and outlines the borough's growth strategy until 2031. It addresses housing, the economy, infrastructure, and the environment.
- 2.20 A key aim of the plan is to provide sufficient housing for the growing population and identifies areas for new housing developments, including affordable housing. The plan emphasises sustainable design, green spaces, and community infrastructure in new housing developments. The SEMK SUE is an allocated site in this plan for 3,000 dwellings.
- 2.21 Policies of relevance to the Land South of Bow Brickhill site include:
- **Policy CT1: Sustainable Transport Network** – The City Council will promote a sustainable pattern of development in Milton Keynes, minimising the need to travel and reducing dependence on the private car.
 - **Policy CT2: Movement and Access** – Development proposals will be required to minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future.
 - **Policy CT3: Walking and Cycling** – The City Council will support developments which enable people to access employment, essential services and community facilities by walking and cycling.
 - **Policy CT4: Crossover on Redways** – New development proposals should aim to protect and enhance the existing Redways in the Borough. Where development proposes to crossover or remove an existing section of a Redway, a safe crossover or convenient alternative route should be provided, which safeguards the existing network and does not impede or comprise the safety of highway users.
 - **Policy CT5: Public Transport** - Development proposals must be designed to meet the needs of public transport operators and users.
 - **Policy SD11: Southeast Milton Keynes Strategic Urban Extension** – Development to the site is required to Ensure development is well connected and integrated with adjacent

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grid squares, public transport services and the strategic and local highway grid network in line with the City Council's Mobility Strategy. Provision of grade separated crossings of the railway should be provided or retained as appropriate to ensure connectivity of the southern areas of the site with the remainder of the site and the city to the north.

- 2.22 Connectivity through a variety of sustainable transport choices will need to be insured through the development to adhere to the policies outlined in the Plan: MK 2016-2031.

Milton Keynes City Council's Strategy 2050

- 2.23 The Milton Keynes Strategy for 2050 was adopted in January 2021 and outlines the vision for the city over the next 28 years. Key points include equal opportunities for all residents, the creation of lifelong homes suitable for people at all life stages, and the development of a pioneering mass rapid transit system. The strategy aims to shape a vibrant, sustainable, and inclusive future for Milton Keynes.
- 2.24 The mass rapid transit system is being pioneered so that residents and visitors can travel throughout Milton Keynes without needing to drive their own car. The City Council have commissioned a study to understand how it could be delivered, alongside supporting a greater focus on walking/cycling through their Local Cycling and Walking Infrastructure Plans. This system will enhance connectivity, reduce congestion, and promote sustainable travel options.
- 2.25 The Land South of Bow Brickhill site provides an opportunity to reflect the sustainable transport goals of Milton Keynes City Council's strategy.

Emerging MK City Plan 2050

- 2.26 The Emerging MK City Plan 2050 builds upon Milton Keynes City Council's Strategy for 2050, which outlines an ambitious vision for the next 28 years. The plan aims to deliver sustainable growth, genuinely affordable housing, new job opportunities, economic growth, employment land protection, and the development of an undergraduate university presence in Central Milton Keynes.
- 2.27 The Emerging MK City Plan 2050 aims to address transportation challenges outlined in the City Vision 2050. In addition to the Mass Rapid Transit system, the Emerging MK City Plan 2050 aims to address congestion, accessibility, and sustainability through identifying specific areas for transport initiatives.
- 2.28 The site is allocated as Policy GS17 South of Bow Brickhill Strategic City Extension. As part of the criteria, it is expected to incorporate MRT infrastructure, and active travel and public transport stops and hubs. Paragraph 3.J of Policy GS17 states:

"The phased introduction of a comprehensive network of transport infrastructure that follows the movement hierarchy set out in Policy GS4 to include:

- *Segregated routes for active travel that integrates well with Bow Brickhill village, the Greensand Ridge, Bow Brickhill Railway Station, the surrounding network of active travel routes, and networks or routes for public transport.*
- *Routes for movement of public transport and general traffic through the sites, with the primary access taken from either from Brickhill Road or new/enhanced junction improvements to the Brickhill Road/Station Road associated with South East Milton Keynes Strategic Urban Extension.*
- *Infrastructure and traffic management measures to mitigate impacts upon the wider highway network."*