

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.

3. To which part of the Local Plan does this representation relate?				
Paragraph	242, 243 and Table 10	Policy	New Design Codes	Policies Map X

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

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

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

Catesby welcomes the change in strategy regarding a new MK wide Design Code and supports the removal of this from the Regulation 18 consultation. We are concerned that a new MK Design Code could be an unnecessary additional layer of policy and guidance. Paragraph 002 (Ref ID: 26-002-20191001) of the PPG is clear stating:

“Planning policies can set out the design outcomes that development should pursue as well as the tools and processes that are expected to be used to embed good design. Appropriate policies can be included within:

- a plan’s vision, objectives, and overarching strategic policies*
- non-strategic policies in local or neighbourhood plans*
- **supplementary planning documents, such as local design guides, masterplans or design codes, which provide further detail on specific design matters**” (our emphasis)*

That being said, the justification in the supporting Consultation Statement refers to the December 2025 update to the NPPF which does not exist.

Paragraph 133 of the NPPF still sets out that *“To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Model Design Guide and National Model Design Code and which reflect local character and design preferences”*.

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.

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

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

Catesby is broadly supportive of 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 build 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 of the result 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 expects 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.

West of Fairfields will deliver c. 280 affordable homes across the development (40% of c. 700 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

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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.

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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' framework³. This approach identifies the key areas to have the most significant potential to make a positive difference.

In this context, the development of West of Fairfields 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)*".

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

³ [Catesby Estates Sustainability Framework 2023.pdf](#)

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

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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.

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N/A.

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

Paragraph Policy Policies Map

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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 whole plan viability report (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.

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Paragraph Policy Policies Map

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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.

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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

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In principle Catesby supports policy CEA8 subject to the below.

Regarding Part B, as commented upon in response to Policy PFHP4, any space standards should be robustly justified and evidenced.

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. Therefore, this requirement should be amended to reflect that such details may not be available until Reserved Matters or Conditions Discharge stage.

The proposals for West of Fairfields included in this representation demonstrate that the provision of accessible open space could meet the requirements of Policy CEA8.

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

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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.

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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;

- a. There is no suitable alternative site to accommodate the development'*
- b. The need and benefits of the development outweigh the adverse impacts on the site.*
- c. All reasonable possibilities for mitigation have been considered; and*
- d. 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 4), which has not been updated in light of no new evidence, providing an analysis of West of Fairfields and the proposal of Special Landscape Area allocation in this location.

In summary, it concluded 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.

- Both parcels of the Site lie in an area of gently sloping plateau to the north-east of Calverton Brook Valley and the string of small settlements collectively known as Calverton. The route of Calverton Road, south west of the parcels, broadly demarks the point at which the landscape character transitions from a plateau landscape with a strong association with Milton Keynes and the more rural Calverton Brook valley;
- The Site is influenced by the recent residential development of Fairfields and Whitehouse;
- In the event that the designation was necessary, consideration should be given to the extent of that designation. The emphasis of the SLA evaluation relates to features within the Calverton Brook valley and the upper valley slopes rather than the plateau, which conversely, its name highlights. Therefore, the inclusion within any SLA of Fields F2 and F3 of Parcel A; and Parcel B of the Site is not necessary as these areas have a limited association with the wider landscape of the Calverton Valley and greater association with the urban edge. This urban edge extends across the plateau to the north-east which forms a logical basis for expansion of the city, contained from the wider landscape by a point of transition at the plateau edge and reinforced by vegetation;
- Furthermore, in the event that an SLA were adopted by the Council, including land within the Site, it is noted that development can be accommodated within the Site without harming the character of the valley landform to the south-west which is the most important part of the SLA.

In addition to the above, this representation includes a separate Technical Note (**Appendix 5**) which compares the proposed allocation of Shenley Dens with West of Fairfields. This concludes that, from a landscape perspective, West of Fairfields would be a more logical extension to Milton Keynes, allowing the existing settlement pattern in this part of the City to be maintained and utilise the transition in landform as a naturally containing feature.

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. As per our representations in response to Policy GS1 and GS2, it is considered that Catesby site at West of Fairfields should have been incorporated into the Sequential Test.

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.

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.
- Include West of Fairfields within the Sequential Test at the plan-making stage.

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 CEA15 Policies Map

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

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

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

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

In addition to considering West of Fairfields within the Sustainability Appraisal as a Reasonable Alternative, and developable and deliverable site which should be allocated within the City Plan 2050, West of Fairfields should be subject to the Sequential Test.

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.

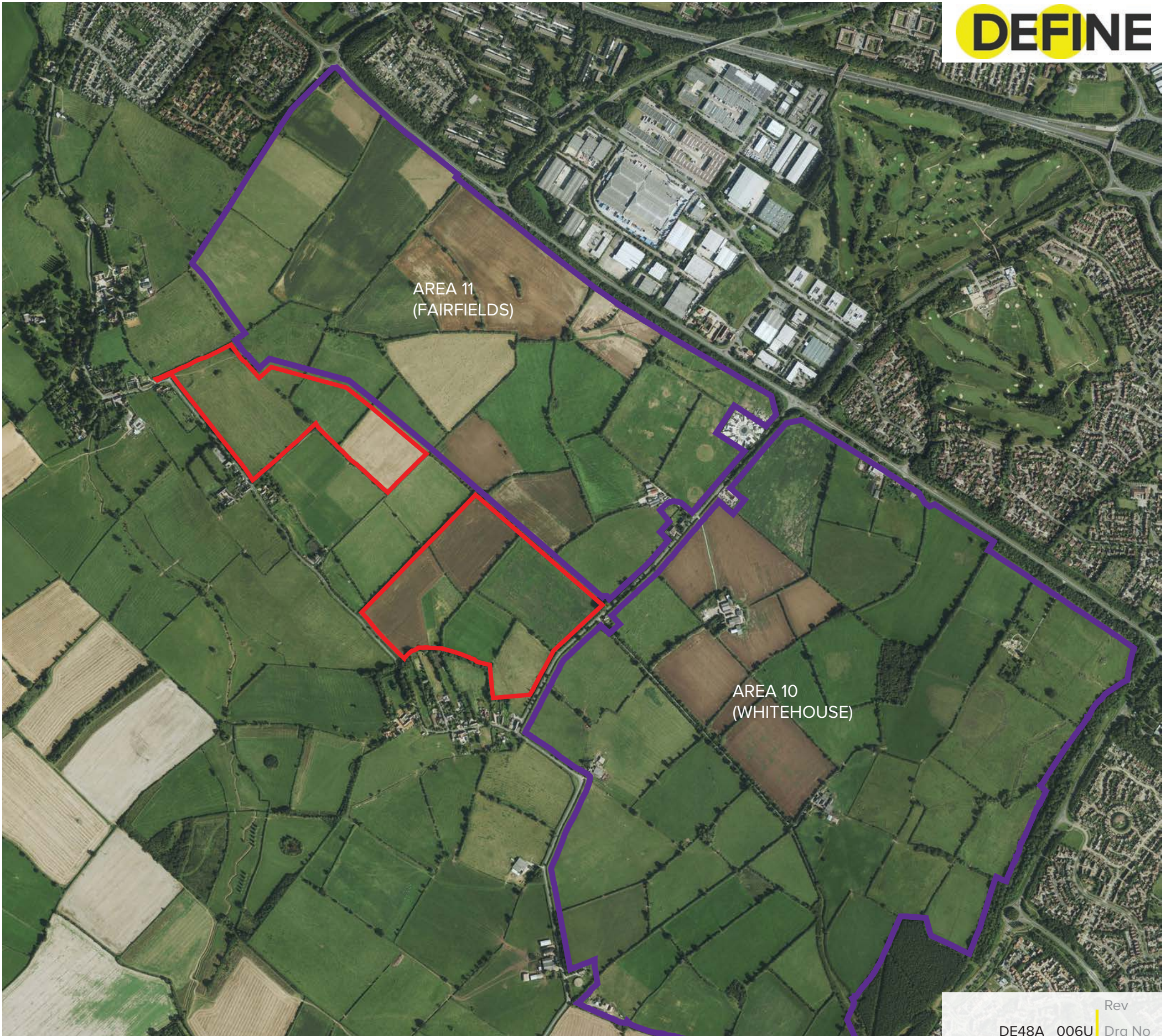
Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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.



AREA 11
(FAIRFIELDS)

AREA 10
(WHITEHOUSE)

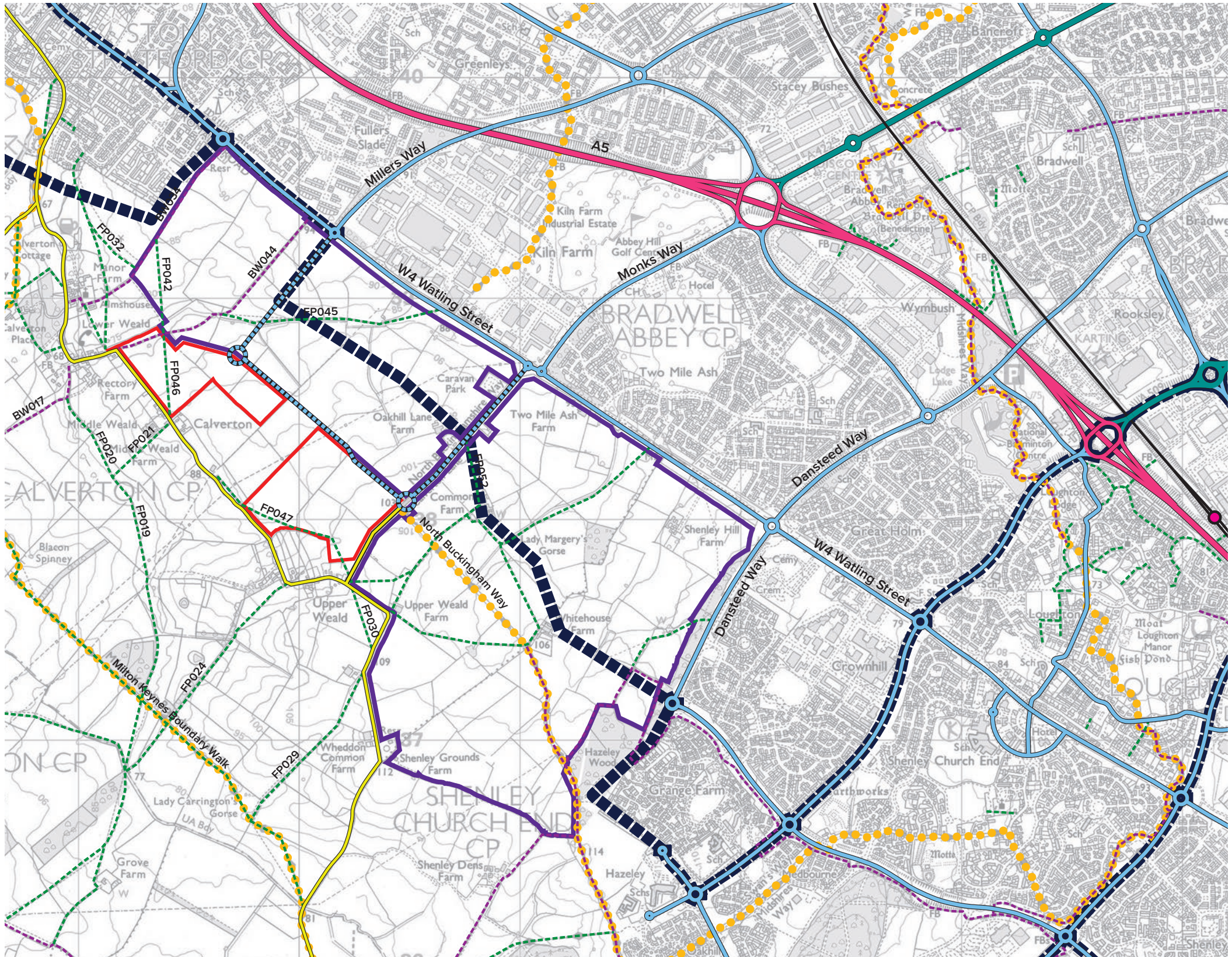
LEGEND

Land ownership

- West of Fairfields
- Milton Keynes Western Expansion Area

SCALE 1:12,500

Rev	
DE48A _006U	Drg No
Urban & Civic	Client
West of Fairfields	Project
Site Location Plan	Title
1:12,500 @ A3	Scale



LEGEND

Land ownership

Site boundary

Milton Keynes Western Expansion Area

Movement

A5

Existing major grid road

Existing minor grid road

Proposed minor grid road

Existing local road

Public footpath

Bridleway

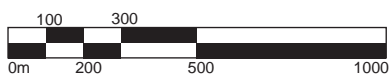
Long distance route

Railway line/station

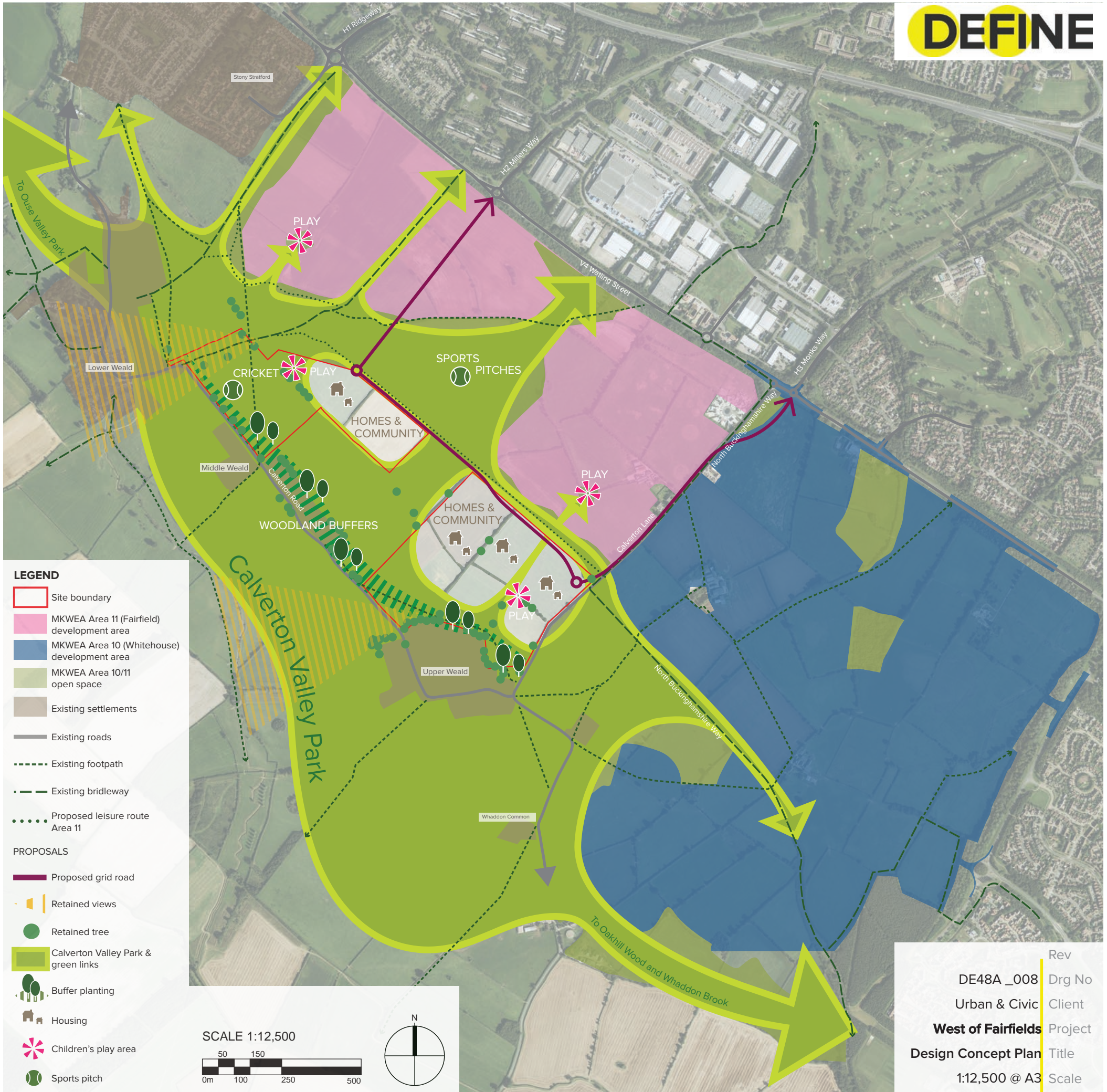
Potential Route for Mass Rapid Transit Network

NOTE:
See land ownership plan for more detailed information

SCALE 1:20,000



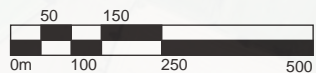
	Rev
DE48A_007	Drg No
Urban & Civic	Client
West of Fairfields	Project
Movement Plan	Title
1:20,000 @ A3	Scale



LEGEND

- Site boundary
- MKWEA Area 11 (Fairfield) development area
- MKWEA Area 10 (Whitehouse) development area
- MKWEA Area 10/11 open space
- Existing settlements
- Existing roads
- Existing footpath
- Existing bridleway
- Proposed leisure route Area 11
- PROPOSALS**
- Proposed grid road
- Retained views
- Retained tree
- Calverton Valley Park & green links
- Buffer planting
- Housing
- Children's play area
- Sports pitch

SCALE 1:12,500




Rev	
DE48A_008	Drg No
Urban & Civic	Client
West of Fairfields	Project
Design Concept Plan	Title
1:12,500 @ A3	Scale


AREA 11
(FAIRFIELDS)

AREA 10
(WHITEHOUSE)

LEGEND

Land ownership

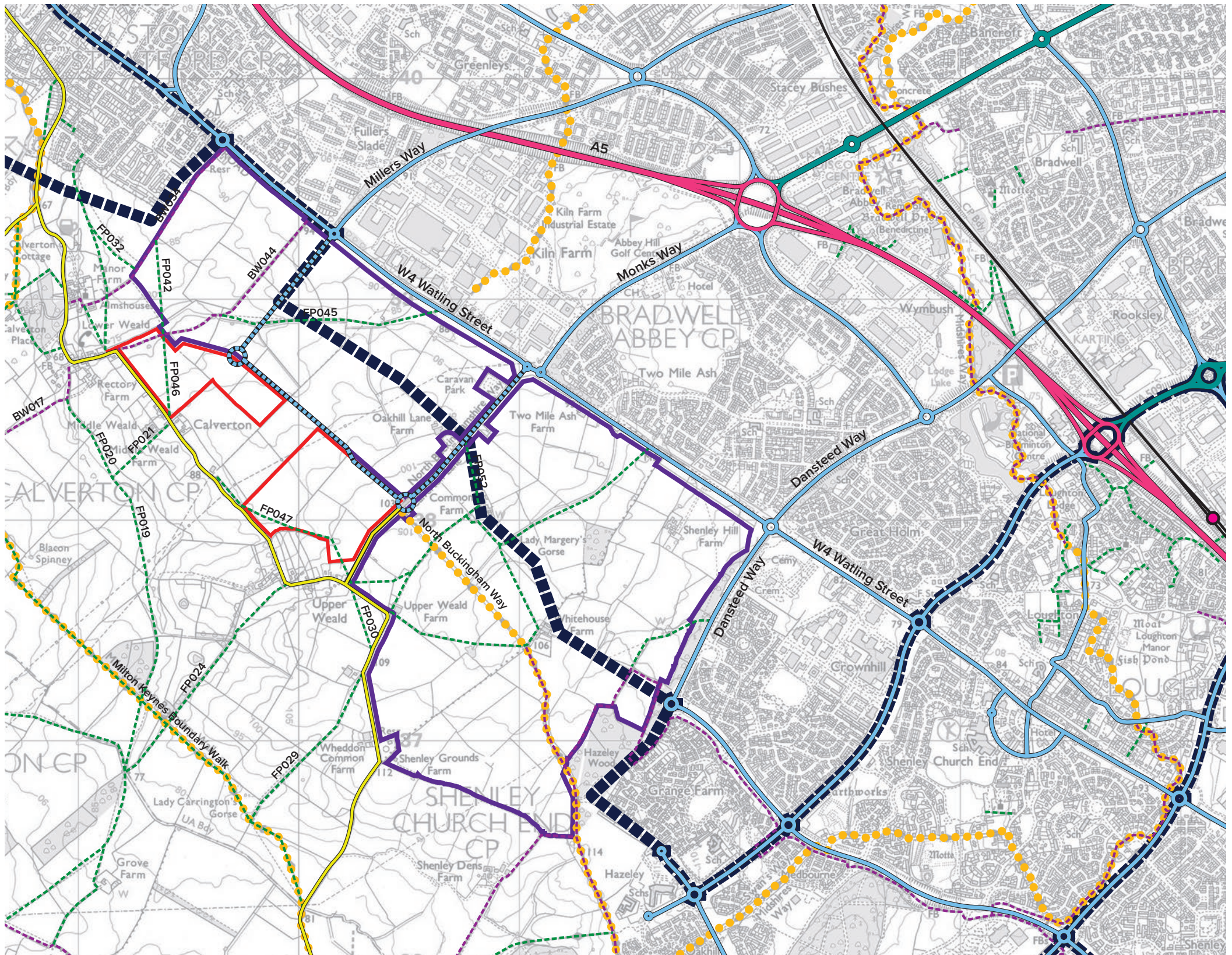
 West of Fairfields

 Milton Keynes Western Expansion Area

SCALE 1:12,500



	Rev
DE48A_006	Drg No
Urban & Civic	Client
West of Fairfields	Project
Site Location Plan	Title
1:12,500 @ A3	Scale



LEGEND

Land ownership

Site boundary

Milton Keynes Western Expansion Area

Movement

A5

Existing major grid road

Existing minor grid road

Proposed minor grid road

Existing local road

Public footpath

Bridleway

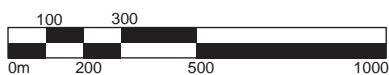
Long distance route

Railway line/station

Potential Route for Mass Rapid Transit Network

NOTE:
See land ownership plan for more detailed information

SCALE 1:20,000



Rev

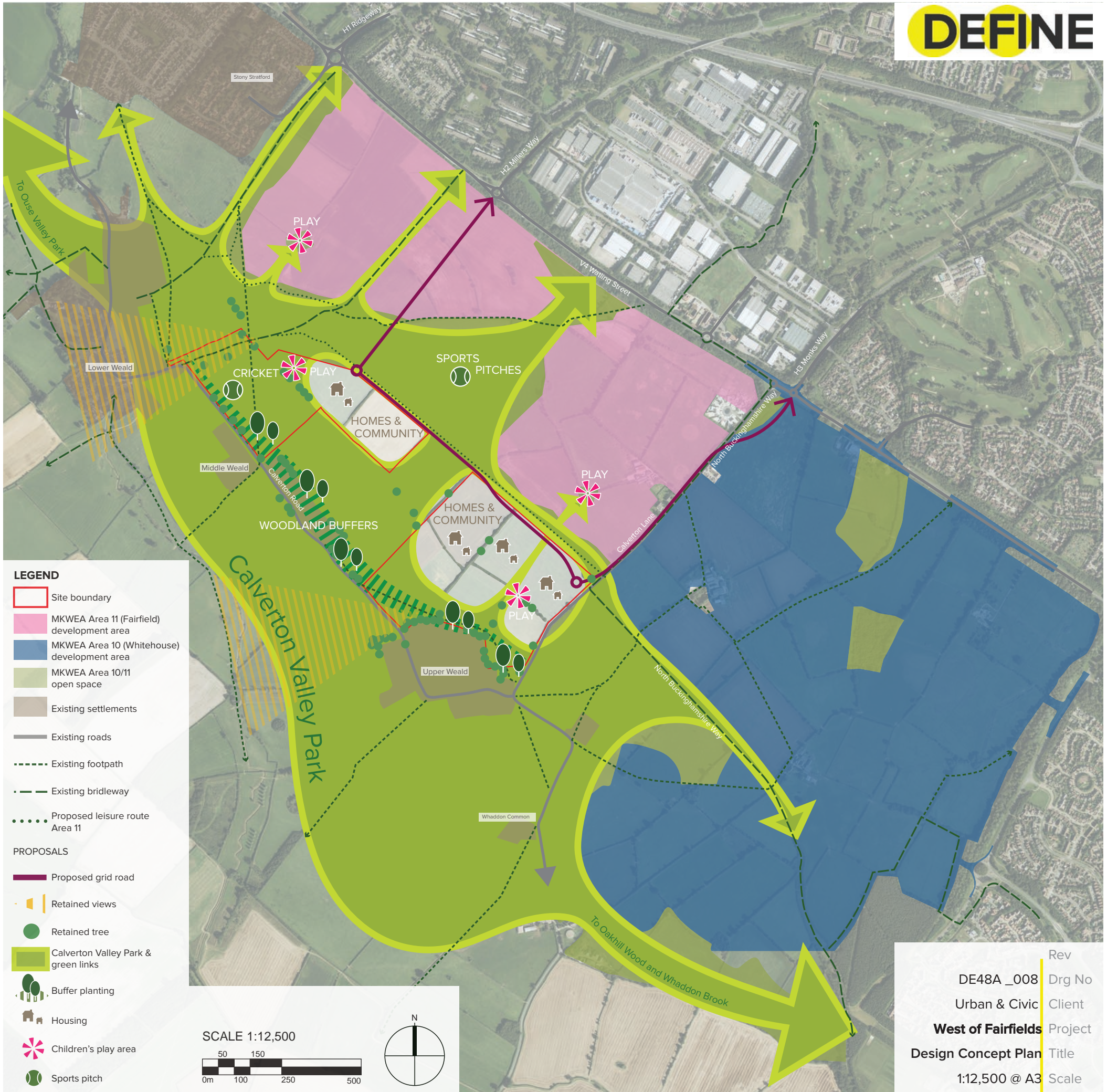
DE48A_007 Drg No

Urban & Civic Client

West of Fairfields Project

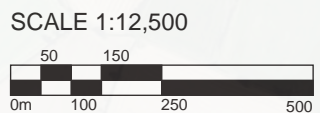
Movement Plan Title

1:20,000 @ A3 Scale



LEGEND

- Site boundary
- MKWEA Area 11 (Fairfield) development area
- MKWEA Area 10 (Whitehouse) development area
- MKWEA Area 10/11 open space
- Existing settlements
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- PROPOSALS**
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Rev	
DE48A_008	Drg No
Urban & Civic	Client
West of Fairfields	Project
Design Concept Plan	Title
1:12,500 @ A3	Scale



West of Fairfield

Landscape and Visual Appraisal

On behalf of **Urban & Civic plc**

Project Ref: 333101517 | Rev: - | Date: 1/10/24

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Document Control Sheet

Project Name: West of Fairfield
Project Ref: 333101517
Report Title: Landscape and Visual Appraisal
Doc Ref: LVA
Date: September 2024

	Name	Position	Signature	Date
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Reviewed by:	P Clark	Associate Director	PC	October 2024
Approved by:	P Clark	Associate Director	PC	October 2024
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved

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 not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

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