

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

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

E-mail Address



Address Line 1

Line 2

Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	

Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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

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

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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 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.

Neither definition appears at Annex 2: Glossary of the National Planning Policy Framework. Moreover, the definition of Secondary Shopping Frontage as it appears at the Glossary of the Regulation 19 Plan defines such areas as:

“Secondary shopping frontages (SSFs) provide greater opportunities for a diversity of uses such as restaurants, cinemas and business”.

This definition is true of the function and the operation of the now defined Secondary Shopping Frontage at Xscape, being as it is a leisure destination.

As highlighted at our representations to Policy ECP2, it is unclear why that policy seeks to include retail uses within such frontages.

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.

We recommend that the confusion regarding the definition of Secondary Shopping Frontages is remedied. This notwithstanding, we contend that the definitions should be removed from the Glossary as they are no longer included within national policy (the National Planning Policy Framework).

Given this, we consider the allocation or designation of the Secondary Shopping Frontage should also be removed.

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.

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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:

We wish to attend the relevant hearing session to assist with the evidence alongside our representations to Paragraphs 58, 59 and 141, the Proposed Policies Map and Policies ECP2 and ECP3, that would in our view assist in ensuring that the Plan is robust and justified.

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

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Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

Ref:
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Milton Keynes City Plan 2050

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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	<input type="text" value="c/o Agent"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="c/o Agent"/>	<input type="text" value="Sid"/>
Last Name	<input type="text" value="c/o Agent"/>	<input type="text" value="Hadjioannou"/>
Job Title	<input type="text" value="Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited"/>	<input type="text" value="Director of Planning"/>
(where relevant) Organisation	<input type="text"/>	<input type="text" value="SAH Town Planning"/>
(where relevant) E-mail Address	<input type="text"/>	<div style="background-color: black; width: 100%; height: 20px;"></div>
Address Line 1	<input type="text"/>	<div style="background-color: black; width: 100%; height: 20px;"></div>
Line 2	<input type="text"/>	<input type="text"/>

Line 3

Line 4

Post Code

Telephone Number



Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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 type="checkbox"/>	No	<input checked="" 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 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.

We support the ambition for a more sustainable and vibrant city centre.

A review of the Retail and Commercial Leisure Study Update 2025, prepared by Nexus Planning (the '2025 Update'), has been undertaken by Turley Economics to understand the evidence base that supports the requirement of around 66,200 sq. m of comparison retail floorspace contained at Paragraph 141 which informs the ambitions for the development of additional retail floorspace at Policy CMK1.

It is highlighted here, that a similar review was undertaken and submitted to the Regulation 18 Plan stage consultation, although it is unclear whether Nexus Planning has taken that review on board when preparing the 2025 Update to the Retail and Commercial Leisure Study.

Given this, we contend that the aforementioned figure is incorrect and based on the comparison goods capacity figure identified in the 2024 Retail Study. As demonstrated in the full review (please see appended Review of Milton Keynes Retail and Commercial Leisure Study Update, 2025- the 'review', prepared by Turley Economics).

The Review reveals that the 2025 Update continues to contain an error (present in the 2024 Retail Study) which significantly exaggerates the forecast comparison floorspace capacity and should therefore be corrected.

The Review also reveals concerns and suggestions surrounding the methodology and assumptions used within the Nexus Retail Study's comparison goods capacity assessment. These concerns centre around the Special Forms of Trading ('SFT') which have not been deducted at the base year. The implications for this are that the capacity calculations in the 2025 Update exaggerate the amount of comparison goods floorspace available throughout the plan period. We therefore recommend that Nexus reviews the comparison goods capacity tables to correct this error.

As a consequence, the alternative capacity analysis (Table 2.2 of the Review of Milton Keynes Retail and Commercial Leisure Study Update 2025 - reproduced below) demonstrates that by deducting SFT from per capita figures at the base year used, the forecast comparison goods capacity in CMK drops from 26,336 - 41,385 sq. m net to only 19,952 – 31,354 sq. m net in 2050 (a 24.0% reduction in capacity). This reflects the outputs in Scenario B with population forecasts based on high housing growth (63,400 dwellings by 2050).

Table 2.2: Alternative Capacity Analysis: Comparison Goods Capacity Requirement in Central Milton Keynes at 2050 (RCLSU 2025 vs Turley Analysis 2025)

Housing Scenario		Retail Study Update Floorspace Capacity (sq m net)	Revised Assessment Floorspace Capacity (sq m net)	Difference in Floorspace Capacity (sq m net)
Scenario A (50,372 by 2050)	Min.	20,392	15,381	-5,011
	Max.	32,044	24,170	-7,874
Scenario B (63,421 by 2050)	Min.	26,336	19,952	-6,384
	Max.	41,385	31,354	-10,031
Range between Scenario A and B	Min.	20,392	15,381	-5,011
	Max.	41,385	31,354	-10,031

Source: Appendix 1, Scenarios A and B, Nexus Table 19b, Turley Table 19b

If modelled using the lower (potentially more realistic) housing delivery figures set out within Scenario A (50,300 dwellings by 2050), which is more aligned with current housing delivery rates in Milton

Keynes, the forecast comparison goods capacity figure reduces further from 20,372 – 32,044 sq. m net (as identified in the Retail Study) to only 15,381 – 24,170 sq. m net at 2050 (a 32.6% reduction).

Clearly, this also has a knock-on effect for available comparison goods capacity calculated in the years 2026, 2030, 2035 and 2040 with substantial decreases in capacity identified in the alternative assessment.

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.

Considering the Review outlined at Q5 we contend that the Nexus Planning 2025 Update is reviewed as it continues to contain an error (present in the 2024 Retail Study) which significantly exaggerates the forecast comparison floorspace capacity and should therefore be corrected.

In addition, and in any event, the 66,200 sq. m comparison retail floorspace figure quoted at Paragraph 141, bullet 5 should be corrected to reflect the updated figure as it appears in the 2025 Update, that being 41,385 sq.m (Scenario B).

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:

We wish to attend the relevant hearing session to articulate our evidence contained here and in other representations submitted to the Regulation 19 Plan those being: Paragraphs 58, 59, the Glossary, the Proposed Policies Map and Policies ECP2 and ECP3.

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

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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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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

c/o Agent

Mr

First Name

c/o Agent

Sid

Last Name

c/o Agent

Hadjioannou

Job Title

Hermes CMK Nominee No.1
Limited and Hermes CMK
Nominee No.2 Limited

Director of Planning

(where relevant)

Organisation

SAH Town Planning

(where relevant)

E-mail Address

Address Line 1

Line 2

Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	

Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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

Paragraph	<input type="text" value="58 & 59"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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 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.

We support the ambition for a more sustainable and vibrant city centre.

We rely on our comments to Paragraph 141 of the Regulation 19 Plan and refer and rely upon to the Review of Milton Keynes Retail and Commercial Leisure Study Update, 2025, prepared by Turley Economics.

By way of context, a 2024 version of the aforementioned Study was submitted with our representations to the Regulation 18 Plan in October 2024 (the 'Study'), highlighting as it did the very same representations we are making to the Regulation 19 Plan.

The Study and our comments to Paragraph 141 highlight that the scenarios and associated comparison floorspace figures at Table 7, and those cited at Paragraphs 58 and 59 have not been updated to correspond to the findings of the Nexus Retail Study (July 2025).

This notwithstanding, we contend, as we have done for Paragraph 141, that the figures quoted are incorrect as the methodology and assumptions used within the Nexus Retail Study, for both comparison and convenience goods capacity have failed to deduct the Special Forms of Trading at the base year. The implications of this are that the capacity calculations in the Nexus Retail Study exaggerate the amount of floorspace available throughout the Plan period.

As matters stand, the capacity figures are considered not to be 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.

Paragraph 58 and Table 6 should be amended in response to our comments to the Nexus Retail Study pertaining the deduction of the Special Forms of Trading at the base year.

Paragraph 59 and Table 7 should be amended in response to our comments to the Nexus Retail Study pertaining the deduction of the Special Forms of Trading at the base year.

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.

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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:

We wish to attend the relevant hearing session to assist with the evidence alongside our representations to Paragraph 141 and Policies ECP2 and ECP3, the Glossary and the Proposed Policies Map that would in our view assist in ensuring that the Plan is robust and justified.

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.

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First Name

Last Name

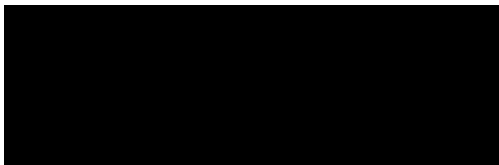
Job Title

(where relevant)

Organisation

(where relevant)

E-mail Address



Address Line 1

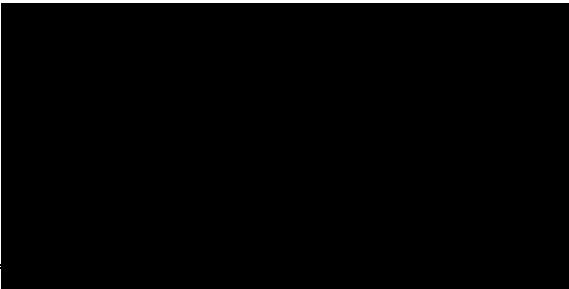
Line 2

Line 3

Line 4

Post Code

Telephone Number



Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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 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 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.

We support the ambition for a more sustainable and vibrant city centre.

However, we do wish to reiterate our comments made to the Regulation 18 Plan consultation.

The ambitious approach taken by the Policy is supported. It is also considered that reviewing the approach taken to sustainable buildings elsewhere within the United Kingdom is a good starting point. However, in areas such as Greater and Central London, land values and final values are much higher than in Milton Keynes, allowing development proposals to absorb the cost.

Moreover, the policy should reflect the cost, complexity and commercial viability pressures of delivering sites in central areas when compared to larger expansion or greenfield sites. The City Council, at Policy HQH2 has recognised that the burden of affordable housing provision and/or cost on residential and residential led schemes over recent times has in effect provided a benchmark of 10% provision. This therefore deems projects viable at that level. Viability issues, in our opinion, will rise again if development proposals are expected to meet the stringent and extensive requirements of Policy CEA1.

Whereas the policy does allow for viability considerations, it is considered that another layer added to development proposals as highlighted above, may have a negative impact on the objectives and ambitions of the Plan, those being to deliver a significant amount of homes and jobs.

The Policy is seeking a significant step change from the incumbent Plan:MK, where development proposals, especially in Central Milton Keynes, have historically struggled on viability grounds to adhere to all the requirements of the Plan.

In light of the above, it is considered that the Policy is not effective.

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 and reasoned justification strengthened to recognise the step changed required from applicants to meet the policy requirements.

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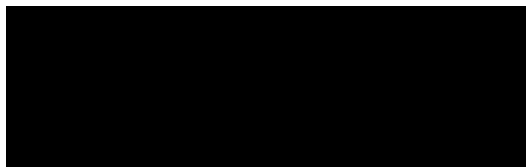
First Name

Last Name

Job Title

(where relevant) Organisation

(where relevant) E-mail Address



Address Line 1

Line 2

Line 3	<input type="text"/>	<input type="text"/>
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Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	

Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="CMK1"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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 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.

The Regulation 19 Plan has a focus on making Milton Keynes a more sustainable, healthy place, to help tackle climate change and reduce carbon emissions. We support the ambition for a more sustainable and vibrant city centre and believe this can be achieved alongside maintaining accessibility for all users.

These representations have been prepared in relation to Policy CMK1 of the Regulation 19 Plan. A separate Technical Report has been prepared and submitted in response to the Consultation. This text provides a summary of the case made in the Technical Report and should be read in conjunction with it. As currently drafted, Policy CMK1 may not fully meet the tests of soundness (as required by the *National Planning Policy Framework (NPPF), 2025, Paragraph 36*), in terms of being justified or consistent with national policy. These representations, and the supporting Technical Report, make the case for why this is the case.

The Policy that this representation relates to is CMK1 ('Central Milton Keynes Development Framework Area'). Relevant parts of this Policy are copied below (emphasis added in **bold**).

Parts B, C and E of Policy CMK1 is set out below:

B. Development proposals in Central Milton Keynes will be required to demonstrate that they are in accordance with the Central Milton Keynes Development Framework shown in Figure 7.

Central Milton Keynes Quarters

C. Development proposals should support patterns of land use within the Central Milton Keynes quarters, as shown in Figure 8, in accordance with the following criteria:

- 1. With the exception of proposals for a multi-use Events Venue at the Old Bus Station and adjacent car park, development proposals within the Downtown Business Quarter should provide at least 80% of the active non-ancillary floorspace for office, education, research and development, and/or hotel use. Education and/or research and development uses include in-person Higher and Further Education teaching, and purpose-built student accommodation;*
- 2. Development proposals on Block C1 must not undermine, and will be supported where they enable, the delivery of improvements to the city's justice, law and governance provision, including provision for a Crown Court;*
- 3. Development proposals within the remainder of the Midtown Quarter for residential, community, cultural, retail, hotel, office and/or education uses will be supported to create and maintain a mixed-use character;*
- 4. Development proposals within the Uptown Leisure Quarter should include, or make provision for, retail, hotel, cultural, community and/or leisure uses;**
- 5. Development proposals within the Parkside Quarter should be residential-led that provides a mix of house types and tenures.**

Infrastructure and land use principles for Central Milton Keynes

E. Development proposals will be supported where they:

- 1. Create small, flexible or affordable premises for retail, office, leisure or cultural uses to support start-up, scale-up and independent businesses, including the continuing operation of the Central Milton Keynes Market;*
- 2. Deliver inclusive cultural and leisure facilities that diversify the city centre, including supporting the evening and night-time economy;*
- 3. Enable meanwhile uses that help to maintain the ongoing vitality and viability of the city centre when vacancies arise;*
- 4. Provide residential-led mixed-use development proposals on **areas of surface level car parking along North and South Row** (with the exception of areas within the Downtown Business Quarter) that provide and/or enhance pedestrian crossings into neighbouring grid squares; and/or**
- 5. Deliver development and interventions associated with other infrastructure projects in the city centre as identified through the Milton Keynes Infrastructure Study and Strategy.*

This policy is preceded by the following explanatory paragraphs that contain relevant detail
143 The Central Milton Keynes Development Framework shown in Figure 7 will promote more intensive use of land where development would benefit the townscape, provide complementary land uses and new amenities, and provide for an enhanced public realm. This includes:

- a) Reconfiguration of Station Square to provide for increased development and higher quality public realm;*
- b) Creation over time of a new high-quality active travel route and area of public realm – referred to as the Midsummer Boulevard Greenway – linking Station Square with the Shopping Centre, and onwards to Campbell Park. This will be the key route for Mass Rapid Transit – referred to as the Metro – as it moves through the city centre;*

- c) Development of the existing surface car park at the Old Bus Station to create a new Events Venue and public realm;
- d) Comprehensive master planned development of Block B4 as the last remaining undeveloped city centre block;
- e) Opportunities for partial development of **land currently used as surface level car parking and green space lying between North Row and Portway (A509) and land lying between South Row and Childs Way;**
- f) Partial development of **land currently used as surface-level car parking facing onto the Gates;**
- g) Development of parcels north and south of Campbell Park

With Reference to Figure 8 paragraphs 144 and 145 set out the uses that should prevail in each quarter

144 Central Milton Keynes will continue to be promoted as the focus for retail, office, residential, cultural and leisure activity as part of making the city centre a more people-friendly and healthy place for a range of users. New development should make a positive contribution to improving the vitality of the city centre through a mix of uses, as set out in Figure 8, and securing high-quality design.

Alternative uses within these quarters must not undermine the delivery of the focus land use of each quarter.

145 As set out in Policy CMK1, these four city quarters are intended to provide a distinct purpose and character. They are intended to be used for assessing any changes to the predominant uses through the planning process rather than marketing or place branding.

- *The Downtown Business Quarter and Block B4 will use the benefits of proximity to the central station and existing businesses to reinforce the office and employment focus of this part of our city centre and provide strong linkages with the proposals to develop an undergraduate university as part of a Tech and Innovation Area.*
- *The Midtown Quarter will provide a greater mix of uses; residential, office, cultural, retail, community and civic, including the Justice Quarter with an intention for much improved justice facilities with a new Crown Court.*
- *The Uptown Quarter will encourage a **greater focus on retail, cultural, community and leisure facilities**, reflecting the existing mix of uses and activities already taking place here.*
- *Finally, the Parkside Quarter adjacent to Campbell Park **will be mainly residential** and provide the opportunity to create a far greater mix of types of homes for future residents of Central Milton Keynes as part of new neighbourhoods.*

The key elements of this Policy that are of concern are:

- Part E Paragraph 4: *4. Provide residential-led mixed-use development proposals on **areas of surface level car parking along North and South Row***
- Paragraph 143 Point E: *e) Opportunities for partial development of **land currently used as surface level car parking and green space lying between North Row and Portway (A509) and land lying between South Row and Childs Way;***

centre:mk has around 2,000 car parking spaces within its curtilage (which it owns) A survey conducted by MRI and Emotional Logic in 2025 on behalf of the owners of centre:mk shows that around 4,650 car parking spaces are required to serve the centre:mk at peak periods (not accounting for future growth in footfall). As such, centre:mk has a reliance on other adjacent car parking that is not under its control. This is in addition to demand from other destinations within the Primary Shopping Area of Central Milton Keynes uses such as Midsummer Place Shopping Centre.

A desktop study has been undertaken to review the number of spaces in the vicinity of centre:mk (mainly within an 8-minute walk) which are available for shoppers. This indicates a total of c.14,000 car

parking spaces across “columns” C-E of the Central Milton Keynes grid (these areas are mainly 8-minute walk from centre:mk). Some centre:mk customers may park further afield, however c.14,000 spaces specified above are the main car parks used by customers of centre:mk, and the most attractive parking for customers will be within 300m of the centre:mk. Refer to **Chapter 5** of the Technical Report where this assessment is presented.

The Policy therefore proposes the loss of car parking spaces in the vicinity of centre:mk. The number of spaces that could be lost is not quantified anywhere in the Regulation 19 Plan or the accompanying Evidence Base. As such, a desktop analysis has been undertaken to review the number of spaces which could be lost as a result of this Policy. This demonstrates that c.2,200 spaces could be lost along *North and South Row*, and c.2,700 spaces of *surface-level car parking fronting onto the Gates* could be lost. This equates to c.4,900 spaces which could be lost as a result of this Policy alone. Refer to **Chapter 5** of the Technical Report where this assessment is presented. The number of spaces which could be lost under Policy CMK1 (c.4,900) is therefore around 35% of the total spaces in the vicinity of centre:mk (c.14,000). Note that Policy CMK2 (the subject of other representations made by the owners of centre:mk (Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited) would result in loss of further spaces and an overall potential 46% loss of parking spaces.

Without reprovision of similar levels of car parking this reduction of car parking would be well below existing parking demand and impose considerable parking restraint within Central Milton Keynes. The effect of this change if applied proportionally across all land uses would significantly reduce footfall within the centre and undermine the vitality, viability and scale of retail and leisure provision. This in turn will reduce the attractiveness of Central Milton Keynes as a major regional centre for retail and leisure uses as highlighted at paragraph 53 of the Regulation 19 Plan, by “drawing people into the City from the Midlands, east and south-east regions. At the heart of this area are the centre:mk Shopping building and the Midsummer Place Shopping Centre...”

It is therefore imperative that any parking lost through development should be replaced in a location that is convenient to shoppers in Central Milton Keynes and brought back into use before they are lost. The scale of the reprovision of parking is considerable and should be specifically identified within land use policies. The locations should be identified with good quality access junctions onto the main access routes ensuring sufficient capacity can be provided where there are large concentrations of parking spaces and therefore traffic flows in one location. It may also require changes in the wording to those policies and zoning.

At present, there is inadequate evidence of the existing demand, the spaces lost and the strategy to re-provide these spaces within the Regulation 19 Plan. It is noted that a Parking Strategy is intended to be developed and consulted on with key stakeholders in 2026 (as referenced in Paragraph 5.11 in the *Transport and Movement Topic Paper*). Once the Parking Strategy is developed, there is an opportunity to strengthen the Plan by addressing parking reprovision and access strategies.

A GIS analysis has been undertaken to understand the catchment of customers to centre:mk using unique anonymised postcode data. These postcodes were collected in three surveys undertaken in 2024 (Spring and Winter) and 2025 (Spring) and relate to responses from over 9,000 shoppers. Key headlines from this analysis are as follows:

- 83% of customers live within a 1-hour drive of centre:mk (**Figure 5** of the Technical Report), with a further 17% who live outside of this area.
- The existing public transport 1-hour catchment is considerably smaller than the 1-hour driving catchment (**Figure 6** of the Technical Report).
- The existing public transport 1 hour catchment represents 42% of those customers within the 1 hour drive time catchment (**Figure 7** of the Technical Report).

- A customer at the 1-hour public transport travel time could drive to centre:mk in 15 minutes – so based on current public transport journey times there would be very little incentive for customers to use public transport out of choice (**Figure 6** of the Technical Report).
- The existing public transport 1 hour catchment represents 35% of the overall catchment for centre:mk customers
- Over 65% of customers are beyond the 1-hour public transport catchment

There is clearly a significant difference between the 1-hour driving and 1-hour public transport catchment areas. A far larger proportion of customers live beyond the 1-hour public transport journey. The 65% of customers located outside of the 1-hour public transport catchment have a higher spend rate representing 72% of the spend at centre:mk.

It is acknowledged that public transport improvements are proposed, specifically in the form of the Mass Rapid Transport (MRT, or Metro) system. However, this would not materially change the 1-hour public transport catchment. As such, the MRT may improve the quality of public transport journey it would have very limited benefit in relation to the scale of the Central Milton Keynes retail and leisure catchment.

An online survey was conducted in November 2025 by Emotional Logic (on behalf of the owners of centre:mk) of shoppers from within the centre:mk catchment, to quantify the scale of attachment to driving when visiting centre:mk and Central Milton Keynes. Over 1,000 responses were received. The survey indicates that 91% of residents find driving the most practical way to get to centre:mk, 91% of residents find driving gives them more freedom and control, and 86% feel safer and more comfortable travelling by car.

A question in the survey was specifically asked regarding what users would do if the number of car parking spaces at centre:mk were to be reduced. Only 25% of users would continue to drive and find car parking as usual. Conversely, 14% would shop online, 13% would visit less frequently, and 8% would visit a different shopping centre instead. Those potentially visiting less often / not visiting at all (35%) is therefore greater than the proportion who said they would not change their habits (25%). This could lead to a significant change in customer demand and footfall, which would significantly affect the vitality and viability of centre:mk and Central Milton Keynes as a major regional centre for retail and leisure as outlined at paragraph 53 of the Regulation 19 Plan.

In terms of alternative transport mode to reach Central Milton Keynes, respondents were not particularly likely to consider using Park & Ride or Bus / Coach as an alternative (score of '5' on a scale of '0' very unlikely to '10' very likely).

The survey highlights the lack of competitiveness that other modes of transport have compared to the car and tangibly demonstrate the impact that reduced car parking provision would have in terms of reducing the likelihood of visiting centre:mk and Central Milton Keynes. This reflects the discretionary nature of shopping and leisure trips, where a worsening of a shopping experience (e.g. through reduced car parking, less convenience and increased congestion) means that shoppers would consider not travelling or using competing shopping centres / city centres instead.

As currently drafted, Policy CMK1 may not fully meet the tests of soundness (in terms of being justified or consistent with national policy). No details are currently presented on the number of car parking spaces that could be affected by these Policies; as such the Council has not presented the proportionate evidence to properly assess the impacts of these Policies. As highlighted above, these Policies could have a significant impact on car parking supply in the vicinity of centre:mk and in Central Milton Keynes as a major regional centre. Our analysis indicates policies may result in a significant reduction in car parking, potentially up to 46%, which warrants careful consideration.

Chapter 7 of the *NPPF* relates to ensuring the vitality of town centres. Paragraph 90 notes that “*Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation*”. In relation to this Part A states that planning policies should “*define a network and hierarchy of town centres and promote their long-term vitality and viability...*”, and Part C states that planning policies should “*retain and enhance existing markets*”.

No evidence has been put forward as part of the Regulation 19 Plan to demonstrate that the loss of Central Milton Keynes car parking would not have a detrimental effect on the vitality and vibrancy of Central Milton Keynes as a major regional centre. It is noted that a Parking Strategy is intended to be developed and consulted on with key stakeholders in 2026. It is concerning that this would follow the current Regulation 19 Plan consultation, as the success of those policies are fundamental to the outcomes of the MK City Plan. Until that time, the Policies appear to lack appropriate proportionate evidence and are inconsistent with national policy; and therefore may not fully meet the tests of soundness. The recent car park survey commissioned by the owners of centre:mk demonstrate that lower car parking provision would result in a reduction in visits to centre:mk and Central Milton Keynes which will have a material impact on its vitality and viability. This appears to be inconsistent with the *NPPF* Chapter 7 objectives, referenced above.

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.

In the absence of a clear parking strategy the MK Regulation 19 Draft City Plan Policy CMK1 may not fully meet the tests of soundness. Any consideration could be delayed until the Draft Parking Strategy has itself been published and consulted upon.

Amendments to the policies to ensure replacement car parks are sized and protected in policy to ensure adequate spaces are available for retail and leisure customers to centre:mk.

Potential changes are shown in red below:

B. Development proposals in Central Milton Keynes will be required to demonstrate that they are in accordance with the Central Milton Keynes Development Framework shown in Figure 7.

Central Milton Keynes Quarters

C. Development proposals should support patterns of land use within the Central Milton Keynes quarters, as shown in Figure 8, in accordance with the following criteria:

- 1. With the exception of proposals for a multi-use Events Venue at the Old Bus Station and adjacent car park, development proposals within the Downtown Business Quarter should provide at least 80% of the active non-ancillary floorspace for office, education, research and development, and/or hotel use. Education and/or research and development uses include in-person Higher and Further Education teaching, and purpose-built student accommodation;*
- 2. Development proposals on Block C1 must not undermine, and will be supported where they enable, the delivery of improvements to the city’s justice, law and governance provision, including provision for a Crown Court;*
- 3. Development proposals within the remainder of the Midtown Quarter for residential, community, cultural, retail, hotel, office and/or education uses will be supported to create and maintain a mixed-use character;*

4. Development proposals within the Uptown Leisure Quarter should include, or make provision for, retail, hotel, cultural, community and/or leisure uses **and appropriate car parking**;
5. Development proposals within the Parkside Quarter should be residential-led that provides a mix of house types and tenures.

Infrastructure and land use principles for Central Milton Keynes

E. Development proposals will be supported where they:

1. Create small, flexible or affordable premises for retail, office, leisure or cultural uses to support start-up, scale-up and independent businesses, including the continuing operation of the Central Milton Keynes Market;
2. Deliver inclusive cultural and leisure facilities that diversify the city centre, including supporting the evening and night-time economy;
3. Enable meanwhile uses that help to maintain the ongoing vitality and viability of the city centre when vacancies arise;
4. Provide residential-led mixed-use development proposals on **areas of surface level car parking along North and South Row, provided the car parking spaces lost are first replaced elsewhere or on-site** (with the exception of areas within the Downtown Business Quarter) that provide and/or enhance pedestrian crossings into neighbouring grid squares; and/or
5. Deliver development and interventions associated with other infrastructure projects in the city centre as identified through the Milton Keynes Infrastructure Study and Strategy.

143 The Central Milton Keynes Development Framework shown in Figure 7 will promote more intensive use of land where development would benefit the townscape, provide complementary land uses and new amenities, and provide for an enhanced public realm. This includes:

- a) Reconfiguration of Station Square to provide for increased development and higher quality public realm;
- b) Creation over time of a new high-quality active travel route and area of public realm – referred to as the Midsummer Boulevard Greenway – linking Station Square with the Shopping Centre, and onwards to Campbell Park. This will be the key route for Mass Rapid Transit – referred to as the Metro – as it moves through the city centre;
- c) Development of the existing surface car park at the Old Bus Station to create a new Events Venue and public realm;
- d) Comprehensive master planned development of Block B4 as the last remaining undeveloped city centre block;
- e) Opportunities for partial development of land currently used as surface level car parking and green space lying between North Row and Portway (A509) and land lying between South Row and Childs Way, provided that the car parking spaces lost are first replaced elsewhere or on-site
- f) Partial development of land currently used as surface-level car parking facing onto the Gates, provided the car parking spaces lost are first replaced elsewhere or on-site;
- g) Development of parcels north and south of Campbell Park

With Reference to Figure 8 paragraphs 144 and 145 set out the uses that should prevail in each quarter

144 Central Milton Keynes will continue to be promoted as the focus for retail, office, residential, cultural and leisure activity as part of making the city centre a more people-friendly and healthy place for a range of users. New development should make a positive contribution to improving the vitality of the city centre through a mix of uses, as set out in Figure 8, and securing high-quality design. **With the exception of replacement car parking**, alternative uses within these quarters must not undermine the delivery of the focus land use of each quarter.

145 As set out in Policy CMK1, these four city quarters are intended to provide a distinct purpose and character. They are intended to be used for assessing any changes to the predominant uses through the planning process rather than marketing or place branding.

- The Downtown Business Quarter and Block B4 will use the benefits of proximity to the central station and existing businesses to reinforce the office and employment focus of this part of our city centre and provide strong linkages with the proposals to develop an undergraduate university as part of a Tech and Innovation Area.
 - The Midtown Quarter will provide a greater mix of uses; residential, office, cultural, retail, community and civic, including the Justice Quarter with an intention for much improved justice facilities with a new Crown Court.
 - The Uptown Quarter will encourage a greater focus on retail, cultural, community and leisure facilities **and associated car parking**, reflecting the existing mix of uses and activities already taking place here.
- Finally, the Parkside Quarter adjacent to Campbell Park will be mainly residential and provide the opportunity to create a far greater mix of types of homes for future residents of Central Milton Keynes as part of new neighbourhoods.

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 articulate the representations provided above.

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

Sharing your personal details

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

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

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



Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

Ref:
(For official use only)

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at ncp.engagement@milton-keynes.gov.uk

This form has two parts –

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

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Title

First Name

Last Name

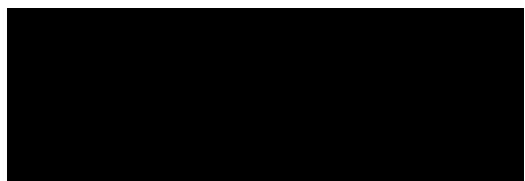
Job Title

(where relevant)
Organisation

(where relevant)
E-mail Address

Address Line 1

Line 2



Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	

Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="CMK2"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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 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.

The Regulation 19 Plan has a focus on making Milton Keynes a more sustainable, healthy place, to help tackle climate change and reduce carbon emissions. We support the ambition for a more sustainable and vibrant city centre and believe this can be achieved alongside maintaining accessibility for all users.

These representations have been prepared in relation to Policy CMK2 of the Regulation 19 Plan. A separate Technical Report has been prepared and submitted in response to the Consultation. This text provides a summary of the case made in the Technical Report and should be read in conjunction with it. As currently drafted, Policy CMK2 may not fully meet the tests of soundness (as required by the *National Planning Policy Framework (NPPF), 2025, Paragraph 36*), in terms of being justified or consistent with national policy. These representations, and the supporting Technical Report, make the case for why this is the case.

The Policy that this representation relates to is CMK2 ('Central Milton Keynes placemaking principles'). Relevant parts of this Policy are copied below (emphasis added in **bold**).

Part B of Policy CMK2 is set out below:

B. Development proposals must manage the level of parking needed to support a vibrant city centre while maintaining high levels of convenience, through:

- 1. Coordinating the phased reduction of **'front of house' surface car parking areas** in tandem with improvements to public transport provision and satisfactory **reprovision of parking to other appropriate locations** in the city centre; and*
- 2. Managing retained and re-provided parking areas to allow flexible usage to meet different demand profiles.*

This policy is also preceded by the following explanatory paragraph that contain relevant detail
*156 We will approve additional guidance, including that for open space and a design code(s), to guide development proposals over the plan period. For example, the creation of pocket parks throughout Central Milton Keynes will be encouraged, including through the **re-use of areas of public realm or surface-level car parking**. These may be **located along the Midsummer Boulevard Greenway**, or within the green frame around the city centre, to serve local communities and provide enhanced links through blocks*

The key elements of this Policy that are of concern are:

- Part B Paragraph 1: *Coordinating the phased reduction of **'front of house' surface car parking areas**.*
- Paragraph 156: *For example, the creation of pocket parks throughout Central Milton Keynes will be encouraged, including through the **re-use of areas of public realm or surface-level car parking**. These may be **located along the Midsummer Boulevard Greenway***

centre:mk has around 2,000 car parking spaces within its curtilage (which it owns). A survey conducted by MRI and Emotional Logic in 2025 on behalf of the owners of the centre:mk shows that around 4,650 car parking spaces are required to serve the centre:mk at peak periods (not accounting for future growth in footfall). As such, centre:mk has a reliance on other adjacent car parking that is not under its control. This is in addition to demand from other destinations within the Primary Shopping Area of Central Milton Keynes uses such as Midsummer Place Shopping Centre.

A desktop study has been undertaken to review the number of spaces in the vicinity of centre:mk (mainly within an 8-minute walk) which are available for shoppers. This indicates a total of c.14,000 car parking spaces across "columns" C-E of the Central Milton Keynes grid (these areas are mainly 8-minute walk from centre:mk). Some centre:mk customers may park further afield, however c.14,000 spaces specified above are the main car parks used by customers of centre:mk, and the most attractive parking for customers will be within 300m of centre:mk. Refer to **Chapter 5** of the Technical Report where this assessment is presented.

The Policy therefore proposes the loss of car parking spaces in close proximity to centre:mk. The number of spaces that could be lost is not quantified anywhere in the Regulation 19 Plan or the accompanying Evidence Base. As such, a desktop analysis has been undertaken to review the number of spaces which could be lost as a result of this Policy. This demonstrates that c.800 spaces could be lost along *Midsummer Boulevard Greenway*, and c.800 spaces of *front of house surface car parking areas* could be lost. This equates to c.1,600 spaces which could be lost as a result of this Policy alone. Refer to **Chapter 5** of the Technical Report where this assessment is presented. The number of spaces which could be lost under Policy CMK2 (c.1,600) is therefore around 11% of the total spaces in the

vicinity of centre:mk (c.14,000). Note that Policy CMK1 (the subject of other representations) would result in loss of further spaces and an overall potential 46% loss of parking spaces.

Without reprovision of similar levels of car parking this reduction of car parking would be well below existing parking demand and impose considerable parking restraint within Central Milton Keynes. The effect of this change if applied proportionally across all land uses would significantly reduce footfall within the centre and undermine the vitality, viability and scale of retail and leisure provision. This in turn will reduce the attractiveness of Central Milton Keynes as a major regional centre for retail and leisure uses as highlighted at paragraph 53 of the Regulation 19 Plan, by “*drawing people into the City from the Midlands, east and south-east regions. At the heart of this area are the centre:mk Shopping building and the Midsummer Place Shopping Centre...*”. It is therefore imperative that any parking lost through development should be replaced in a location that is convenient to shoppers in Central Milton Keynes and brought back into use before they are lost.

The scale of the reprovision of parking is considerable and should be specifically identified within land use policies. The locations should be identified with good quality access junctions onto the main access routes ensuring sufficient capacity can be provided where there are large concentrations of parking spaces and therefore traffic flows in one location. It may also require changes in the wording to those policies and zoning.

At present, there is inadequate evidence of the existing demand, the spaces lost and the strategy to re-provide these spaces within the Regulation 19 Plan. It is noted that a Parking Strategy is intended to be developed and consulted on with key stakeholders in 2026 (as referenced in Paragraph 5.11 in the *Transport and Movement Topic Paper*). The Parking Strategy is critical evidence to understand the true implications of the draft policies and once this detail is known it is likely that policies and figures within the plan would need to change to demonstrate a considered car parking replacement and access strategy.

A GIS analysis has been undertaken to understand the catchment of customers to centre:mk using unique anonymised postcode data for customers. These postcodes were collected in three surveys undertaken in 2024 (Spring and Winter) and 2025 (Spring) and relate to responses from over 9,000 shoppers. Key headlines from this analysis are as follows:

- 83% of customers live within a 1-hour drive of centre:mk (**Figure 5** of the Technical Report), with a further 17% who live outside of this area.
- The existing public transport 1-hour catchment is considerably smaller than the 1-hour driving catchment (**Figure 6** of the Technical Report).
- The existing public transport 1 hour catchment represents 42% of those customers within the 1-hour drive time catchment (**Figure 7** of the Technical Report).
- A customer at the 1-hour public transport travel time could drive to centre:mk in 15 minutes – so based on current public transport journey times there would be very little incentive for customers to use public transport out of choice (**Figure 6** of the Technical Report).
- The existing public transport 1-hour catchment represents 35% of the overall catchment for centre:mk customers
- Over 65% of customers are beyond the 1-hour public transport catchment

There is clearly a significant difference between the 1-hour driving and 1-hour public transport catchment areas. A far larger proportion of customers live beyond the 1-hour public transport journey. The 65% of customers located outside of the 1-hour public transport catchment have a higher spend rate representing 72% of the spend at centre:mk.

It is acknowledged that public transport improvements are proposed, specifically in the form of the Mass Rapid Transport (MRT, or Metro) system. However, this would not materially change the 1-hour public transport catchment. As such, the MRT may improve the quality of public transport journey it would have very limited benefit in relation to the scale of the Central Milton Keynes retail and leisure catchment.

An online survey was conducted in November 2025 by Emotional Logic (on behalf of the centre:mk owners) of shoppers from within the centre:mk catchment, to quantify the scale of attachment to driving when visiting centre:mk and Milton Keynes. Over 1,000 responses were received. The survey indicates that 91% of residents find driving the most practical way to get to centre:mk, 91% of residents find driving gives them more freedom and control, and 86% feel safer and more comfortable travelling by car. A question in the survey was specifically asked regarding what users would do if the number of car parking spaces at centre:mk were to be reduced. Only 25% of users would continue to drive and find car parking as usual. Conversely, 14% would shop online, 13% would visit less frequently, and 8% would visit a different shopping centre instead. Those potentially visiting less often / not visiting at all (35%) is therefore greater than the proportion who said they would not change their habits (25%). This could lead to a significant change in demand and footfall, potentially affecting the vitality of centre:mk and Central Milton Keynes as a whole. In terms of alternative transport mode to reach the Milton Keynes, respondents were not particularly likely to consider using Park & Ride or Bus / Coach as an alternative (score of '5' on a scale of '0' very unlikely to '10' very likely).

Separate data collected from exit surveys indicates that the strong preference for customers is to use surface level car parking (94% to 96% prefer this, compared to 1% - 5% preferring the centre:mk MSCP). The survey highlights the lack of competitiveness that other modes of transport have compared to the car and tangibly demonstrate the impact that reduced car parking provision would have in terms of reducing the likelihood of visiting centre:mk and Central Milton Keynes. This reflects the discretionary nature of shopping and leisure trips, where a worsening of a shopping experience (e.g. through reduced car parking, less convenience and increased congestion) means that shoppers would consider not travelling or using competing shopping centres / city centres instead.

As currently drafted, Policy CMK2 may not fully meet the tests of soundness (in terms of being justified or consistent with national policy). No details are currently presented on the number of car parking spaces that could be affected by these Policies; as such the Council has not presented the proportionate evidence to properly assess the impacts of these Policies. As highlighted above, these Policies could have a significant impact on car parking supply in the vicinity of centre:mk and in Central Milton Keynes as a whole. Our analysis indicates policies may result in a significant reduction in car parking, potentially up to 46%, which warrants careful consideration.

Chapter 7 of the *NPPF* relates to ensuring the vitality of town centres. Paragraph 90 notes that *"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation"*. In relation to this Part A states that planning policies should *"define a network and hierarchy of town centres and promote their long-term vitality and viability..."*, and Part C states that planning policies should *"retain and enhance existing markets"*.

No evidence has been put forward as part of the Regulation 19 Plan to demonstrate that the loss of Central Milton Keynes car parking would not have a detrimental effect on the vitality and vibrancy of Central Milton Keynes as a major regional centre. It is noted that a Parking Strategy is intended to be developed and consulted on with key stakeholders in 2026. It is concerning that this would follow the current Regulation 19 Plan consultation, as the success of those policies are fundamental to the

outcomes of the City Plan. Until that time, the Policies appear to lack appropriate proportionate evidence and are inconsistent with national policy; and therefore, may not fully meet the tests of soundness. The recent car park survey discussed above tangibly demonstrates that lower car parking provision would result in reduced likelihood of visits to centre:mk and Milton Keynes. This appears to be inconsistent with the NPPF Chapter 7 objectives, referenced above.

It is acknowledged that Policy CMK2 refers to the “*satisfactory re-provision of parking to other appropriate locations*”. Again, there is no detail regarding the number of spaces that this relates to, and the reference to “*satisfactory re-provision*” is inappropriately vague. As highlighted earlier, data collected by Emotional Logic (on behalf of the centre:mk Owners) indicates that centre:mk users have a strong preference for the use of surface level car parking compared to multi storey car parking. Re-providing car parking in less convenient locations could still have a detrimental effect on shopper experience, and as a result the vitality of the Central Milton Keynes. This appears to be inconsistent 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.

Potential changes are shown in red below:

B. Development proposals must manage the level of parking needed to support a vibrant city centre while maintaining high levels of convenience, through:

- 1. Coordinating the phased reduction of ‘front of house’ surface car parking areas as identified at CMK 1 E.4. in tandem with improvements to public transport provision and satisfactory re-provision first of **high quality and convenient** parking to other appropriate locations in the city centre. **Provision of car parking spaces should meet demand for retail and leisure users, should be of high quality and within 300m walking distance to centre:mk;** and*
- 2. Managing and protecting retained parking, and re-provided parking areas to allow flexible usage to meet different demand profiles*

156 We will approve additional guidance, including that for open space and a design code(s), to guide development proposals over the plan period. For example, the creation of pocket parks throughout Central Milton Keynes will be encouraged, including through the re-use of areas of public realm or surface-level car parking. These may be located along the Midsummer Boulevard Greenway, or within the green frame around the city centre, to serve local communities and provide enhanced links through blocks

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 articulate the representations provided above.

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

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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.

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Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

Ref:
(For official use only)

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at ncp.engagement@milton-keynes.gov.uk

This form has two parts –

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

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Title

First Name

Last Name


Job Title

(where relevant)
Organisation

(where relevant)
E-mail Address

Address Line 1

Line 2

Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	

Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="ECP2"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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 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.

The relationship between Nexus’ retail analysis and the current (Regulation 19) version of the City Plan replicates the approach adopted in the previous (Regulation 18) iteration. The capacity figures from the Retail and Commercial Leisure Study, 2025 Update (the ‘RCLSU’) are set out without caveats in The Economic and Cultural Prosperity Topic Paper, Regulation 19 Version (Table 12, page 36) (‘Topic Paper’), although notably not in the Regulation 19 Plan itself (which continues to reference historic figures as noted above). The approach to the key policy for CMK (ECP2) is, with one exception (Xscape Building), largely unchanged.

Shopping Frontage Definitions

The important matters highlighted at paras 3.1-3.13 of the 2024 report submitted with our Regulation 18 Plan representations in relation Town Centre and Primary Shopping Areas (PSAs) continue to be relevant.

Commentary provided by Nexus at paragraphs 19.36 - 19.43 of the 2024 Retail Study is useful in helping to understand the definitions of Town Centre and Primary Shopping Area (PSA) boundaries and how they should be used in plan-making, but it is unclear how this advice is carried over to the Regulation 18 and 19 Plans, particularly in relation to the retail boundaries drawn within Central Milton Keynes.

The 2024 Retail Study, prepared by Nexus explains that Town Centre and Primary Shopping Area (PSA) boundaries enable developers and decision makers to consider the sequential and impact tests when determining individual proposals for development and / or changes of use.

As the Council has defined PSA boundaries, edge-of-centre sites are those that are defined as sites which are within a 300-metre walking distance of a PSA boundary, whilst out-of-centre sites are defined as areas beyond the 300 metres. Town Centre and PSA boundaries are important in this context (19.36-37).

Local authorities often utilise the PSA definition to help designate frontages that they are keen to see prosper in retail use, with differing ranges of main town centre uses allowed within Primary and Secondary Shopping Frontages. However, Paragraph 90 of the NPPF requires local authorities to define the extent of town centres and PSAs only, with no requirement to identify Primary and Secondary Frontages. References to these frontages were removed from national policy in **2019** (19.39-40).

Annex 2 of the NPPF indicates that a Primary Shopping Area is the *“Defined area where retail development is concentrated”*. Annex 2 also identifies that a town centre is the *“Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area”*.

Whilst there is no longer a requirement in the NPPF to designate a Primary and Secondary Frontage within a PSA, Nexus considers that there remains a policy basis for continuing to identify these areas in CMK because of their role in assisting the Council with defining the types of main town centre uses it envisages being appropriate in different parts of CMK (RCLSU 4.20). This is played out in Policy ECP2 where the Council defines a wider grouping as being suitable within its Secondary Frontage (i.e. drinking establishments, medical and health services). However, there appears to be no consideration as to why the Xscape building, which is predominantly a leisure and food and drink destination, has been included as part of the Secondary Shopping Frontage, which now supports, at Part D, retail uses.

Strengthening the Primary Shopping Area of CMK

In relation to strengthening the vitality and viability of the centres within the Milton Keynes’ retail hierarchy, Policy GS5 highlights that proposals for additional retail development **within the PSA** will be supported. In relation to CMK, Policy GS5 identifies the PSA as the regional

shopping centre for comparison goods shopping, with the remainder of the City Centre (outside of the PSA) suitable for **other** main town centre uses and providing significant leisure functions, as well as important clusters of civic and public buildings.

Our previous representation to the Regulation 18 Plan raised concern about the confusing wording within Policy ECP2 with regard to the location of the Xscape building which suggested that the Secondary Shopping Frontage around the building was within the PSA. This contradicted the CMK Inset Map which showed the Xscape frontage outside of this area. As part of our previous representations, we recommended that a clarification should be inserted into the wording to confirm that the Xscape building lies outside of the PSA (Recommendation 1).

Whilst Recommendation 1 has been largely accepted and policy wording amended in the Regulation 19 plan to clarify the status of the Xscape Building as lying outside of the PSA, we note that Recommendation 2 has been ignored. These are reproduced further below with reference to the wording in Policy ECP2.

The significant reduction in assessed retail capacity within the RCLSU highlighted elsewhere in our review continues to provide an important context to the operation of Policy ECP2. It is imperative that any retail growth identified through population and spending increase is directed towards the CMK PSA and is not diluted by an overly permissive policy framework that fails to restrict such uses in secondary and peripheral areas. As noted above, we continue to conclude, based on our review of the RCLS and RCLSU, that comparison goods capacity in CMK has been exaggerated and that such a policy which seeks expansion of retail uses outside of the PSA is not evidence based or sound.

Based on the advice contained in these studies, the Regulation 19 Plan continues to define Primary and Secondary Frontages in CMK, and to adopt a criteria-based approach in ECP2:

- *C. “Within the Primary Shopping Frontages at ground floor level, development for Retail, Food and Drink, Financial, Professional and other services, gyms, creche, leisure and cultural uses will be supported.*
- *D. Within Secondary Shopping frontages at ground floor level, development for **Retail** (our emphasis), Food and Drink, Financial, Professional and other services, gyms, creche, leisure and cultural uses, drinking establishments, medical and health services will be supported.”*

As we have stated previously, Criteria C and D effectively allow the same uses in both defined frontages, including, crucially, retail uses. This largely unamended policy in the Regulation 19 Plan therefore permits retail uses **outside** of the PSA, contrary to other policies in the plan (specifically Policy GS5) which identify the CMK PSA as the regional shopping centre for comparison goods, with the remainder of the City Centre (outside of the PSA) suitable for **other** main town centre uses.

This approach also conflicts with the NPPF, which requires impact and sequential testing for edge-of-centre proposals (i.e. those which lie outside of the PSA), a requirement echoed in

Policy ECP3. In fact, the range of permitted uses in the Secondary Shopping Frontage in ECP2 continues to be wider than in the Primary Shopping Frontage, which is illogical and conflicts with the City Plan's own definition of the uses that should be contained within these frontages.

Policy ECP2 as currently worded is, in our view, neither robust nor fit for purpose and conflicts with the NPPF and other policies within the Plan (Policy GS5 and ECP3). As it stands, Policy ECP2 has the potential to allow retail uses outside of the PSA that are essential to its future vitality and disperses needed retail investment to secondary locations. This issue is the more significant given the significant reduction in comparison goods retail capacity that we have identified.

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.

Consistent with Recommendation 2 of our 2024 report (Appendix 2), in order to make Policy ECP2 sound, the easiest way to remedy the issue is for the Council to delete references to Primary and Secondary Frontages in Policy ECP2 (as there is no requirement in national policy to define these areas) and revise the Inset Map accordingly to define the PSA for CMK only i.e. remove the secondary frontage designation from the Xscape site.

In doing so, the retail offer of the PSA of CMK could be strengthened and maintained as the regional shopping centre for comparison goods (as outlined in Policy GS5). The PSA would also align with the definition as outlined in the NPPF and the City Plan (i.e. as the area where retail is concentrated). In so doing, ECP2 would then be consistent with national policy and sound.

Proposals for other main town centre uses could still be supported in the Xscape building (by virtue of it being an edge of centre site outside of the PSA) but any significant proposals for retail uses (over 900 sq m) would be subject to impact and sequential testing as outlined within Policy ECP3 in order to protect the vitality and viability of the PSA and prevent the dilution of its core retail offer.

Alternatively, if the Council is minded to retain references to the Primary and Secondary Shopping Frontages in order to define the types of main town centre uses it envisages being appropriate in different parts of CMK (despite this approach not being supported in national guidance), in order to make the policy sound, we recommend that the reference in Criterion D to 'Retail' being permissible within Secondary Shopping Frontages is deleted.

As noted above, proposals for other main town centre uses in the Xscape building would still be supported (as allowed by the remainder of Policy ECP2) but any significant proposals for retail uses (over 900 sq m) would be subject to impact and sequential testing as outlined within Policy ECP3. This would also enable the defined PSA in CMK to be strengthened as the

regional centre for comparison goods (consistent with Policy GS5) and avoid the dilution of this offer to areas outside of the PSA.

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:

We wish to attend the relevant hearing session to articulate our evidence contained here and in other representations submitted to the Regulation 19 Plan, those being: Paragraphs 58, 59 and 141, the Glossary, the Proposed Policies Map and Policy ECP3.

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.

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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

First Name

Last Name

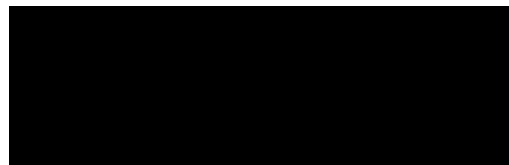
Job Title

(where relevant)

Organisation

(where relevant)

E-mail Address



Address Line 1

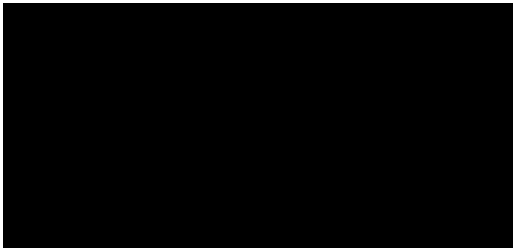
Line 2

Line 3

Line 4

Post Code

Telephone Number



Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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 type="checkbox"/>	No	<input checked="" 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 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.

The Sequential and impact test must be applied to **all** proposals, including comparison retail outside of the area defined as the Primary Shopping Frontages and those outside of the Primary Shopping Area as identified on the Central Milton Keynes Inset Map.

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.

Remove Secondary Shopping Frontage designation at the Xscape site, as this sits outside of the Primary Shopping Area.

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.

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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:

We wish to attend the relevant hearing session to articulate our evidence contained here and in other representations submitted to the Regulation 19 Plan, those being: Paragraphs 58, 59 and 141, the Glossary, the Proposed Policies Map and Policy ECP2.

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Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

Ref:
(For official use only)

Name of the Local Plan to which this representation relates:

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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

First Name

Last Name

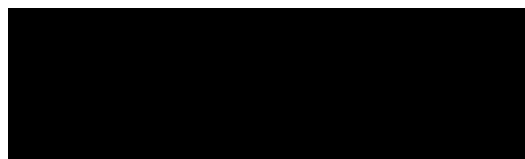
Job Title

(where relevant)

Organisation


(where relevant)

E-mail Address



Address Line 1

Line 2

Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	

Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="GS9"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input 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 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.

We fully support the Metro corridors and the drive to deliver higher densities that exploit their highly accessible locations (paragraph 80). We consider it is the correct approach to achieve densities and associated housing mix that take account of the immediate context of that development. This will in our view strike a balance between maximising efficient use of land and achieving good design and placemaking.

The above notwithstanding, when Policy GS9, and the reasoned justification that supports is read as a whole, is seemingly referring to residential development i.e. ‘major’ residential (or led) and the regeneration of residential estate(s). The Policy refers to ‘major’ development. It is therefore unclear what forms of development should adhere to the policy.

In the event, for example, that enhancement proposals for centre:mk Shopping Building are proposed, that are deemed 'major', it is considered unreasonable to expect that proposal to adhere to the Part A and B requirements, as these are seemingly residential development focused. In addition, given the Listed nature of centre:mk, it is considered unrealistic to expect any associated proposals that are deemed 'major' to achieve the densities sought whilst making provision to Metro infrastructure.

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.

We consider that Policy GS9 and the reasoned justification that supports it should include wording making it clear that the policy relates to residential, residential-led developments and regeneration of residential estate(s).

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.

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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:

In the absence of any clarification regarding the above, we wish to attend the relevant hearing session to assist with clarifying what forms of development should adhere to the policy.

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.

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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.

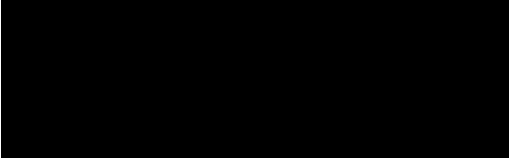

Part A


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	<input type="text" value="c/o Agent"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="c/o Agent"/>	<input type="text" value="Sid"/>
Last Name	<input type="text" value="c/o Agent"/>	<input type="text" value="Hadjioannou"/>
Job Title	<input type="text" value="Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited"/>	<input type="text" value="Director of Planning"/>
(where relevant) Organisation	<input type="text"/>	<input type="text" value="SAH Town Planning"/>
(where relevant) E-mail Address	<input type="text"/>	
Address Line 1	<input type="text"/>	
Line 2	<input type="text"/>	<input type="text"/>

Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	

Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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

Paragraph	<input type="text"/>	Policy	PFHP4	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input 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 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.

We support the general thrust of the policy.

We consider that Parts C and D, may in practice prove difficult to deliver on-site for major residential development that takes the form of apartments, especially development that is of high density in central locations such as Central Milton Keynes.

Part C is unclear as to the amount of on-site provision that is envisaged, and whether this requirement forms part of the overall amenity space requirements for development.

Part D is also unclear as to whether the requirement applies to houses, apartments or both. It is also unclear how applicants are required to demonstrate that on-site provision is not possible and how the requisite off-site contributions will be calculated.

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 or a new reasoned justification paragraph added to reflect the aforementioned comments.

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

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

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

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

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

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

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

Sharing your personal details

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

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

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

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

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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

First Name

Last Name

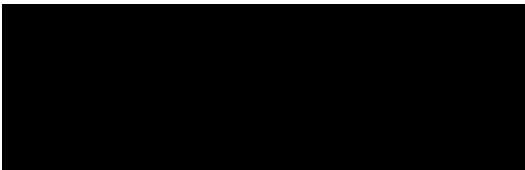
Job Title

(where relevant)

Organisation

(where relevant)

E-mail Address



Address Line 1

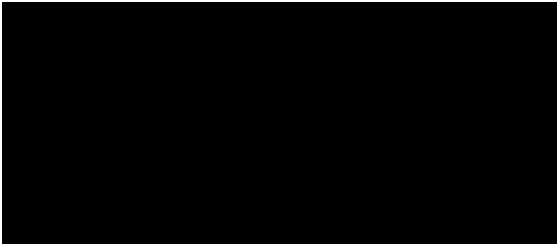
Line 2

Line 3

Line 4

Post Code

Telephone Number



Part B – Please use a separate sheet for each representation

Name or Organisation: Hermes CMK Nominee No.1 Limited and Hermes CMK Nominee No.2 Limited

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

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

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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 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.

Neither definition for Primary nor Secondary Shopping Frontages appear at Annex 2: Glossary of the National Planning Policy Framework.

Moreover, the definition of Secondary Shopping Frontage as it appears at the Glossary of the Reg 19 Plan defines such areas as:

“Secondary shopping frontages (SSFs) provide greater opportunities for a diversity of uses such as restaurants, cinemas and business”.

This definition is true of the function and the operation of the now defined Secondary Shopping Frontage at Xscape, being as it is a leisure destination.

As highlighted at our representations to Policy ECP2, it is unclear why that policy seeks to include retail uses within such frontages, especially as it is not consistent with national policy.

It is therefore considered that Proposed Policies Map is not 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.

We request that the designation of the Secondary Shopping Frontage at the Xscape site is removed.

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:

We wish to attend the relevant hearing session to assist with the evidence alongside our representations to Paragraphs 58, 59 and 141, the Glossary and Policies ECP2 and ECP3, that would in our view assist in ensuring that the Plan is robust and justified.

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.

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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.*

**Review of Milton Keynes Retail and
Commercial Leisure Study Update 2025**
On Behalf of Hermes CMK General Partner Ltd

December 2025

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Client

Hermes CMK General Partner Limited

Our reference

BTPL1000

December 2025

Executive Summary

Review of Retail and Commercial Leisure Study Update 2025

- 1.1 A review of the Retail and Commercial Leisure Study Update 2025, prepared by Nexus Planning, has been undertaken by Turley Economics to understand the evidence base that supports the requirement of around 66,200 sq m of comparison retail floorspace contained at paragraph 141 of the Regulation 19 MK City Plan 2050 which informs the ambitions for the development of additional retail floorspace at Policy CMK1.
- 1.2 This figure is incorrect and based on the comparison goods capacity figure identified in the 2024 Retail Study. Retail capacity figures presented elsewhere in the Plan (under the ‘Meeting Our Retail Needs’ section at paragraphs 53-63) are also incorrect. As we demonstrate in our full review, the 2025 Update continues to contain an error (present in the 2024 Retail Study) which significantly exaggerates the forecast comparison floorspace capacity and should be corrected.
- 1.3 Our review reveals concerns and suggestions surrounding the methodology and assumptions used within the Nexus Retail Study’s comparison goods capacity assessment. These concerns centre around the Special Forms of Trading (‘SFT’) which have not been deducted at the base year. The implications for this are that the capacity calculations in the Retail Study exaggerate the amount of comparison goods floorspace available throughout the plan period. We therefore recommend that Nexus reviews the comparison goods capacity tables to correct this error.

Table 2.2: Alternative Capacity Analysis: Comparison Goods Capacity Requirement in Central Milton Keynes at 2050 (RCLSU 2025 vs Turley Analysis 2025)

Housing Scenario		Retail Study Update Floorspace Capacity (sq m net)	Revised Assessment Floorspace Capacity (sq m net)	Difference in Floorspace Capacity (sq m net)
Scenario A (50,372 by 2050)	Min.	20,392	15,381	-5,011
	Max.	32,044	24,170	-7,874
Scenario B (63,421 by 2050)	Min.	26,336	19,952	-6,384
	Max.	41,385	31,354	-10,031
Range between Scenario A and B	Min.	20,392	15,381	-5,011
	Max.	41,385	31,354	-10,031

Source: Appendix 1, Scenarios A and B, Nexus Table 19b, Turley Table 19b

- 1.4 As a consequence, the alternative capacity analysis (Table 2.2 of the Review of Milton Keynes Retail and Commercial Leisure Study Update 2025 - reproduced above) demonstrates that by deducting SFT from per capita figures at the base year used, the

forecast comparison goods capacity in CMK drops from 26,336 - 41,385 sq m net to only 19,952 – 31,354 sq m net in 2050 (a 24.0% reduction in capacity). This reflects the outputs in Scenario B with population forecasts based on high housing growth (63,400 dwellings by 2050).

- 1.5 If modelled using the lower (potentially more realistic) housing delivery figures set out within Scenario A (50,300 dwellings by 2050), which is more aligned with current housing delivery rates in Milton Keynes, the forecast comparison goods capacity figure in CMK reduces further from 20,372 – 32,044 sq m net (as identified in the Retail Study) to only 15,381 – 24,170 sq m net at 2050 (a 32.6% reduction).
- 1.6 Clearly, this also has a knock-on effect for available comparison goods capacity calculated in the years 2026, 2030, 2035 and 2040 with substantial decreases in capacity identified in our alternative assessment.
- 1.7 It is also of note that this error is present within the convenience goods capacity assessment, although less pronounced as the SFT reduction at the base year should be 5.0% (compared with 23.1% in the comparison goods scenario) and the forecast floorspace capacity in CMK is mostly negative up to the end of the Plan period. This error requires correction in both the RCLSU and Regulation 19 Plan.

Policy ECP2 ‘Supporting the Vitality and Viability of Centres’

- 1.8 The relationship between Nexus’ retail analysis and the current (Regulation 19) version of the City Plan replicates the approach adopted in the previous (Regulation 18) iteration. The capacity figures from the RCLSU are set out without caveats in The Economic and Cultural Prosperity Topic Paper, Regulation 19 Version (Table 12, page 36) (‘Topic Paper’), although notably not in the plan itself (which continues to reference historic figures at paragraph 141 or across the city as a whole at Table 7). The approach to the key policy for CMK (ECP2) is, with one exception (Xscape Building), largely unchanged.

Shopping Frontage Definitions

- 1.9 The important matters highlighted at paras 3.1-3.13 of our 2024 report in relation Town Centre and Primary Shopping Areas (PSAs) continue to be relevant to our client’s representations to the Regulation 19 Plan and are reproduced below.
- 1.10 Commentary provided by Nexus at paragraphs 19.36 - 19.43 of the 2024 Retail Study is useful in helping to understand the definitions of Town Centre and Primary Shopping Area (PSA) boundaries and how they should be used in plan-making, but it is unclear how this advice is carried over to the Plan, particularly in relation to the retail boundaries drawn within CMK.
- 1.11 The 2024 Retail Study explains that Town Centre and PSA boundaries enable developers and decision makers to consider the sequential and impact tests when determining individual proposals for development and / or changes of use. As the Council has defined PSA boundaries, edge-of-centre sites are those that are defined as sites which are within a 300 metre walking distance of a PSA boundary, whilst out-of-

centre sites are defined as areas beyond the 300 metres. Town Centre and PSA boundaries are important in this context (19.36-37).

- 1.12 Local authorities often utilise the PSA definition to help designate frontages that they are keen to see prosper in retail use, with differing ranges of main town centre uses allowed within Primary and Secondary Shopping Frontages. However, Paragraph 90 of the NPPF requires local authorities to define the extent of town centres and PSAs only, with no requirement to identify Primary and Secondary Frontages. References to these frontages were removed from national policy in 2019 (19.39-40).
- 1.13 Annex 2 of the NPPF indicates that a Primary Shopping Area is the “Defined area where retail development is concentrated”. Annex 2 also identifies that a town centre is the “Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area”.
- 1.14 Whilst there is no longer a requirement in the NPPF to designate a Primary and Secondary Frontage within a PSA, Nexus considers that there remains a policy basis for continuing to identify these areas in CMK because of their role in assisting the Council with defining the types of main town centre uses it envisages being appropriate in different parts of CMK (RCLSU 4.20). This is played out in Policy ECP2 where the Council defines a wider grouping as being suitable within its Secondary Frontage (i.e. drinking establishments, medical and health services). However, there appears to be no consideration as to why the Xscape building, which is predominantly a leisure destination, has been included as part of the Secondary Shopping Frontage.

Strengthening the Primary Shopping Area of CMK

- 1.15 In relation to strengthening the vitality and viability of the centres within the Milton Keynes’ retail hierarchy, Policy GS5 highlights that proposals for additional retail development **within the PSA** will be supported. In relation to CMK, Policy GS5 identifies the PSA as the regional shopping centre for comparison goods shopping, with the remainder of the City Centre (outside of the PSA) suitable for **other** main town centre uses and providing significant leisure functions, as well as important clusters of civic and public buildings.
- 1.16 Our previous representation to the Regulation 18 plan raised concern about the confusing wording within Policy ECP2 with regard to the location of the Xscape building which suggested that the Secondary Shopping Frontage around the building was within the PSA. This contradicted the CMK Inset Map which showed the Xscape frontage outside of this area. As part of our previous representations, we recommended that a clarification should be inserted into the wording to confirm that the Xscape building lies outside of the PSA (Recommendation 1).
- 1.17 Whilst Recommendation 1 has been largely accepted and policy wording amended in the Regulation 19 plan to clarify the status of the Xscape Building as lying outside of the PSA, we note that Recommendation 2 has been ignored. These are reproduced further below with reference to the wording in Policy ECP2.

- 1.18 The significant reduction in assessed retail capacity within the RCLSU highlighted elsewhere in our review continues to provide an important context to the operation of Policy ECP2. It is imperative that any retail growth identified through population and spending increase is directed towards the CMK PSA and is not diluted by an overly permissive policy framework that fails to restrict such uses in secondary and peripheral areas. As noted above, we continue to conclude, based on our review of the RCLS and RCLSU, that comparison goods capacity in Central MK has been exaggerated and that such a policy which seeks expansion of retail uses outside of the PSA is not evidence based or sound.
- 1.19 Based on the advice contained in these studies, the Regulation 19 plan continues to define Primary and Secondary Frontages in CMK, and to adopt a criteria-based approach in ECP2:
- *C. “Within the Primary Shopping Frontages at ground floor level, development for Retail, Food and Drink, Financial, Professional and other services, gyms, creche, leisure and cultural uses will be supported.*
 - *D. Within Secondary Shopping frontages at ground floor level, development for **Retail** (our emphasis), Food and Drink, Financial, Professional and other services, gyms, creche, leisure and cultural uses, drinking establishments, medical and health services will be supported.”*
- 1.20 As we have stated previously, Criteria C and D effectively allow the same uses in both defined frontages, including, crucially, retail uses. This largely unamended policy in the Regulation 19 plan therefore permits retail uses **outside** of the PSA, contrary to other policies in the plan (specifically Policy GS5) which identify the CMK PSA as the regional shopping centre for comparison goods, with the remainder of the City Centre (outside of the PSA) suitable for **other** main town centre uses.
- 1.21 This approach also conflicts with the NPPF, which requires impact and sequential testing for edge-of-centre proposals (i.e. those which lie outside of the PSA), a requirement echoed in Policy ECP3. In fact, the range of permitted uses in the Secondary Shopping Frontage in ECP2 continues to be wider than in the Primary Shopping Frontage, which is illogical and conflicts with the City Plan’s own definition of the uses that should be contained within these frontages.
- 1.22 Policy ECP2 as currently worded is, in our view, neither robust nor fit for purpose and conflicts with the NPPF and other policies within the Plan (Policy GS5 and ECP3). As it stands, Policy ECP2 has the potential to allow retail uses outside of the PSA that are essential to its future vitality and disperse needed retail investment to secondary locations. This issue is the more significant given the significant reduction in comparison goods retail capacity that we have identified.

Recommended Modifications

- 1.23 Consistent with Recommendation 2 of our 2024 report (Appendix 2), in order to make Policy ECP2 sound, the easiest way to remedy the issue is for the Council to delete references to Primary and Secondary Frontages in Policy ECP2 (as there is no

requirement in national policy to define these areas) and revise the Inset Map accordingly to define the PSA for CMK only.

- 1.24 In doing so, the retail offer of the PSA of CMK could be strengthened and maintained as the regional shopping centre for comparison goods (as outlined in Policy GS5). The PSA would also align with the definition as outlined in the NPPF and the City Plan (i.e. as the area where retail is concentrated). In doing, ECP2 would then be consistent with national policy and sound.
- 1.25 Proposals for other main town centre uses could still be supported in the Xscape building (by virtue of it being an edge of centre site outside of the PSA) but any significant proposals for retail uses (over 900 sq m) would be subject to impact and sequential testing as outlined within Policy ECP3 in order to protect the vitality and viability of the PSA and prevent the dilution of its core retail offer.
- 1.26 Alternatively, if the Council is minded to retain references to the Primary and Secondary Shopping Frontages in order to define the types of main town centre uses it envisages being appropriate in different parts of CMK (despite this approach not being supported in national guidance), in order to make the policy sound, we recommend that the reference in Criterion D to 'Retail' being permissible within Secondary Shopping Frontages is deleted.
- 1.27 As noted above, proposals for other main town centre uses in the Xscape building would still be supported (as allowed by the remainder of Policy ECP2) but any significant proposals for retail uses (over 900 sq m) would be subject to impact and sequential testing as outlined within Policy ECP3. This would also enable the defined PSA in CMK to be strengthened as the regional centre for comparison goods (consistent with Policy GS5) and avoid the dilution of this offer to areas outside of the PSA.

1. Introduction

- 1.1 Turley has been instructed by Hermes CMK General Partner Limited ('Hermes') to review and critique the Retail and Commercial Leisure Study 2025 Update ('the Retail Study Update or 'RCLSU'), which has been prepared by Nexus Planning ('Nexus') for Milton Keynes City Council ('the Council').
- 1.2 Hermes will be submitting representations to the Regulation 19 Consultation Version of the MK City Plan 2050 ('the City Plan'), the consultation deadline for which is 22 December 2025. It is intended that this critique will inform this submission.

Retail and Commercial Leisure Study Update

- 1.3 The RCLSU (July 2025) is a revised and amended version of the earlier Retail and Commercial and Leisure Study ('RCLS'), also prepared by Nexus and published in March 2024. Nexus explains (paragraph 1.5) that the RCLSU does not replace the RCLS and should be 'read alongside' the previous document.
- 1.4 The basis for the revisions to the RCLS is explained by Nexus at paragraphs 1.1-1.4. The resulting updated study includes revised retail capacity projections whilst also responding to representations submitted in relation to the earlier Regulation 18 Consultation Version of the City Plan. This is explained at para 1.14 of the RCLSU:

'Nexus is therefore asked to comment on those representations and advise what, if any, suggested changes there should be to the policies and related explanatory text set out in the draft Regulation 18 consultation Plan'.

Other Documents

- 1.5 In addition to a critique of the RCLSU, Turley has also assessed and reviewed the following documents:
- The Regulation 19 Version of the City Plan, focussing on proposed policies for CMK.
 - The Economic and Cultural Prosperity Topic Paper, Regulation 19 Version, November 2025.

Background

- 1.6 Representations submitted on behalf of Hermes to the Regulation 18 Plan included a critique of the 2024 Nexus Retail Study (RCLS) prepared by Turley (September 2024). These representations highlighted errors in the retail analysis presented in the RCLS, and confusing and contradictory policies for Central MK in the Reg 18 Plan relating, in particular, to retail frontages and the extent of the Primary Shopping Area ('PSA'). The following matters were highlighted:
- The capacity for comparison goods floorspace had been overstated to a significant degree due to erroneous analysis by Nexus, which failed to deduct SFT from the expenditure (and resulting floorspace) projections.

- The Regulation 18 plan incorporated maximum capacity projections based on an uncritical acceptance of the Nexus outputs, without reference to the problematic nature of long-term forecasting and margins of error highlighted in the 2024 Retail Study. This approach is repeated in the figures presented within the Regulation 19 Plan ('Meeting Our Retail Needs' - paragraphs 53-63). Moreover, the Regulation 19 Plan references historic capacity figures from the RCLS (66,200 sq m net of comparison floorspace, para. 141) rather than those set out in the RCLSU.
 - Although the locational status of the Xscape Building in policy terms is now clarified (a matter highlighted in our earlier representations), the Regulation 19 Plan through Policy ECP2 continues to apply a confusing policy framework in relation to primary and secondary frontages in Central MK, at odds with National Guidance. The extent of the 'retail need' which underpins these policies is flawed for the reasons stated above (and as set out in detail in our earlier representations).
- 1.7 These matters have not been satisfactorily addressed in the RCLSU, in the Regulation 19 Plan or in Economic and Cultural Prosperity Topic Paper. We continue to recommend the rewording or removal of elements within Policy ECP2 to ensure that the retail offer of the Primary Shopping Area ('PSA') of CMK is not diluted into edge-of-centre locations, particularly to parts of the Secondary Shopping Frontage which lie outside of the PSA.
- 1.8 The contents of this report and our representations to the Regulation 19 Plan should therefore be read in conjunction with Turley's 2024 review of the RCLS (**Appendix 2**).

2. Critique of Retail Study Update

- 2.1 This section of the report sets out a critique of the RCLSU, focusing on Nexus' updated comparison goods capacity exercise, key assumptions and errors. An alternative capacity assessment prepared by Turley is summarised below, supported by a series of tables. These are included at **Appendix 1**.
- 2.2 As part of this review, we summarise the key changes underpinning the revised Nexus capacity figures, but do not repeat our general comments on methodology and background matters, which are largely as set out in our 2024 report (paragraphs 2.1 – 2.15) at **Appendix 2**.
- 2.3 We continue to conclude that comparison goods capacity in CMK over the plan period has been overstated to a significant extent, with clear implications for policy formulation.

Quantitative Analysis – Comparison Goods

- 2.4 We have reviewed the inputs and supporting assumptions in the RCLSU and make the following observations:
- 2.5 **Population and Per Capita Spending:** per capita spending is derived from Experian, a reliable source of such data. Population data is derived from the population scenarios set out in the Milton Keynes Housing and Economic Development Needs Assessment Update 2025 ('HEDNA Update'). These are based on projected housing needs for MK and various scenarios of housing growth up to 2050. The two scenarios of most relevance to the retail capacity modelling are as follows:
- **Scenario A** is based on Scenario A of the HEDNA Update, which proposes an average annual housing growth of 1,799 dwellings over the period 2022-2050 (50,400 dwellings) across the Council area, with a 2050 population of c. 382,000.
 - **Scenario B** is based on Scenario 3 of the original HEDNA, which proposes an average annual housing of 2,265 dwellings over the period 2022-2050 (63,400 dwellings) across the Council area, with a 2050 population of 410,000.
- 2.6 Although the Scenario B figure remains unchanged from the figures used in the RCLS, the Scenario A figure has been lowered from 1,902 dwellings per annum in the original RCLS to 1,799 dpa in the RCLSU, resulting in slightly lower capacity figures in the minimum floorspace scenario.
- 2.7 It is not possible to verify the population calculations that underly the HEDNA Update as these are not explicitly presented within the report.
- 2.8 In terms of how the projected completions per annum within Scenarios A and B compare with existing housing completion rate across the Council area, the current 5 year average number of housing completions is 1,690 dwellings per annum (figures

from 2020/21 – 2024/25).¹ This figure is closer to the 1,799 dwellings per annum figure presented within Scenario A than the 2,265 dwellings per annum in Scenario B. If the housing completions across the Council area continue at the same rate as over the past 5 years, the average delivery figure is likely to be closer to the minimum capacity figure in Scenario A and may not reach the maximum population set out in the high-delivery scenario.

- 2.9 The alternative capacity analysis presented below examines the implications for housing delivery in both scenarios. This is in order to provide an understanding of the minimum and maximum comparison goods floorspace that might be supported up to the end of the plan period using the same methodology as in the Retail Study.
- 2.10 **Growth Rates:** these have been applied based on Experian forecasts derived from the Experian Retail Planner Briefing Note 22, March 2025 ('ERPBN 22'). Our original review of the RCLS highlighted how growth rates in the most recent Experian publication should be used to inform the capacity assessment analysis. This is an approach that has been followed by Nexus in the Retail Study Update.
- 2.11 As acknowledged by Nexus in the RCLSU (paragraph 2.15), as a result of the new growth rates, forecasts for both convenience and comparison goods are now generally less optimistic than what was forecast in the RCLS, leading to negative growth for convenience goods up to 2040 and negative growth for comparison goods initially, and then positive growth from 2026, with annual growth thereafter more conservative than previous forecasts.
- 2.12 **Special Forms of Trading ('SFT'):** as with the RCLS, the treatment of SFT in the RCLSU is unclear. The assessment appears to not deduct SFT at the base year, instead missing this step and then applying growth rates that have been adjusted to account for SFT for sales via stores.
- 2.13 Reading the RCLS alongside the RCLSU (as advised by Nexus), paragraph 4.23(b), the original RCLS states the following:

"Experian Retail Planner Briefing Note 20 (February 2023) provides estimated year-on-year forecasts of internet and other SFT, which allows us to 'strip out' any expenditure that is, either now or in the future, diverted to SFT. This ensures that the increasing propensity to shop by SFT is accounted for in our modelling. These increasing deductions for SFT have the effect of off-setting some of the growth in expenditure in the Study Area derived from population increases. Furthermore, many brands offer online sales, but source the goods from their own stores' shelves. This is often the case for foodstores where employees will pick online orders from stores' shelves before, during or after opening hours. These orders are then delivered by dedicated vans from each store and as such, the online expenditure is attributed to tangible stores. Experian provides 'adjusted' figures to account for this."

¹ Gov.uk Live Tables on Housing Supply. Table 253: Housing supply – indicators of new supply, England to 2024/25 (19 September 2025)

2.14 Use of this method is echoed in the notes provided at Table 8a of the economic tables presented at RCLSU Appendices A and B. These state that:

“c. Per capita expenditure figures are derived from Experian MMG3 data (2025 report) at 2023 - the 2023 figures are then projected to the assessment years using “Ex. SFT adjusted for sales via stores’ forecast growth rates taken from Figure 7 of Experian Retail Planner Briefing Note 22.”

2.15 The method used within both the RCLS and RCLSU appears to be at odds with advice of how to use the adjusted SFT growth rates presented within the Experian guidance. The footnote to Figure 7 at Appendix 3 (in ERPBN 22 and 20) reads as follows:

“To make use of the growth rates in the ‘Exc all SFT’ columns of the table, the starting point should be a total that excludes all SFT (our emphasis). The growth rates can then be applied to give a total that excludes all SFT, by the year of interest. No further adjustments are required to exclude all SFT, as this is accounted for in the starting input and the growth rates.

“The same principle applies to use of the ‘Ex SFT adjusted for sales via stores’ columns. The starting point should be a total that excludes all SFT adjusted for sales via stores. The growth rates can then be applied, and the final output will be a total that excludes all SFT adjusted for sales via stores, with no further adjustments required.”

2.16 We have acquired the per capita spending figures for each of the survey zones from Experian in order to verify whether the per capita figures within RCLSU exclude SFT as stated by Nexus throughout the Retail Study. Whilst the base year of 2023 is not included within the tables in Appendix A and B appended to the RCLSU, the base year per capita figures are included within the full Excel spreadsheets of the tables that have been uploaded to the Council’s website.

2.17 As stated above, Nexus has derived its figures from Experian’s Micromarketer Generation 3 (MMG3) platform whereas Turley has derived its figures from Experian Location Analyst platform. This results in minor discrepancies in the figures which we do not anticipate will have a major bearing on the capacity figures overall. These figures are presented in full in Table 1 at Appendix 1 and partially presented in Table 2.1 below for information.

Table 2.1: Comparative Analysis of Per Capita Figures at 2023

Source	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5
Nexus figures: Experian 2024-based <u>“Excluding SFT”</u>	3,501	4,029	3,488	4,020	4,001
Turley figures Experian 2024-based <u>Including SFT</u>	3,485	4,038	3,495	4,027	4,011

Source: RCLSU per capita figures and Turley per capita figures (Experian derived)

- 2.18 As can be seen from Table 2.1, the per capita figures presented within the RCLSU economic tables that purportedly exclude SFT are similar to the per capita figures derived from Experian prior to SFT being deducted.
- 2.19 This analysis, and details of the methodology outlined in the Retail Study, would suggest that SFT has not been deducted at the base year. As stated within our review of the RCLS at Appendix 2, the implications for this are that the capacity calculations in the RCLSU continue to exaggerate the amount of comparison goods floorspace available throughout the plan period.
- 2.20 **Floorspace productivity growth:** the efficiency growth rates used to calculate the growth in comparison goods benchmark turnovers and sales densities ranges from - 0.1% to +2.3% per annum. These are derived from the latest ERPBN 22 and are robust.
- 2.21 **Inflow:** the turnover of comparison goods destinations in Milton Keynes factors in an inflow of 2% from outside of the Study Area, based on Nexus' professional judgement (RCLS para 4.72). Whilst this assumption is not explained anywhere within the assessment or within the RCLSU, the level of inflow is small and appears to be reasonable.
- 2.22 **Equilibrium Trading:** a comment that was raised in our 2024 critique of the RCLS, and is a key assumption applied by Nexus to quantify capacity in the RCLSU is 'equilibrium trading' in the base year. This effectively means that actual and benchmark turnovers are assumed to be in balance in 2023. This is effectively a judgement by Nexus and one that is critical to the capacity calculation. Capacity is calculated by applying a benchmark sales density of £3,500/sq m in 2023 (maximum forecast) and £5,500 sq m in 2023 (minimum forecast), increasing (in line with floorspace efficiency) in subsequent years (up to 2050).
- 2.23 The problem with Nexus' approach is that the actual benchmark turnover per sq m in 2023 is not identified, and any relationship with an assumed range between the £3,500 and £5,500/sq m trading level is unknown. This would require Nexus to use net comparison floorspace for CMK and other centres to calculate this figure. It may be that there is pent-up capacity in the base year (because the sales density is in reality much higher), which would have fundamental implications for future years. Unfortunately, this is not explored in the study and remains a significant unknown.
- 2.24 In the absence of a base year assessment, Nexus' analysis is therefore something of an artificial exercise determined by the differences between expenditure growth rates and floorspace efficiency. On the basis of the rates for each applied by Nexus (derived from ERPBN 22), these effectively cancel each other out. Where efficiency and growth rates are broadly the same, the principal determinant of capacity is therefore population growth as modelled within the housing delivery scenarios in the HEDNA.

Meeting Our Retail Needs

- 2.25 The errors identified within the RCLSU are replicated within the Regulation 19 Plan. The 'Meeting Our Retail Needs' section at paragraphs 53-63 contains Tables 6 and 7 with forecasts for new convenience and comparison goods floorspace across the Milton

Keynes City Council area. These figures should be replaced when RCLSU is revised to correct the errors within the assessment.

2.26 It is also of note that the errors referenced above are also present within the convenience goods capacity assessment. The implications are however less pronounced as the SFT rate reduction at the base year is 5.0% (compared with 23.1% in the comparison goods scenario) and the forecast floorspace capacity in CMK is mostly negative up to the end of the Plan period. The capacity figures however still require correction within both the RCLSU and Regulation 19 Plan.

Alternative Comparison Capacity Calculation

2.27 Following the identification of the same potential error within the capacity tables as highlighted within our original critique, which suggests that SFT has not been correctly deducted from the per capita figures at the base year (2023), we have presented an alternative assessment of comparison goods floorspace capacity below. These tables are presented in full at **Appendix 1**.

2.28 The alternative capacity assessment examine the implications of deducting SFT at the base year based on the estimated and project market shares of ‘non-store retail sales’ derived from Appendix 3 of ERPBN 22. For comparison goods, this represents a 23.1% deduction at the base year of 2023. Floorspace efficiency rates have been kept the same as reported in the Retail Study (derived from ERPBN 22) alongside use of the equilibrium trading model.

2.29 A summary of the outputs of the alternative capacity assessment are presented in Table 2.2 below:

Table 2.2: Alternative Capacity Analysis: Comparison Goods Capacity Requirement in Central Milton Keynes at 2050 (RCLSU 2025 vs Turley Analysis 2025)

Housing Scenario		Retail Study Update Floorspace Capacity (sq m net)	Revised Assessment Floorspace Capacity (sq m net)	Difference in Floorspace Capacity (sq m net)
Scenario A (50,372 by 2050)	Min.	20,392	15,381	-5,011
	Max.	32,044	24,170	-7,874
Scenario B (63,421 by 2050)	Min.	26,336	19,952	-6,384
	Max.	41,385	31,354	-10,031
Range between Scenario A and B	Min.	20,392	15,381	-5,011
	Max.	41,385	31,354	-10,031

Source: Appendix 1, Scenarios A and B, Nexus Table 19b, Turley Table 19b

- 2.30 In summary, the alternative capacity analysis demonstrates that through factoring in deductions for SFT to the expenditure per capita figures used within the Retail Study, the forecast comparison goods capacity drops from 26,336 - 41,385 sq m net to only 19,952 - 31,354 sq m net in 2050 (a 24.0% reduction in capacity). This reflects the outputs in Scenario B with population forecasts based on high housing growth (c. 63,400 by 2050).
- 2.31 If modelled using the lower housing delivery figures set out within Scenario A (50,372 dwellings by 2050), which are potentially more realistic based on existing completion rates, the forecast comparison goods capacity figure reduces further from 20,392 – 41,385 sq m net (as identified in the Retail Study) to only 15,381 – 24,170 sq m net at 2050 (a 32.6% reduction).
- 2.32 Clearly, this also has a knock-on effect for available comparison goods capacity calculated in the years 2026, 2031, 2036 and 2041 with substantial decreases in capacity identified in the alternative assessment.
- 2.33 The alternative capacity scenario demonstrates that through factoring in the deduction of SFT at the base year, the comparison goods capacity in CMK decreases significantly. In our view, this alternative scenario is more robust than the analysis presented within the RCLSU, and the capacity for comparison goods floorspace up to the end of the plan period is in reality far less than suggested by Nexus.
- 2.34 **Recommendation:** We have examined the methodology and assumptions used within the Retail Study's comparison goods capacity assessment and have concerns that SFT has not been deducted at the base year (2023). The implications for this are that the capacity calculations in the Retail Study Update (and replicated in the Regulation 19 Plan) continue to exaggerate the amount of comparison goods floorspace available throughout the plan period. We therefore recommend that Nexus reviews the comparison goods capacity tables to correct this error.
- 2.35 As a result of the significantly reduced comparison goods floorspace capacity, any attempt to extend the PSA of CMK or allow the development of additional retail floorspace within the Secondary Shopping Frontages (particularly around the Xscape building which lies outside of the PSA) should be strongly resisted.

3. Policy Implications

Comparison Goods Floorspace Capacity

- 3.1 The relationship between Nexus' retail analysis and the current (Regulation 19) version of the City Plan replicates the approach adopted in the previous (Regulation 18) iteration. The capacity figures from the RCLSU for CMK are set out without caveats in The Economic and Cultural Prosperity Topic Paper, Regulation 19 Version (Table 12, page 36) ('Topic Paper'), although notably not in the plan itself (which continues to reference a historic capacity figure at paragraph 141 or across the city as a whole at Table 7). The approach to the key policy for CMK (ECP2) is, with one exception (Xscape Building), largely unchanged.
- 3.2 The important matters highlighted at paras 3.1-3.13 of our earlier report continue to be relevant to our client's representations. These paragraphs should be read in conjunction with the matters raised below.
- 3.3 We note that **Recommendation 1** has been largely accepted and policy wording amended to clarify the status of the Xscape Building as lying outside of the PSA. We continue to urge the Council to amend policy ECP2 as per **Recommendation 2** of our 2024 critique.

Response to Earlier Representations

- 3.4 Although not attributed directly, our earlier Regulation 18 representations are summarised in both the Topic Paper and RCLSU.
- 3.5 The **Topic Paper** summary reads:
- 'Suggestion that to reflect the Retail Study (which has Xscape outside the PSA), it is recommended to delete references to Primary and Secondary Frontages in Policy ECP2 and revise the Inset Map to define the PSA for CMK only; strengthening the PSA's retail offer and align it with national policy and MKCP definitions.'*
- 3.6 The **RCLSU** considers the necessity for Primary and Secondary Frontages in Central MK; policy wording relating to the Xscape building; and alternative uses within shopping areas, all matters that we have raised, but few changes are advised.
- 3.7 We are disappointed with these responses. No suggested changes to policy are contained in the Topic Paper. Nexus advises that Primary and Secondary frontages are retained in CMK (contrary to our views), although agrees that (Regulation 18) Policy ECP2 is confusing in respect of the Xscape Building.
- 3.8 Nexus has not responded to the flaws in its retail analysis highlighted in our 2024 critique, or our conclusion that comparison goods capacity has been substantially overstated.

Policy ECP2 ‘Supporting the Vitality and Viability of Centres’

- 3.9 The significant reduction in assessed retail capacity highlighted above provides an important context to the operation of Policy ECP2. It is imperative that any retail growth identified through population and spending increase is directed towards the CMK PSA and is not diluted by an overly permissive policy framework that fails to restrict such uses in secondary and peripheral areas. We continue to conclude, based on our review of the RCLS and RCLSU, that comparison goods capacity in Central MK has been exaggerated and that such policy is not on a sound footing.
- 3.10 Based on the advice contained in these studies, the Regulation 19 plan continues to define Primary and Secondary Frontages in CMK, and to adopt a criteria-based approach in ECP2 as follows:
- *C. “Within the Primary Shopping Frontages at ground floor level, development for Retail, Food and Drink, Financial, Professional and other services, gyms, creche, leisure and cultural uses will be supported.*
 - *D. Within Secondary Shopping frontages at ground floor level, development for **Retail** (our emphasis), Food and Drink, Financial, Professional and other services, gyms, creche, leisure and cultural uses, drinking establishments, medical and health services will be supported.”*
- 3.11 As we have stated previously, Criteria C and D effectively allow the same uses in both defined frontages, including, crucially, retail uses. This largely unamended policy therefore permits retail uses outside of the PSA, contrary to other policies in the plan (specifically Policy GS5) which identify the CMK PSA as the regional shopping centre for comparison goods, with the remainder of the City Centre (outside of the PSA) suitable for other main town centre uses.
- 3.12 This approach also conflicts with the NPPF, which requires impact and sequential testing for edge-of-centre proposals (i.e. those which lie outside of the PSA), a requirement echoed in Policy ECP3. In fact, the range of permitted uses in the Secondary Shopping Frontage in ECP2 continues to be wider than in the Primary Shopping Frontage, which is illogical and conflicts with the City Plan’s own definition of the uses that should be contained within these frontages.
- 3.13 Policy ECP2 as currently worded is, in our view, neither robust nor fit for purpose. It has the potential to allow retail uses outside of the PSA that are essential to its future vitality and disperse needed retail investment to secondary locations. This issue is the more significant given the reduction in comparison goods retail capacity that we have identified.
- 3.14 We therefore urge the Council to amend the plan as per either option of **Recommendation 2** of our 2024 report. This is included in full at **Appendix 2**.

Appendix 1: Alternative Comparison Goods Capacity Tables

Milton Keynes - Retail and Leisure Needs Assessment

TABLE 1: COMPARATIVE ANALYSIS OF EXPERIAN DATA (RETAIL STUDY UPDATE 2025 AND TURLEY EXPERIAN FIGURES)

	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Zone 13	Zone 14
RCLS Update														
Comparison goods expenditure per capita ('excluding SFT')	3,501	4,029	3,488	4,020	4,001	3,890	3,732	4,816	4,576	5,165	4,464	4,591	4,285	4,369
Turley Sense Check														
Comparison goods expenditure per capita (<u>including SFT</u>)	3,485	4,038	3,495	4,027	4,011	3,886	3,734	4,830	4,473	5,165	4,442	4,579	4,267	4,368

Notes:

- a. RCLS Experian figures per capita derived from Excel spreadsheet of economic tables appended to RCLSU (unprocessed expenditure 2024-based data derived from Experian MMG3 data - 2025 report). These figures include SFT but are stated as excluding SFT in the Retail Study Update 2025 expenditure tables.
- b. Turley sense-check figures derived from Experian Location Analyst (unprocessed expenditure data 2024-based estimates). These figures include SFT.

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FIGURES NOT EXCLUDING SPECIAL FORMS OF TRADING (SFT) AT BASE YEAR

Nexus Table 8a: Population and comparison goods expenditure per capita

Zone	Population					Population Growth 2026-2050	Comparison expenditure per capita (stated in Retail Study Update 2025 as excluding SFT)				
	2026	2031	2036	2041	2050		2026	2031	2036	2041	2050
Zone 1	35,407	38,172	40,937	43,702	48,679	37.5%	£3,459	£3,815	£4,241	£4,696	£5,612
Zone 2	52,237	56,316	60,396	64,475	71,818	37.5%	£3,980	£4,390	£4,880	£5,404	£6,458
Zone 3	31,085	33,513	35,940	38,368	42,737	37.5%	£3,446	£3,801	£4,225	£4,679	£5,592
Zone 4	45,304	48,842	52,380	55,918	62,286	37.5%	£3,971	£4,380	£4,869	£5,392	£6,444
Zone 5	29,003	31,268	33,533	35,798	39,875	37.5%	£3,953	£4,360	£4,847	£5,367	£6,414
Zone 6	20,956	22,593	24,229	25,866	28,811	37.5%	£3,843	£4,238	£4,712	£5,217	£6,235
Zone 7	27,526	29,676	31,825	33,975	37,844	37.5%	£3,687	£4,066	£4,520	£5,005	£5,982
Zone 8	103,405	106,904	109,827	112,628	117,765	13.9%	£4,758	£5,248	£5,834	£6,460	£7,721
Zone 9	24,814	26,752	28,690	30,627	34,115	37.5%	£4,520	£4,986	£5,542	£6,137	£7,334
Zone 10	10,108	10,897	11,687	12,476	13,897	37.5%	£5,102	£5,628	£6,256	£6,928	£8,279
Zone 11	73,194	75,280	76,982	78,587	82,066	12.1%	£4,410	£4,864	£5,407	£5,988	£7,156
Zone 12	107,051	109,844	111,802	113,622	118,378	10.6%	£4,535	£5,002	£5,561	£6,157	£7,359
Zone 13	130,018	134,498	138,072	141,502	147,995	13.8%	£4,233	£4,669	£5,190	£5,747	£6,869
Zone 14	66,951	68,976	70,762	72,608	75,960	13.5%	£4,316	£4,761	£5,292	£5,860	£7,004
Inner Study Area (Zones 1-7, 9-10)	276,440	298,028	319,616	341,204	380,062	37.5%					
Total Study Area	757,059	793,530	827,061	860,151	922,226	21.8%					

Notes

- a. Zones are based on Postcode geography as shown on the plan at Appendix A
- b. Population data is sourced from Experian MMG3 data (2025 report) for the year 2024.
- c. Per capita expenditure figures are derived from Experian MMG3 data (2025 report) at 2023 - the 2023 figures are then projected to the assessment years using "Ex. SFT adjusted for sales via stores" forecast growth rates taken from Figure 7 of Experian Retail Planner Briefing Note 20.

Nexus Table 8b: Total comparison goods expenditure available

Zones	Comparison expenditure (£m)					Growth (£m) 2026-2050
	2026	2031	2036	2041	2050	
Zone 1	£122.5	£145.6	£173.6	£205.2	£273.2	123.1%
Zone 2	£207.9	£247.2	£294.7	£348.4	£463.8	123.1%
Zone 3	£107.1	£127.4	£151.9	£179.5	£239.0	123.1%
Zone 4	£179.9	£213.9	£255.1	£301.5	£401.4	123.1%
Zone 5	£114.6	£136.3	£162.5	£192.1	£255.8	123.1%
Zone 6	£80.5	£95.8	£114.2	£134.9	£179.6	123.1%
Zone 7	£101.5	£120.7	£143.9	£170.1	£226.4	123.1%
Zone 8	£492.0	£561.0	£640.7	£727.6	£909.2	84.8%
Zone 9	£112.2	£133.4	£159.0	£188.0	£250.2	123.1%
Zone 10	£51.6	£61.3	£73.1	£86.4	£115.1	123.1%
Zone 11	£322.8	£366.2	£416.3	£470.5	£587.2	81.9%
Zone 12	£485.5	£549.4	£621.7	£699.6	£871.1	79.4%
Zone 13	£550.4	£628.0	£716.6	£813.3	£1,016.5	84.7%
Zone 14	£289.0	£328.4	£374.5	£425.5	£532.0	84.1%
Total Study Area	£3,217.4	£3,714.6	£4,297.8	£4,942.8	£6,320.5	96.4%

Notes

- a. Figures derived from multiplying per capita expenditure with population within each zone using data provided at Table 8a

SCENARIO A

FIGURES EXCLUDING SPECIAL FORMS OF TRADING (SFT) AT BASE YEAR (23.1% AT 2023)

Turley Table 8a: Population and comparison goods expenditure per capita

Zone	Population					Population Growth 2026-2050	Comparison expenditure per capita (actually excluding SFT)				
	2026	2031	2036	2041	2050		2026	2031	2036	2041	2050
Zone 1	35,407	38,172	40,937	43,702	48,679	37.5%	£2,660	£2,934	£3,261	£3,611	£4,316
Zone 2	52,237	56,316	60,396	64,475	71,818	37.5%	£3,061	£3,376	£3,753	£4,156	£4,966
Zone 3	31,085	33,513	35,940	38,368	42,737	37.5%	£2,650	£2,923	£3,249	£3,598	£4,300
Zone 4	45,304	48,842	52,380	55,918	62,286	37.5%	£3,054	£3,368	£3,745	£4,146	£4,955
Zone 5	29,003	31,268	33,533	35,798	39,875	37.5%	£3,040	£3,353	£3,727	£4,127	£4,933
Zone 6	20,956	22,593	24,229	25,866	28,811	37.5%	£2,955	£3,259	£3,623	£4,012	£4,795
Zone 7	27,526	29,676	31,825	33,975	37,844	37.5%	£2,835	£3,127	£3,476	£3,849	£4,600
Zone 8	103,405	106,904	109,827	112,628	117,765	13.9%	£3,659	£4,036	£4,486	£4,968	£5,937
Zone 9	24,814	26,752	28,690	30,627	34,115	37.5%	£3,476	£3,834	£4,262	£4,719	£5,640
Zone 10	10,108	10,897	11,687	12,476	13,897	37.5%	£3,924	£4,328	£4,811	£5,327	£6,367
Zone 11	73,194	75,280	76,982	78,587	82,066	12.1%	£3,391	£3,740	£4,158	£4,604	£5,503
Zone 12	107,051	109,844	111,802	113,622	118,378	10.6%	£3,487	£3,847	£4,276	£4,735	£5,659
Zone 13	130,018	134,498	138,072	141,502	147,995	13.8%	£3,255	£3,590	£3,991	£4,420	£5,282
Zone 14	66,951	68,976	70,762	72,608	75,960	13.5%	£3,319	£3,661	£4,070	£4,507	£5,386
Inner Study Area (Zones 1-7, 9-10)	276,440	298,028	319,616	341,204	380,062	37.5%					
Total Study Area	757,059	793,530	827,061	860,151	922,226	21.8%					

Notes

- a. Zones are based on Postcode geography as shown on the plan at Appendix A
- b. Population data is sourced from Experian MMG3 data (2025 report) for the year 2024.
- c. Per capita expenditure figures are derived from Experian MMG3 data (2025 report) at 2023. SFT then deducted at base year as advised by Experian. The 2023 figures are then projected to the assessment years using "Ex. SFT adjusted for sales via stores" forecast growth rates taken from Figure 7 of Experian Retail Planner Briefing Note 22.

Turley Table 8b: Total comparison goods expenditure available

Zones	Comparison expenditure (£m)					Growth (£m) 2026-2050
	2026	2031	2036	2041	2050	
Zone 1	£94.2	£112.0	£133.5	£157.8	£210.1	123.1%
Zone 2	£159.9	£190.1	£226.7	£267.9	£356.7	123.1%
Zone 3	£82.4	£98.0	£116.8	£138.1	£183.8	123.1%
Zone 4	£138.4	£164.5	£196.1	£231.9	£308.6	123.1%
Zone 5	£88.2	£104.8	£125.0	£147.7	£196.7	123.1%
Zone 6	£61.9	£73.6	£87.8	£103.8	£138.1	123.1%
Zone 7	£78.0	£92.8	£110.6	£130.8	£174.1	123.1%
Zone 8	£378.4	£431.4	£492.7	£559.5	£699.2	84.8%
Zone 9	£86.3	£102.6	£122.3	£144.5	£192.4	123.1%
Zone 10	£39.7	£47.2	£56.2	£66.5	£88.5	123.1%
Zone 11	£248.2	£281.6	£320.1	£361.8	£451.6	81.9%
Zone 12	£373.3	£422.5	£478.1	£538.0	£669.9	79.4%
Zone 13	£423.2	£482.9	£551.1	£625.4	£781.7	84.7%
Zone 14	£222.2	£252.5	£288.0	£327.2	£409.1	84.1%
Total Study Area	£2,474.2	£2,856.5	£3,305.0	£3,801.0	£4,860.5	96.4%

Notes

- a. Figures derived from multiplying per capita expenditure with population within each zone using data provided at Table 8a

SCENARIO A

FIGURES NOT EXCLUDING SPECIAL FORMS OF TRADING (SFT) AT BASE YEAR

Nexus Table 19a: Comparison Goods Capacity Assessment - Milton Keynes

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£1,937.2	£2,236.5	£2,587.7	£2,976.0	£3,805.6
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£1,937.2	£2,170.5	£2,431.8	£2,724.6	£3,343.4
STEP 3:	Available Expenditure before commitments (£m)	£66.1	£155.9	£251.4	£462.2	£355.4
STEP 4:	Turnover of all committed floorspace (£m)	£21.6	£24.2	£27.2	£33.3	£33.3
STEP 5:	Surplus Expenditure (£m)	£44.4	£131.6	£224.2	£428.8	£428.8
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):	11,331	29,954	45,549	70,990	70,990
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	16,186	42,792	65,070	101,415	101,415
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):	7,210	19,062	28,986	45,176	45,176
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	10,300	27,231	41,408	64,537	64,537

Nexus Table 19b: Comparison Goods Capacity Assessment - Central Milton Keynes

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£863.1	£996.4	£1,152.8	£1,325.9	£1,695.4
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£863.1	£967.0	£1,083.4	£1,213.9	£1,489.5
STEP 3:	Available Expenditure before commitments (£m)	£29.4	£69.4	£112.0	£205.9	£205.9
STEP 4:	Turnover of all committed floorspace (£m)	£8.0	£9.0	£10.1	£12.3	£12.3
STEP 5:	Surplus Expenditure (£m)	£21.4	£60.5	£101.9	£193.6	£193.6
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):	5,465	13,762	20,709	32,044	32,044
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	7,806	19,660	29,585	45,777	45,777
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):	3,477	8,757	13,179	20,392	20,392
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	4,968	12,511	18,827	29,131	29,131

Nexus Table 19c: Comparison Goods Capacity Assessment - Rest of MKCC

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£1,074.1	£1,240.1	£1,434.8	£1,650.1	£2,110.1
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£1,074.1	£1,203.5	£1,348.4	£1,510.8	£1,853.8
STEP 3:	Available Expenditure before commitments (£m)	£36.6	£86.4	£139.4	£256.3	£256.3
STEP 4:	Turnover of all committed floorspace (£m)	£13.6	£15.3	£17.1	£21.0	£21.0
STEP 5:	Surplus Expenditure (£m)	£23.0	£71.1	£122.3	£235.3	£235.3
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):	5,866	16,192	24,839	38,946	38,946
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	8,380	23,132	35,485	55,637	55,637
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):	3,733	10,304	15,807	24,784	24,784
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	5,333	14,720	22,581	35,406	35,406

Notes:

STEP 1: Survey Derived (with Inflow) turnover assume constant market shares over the forecast period, derived from Table 18b
STEP 2: Assumption is made that comparison retail market is in 'equilibrium' at the base year (i.e. 2026, 'benchmark' turnovers are equivalent to the survey-derived turnover levels, with inflow). Average productivity growth rates from Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22, are then used to project the available benchmark expenditure.
STEP 3: The forecast residual expenditure capacity (pre commitments) has been derived from Steps 1 and 2.
STEP 4: The turnover of all known commitments has been derived from Table 18c. It is assumed that all commitments would be operational and with mature trading conditions by 2031.
STEP 5: The Surplus Expenditure capacity incorporates the forecast turnover of all commitments (Step 4).
STEP 6: The Surplus Expenditure is converted into a net/gross floorspace capacity, based on Nexus judgement. Average sales density is assumed to be £3,500 per sq.m which Nexus Planning considers to be towards the lower end of what could be achieved. The sales density for respective years is "grown" using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22.
STEP 7: The Surplus Expenditure is converted into a net/gross floorspace capacity, based on Nexus judgement. Average sales density is assumed to be £5,500 per sq.m which Nexus Planning considers to be towards the higher end of what could be achieved. The sales density for respective years is "grown" using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22.

SCENARIO A

FIGURES EXCLUDING SPECIAL FORMS OF TRADING (SFT) AT BASE YEAR (23.1% AT 2023)

Turley Table 19a: Comparison Goods Capacity Assessment - Milton Keynes

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£1,489.7	£1,719.9	£1,989.9	£2,288.6	£2,926.5
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£1,489.7	£1,669.1	£1,870.1	£2,095.2	£2,571.1
STEP 3:	Available Expenditure before commitments (£m)	£50.8	£119.9	£193.3	£355.4	£355.4
STEP 4:	Turnover of all committed floorspace (£m)	£21.6	£24.2	£27.2	£33.3	£33.3
STEP 5:	Surplus Expenditure (£m)	£29.2	£95.6	£166.2	£322.1	£322.1
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):	7,438	21,760	33,752	53,317	53,317
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	10,626	31,086	48,217	76,167	76,167
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):	4,734	13,847	21,479	33,929	33,929
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	6,762	19,782	30,684	48,470	48,470

Turley Table 19b: Comparison Goods Capacity Assessment - Central Milton Keynes

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£663.7	£766.2	£886.5	£1,019.6	£1,303.8
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£663.7	£743.6	£833.1	£933.5	£1,145.5
STEP 3:	Available Expenditure before commitments (£m)	£22.6	£53.4	£86.1	£158.3	£158.3
STEP 4:	Turnover of all committed floorspace (£m)	£8.0	£9.0	£10.1	£12.3	£12.3
STEP 5:	Surplus Expenditure (£m)	£14.6	£44.4	£76.1	£146.0	£146.0
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):	3,731	10,111	15,454	24,170	24,170
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	5,329	14,444	22,077	34,529	34,529
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):	2,374	6,434	9,834	15,381	15,381
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	3,391	9,192	14,049	21,973	21,973

Turley Table 19c: Comparison Goods Capacity Assessment - Rest of MKCC

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£826.0	£953.6	£1,103.4	£1,269.0	£1,622.7
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£826.0	£925.5	£1,036.9	£1,161.8	£1,425.6
STEP 3:	Available Expenditure before commitments (£m)	£28.2	£66.5	£107.2	£197.1	£197.1
STEP 4:	Turnover of all committed floorspace (£m)	£13.6	£15.3	£17.1	£21.0	£21.0
STEP 5:	Surplus Expenditure (£m)	£14.5	£51.2	£90.1	£176.1	£176.1
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):	3,708	11,649	18,298	29,147	29,147
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	5,297	16,641	26,141	41,638	41,638
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):	2,360	7,413	11,644	18,548	18,548
	(iii) Assumed Net / Gross Floorspace Ratio:	70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):	3,371	10,590	16,635	26,497	26,497

Notes:

STEP 1: Survey Derived (with Inflow) turnover assume constant market shares over the forecast period, derived from Table 18b
STEP 2: Assumption is made that comparison retail market is in 'equilibrium' at the base year (i.e. 2026, 'benchmark' turnovers are equivalent to the survey-derived turnover levels, with inflow). Average productivity growth rates from Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22, are then used to project the available benchmark expenditure.
STEP 3: The forecast residual expenditure capacity (pre commitments) has been derived from Steps 1 and 2.
STEP 4: The turnover of all known commitments has been derived from Table 18c. It is assumed that all commitments would be operational and with mature trading conditions by 2031.
STEP 5: The Surplus Expenditure capacity incorporates the forecast turnover of all commitments (Step 4).
STEP 6: The Surplus Expenditure is converted into a net/gross floorspace capacity, based on Nexus judgement. Average sales density is assumed to be £3,500 per sq.m which Nexus Planning considers to be towards the lower end of what could be achieved. The sales density for respective years is "grown" using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22.
STEP 7: The Surplus Expenditure is converted into a net/gross floorspace capacity, based on Nexus judgement. Average sales density is assumed to be £5,500 per sq.m which Nexus Planning considers to be towards the higher end of what could be achieved. The sales density for respective years is "grown" using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22.

SCENARIO B

FIGURES NOT EXCLUDING SPECIAL FORMS OF TRADING (SFT) AT BASE YEAR

Nexus Table 8a: Population and comparison goods expenditure per capita

Zone	Population					Population Growth 2026-2050	Comparison expenditure per capita (stated in Retail Study Update 2025 as excluding SFT)				
	2026	2031	2036	2041	2050		2026	2031	2036	2041	2050
Zone 1	36,517	38,791	41,743	44,366	47,461	30.0%	£3,459	£3,815	£4,241	£4,696	£5,612
Zone 2	53,442	55,712	57,417	59,222	61,926	15.9%	£3,980	£4,390	£4,880	£5,404	£6,458
Zone 3	33,453	39,545	44,488	49,531	59,628	78.2%	£3,446	£3,801	£4,225	£4,679	£5,592
Zone 4	46,773	50,917	57,895	62,619	70,148	50.0%	£3,971	£4,380	£4,869	£5,392	£6,444
Zone 5	29,757	31,021	35,308	39,313	47,321	59.0%	£3,953	£4,360	£4,847	£5,367	£6,414
Zone 6	22,307	26,153	29,790	30,251	30,897	38.5%	£3,843	£4,238	£4,712	£5,217	£6,235
Zone 7	28,055	29,091	30,040	30,850	31,630	12.7%	£3,687	£4,066	£4,520	£5,005	£5,982
Zone 8	103,405	106,904	109,827	112,628	117,765	13.9%	£4,758	£5,248	£5,834	£6,460	£7,721
Zone 9	25,307	29,600	39,157	46,480	60,765	140.1%	£4,520	£4,986	£5,542	£6,137	£7,334
Zone 10	10,308	10,411	10,515	10,619	10,826	5.0%	£5,102	£5,628	£6,256	£6,928	£8,279
Zone 11	73,194	75,280	76,982	78,587	82,066	12.1%	£4,410	£4,864	£5,407	£5,988	£7,156
Zone 12	107,051	109,844	111,802	113,622	118,378	10.6%	£4,535	£5,002	£5,561	£6,157	£7,359
Zone 13	130,018	134,498	138,072	141,502	147,995	13.8%	£4,233	£4,669	£5,190	£5,747	£6,869
Zone 14	66,951	68,976	70,762	72,608	75,960	13.5%	£4,316	£4,761	£5,292	£5,860	£7,004
Inner Study Area (Zones 1-7, 9-10)	285,919	311,242	346,352	373,249	420,602	47.1%					
Total Study Area	766,538	806,744	853,797	892,196	962,766	25.6%					

Notes

- a. Zones are based on Postcode geography as shown on the plan at Appendix A
- b. Population data is sourced from Experian MMG3 data (2025 report) for the year 2024.
- c. Per capita expenditure figures are derived from Experian MMG3 data (2025 report) at 2023 - the 2023 figures are then projected to the assessment years using 'Ex. SFT adjusted for sales via stores' forecast growth rates taken from Figure 7 of Experian Retail Planner Briefing Note 22.

Nexus Table 8b: Total comparison goods expenditure available

Zones	Comparison expenditure (£m)					Growth (£m) 2026-2050
	2026	2031	2036	2041	2050	
Zone 1	£126.3	£148.0	£177.0	£208.4	£266.4	110.9%
Zone 2	£212.7	£244.6	£280.2	£320.0	£399.9	88.0%
Zone 3	£115.3	£150.3	£188.0	£231.8	£333.4	189.2%
Zone 4	£185.7	£223.0	£281.9	£337.6	£452.0	143.4%
Zone 5	£117.6	£135.2	£171.1	£211.0	£303.5	158.0%
Zone 6	£85.7	£110.8	£140.4	£157.8	£192.6	124.7%
Zone 7	£103.4	£118.3	£135.8	£154.4	£189.2	82.9%
Zone 8	£492.0	£561.0	£640.7	£727.6	£909.2	84.8%
Zone 9	£114.4	£147.6	£217.0	£285.3	£445.7	289.6%
Zone 10	£52.6	£58.6	£65.8	£73.6	£89.6	70.4%
Zone 11	£322.8	£366.2	£416.3	£470.5	£587.2	81.9%
Zone 12	£485.5	£549.4	£621.7	£699.6	£871.1	79.4%
Zone 13	£550.4	£628.0	£716.6	£813.3	£1,016.5	84.7%
Zone 14	£289.0	£328.4	£374.5	£425.5	£532.0	84.1%
Total Study Area	£3,253.4	£3,769.4	£4,427.0	£5,116.4	£6,588.5	102.5%

Notes:

- a. Figures derived from multiplying per capita expenditure with population within each zone using data provided at Table 8a

SCENARIO B

FIGURES EXCLUDING SPECIAL FORMS OF TRADING (SFT) AT BASE YEAR (23.1% AT 2023)

Turley Table 8a: Population and comparison goods expenditure per capita

Zone	Population					Population Growth 2026-2050	Comparison expenditure per capita (actually excluding SFT)				
	2026	2031	2036	2041	2050		2026	2031	2036	2041	2050
Zone 1	36,517	38,791	41,743	44,366	47,461	30.0%	£2,660	£2,934	£3,261	£3,611	£4,316
Zone 2	53,442	55,712	57,417	59,222	61,926	15.9%	£3,061	£3,376	£3,753	£4,156	£4,966
Zone 3	33,453	39,545	44,488	49,531	59,628	78.2%	£2,650	£2,923	£3,249	£3,598	£4,300
Zone 4	46,773	50,917	57,895	62,619	70,148	50.0%	£3,054	£3,368	£3,745	£4,146	£4,955
Zone 5	29,757	31,021	35,308	39,313	47,321	59.0%	£3,040	£3,353	£3,727	£4,127	£4,933
Zone 6	22,307	26,153	29,790	30,251	30,897	38.5%	£2,955	£3,259	£3,623	£4,012	£4,795
Zone 7	28,055	29,091	30,040	30,850	31,630	12.7%	£2,835	£3,127	£3,476	£3,849	£4,600
Zone 8	103,405	106,904	109,827	112,628	117,765	13.9%	£3,659	£4,036	£4,486	£4,968	£5,937
Zone 9	25,307	29,600	39,157	46,480	60,765	140.1%	£3,476	£3,834	£4,262	£4,719	£5,640
Zone 10	10,308	10,411	10,515	10,619	10,826	5.0%	£3,924	£4,328	£4,811	£5,327	£6,367
Zone 11	73,194	75,280	76,982	78,587	82,066	12.1%	£3,391	£3,740	£4,158	£4,604	£5,503
Zone 12	107,051	109,844	111,802	113,622	118,378	10.6%	£3,487	£3,847	£4,276	£4,735	£5,659
Zone 13	130,018	134,498	138,072	141,502	147,995	13.8%	£3,255	£3,590	£3,991	£4,420	£5,282
Zone 14	66,951	68,976	70,762	72,608	75,960	13.5%	£3,319	£3,661	£4,070	£4,507	£5,386
Inner Study Area (Zones 1-7, 9-10)	285,919	311,242	346,352	373,249	420,602	47.1%					
Total Study Area	766,538	806,744	853,797	892,196	962,766	25.6%					

Notes

- a. Zones are based on Postcode geography as shown on the plan at Appendix A
- b. Population data is sourced from Experian MMG3 data (2025 report) for the year 2024.
- c. Per capita expenditure figures are derived from Experian MMG3 data (2025 report) at 2023. SFT then deducted at base year as advised by Experian. The 2023 figures are then projected to the assessment years using 'Ex. SFT adjusted for sales via stores' forecast growth rates taken from Figure 7 of Experian Retail Planner Briefing Note 22.

Turley Table 8b: Total comparison goods expenditure available

Zones	Comparison expenditure (£m)					Growth (£m) 2026-2050
	2026	2031	2036	2041	2050	
Zone 1	£97.1	£113.8	£136.1	£160.2	£204.8	110.9%
Zone 2	£163.6	£188.1	£215.1	£246.1	£307.6	88.0%
Zone 3	£88.7	£115.6	£144.6	£178.2	£256.4	189.2%
Zone 4	£142.8	£171.5	£216.8	£259.6	£347.6	143.4%
Zone 5	£90.5	£104.0	£131.6	£162.3	£233.4	158.0%
Zone 6	£65.9	£85.2	£107.9	£121.4	£148.1	124.7%
Zone 7	£79.5	£91.0	£104.4	£118.7	£145.5	82.9%
Zone 8	£378.4	£431.4	£492.7	£559.5	£699.2	84.8%
Zone 9	£88.0	£113.5	£166.9	£219.4	£342.7	289.6%
Zone 10	£40.4	£45.1	£50.6	£56.6	£68.9	70.4%
Zone 11	£248.2	£281.6	£320.1	£361.8	£451.6	81.9%
Zone 12	£373.3	£422.5	£478.1	£538.0	£669.9	79.4%
Zone 13	£423.2	£482.9	£551.1	£625.4	£781.7	84.7%
Zone 14	£222.2	£252.5	£288.0	£327.2	£409.1	84.1%
Total Study Area	£2,501.9	£2,898.7	£3,404.4	£3,934.5	£5,066.6	102.5%

Notes:

- a. Figures derived from multiplying per capita expenditure with population within each zone using data provided at Table 8a

Milton Keynes - Retail and Leisure Needs Assessment

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SCENARIO B

FIGURES NOT EXCLUDING SPECIAL FORMS OF TRADING (SFT) AT BASE YEAR

Nexus Table 19a: Comparison Goods Capacity Assessment - Milton Keynes

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£1,970.7	£2,283.2	£2,681.6	£3,099.1	£3,990.8
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£1,970.7	£2,208.0	£2,473.8	£2,771.7	£3,401.2
STEP 3:	Available Expenditure before commitments (£m)		£75.3	£207.7	£327.4	£589.7
STEP 4:	Turnover of all committed floorspace (£m)		£21.6	£24.2	£27.2	£33.3
STEP 5:	Surplus Expenditure (£m)		£53.6	£183.5	£300.2	£556.3
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		13,671	41,759	60,989	92,097
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		19,530	59,656	87,128	131,567
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		8,700	26,574	38,811	58,607
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		12,428	37,963	55,445	83,724

Nexus Table 19b: Comparison Goods Capacity Assessment - Central Milton Keynes

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£876.7	£1,015.8	£1,193.0	£1,378.7	£1,775.5
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£876.7	£982.3	£1,100.6	£1,233.1	£1,513.1
STEP 3:	Available Expenditure before commitments (£m)		£33.5	£92.4	£145.7	£262.3
STEP 4:	Turnover of all committed floorspace (£m)		£8.0	£9.0	£10.1	£12.3
STEP 5:	Surplus Expenditure (£m)		£25.5	£83.4	£135.6	£250.0
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		6,495	18,991	27,546	41,385
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		9,279	27,130	39,352	59,122
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		4,133	12,085	17,529	26,336
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		5,905	17,265	25,042	37,623

Nexus Table 19c: Comparison Goods Capacity Assessment - Rest of MKCC

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£1,094.0	£1,267.5	£1,488.6	£1,720.4	£2,215.4
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£1,094.0	£1,225.7	£1,373.3	£1,538.6	£1,888.1
STEP 3:	Available Expenditure before commitments (£m)		£41.8	£115.3	£181.7	£327.3
STEP 4:	Turnover of all committed floorspace (£m)		£13.6	£15.3	£17.1	£21.0
STEP 5:	Surplus Expenditure (£m)		£28.1	£100.0	£164.6	£306.3
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		7,176	22,768	33,443	50,712
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		10,251	32,526	47,776	72,445
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		4,566	14,489	21,282	32,271
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		6,523	20,698	30,403	46,101

Notes:

STEP 1: Survey Derived (with Inflow) turnover as assume constant market shares over the forecast period, derived from Table 18b

STEP 2: Assumption is made that comparison retail market is in 'equilibrium' at the base year (i.e. 2026, 'benchmark' turnovers are equivalent to the survey-derived turnover levels, with inflow). Average productivity growth rates from Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22, are then used to project the available benchmark expenditure.

STEP 3: The forecast residual expenditure capacity (pre commitments) has been derived from Steps 1 and 2.

STEP 4: The turnover of all known commitments has been derived from Table 18c. It is assumed that all commitments would be operational and with mature trading conditions by 2031.

STEP 5: The Surplus Expenditure capacity incorporates the forecast turnover of all commitments (Step 4).

STEP 6: The Surplus Expenditure is converted into a net/gross floorspace capacity, based on Nexus judgement. Average sales density is assumed to be £3,500 per sq.m which Nexus Planning considers to be towards the lower end of what could be achieved. The sales density for respective years is "grown" using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22.

STEP 7: The Surplus Expenditure is converted into a net/gross floorspace capacity, based on Nexus judgement. Average sales density is assumed to be £5,500 per sq.m which Nexus Planning considers to be towards the higher end of what could be achieved. The sales density for respective years is "grown" using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22.

Milton Keynes - Retail and Leisure Needs Assessment

Turley Economics edits

2023 Prices

SCENARIO B

FIGURES EXCLUDING SPECIAL FORMS OF TRADING (SFT) AT BASE YEAR (23.1% AT 2023)

Turley Table 19a: Comparison Goods Capacity Assessment - Milton Keynes

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£1,515.4	£1,755.8	£2,062.1	£2,383.2	£3,069.0
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£1,515.4	£1,697.9	£1,902.4	£2,131.5	£2,615.5
STEP 3:	Available Expenditure before commitments (£m)		£57.9	£159.7	£251.8	£453.4
STEP 4:	Turnover of all committed floorspace (£m)		£21.6	£24.2	£27.2	£33.3
STEP 5:	Surplus Expenditure (£m)		£36.2	£135.5	£224.6	£420.1
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		9,238	30,838	45,626	69,548
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		13,197	44,055	65,180	99,354
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		5,879	19,624	29,035	44,258
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		8,398	28,035	41,478	63,225

Turley Table 19b: Comparison Goods Capacity Assessment - Central Milton Keynes

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£674.2	£781.1	£917.4	£1,060.3	£1,365.3
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£674.2	£755.4	£846.3	£948.2	£1,163.6
STEP 3:	Available Expenditure before commitments (£m)		£25.7	£71.1	£112.0	£201.7
STEP 4:	Turnover of all committed floorspace (£m)		£8.0	£9.0	£10.1	£12.3
STEP 5:	Surplus Expenditure (£m)		£17.7	£62.1	£102.0	£189.4
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		4,523	14,132	20,711	31,354
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		6,461	20,189	29,588	44,791
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		2,878	8,993	13,180	19,952
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		4,112	12,848	18,828	28,503

Turley Table 19c: Comparison Goods Capacity Assessment - Rest of MKCC

Assume Equilibrium at Base Year and Constant Market Shares

		2026	2031	2036	2041	2050
STEP 1:	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£841.3	£974.7	£1,144.7	£1,323.0	£1,703.6
STEP 2:	Total Forecast "Benchmark" Turnover of all Floorspace (£m)	£841.3	£942.6	£1,056.0	£1,183.2	£1,451.9
STEP 3:	Available Expenditure before commitments (£m)		£32.1	£88.7	£139.8	£251.7
STEP 4:	Turnover of all committed floorspace (£m)		£13.6	£15.3	£17.1	£21.0
STEP 5:	Surplus Expenditure (£m)		£18.5	£73.4	£122.6	£230.7
STEP 6:	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£3,500.0	£3,921.4	£4,393.6	£4,922.7	£6,040.6
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		4,715	16,706	24,915	38,194
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		6,736	23,865	35,593	54,563
STEP 7:	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:					
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m):	£5,500.0	£6,162.3	£6,904.3	£7,735.7	£9,492.4
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		3,001	10,631	15,855	24,305
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		4,286	15,187	22,650	34,722

Notes:

STEP 1: Survey Derived (with Inflow) turnover as assume constant market shares over the forecast period, derived from Table 18b

STEP 2: Assumption is made that comparison retail market is in 'equilibrium' at the base year (i.e. 2026, 'benchmark' turnovers are equivalent to the survey-derived turnover levels, with inflow). Average productivity growth rates from Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22, are then used to project the available benchmark expenditure.

STEP 3: The forecast residual expenditure capacity (pre commitments) has been derived from Steps 1 and 2.

STEP 4: The turnover of all known commitments has been derived from Table 18c. It is assumed that all commitments would be operational and with mature trading conditions by 2031.

STEP 5: The Surplus Expenditure capacity incorporates the forecast turnover of all commitments (Step 4).

STEP 6: The Surplus Expenditure is converted into a net/gross floorspace capacity, based on Nexus judgement. Average sales density is assumed to be £3,500 per sq.m which Nexus Planning considers to be towards the lower end of what could be achieved. The sales density for respective years is "grown" using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22.

STEP 7: The Surplus Expenditure is converted into a net/gross floorspace capacity, based on Nexus judgement. Average sales density is assumed to be £5,500 per sq.m which Nexus Planning considers to be towards the higher end of what could be achieved. The sales density for respective years is "grown" using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 22.

Appendix 2: Review of Milton Keynes Retail and Commercial Leisure Study 2024

**Review of Milton Keynes Retail and
Commercial Leisure Study 2024**
On Behalf of Hermes CMK General Partner Ltd

September 2024

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Client

Hermes CMK General Partner Limited

Our reference

BTPL1000

September 2024

1. Introduction

- 1.1 Turley has been instructed by Hermes CMK General Partner Limited ('Hermes') to review and critique the Retail and Commercial Leisure Study 2024 ('the Retail Study') which has been prepared by Nexus Planning ('Nexus') for Milton Keynes Council ('the Council'). The Retail Study (dated March 2024) is intended to inform the preparation of the MK City Plan 2050 ("the City Plan") which will replace the current Local Plan, Plan:MK 2016-2031, adopted in March 2019.
- 1.2 Hermes will be submitting representations to the Regulation 18 Consultation Version of the City Plan, the consultation deadline for which is 9 October 2024. It is intended that the Turley critique will inform this submission.

Scope of Critique

- 1.3 Our critique focusses on the Retail Study's comparison goods capacity analysis up to 2050, the forecasts for which are largely based on different population projection scenarios as set out in the Council's draft Housing and Economic Development Needs Assessment ('HEDNA'). These are explored in further detail in the later sections.
- 1.4 In summary, based on the lower housing projections presented in Scenario A (53,400 dwellings constructed by 2050), the Retail Study suggests that there will capacity for 37,348 – 58,690 sq m net of comparison goods floorspace in Central Milton Keynes ('CMK'). Using the higher housing projections in Scenario B, this capacity increases to 42,125 – 66,196 sq m net of comparison goods floorspace. Along with the forecast housing completions and population increase, the length of the forecast period (26 years) contributes to the greater floorspace need identified at 2020.
- 1.5 As part of our review, we have examined Nexus' methodology and quantitative analysis in detail, and sought to identify those factors that have influenced the outputs of the assessment. Our review concludes that the retail evidence base overstates the available comparison goods capacity and is based on a timeframe (up to 2050) which generates a need for which there is limited supporting market evidence. We have also prepared a revised capacity calculation based on logical adjustments to the consultant's analysis. This analysis is summarised below with supporting tables included at Appendix 1.

Policy Implications

- 1.6 The policy implications of the Retail Study findings are considered in our representations. We note that whilst additional capacity for up to 66,196 sq m of additional comparison goods floorspace in CMK is identified in the Retail Study, the only direct policy reference to this maximum capacity figure is found in Policy CMK2 which supports development of this level of floorspace in CMK. This maximum floorspace figure has been incorporated into the City Plan based on the uncritical acceptance of the Nexus outputs and without reference to the problematic nature of long-term forecasting and margins of error highlighted in the Retail Study.

- 1.7 In addition to this, we have raised concerns that the Nexus modelling has resulted in dramatically overstated levels of comparison foods floorspace capacity which have been carried through to the City Plan. These errors within the Retail Study must be corrected by Nexus to ensure the correct capacity figures are reported in the next iteration of the plan, particularly in Policy CMK2.

- 1.8 Our policy review goes on to consider the wording within Policy ECP2 which seeks to support the vitality and viability of centres across the Council area. In order to strengthen the role of CMK as the regional shopping centre for comparison goods (an aim of Policy GS5), we recommend the rewording or removal of elements within Policy ECP2 to ensure that the retail offer of the Primary Shopping Area ('PSA') of CMK is not diluted into edge-of-centre locations, particularly to parts of the Secondary Shopping Frontage which lie outside of the PSA.

2. Critique of Study

- 2.1 This section of the report sets out a point-by-point critique of the Retail Study, focussing on the comparison goods capacity methodology, key assumptions and errors.
- 2.2 An alternative assessment is summarised below, supported by a series of tables. These are included at Appendix 1.

General Comments

- 2.3 The Retail Study is a conventional assessment of the need for additional retail and leisure floorspace in a defined area over a specified forecast period (up to 2050). It combines quantitative and qualitative research. The length of the forecast period contributes to the greater floorspace need identified at the end of the plan period.
- 2.4 The assessment includes 'health checks' of key centres, a policy overview, an analysis of retail and commercial leisure trends, together with conventional capacity analysis underpinned by a recent household survey. This leads to a series of recommendations. We comment on the methodology and assumptions below.
- 2.5 The study is comprehensive and much of the supporting analysis appears to be reasonable, although the assessment does contain errors that have implications for study outputs (see below). Some of the contextual analysis is excellent, in particular the overview of trends and influences in the retail and commercial leisure sectors. This is well-researched and comprehensively referenced.
- 2.6 The qualitative and health check analysis is also more comprehensive than is commonly found in LPA retail studies. CMK and other key centres are analysed in detail in the report at Sections 7-15 on the basis of PPG indicators.
- 2.7 In summary, the health check of CMK at Section 7 reveals whilst the centre has a particularly strong comparison goods offer, it currently suffers from vacancy rates which slightly exceed the national average (15.0% when compared with the UK average of 13.8%). Leisure services are strong in the centre with a particular focus around Xscape and 12th Street. The Retail Study notes that this area, which lies outside of the Primary Shopping Area ('PSA'), is also dominated by bars and restaurants which represent a particular strength of the wider town centre. As far as we can determine, the conclusions of these elements of the report appear to be sound.

Quantitative Analysis – Comparison Goods

- 2.8 Nexus' comparison goods retail capacity assessment ('Market Shares and Capacity Assessment') is set out in Section 4 of the Retail Study, with supporting expenditure, market share and turnover analysis appended (Appendices C and D). The convenience goods assessment is also summarised in the same section of the report with the expenditure, market shares and turnover analysis appended.
- 2.9 The capacity calculations are based on an analysis of the catchment area and current shopping patterns. The analysis is underpinned by an up-to-date and statistically

significant household survey (NEMS, March 2023), which has a sample base of c. 1,400 households. The definition of the Survey / Study Area (based on post code geography) and survey zones (based on ward geography) appear to be logical and appropriate for the purposes of exploring shopping patterns at a local level, identifying market shares and quantifying capacity.

- 2.10 We have reviewed the methodology, inputs and supporting assumptions in the Retail Study and make the following observations:
- 2.11 **Methodology:** the methodology (used to assess capacity) is a conventional spreadsheet-based calculation method that compares 'potential spending' attracted to existing centres with 'benchmark turnovers', which are calculated from the survey and projected forward applying an assumed rate of floorspace efficiency. Capacity arises from the difference between the two figures (potential and benchmark), with allowance for commitments. The supporting analysis is based on market shares derived from the household survey, which are used to calculate centre turnovers in the base year (2023) and subsequent years.
- 2.12 This methodology is reliable and robust if the inputs are calculated correctly and the supporting assumptions are reasonable. This includes the derivation of market shares and turnovers. The market shares are derived from the responses to survey questions relating to various comparison goods spending categories. This information, in conjunction with per capita and total expenditure by zone, is used to generate comparison goods turnovers, including for MK Central.
- 2.13 The market share analysis therefore supports all subsequent stages of the analysis. Market shares remain constant for the purposes of calculating capacity. For the capacity assessment, Nexus has assumed that the Council area's attraction to Study Area residents will remain constant, at 58.9% of all spending proportionate to population growth, whilst Central Milton Keynes' retail attraction will remain constant at 26.4%. Nexus considers that maintaining a constant market share provides a sensible basis for analysis given the reasonably limited scale of planned developments inside and nearby the Council area (paragraph 4.72). We agree with this as a general approach to the assessment.
- 2.14 The basis of this analysis is explained in paragraphs 4.71 – 4.77 of the report. As this element of the assessment involves numerous calculations and weighting by spend (£) by households on the different comparison goods categories, it is difficult to verify the accuracy of Nexus' market share analysis. In reality, this would require access to its underlying spreadsheets.
- 2.15 We note that the market share analysis for the comparison goods assessment is based on single/main responses only to survey questions, and excludes secondary choices. This may lead to the survey under-recording the significance of smaller and top-up/secondary destinations, which could have implications for the quantitative assessment.
- 2.16 **Population and Per Capita Spending:** per capita spending is derived from Experian, a reliable source of such data. Population data is derived from the population scenarios set out in the draft Milton Keynes Housing and Economic Development Needs

Assessment ('HEDNA'). These are based on household projected housing needs for MK and various scenarios of housing growth up to 2050. The two scenarios of most relevance to the retail capacity modelling are as follows:

- **Scenario A** is based on Scenario 2b of the HEDNA, which proposes an average annual housing growth of 1,902 dwellings over the period 2022-2050 (53,200 dwellings) across the Council area, with a 2050 population of 384,000.
- **Scenario B** is based on Scenario 3 of the HEDNA, which proposes an average annual housing of 2,265 dwellings over the period 2022-2050 (63,400 dwellings) across the Council area, with a 2050 population of 410,000.

- 2.17 It is not possible to verify the population calculations that underly the HEDNA as these are not explicitly presented within the report.
- 2.18 In terms of how the projected completions per annum within Scenarios A and B compare with existing housing completion rate across the Council area, the current 5 year average number of housing completions is 2,000 dwellings per annum (figures from 2019/20 – 2023/24). This figure is slightly closer to the 1,902 dwellings per annum figure presented within Scenario A than the 2,265 dwellings per annum in Scenario B. If the housing completions across the Council area continue at the same rate as over the past 5 years, the average delivery figure is likely to be somewhere between Scenario A and B and may not reach the maximum population set out in the high-delivery scenario.
- 2.19 The alternative capacity analysis presented below examines the implications for housing delivery in both scenarios. This is in order to provide an understanding of the minimum and maximum comparison goods floorspace that might be supported up to the end of the plan period using the same methodology as in the Retail Study.
- 2.20 **Growth Rates:** these have been applied based on Experian forecasts derived from the Experian Retail Planner Briefing Note 20, February 2023 ('ERPBN 20') (-1.0% to +2.8% excluding SFT adjusted for sales via stores for the period 2023 – 2050, with lower rates applied in 2023 and 2024) (Figure 4.23.1). Whilst these seem reasonable in our view, the growth rates are higher than recent estimates presented within the latest version of the Experian Retail Planner Briefing Note 21, February 2024 ('ERPBN 21'). Over the extensive plan period, the use of higher growth rates in the Retail Study has the effect of generating additional capacity. In our view therefore, the lower growth rates from the more recent Experian publication should be used. This feature of the modelling is examined in further detail below.
- 2.21 **Special Forms of Trading ('SFT'):** the treatment of SFT in the Retail Study is unclear. The market share of SFT by Inner and Outer Zone has been calculated from the survey (34.9% from the Inner Zones and 38.9% from the Outer Zones as stated in paragraph 4.19), but the assessment appears to not deduct SFT at the base year, instead missing this step and then applying growth rates that have been adjusted to account for SFT for sales via stores.
- 2.22 At paragraph 4.23(b), the Retail Study states the following:

“Experian Retail Planner Briefing Note 20 (February 2023) provides estimated year-on-year forecasts of internet and other SFT, which allows us to ‘strip out’ any expenditure that is, either now or in the future, diverted to SFT. This ensures that the increasing propensity to shop by SFT is accounted for in our modelling. These increasing deductions for SFT have the effect of off-setting some of the growth in expenditure in the Study Area derived from population increases. Furthermore, many brands offer online sales, but source the goods from their own stores’ shelves. This is often the case for foodstores where employees will pick online orders from stores’ shelves before, during or after opening hours. These orders are then delivered by dedicated vans from each store and as such, the online expenditure is attributed to tangible stores. Experian provides ‘adjusted’ figures to account for this.”

- 2.23 Use of this method is echoed in the notes provided at Table 8a of the economic tables presented at Appendices C and D. These state that:

“c. Per capita expenditure figures are derived from Experian MMG3 data (2021 report) at 2020 - the 2020 figures are then projected to the assessment years using “Ex. SFT adjusted for sales via stores’ forecast growth rates taken from Figure 7 of Experian Retail Planner Briefing Note 20.”

- 2.24 The method used within the Retail Study appears to be at odds with advice of how to use the adjusted SFT growth rates presented within the Experian guidance. The footnote to Figure 7 (in both ERPBN 20 and 21) reads as follows:

“To make use of the growth rates in the ‘Exc all SFT’ columns of the table, the starting point should be a total that excludes all SFT (our emphasis). The growth rates can then be applied to give a total that excludes all SFT, by the year of interest. No further adjustments are required to exclude all SFT, as this is accounted for in the starting input and the growth rates.

“The same principle applies to use of the ‘Ex SFT adjusted for sales via stores’ columns. The starting point should be a total that excludes all SFT adjusted for sales via stores. The growth rates can then be applied, and the final output will be a total that excludes all SFT adjusted for sales via stores, with no further adjustments required.”

- 2.25 We have attempted to verify whether the per capita figures exclude SFT as stated by Nexus throughout the Retail Study. Whilst we have been unable to acquire 2021-based per capita figures (Experian has indicated to us that it is unable to provide this historic data), we have acquired 2022 and 2023-based estimates from Experian for the Study Area zones. In order to compare the per capita figures, we have ensured these are in the base year (2023) and price year (2020) using growth rates and price indices derived from the latest ERPBN 21. This analysis is presented in full in Tables 5-7 at Appendix 1 and partially presented in Table 2.1 below for information.

Table 2.1: Comparative Analysis of Per Capita Figures at 2023

Source	Zone 1	Zone 2	Zone 3	Zone 4
Retail Study (Experian 2021- based) <u>“Excluding SFT”</u>	3,910	4,454	3,446	4,363
Experian 2022- based <u>Including SFT</u>	3,385	3,968	3,063	3,827
Experian 2023- based (latest) <u>Including SFT</u>	2,985	3,555	3,098	3,544

Source: Retail Study (Table 8a, Appendices C & D); Turley Alternative Capacity Analysis

- 2.26 As can be seen from Table 2.1, the per capita figures presented within the Retail Study that purportedly exclude SFT are significantly higher than the Experian 2022 and 2023-based figures that include SFT. For example, in the Retail Study, the comparison goods per capita figure for Zone 1 is £3,910/sq m in 2023 (which is reported to exclude SFT) which compares with the latest Experian figure of £2,985/sq m (prior to SFT being deducted).
- 2.27 This analysis, and details of the methodology outlined in the Retail Study, would suggest that SFT has not been deducted at the base year. The implications for this are that the capacity calculations in the Retail Study exaggerate the amount of comparison goods floorspace available throughout the plan period which is exacerbated further by the growth rates used (from ERPBN 20) which are slightly higher than the latest estimates from Experian (ERPBN 21).
- 2.28 **Floorspace productivity growth:** the efficiency growth rates used to calculate the growth in comparison goods benchmark turnovers and sales densities ranges from - 0.4% to +2.8% per annum. These are derived from ERPBN 20 and have not changed significantly within the latest publication. In our view, the rates used are robust.
- 2.29 **Inflow:** the turnover of comparison goods destinations in Milton Keynes factors in an inflow of 2% from outside of the Study Area, based on Nexus’ professional judgement (para 4.72). Whilst this assumption is not explained anywhere within the assessment, the level of inflow is small and appears to be reasonable.
- 2.30 **Equilibrium Trading:** a key assumption applied by Nexus to quantify capacity is ‘equilibrium trading’ in the base year. This effectively means that actual and benchmark turnovers are assumed to be in balance in 2023. This is effectively a judgement by Nexus and one that is critical to the capacity calculation. Capacity is calculated by applying a benchmark sales density of £3,500/sq m in 2023 (maximum forecast) and £5,500 sq m in 2023 (minimum forecast), increasing (in line with floorspace efficiency) in subsequent years (up to 2050).

- 2.31 The problem with Nexus' approach is that the actual benchmark turnover per sq m in 2023 is not identified, and any relationship with an assumed range between the £3,500 and 5,500/sq m trading level is unknown. This would require Nexus to use net comparison floorspace for CMK and other centres to calculate this figure. It may be that there is pent-up capacity in the base year (because the sales density is in reality much higher), which would have fundamental implications for future years. Unfortunately, this is not explored in the study and remains a significant unknown.
- 2.32 In the absence of a base year assessment, Nexus' analysis is therefore something of an artificial exercise determined by the differences between expenditure growth rates and floorspace efficiency. On the basis of the rates for each applied by Nexus (derived from ERPBN 20), these effectively cancel each other out. Where efficiency and growth rates are broadly the same, the principal determinant of capacity is therefore population growth as modelled within the housing delivery scenarios in the HEDNA.

Alternative Comparison Capacity Calculation

- 2.33 Following the identification of the potential error within the capacity tables (Table 8a, Appendices C and D) which suggests that SFT has not been correctly deducted from the per capita figures, we have presented an alternative assessment of comparison goods floorspace capacity below. These tables are presented in full at Appendix 1.
- 2.34 This assessment examines the implications of using the latest Experian per capita figures for each of the Retail Study zones (2023-based), deducting SFT at the base year for the Inner and Outer zones (in line with survey-derived estimates provided within the Retail Study), and applying the latest Experian growth rates (excluding SFT adjusted for sales via stores) from the ERPBN 21. Floorspace efficiency rates have been kept the same as reported in the Retail Study (derived from ERPBN 20) alongside use of the equilibrium trading model.
- 2.35 The following information is presented in the alternative capacity assessment. The suffix of A or B next to the table numbers denotes the use of the population projections in Scenario A (53,200 dwellings) or B (63,400 dwellings) of the draft HEDNA.
- **Retail Study Capacity (Tables 1 A/B – 4 A/B)** – assessment derived directly from the Retail Study for comparative purposes with the alternative capacity analysis. Per capita spend is derived from Experian (2021-based), growth rates (minus SFT for non-store sales) have been derived from Experian (ERPBN 20) as well as efficiency rates.
 - **Per Capita Expenditure Analysis (Tables 5 – 7)** – examines the difference between per capita spend in the Retail Study (2021-based estimates) with per capita spend from Experian (2022 and 2023-based estimates). As detailed above, the analysis suggests that an error has been made in the Retail Study in not deducting SFT at the base year which results in overstated levels of capacity. We have corrected this in the alternative capacity scenario.
 - **Alternative Capacity Scenario (Tables 8 A/B - 11 A/B)** – uses the latest per capita spend derived from Experian (2023-based) and deducts SFT at the base year (2023) using survey-derived levels of SFT for comparison goods within the

Inner and Outer MK zones. The analysis also adopts the latest growth rates from Experian (ERPBN 21) excluding SFT from non-store sales. Floorspace efficiency rates have been kept the same as reported in the Retail Study alongside use of the equilibrium trading model.

- **Summary (Table 12)** – provides a summary of the capacity outputs of Tables 4 A/B and Tables 11 A/B), comparing the outputs of the Retail Study with those of the alternative capacity analysis.

2.36 A summary of the outputs of the alternative capacity assessment are presented in Table 2.2 below:

Table 2.2: Alternative Capacity Analysis: Comparison Goods Capacity Requirement at 2050 (Retail Study vs Turley Analysis)

Housing Scenario		Retail Study Floorspace Capacity (sq m net)	Alternative Assessment Floorspace Capacity (sq m net)	Difference in Floorspace Capacity (sq m net)
Scenario A (53,200 by 2050)	Min.	37,348	14,051	-23,297
		to	to	to
	Max.	58,690	22,081	-36,609
Scenario B (63,400 by 2050)	Min.	42,125	16,460	-25,665
		to	to	to
	Max.	66,196	25,866	-40,330
Range between Scenario A and B	Min.	37,348	14,051	-23,297
		to	to	to
	Max.	66,196	25,866	-40,330

Source: Turley Alternative Capacity Analysis (Table 12, Appendix 1)

- 2.37 In summary, the alternative capacity analysis demonstrates that through updating the per capita figures and assumptions used within the Retail Study, the forecast comparison goods capacity drops from 42,125 - 66,196 sq m net to only 16,460 to 25,866 sq m net in 2050 (a 60.9% reduction in capacity). This reflects the outputs in Scenario B with population forecasts based on high housing growth (63,400 dwellings by 2050).
- 2.38 If modelled using the lower (potentially more realistic) housing delivery figures set out within Scenario A (53,200 dwellings by 2050), the forecast comparison goods capacity figure reduces further from 37,348 – 58,690 sq m net (as identified in the Retail Study) to only 14,051 - 22,081 sq m net at 2050 (a 62.3% reduction).
- 2.39 Clearly, this also has a knock-on effect for available comparison goods capacity calculated in the years 2026, 2030, 2035 and 2040 with substantial decreases in capacity identified in the alternative assessment.

- 2.40 The alternative capacity scenarios demonstrate that even with minor changes to the analysis to reflect the latest expenditure figures and growth rates from Experian and deduction of SFT at the base year, the comparison goods capacity in CMK decreases significantly. In our view, this alternative scenario is more robust than the analysis presented within the Retail Study, and the capacity for comparison goods floorspace up to the end of the plan period is in reality far less than suggested by Nexus.
- 2.41 **Recommendation:** We have examined the methodology and assumptions used within the Retail Study's comparison goods capacity assessment and have concerns that SFT has not been deducted at the base year. The implications for this are that the capacity calculations in the Retail Study exaggerate the amount of comparison goods floorspace available throughout the plan period which is exacerbated further by the growth rates used (from ERPBN 20) which are slightly higher than the latest estimates from Experian (ERPBN 21). We therefore recommend that Nexus reviews the comparison goods capacity tables to correct this potential error.
- 2.42 As a result of the significantly reduced comparison goods floorspace capacity, any attempt to extend the PSA of CMK or allow the development of additional retail floorspace within the Secondary Shopping Frontages (particularly around the Xscape building which lies outside of the PSA) should be resisted.

3. Policy Implications

Comparison Goods Floorspace Capacity

- 3.1 The Retail Study stresses that given current economic uncertainties and pressures on the retail sector, there is a need to treat the long-term forecasts presented within the capacity assessment with caution. As Nexus highlights, guidance in the PPG states that *“Given the uncertainty in forecasting long-term retail trends and consumer behaviour, this assessment may need to focus on a limited period (such as the next five years) but will need to take the lifetime of the plan into account and be regularly reviewed.”* Accordingly, Nexus advises that the 2040 and 2050 capacity forecasts presented in the Retail Study should be treated as indicative and reviewed over time (paragraph 19.8).
- 3.2 Nexus also stresses that capacity identified in the Retail Study does not equate to need. It states that need is more than just a quantitative measure; it should also involve qualitative considerations around issues such as any residents’ dissatisfaction with the current level of provision, and the potential impacts of realising capacities on the ground from health check work. Accordingly, Nexus warns that capacity modelling should not be seen as an absolute; it is a guide to a Plan-led approach (paragraph 19.9).
- 3.3 Whilst additional capacity for up to 66,196 sq m of additional comparison goods floorspace in CMK is identified in the Retail Study (using the high housing delivery projections in Scenario B), the only direct policy reference to this maximum capacity figure is found in Policy CMK2. This states that development of comparison goods floorspace will be supported in CMK up to 66,200 sq m net. This has been incorporated into the City Plan based on the uncritical acceptance of the Nexus outputs and without reference to the problematic nature of long-term forecasting and margins of error highlighted in the Retail Study.
- 3.4 In addition to this, as raised in the previous section, we have concerns that the inclusion of SFT within the Nexus modelling has resulted in dramatically overstated levels of comparison goods floorspace capacity which have been carried through to the City Plan. These errors within the Retail Study must be corrected by Nexus to ensure the correct capacity figures are reported in the next iteration of the plan, particularly in Policy CMK2.
- 3.5 As a result of the significant reduction in comparison goods floorspace capacity over the plan period, any attempts to extend the PSA of CMK or allow the development of retail floorspace within the Secondary Shopping Frontages should be strongly resisted. As recommended in the Retail Study, capacity forecasts do not equate to need; they should instead be treated as indicative and reviewed over time.

Town Centres and Primary Shopping Areas

- 3.6 Other than the reference to the maximum comparison goods capacity figure in Policy CMK2, there appears to be very few linkages between the Retail Study and the draft retail policies in the wider City Plan.

- 3.7 Commentary provided by Nexus at paragraphs 19.36 - 19.43 of the Retail Study is useful in helping to understand the definitions of Town Centre and PSA boundaries and how they should be used in plan-making, but it is unclear how this advice is carried over to the City Plan, particularly in relation to the retail boundaries drawn within CMK.
- 3.8 The Retail Study explains that Town Centre and PSA boundaries enable developers and decision makers to consider the sequential and impact tests when determining individual proposals for development and / or changes of use. As the Council has defined PSA boundaries, edge-of-centre sites are those that are defined as sites which are within a 300 metre walking distance of a PSA boundary, whilst out-of-centre sites are defined as areas beyond the 300 metres. Town Centre and PSA boundaries are important in this context (19.36-37).
- 3.9 Local authorities often utilise the PSA definition to help designate frontages that they are keen to see prosper in retail use, with differing ranges of main town centre uses allowed within Primary and Secondary Shopping Frontages. However, Paragraph 90 of the NPPF requires local authorities to define the extent of town centres and PSAs only, with no requirement to identify Primary and Secondary Frontages. References to these frontages were removed from national policy in 2019 (19.39-40).
- 3.10 Annex 2 of the NPPF indicates that a Primary Shopping Area is the *“Defined area where retail development is concentrated”*. Annex 2 also identifies that a town centre is the *“Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area”*.
- 3.11 Whilst there is no longer a requirement in the NPPF to designate a Primary and Secondary Frontage within a PSA, Nexus considers that there remains a policy basis for continuing to identify these areas in CMK because of their role in providing a core retail function for the sub-region (19.43). However, there appears to be no discussion or justification for this in the report, and no consideration as to why the Xscape building, which is predominantly a leisure destination, has been included as part of the Secondary Shopping Frontage (see Policy ECP2 below).
- 3.12 As there is no longer a definition for what constitutes a Primary or Secondary Shopping Frontage in national policy, the Glossary provided at Section 10 of the City Plan attempts to clarify these terms.
- Primary Shopping Areas are defined as an area where retail is concentrated (consistent with the definition in the NPPF).
 - Primary Shopping Frontages are defined as areas that are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods.
 - Secondary Shopping Frontages are defined as those that provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

Protecting Town Centres and CMK

3.13 In relation to strengthening the vitality and viability of the centres within the Milton Keynes' retail hierarchy, Policy GS5 highlights that proposals for additional retail development within the PSA will be supported. In relation to CMK, Policy GS5 identifies the PSA as the regional shopping centre for comparison goods shopping, with the remainder of the City Centre (outside of the PSA) suitable for other main town centre uses and providing significant leisure functions, as well as important clusters of civic and public buildings.

3.14 Policy ECP2 'Supporting the Vitality and Viability of Centres' is the primary focus of our representations in relation to CMK and how the retail boundaries are addressed within this policy. Policy ECP2 states the following:

"B. Located within the City Centre boundary, the Primary Shopping Area of Central Milton Keynes comprises the Primary and Secondary Shopping frontages, alongside a secondary shopping frontage in the Xscape building, which are shown on the Policies Map."

3.15 Whilst Criterion B seems to suggest that the Secondary Shopping Frontage in the Xscape building is within the PSA, this contradicts the CMK Inset Map which shows the Xscape frontage outside of this area. The Retail Study does not include any proposed revisions to the retail boundaries within the adopted Plan:MK (where the Xscape building lies within the Secondary Shopping Frontage and outside of the PSA). We therefore assume that the confusing wording used at Criterion B is unintentional, and instead the Secondary Shopping Frontage around the Xscape building lies outside of the PSA as shown on the Inset Map.

3.16 **Recommendation 1:** a clarification should be inserted into Criterion B to confirm the Secondary Shopping Frontage around the Xscape building lies outside of the PSA (if the Council is minded to retain references to the Secondary Shopping Frontage - see further recommendations below).

3.17 Policy ECP2 goes on to state:

C. Within the Primary Shopping Frontages at ground floor level, development for Retail uses, Food & Drink and Financial, Professional, and other services, gyms, creche, leisure and cultural uses will normally be permitted.

D. Within Secondary Shopping frontages at ground floor level, development for Retail uses (our emphasis), Food & Drink and Financial, Professional, and other services, gyms, creche, leisure and cultural uses and drinking establishments, medical and health services will normally be permitted."

3.18 Criteria C and D effectively allow the same uses in both defined frontages, which include retail uses. The policy as drafted therefore permits retail uses outside of the PSA, contrary to other policies in the plan (specifically Policy GS5) which identify the CMK PSA as the regional shopping centre for comparison goods, with the remainder of the City Centre (outside of the PSA) suitable for other main town centre uses. This also conflicts with the NPPF, which requires impact and sequential testing for edge-of-

centre proposals (ie. those which lie outside of the PSA), a requirement echoed in Policy ECP3. In fact, the range of permitted uses in the Secondary Shopping Frontage in ECP2 is wider than in the Primary Shopping Frontage, which is illogical and conflicts with the City Plan's own definition of the uses that should be contained within these frontages.

- 3.19 **Recommendation 2 – Option 1:** The easiest way to remedy this issue is for the Council to delete references to Primary and Secondary Frontages in Policy ECP2 (as there is no requirement in national policy to define these areas) and revise the Inset Map accordingly to define the PSA for CMK only.
- 3.20 In doing so, the retail offer of the PSA of CMK could be strengthened and maintained as the regional shopping centre for comparison goods (as outlined in Policy GS5). The PSA would also align with the definition as outlined in the NPPF and the City Plan (i.e. as the area where retail is concentrated).
- 3.21 Proposals for other main town centre uses could still be supported in the Xscape building (by virtue of it being an edge of centre site outside of the PSA) but any significant proposals for retail uses (over 900 sq m) would be subject to impact and sequential testing as outlined within Policy ECP3 in order to protect the vitality and viability of the PSA and prevent the dilution of its core retail offer.
- 3.22 **Recommendation 2 – Option 2:** We understand that there are concerns that any recommendations advocating the removal of the Primary and Secondary Shopping Frontages may have the unintended effect of the Council trying to extend the PSA to include the Xscape building in the next iteration of the City Plan. Whilst there is no guidance in the Retail Study to support this move and it is clear that our alternative assessment suggests a significant decrease in comparison goods capacity over the plan period, this is something that the Council previously attempted in 2018. The proposal to extend the PSA around the Xscape building in Plan:MK was ultimately rejected by the Local Plan Inspector in February 2019 who stated that an enlarged PSA in Milton Keynes may unintentionally serve to dilute the efforts to reinforce the established retail core of CMK.
- 3.23 If it is an ongoing concern that raising these issues may cause the Council to attempt to extend the PSA to include the Xscape building, we recommend that representations are made to delete the reference in Criterion D to 'Retail Uses' being permissible within Secondary Shopping Frontages.
- 3.24 As noted above, proposals for other main town centre uses in the Xscape building would still be supported (as allowed by the remainder of Policy ECP2) but any significant proposals for retail uses (over 900 sq m) would be subject to impact and sequential testing as outlined within Policy ECP3. This would also enable the defined PSA in CMK to be strengthened as the regional centre for comparison goods (as stated under Policy GS5) and avoid the dilution of this offer to areas outside of the PSA.

Appendix 1: Alternative Capacity Tables

REVIEW OF MK RETAIL AND COMMERCIAL LEISURE STUDY 2024 COMPARISON GOODS FLOORSPACE CAPACITY FIGURES

THE FIGURES IN TABLES 1A-4A AND 1B-4B ARE ALL DERIVED DIRECTLY FROM THE RETAIL STUDY FOR COMPARATIVE PURPOSES WITH THE ALTERNATIVE CAPACITY ANALYSIS PRESENTED IN THE LATER TABLES

TABLE 1A: POPULATION PROJECTIONS ACROSS STUDY AREA (2023-2050) - SCENARIO A (53,200 DWELLINGS)

Zone	Population						Growth 2023-2050
	2023	2026	2030	2035	2040	2050	
Zone 1	32,754	34,414	36,628	39,395	42,161	47,695	45.6%
Zone 2	51,976	54,610	58,123	62,514	66,904	75,685	45.6%
Zone 3	30,076	31,600	33,633	36,174	38,714	43,796	45.6%
Zone 4	44,890	47,165	50,199	53,991	57,783	65,367	45.6%
Zone 5	28,665	30,118	32,055	34,477	36,898	41,741	45.6%
Zone 6	21,012	22,077	23,497	25,272	27,047	30,597	45.6%
Zone 7	26,766	28,123	29,931	32,193	34,454	38,976	45.6%
Zone 8	99,753	102,290	104,975	107,683	110,263	116,287	16.6%
Zone 9	24,676	25,927	27,594	29,679	31,763	35,932	45.6%
Zone 10	9,373	9,848	10,481	11,273	12,065	13,649	45.6%
Zone 11	70,906	72,382	73,902	75,558	77,204	81,422	14.8%
Zone 12	100,104	102,233	104,476	106,635	108,554	114,484	14.4%
Zone 13	126,106	129,920	133,809	137,809	141,477	149,206	18.3%
Zone 14	64,231	65,709	67,337	69,139	70,982	74,860	16.5%
Inner Zone (1-7,9-10)	270,188	283,882	302,141	324,968	347,789	393,438	45.6%
Total Study Area	731,288	756,416	786,640	821,792	856,269	929,697	27.1%

Notes:
 1. Derived from Milton Keynes Retail and Commercial Leisure Study 2024 (Appendix C, Table 8a, Scenario A)
 2. Scenario A is based on Scenario 2b of the draft HEDNA, which proposes an average annual housing growth of 1,902 dwellings over the period 2022-2050, with a 2050 population of 384,000. Total 28-year growth: 53,200 (1,902 dpa)

TABLE 2A: COMPARISON GOODS PER CAPITA EXPENDITURE ACROSS STUDY AREA (RETAIL STUDY)

Zone	Comparison Goods Expenditure Per Capita (£)					
	2023	2026	2030	2035	2040	2050
Zone 1	3,910	3,953	4,350	4,970	5,706	7,521
Zone 2	4,454	4,503	4,955	5,661	6,500	8,567
Zone 3	3,446	3,484	3,834	4,380	5,029	6,628
Zone 4	4,363	4,411	4,854	5,546	6,367	8,392
Zone 5	4,240	4,286	4,717	5,389	6,187	8,155
Zone 6	3,973	4,016	4,420	5,050	5,798	7,642
Zone 7	3,955	3,998	4,400	5,027	5,772	7,607
Zone 8	4,729	4,781	5,261	6,011	6,901	9,096
Zone 9	4,875	4,928	5,424	6,197	7,114	9,377
Zone 10	5,413	5,472	6,022	6,880	7,899	10,412
Zone 11	4,596	4,646	5,113	5,842	6,707	8,840
Zone 12	4,741	4,793	5,275	6,026	6,919	9,119
Zone 13	4,509	4,558	5,017	5,731	6,580	8,673
Zone 14	4,723	4,774	5,255	6,003	6,892	9,084
Inner Zone (1-7,9-10)	-	-	-	-	-	-
Total Study Area	-	-	-	-	-	-

Notes:
 1. Derived from Milton Keynes Retail and Commercial Leisure Study 2024 (Appendix C, Table 8a)
 2. Retail Study states that per capita expenditure figures are derived from Experian MMG3 data (2021 report) at 2020 - the 2020 figures have then been projected to the assessment years using "Ex. SFT adjusted for sales via stores' forecast growth rates taken from Figure 7 of Experian Retail Planner Briefing Note 20.

TABLE 3A: SCENARIO A (53,200 DWELLINGS) - RETAIL STUDY TOTAL EXPENDITURE (£M)

Zone	Comparison Goods Expenditure (£m)					
	2023	2026	2030	2035	2040	2050
Zone 1	128.1	136.0	159.3	195.8	240.6	358.7
Zone 2	231.5	245.9	288.0	353.9	434.9	648.4
Zone 3	103.6	110.1	128.9	158.4	194.7	290.3
Zone 4	195.9	208.0	243.7	299.4	367.9	548.6
Zone 5	121.5	129.1	151.2	185.8	228.3	340.4
Zone 6	83.5	88.7	103.9	127.6	156.8	233.8
Zone 7	105.9	112.4	131.7	161.8	198.9	296.5
Zone 8	471.7	489.0	552.3	647.3	760.9	1,057.7
Zone 9	120.3	127.8	149.7	183.9	226.0	336.9
Zone 10	50.7	53.9	63.1	77.6	95.3	142.1
Zone 11	325.9	336.3	377.9	441.4	517.8	719.8
Zone 12	474.6	490.0	551.1	642.6	751.0	1,044.0
Zone 13	568.6	592.2	671.3	789.8	930.9	1,294.0
Zone 14	303.4	313.7	353.8	415.1	489.2	680.1
Inner Zone (1-7,9-10)	1,141.0	1,211.9	1,419.5	1,744.3	2,143.2	3,195.7
Total Study Area	3,285.3	3,444.3	3,926.3	4,680.7	5,593.3	7,991.5

Notes:
 1. Derived from Milton Keynes Retail and Leisure Needs Assessment (Appendix C, Table 8b, Scenario A)
 2. Scenario A is based on Scenario 2b of the draft HEDNA, which proposes an average annual housing growth of 1,902 dwellings over the period 2022-2050, with a 2050 population of 384,000. Total 28-year growth: 53,200 (1,902 dpa)

TABLE 1B: POPULATION PROJECTIONS ACROSS STUDY AREA (2023-2050) - SCENARIO B (63,400 DWELLINGS)

Zone	Population						Growth 2023-2050
	2023	2026	2030	2035	2040	2050	
Zone 1	32,754	34,731	37,367	40,662	43,957	50,547	54.3%
Zone 2	51,976	55,113	59,296	64,525	69,753	80,210	54.3%
Zone 3	30,076	31,891	34,312	37,337	40,363	46,414	54.3%
Zone 4	44,890	47,599	51,212	55,728	60,244	69,275	54.3%
Zone 5	28,665	30,395	32,702	35,586	38,469	44,236	54.3%
Zone 6	21,012	22,280	23,971	26,085	28,199	32,426	54.3%
Zone 7	26,766	28,382	30,536	33,228	35,921	41,306	54.3%
Zone 8	99,753	102,290	104,975	107,683	110,263	116,287	16.6%
Zone 9	24,676	26,165	28,151	30,634	33,116	38,081	54.3%
Zone 10	9,373	9,939	10,693	11,636	12,579	14,465	54.3%
Zone 11	70,906	72,382	73,902	75,558	77,204	81,422	14.8%
Zone 12	100,104	102,233	104,476	106,635	108,554	114,484	14.4%
Zone 13	126,106	129,920	133,869	137,809	141,477	149,206	18.3%
Zone 14	64,231	65,709	67,337	69,139	70,982	74,860	16.5%
Inner Zone (1-7,9-10)	270,188	286,495	308,240	335,421	362,601	416,960	54.3%
Total Study Area	731,288	759,029	792,799	832,245	871,081	953,219	30.3%

Notes:
 1. Derived from Milton Keynes Retail and Commercial Leisure Study 2024 (Appendix D, Table 8a, Scenario A)
 2. Scenario B is based on Scenario 3 of the draft HEDNA, which proposes an average annual housing of 2,265 dwellings over the period 2022-2050, with a 2050 population of 410,000. Total 28-year growth: 63,400 (2,265 dpa)

TABLE 2B: COMPARISON GOODS PER CAPITA EXPENDITURE ACROSS STUDY AREA (RETAIL STUDY) - SAME AS TABLE 2A ABOVE

Zone	Comparison Goods Expenditure Per Capita (£)					
	2023	2026	2030	2035	2040	2050
Zone 1	3,910	3,953	4,350	4,970	5,706	7,521
Zone 2	4,454	4,503	4,955	5,661	6,500	8,567
Zone 3	3,446	3,484	3,834	4,380	5,029	6,628
Zone 4	4,363	4,411	4,854	5,546	6,367	8,392
Zone 5	4,240	4,286	4,717	5,389	6,187	8,155
Zone 6	3,973	4,016	4,420	5,050	5,798	7,642
Zone 7	3,955	3,998	4,400	5,027	5,772	7,607
Zone 8	4,729	4,781	5,261	6,011	6,901	9,096
Zone 9	4,875	4,928	5,424	6,197	7,114	9,377
Zone 10	5,413	5,472	6,022	6,880	7,899	10,412
Zone 11	4,596	4,646	5,113	5,842	6,707	8,840
Zone 12	4,741	4,793	5,275	6,026	6,919	9,119
Zone 13	4,509	4,558	5,017	5,731	6,580	8,673
Zone 14	4,723	4,774	5,255	6,003	6,892	9,084
Inner Zone (1-7,9-10)	-	-	-	-	-	-
Total Study Area	-	-	-	-	-	-

Notes:
 1. Derived from Milton Keynes Retail and Commercial Leisure Study 2024 (Appendix D, Table 8a)
 2. Retail Study states that per capita expenditure figures are derived from Experian MMG3 data (2021 report) at 2020 - the 2020 figures have then been projected to the assessment years using "Ex. SFT adjusted for sales via stores' forecast growth rates taken from Figure 7 of Experian Retail Planner Briefing Note 20.

TABLE 3B: SCENARIO B (63,400 DWELLINGS) - RETAIL STUDY TOTAL EXPENDITURE (£M)

Zone	Comparison Goods Expenditure (£m)					
	2023	2026	2030	2035	2040	2050
Zone 1	128.1	137.3	162.6	202.1	250.8	380.1
Zone 2	231.5	248.1	293.8	365.3	453.4	687.2
Zone 3	103.6	111.1	131.5	163.5	203.0	307.6
Zone 4	195.9	209.9	248.6	309.1	383.6	581.4
Zone 5	121.5	130.3	154.3	191.8	238.0	360.8
Zone 6	83.5	89.5	106.0	131.7	163.5	247.8
Zone 7	105.9	113.5	134.4	167.0	207.3	314.2
Zone 8	471.7	489.0	552.3	647.3	760.9	1,057.7
Zone 9	120.3	128.9	152.7	189.8	235.6	357.1
Zone 10	50.7	54.4	64.4	80.1	99.4	150.6
Zone 11	325.9	336.3	377.9	441.4	517.8	719.8
Zone 12	474.6	490.0	551.1	642.6	751.0	1,044.0
Zone 13	568.6	592.2	671.6	789.8	930.9	1,294.0
Zone 14	303.4	313.7	353.8	415.1	489.2	680.1
Inner Zone (1-7,9-10)	1,141.0	1,223.0	1,448.2	1,800.5	2,234.5	3,386.7
Total Study Area	3,285.3	3,444.3	3,955.0	4,736.8	5,684.6	8,182.5

Notes:
 1. Derived from Milton Keynes Retail and Leisure Needs Assessment (Appendix C, Table 8b, Scenario A)
 2. Scenario A is based on Scenario 2b of the draft HEDNA, which proposes an average annual housing growth of 1,902 dwellings over the period 2022-2050, with a 2050 population of 384,000. Total 28-year growth: 53,200 (1,902 dpa)

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REVIEW OF MK RETAIL AND COMMERCIAL LEISURE STUDY 2024 COMPARISON GOODS FLOORSPACE CAPACITY FIGURES

TABLE 4A: SCENARIO A (53,200 DWELLINGS) - COMPARISON GOODS CAPACITY ASSESSMENT FOR CMK (RETAIL STUDY)

Assumes Equilibrium at Base Year and Constant Market Shares

THESE FIGURES ARE DERIVED DIRECTLY FROM THE RETAIL STUDY FOR COMPARATIVE PURPOSES WITH THE ALTERNATIVE CAPACITY ANALYSIS PRESENTED IN THE LATER TABLES

% Market Share		2023	2026	2030	2035	2040	2050
Expenditure in the Study Area (£m)		£3,285.3	£3,433.1	£3,926.3	£4,680.7	£5,593.3	£7,991.5
Expenditure directed to Milton Keynes Council Area (£m)	58.9%	£1,934.0	£2,021.0	£2,311.3	£2,755.4	£3,292.7	£4,704.4
Expenditure directed to Central Milton Keynes (£m)	26.4%	£868.8	£907.9	£1,038.3	£1,237.8	£1,479.1	£2,113.3
Inflow (%)	2.0%	£886.2	£926.0	£1,059.1	£1,262.6	£1,508.7	£2,155.6
		2023	2026	2030	2035	2040	2050
STEP 1	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£886.2	£926.0	£1,059.1	£1,262.6	£1,508.7	£2,155.6
STEP 2	Total Forecast "Benchmark" Turnover of all Floorspace (£m):	£886.2	£917.3	£1,000.8	£1,148.9	£1,319.0	£1,738.6
STEP 3	Available Expenditure before commitments (£m):		£8.7	£58.3	£113.6	£189.7	£417.0
STEP 4	Turnover of all committed floorspace (£m):		£7.4	£8.1	£9.3	£10.6	£14.0
STEP 5	Surplus Expenditure (£m)		£1.3	£50.3	£104.4	£179.0	£403.0
STEP 6	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:						
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m)	3,500.0	3,623.2	3,952.6	4,537.9	5,209.8	6,866.7
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		358	12,713	22,996	34,367	58,690
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		1,698	20,955	37,617	55,846	94,565
STEP 7	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:						
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m)	5,500.0	5,693.6	6,211.3	7,130.9	8,186.8	10,790.6
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		228	8,090	14,634	21,870	37,348
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		1,081	13,335	23,938	35,539	60,178

Notes:

1. Derived from Retail Study, Appendix C, Tables 18a, 18b and 19b
2. Scenario A is based on Scenario 2b of the draft HEDNA, which proposes an average annual housing growth of 1,902 dwellings over the period 2022-2050, with a 2050 population of 384,000. Total 28-year growth: 53,200 (1,902 dpa)
3. Process within Steps 1 - 7 explained in detail in Retail Study (Table 19b)

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<p>MKCC Retail and Commercial Leisure Study Medium housing delivery target of 53,200 homes Comparison Goods Capacity Identified at 2050</p> <p>37,348 - 58,690 sq m net</p>
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REVIEW OF MK RETAIL AND COMMERCIAL LEISURE STUDY 2024 COMPARISON GOODS FLOORSPACE CAPACITY FIGURES

TABLE 4B: SCENARIO B (63,400 DWELLINGS) - COMPARISON GOODS CAPACITY ASSESSMENT FOR CMK (RETAIL STUDY)

Assumes Equilibrium at Base Year and Constant Market Shares

THESE FIGURES ARE DERIVED DIRECTLY FROM THE RETAIL STUDY FOR COMPARATIVE PURPOSES WITH THE ALTERNATIVE CAPACITY ANALYSIS PRESENTED IN THE LATER TABLES

% Market Share		2023	2026	2030	2035	2040	2050
Expenditure in the Study Area (£m)		£3,285.3	£3,444.3	£3,955.0	£4,736.8	£5,684.6	£8,182.5
Expenditure directed to Milton Keynes Council Area (£m)	58.9%	£1,935.0	£2,028.7	£2,329.5	£2,790.0	£3,348.2	£4,819.5
Expenditure directed to Central Milton Keynes (£m)	26.4%	£868.8	£910.8	£1,045.9	£1,252.6	£1,503.3	£2,163.9
Inflow (%)	2.0%	£886.2	£929.1	£1,066.8	£1,277.7	£1,533.3	£2,207.1
		2023	2026	2030	2035	2040	2050
STEP 1	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£886.2	£929.1	£1,066.8	£1,277.7	£1,533.3	£2,207.1
STEP 2	Total Forecast "Benchmark" Turnover of all Floorspace (£m):	£886.2	£917.3	£1,000.8	£1,148.9	£1,319.0	£1,738.6
STEP 3	Available Expenditure before commitments (£m):		£11.7	£66.1	£128.8	£214.3	£468.6
STEP 4	Turnover of all committed floorspace (£m):		£7.4	£8.1	£9.3	£10.6	£14.0
STEP 5	Surplus Expenditure (£m)		£4.3	£58.0	£119.5	£203.7	£454.6
STEP 6	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:						
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m)	3,500.0	3,623.2	3,952.6	4,537.9	5,209.8	6,866.7
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		1,189	14,669	26,332	39,092	66,196
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		1,698	20,955	37,617	55,846	94,565
STEP 7	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:						
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m)	5,500.0	5,693.6	6,211.3	7,130.9	8,186.8	10,790.6
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		756	9,335	16,757	24,877	42,125
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		1,081	13,335	23,938	35,539	60,178

Notes:

1. Derived from Retail Study, Appendix D, Tables 18a, 18b and 19b
2. Scenario B presented in Table is based on Scenario 3 of the draft HEDNA, which proposes an average annual housing of 2,265 dwellings over the period 2022-2050, with a 2050 population of 410,000. Total 28-year growth: 63,400 (2,265 dpa)
3. Process within Steps 1 - 7 explained in detail in Retail Study (Table 19b)

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<p>MKCC Retail and Commercial Leisure Study Upper housing delivery target of 63,400 homes Comparison Goods Capacity Identified at 2050</p> <p>42,125 - 66,196 sq m net</p>

REVIEW OF MK RETAIL AND COMMERCIAL LEISURE STUDY 2024 COMPARISON GOODS FLOORSPACE CAPACITY FIGURES

TABLE 5: COMPARISON GOODS PER CAPITA EXPENDITURE FIGURES DERIVED FROM RETAIL STUDY (2021-BASED RELEASE)

Figures "Excluding SFT"	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Zone 13	Zone 14
Total Comparison per Person 2023 (£)	3,910	4,454	3,446	4,363	4,240	3,973	3,955	4,729	4,875	5,413	4,596	4,741	4,509	4,723

Notes:

1. Derived from Retail Study, Appendices C & D, Table 8a. Experian MMG3 data (2021 report) (grown to 2023 base in Retail Study)
2. Retail Study tables state that figures exclude SFT. When these figures are compared with other Experian figures provided in Tables 6 and 7 below, this may be a mistake - in our view the authors of the Retail Study may have not deducted SFT at the base year.

TABLE 6: COMPARISON GOODS PER CAPITA EXPENDITURE FIGURES DERIVED FROM EXPERIAN (2022-BASED RELEASE)

Figures Including SFT	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Zone 13	Zone 14
Total Comparison per Person 2021 (£)	3,619	4,244	3,275	4,092	3,948	3,802	3,762	4,357	4,500	4,868	4,232	4,320	4,198	4,428
Total Comparison per Person 2022 (£)	3,500	4,104	3,167	3,957	3,817	3,677	3,638	4,213	4,351	4,707	4,092	4,177	4,060	4,282
Total Comparison per Person 2023 (£)	3,385	3,968	3,063	3,827	3,691	3,556	3,518	4,074	4,208	4,552	3,957	4,039	3,926	4,140

Notes:

1. Experian per capita figures (2022 based estimates) provided to Turley on 11/9/24 in 2021 prices. Converted to 2020 prices using comparison goods price indices in Experian Retail Planner Briefing Note 21 (February 2024).
2. Figures at 2021 then grown to 2023 using growth rates identified at Figure 7 of Experian Retail Planner Briefing Note 21 (Growth in sales volumes (retail spend) per head 2010-2040 (% per annum) not adjusted for SFT)

TABLE 7: COMPARISON GOODS PER CAPITA EXPENDITURE FIGURES DERIVED FROM EXPERIAN (2023-BASED RELEASE)

Figures Including SFT	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Zone 13	Zone 14
Total Comparison per Person 2022 (£)	3,087	3,676	3,203	3,664	3,559	3,445	3,370	4,285	3,996	4,457	3,742	3,903	3,758	3,972
Total Comparison per Person 2023 (£)	2,985	3,555	3,098	3,544	3,442	3,331	3,259	4,144	3,864	4,310	3,619	3,774	3,634	3,841

Notes:

1. Experian per capita figures (2023-based estimates) provided to Turley on 11/9/24 in 2022 prices. Converted to 2020 prices using comparison goods price indices in Experian Retail Planner Briefing Note 21 (February 2024).
2. Figures at 2022 then grown to 2023 using growth rates identified at Figure 7 of Experian Retail Planner Briefing Note 21 (Growth in sales volumes (retail spend) per head 2010-2040 (% per annum) not adjusted for SFT)

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REVIEW OF MK RETAIL AND COMMERCIAL LEISURE STUDY 2024 COMPARISON GOODS FLOORSPACE CAPACITY FIGURES

THE FIGURES IN TABLES 8A-11A AND 8B-11B REFLECT THE USE OF UPDATED PER CAPITA FIGURES, DEDUCTION OF SFT IN THE BASE YEAR (2023) AND USE OF REVISED GROWTH RATES (EXCLUDING SFT) DERIVED FROM LATEST EXPERIAN RETAIL PLANNER BRIEFING NOTE 21 (FEBRUARY 2024)

TABLE 8A: POPULATION PROJECTIONS ACROSS STUDY AREA (2023-2050) - SCENARIO A (53,200 DWELLINGS) - DERIVED DIRECTLY FROM RETAIL STUDY

Zone	Population						Growth 2023-2050
	2023	2026	2030	2035	2040	2050	
Zone 1	32,754	34,414	36,628	39,395	42,161	47,695	45.6%
Zone 2	51,976	54,610	58,123	62,514	66,904	75,685	45.6%
Zone 3	30,076	31,600	33,633	36,174	38,714	43,796	45.6%
Zone 4	44,890	47,165	50,199	53,991	57,783	65,367	45.6%
Zone 5	28,665	30,118	32,055	34,477	36,898	41,741	45.6%
Zone 6	21,012	22,077	23,497	25,272	27,047	30,597	45.6%
Zone 7	26,766	28,123	29,931	32,193	34,454	38,976	45.6%
Zone 8	99,753	102,290	104,975	107,683	110,263	116,287	16.6%
Zone 9	24,676	25,927	27,594	29,679	31,763	35,932	45.6%
Zone 10	9,373	9,848	10,481	11,273	12,065	13,649	45.6%
Zone 11	70,906	72,382	73,902	75,558	77,204	81,422	14.8%
Zone 12	100,104	102,233	104,476	106,635	108,554	114,484	14.4%
Zone 13	126,106	129,920	133,809	137,809	141,477	149,206	18.3%
Zone 14	64,231	65,709	67,337	69,139	70,982	74,860	16.5%
Inner Zone (1-7,9-10)	270,188	283,882	302,141	324,968	347,789	393,438	45.6%
Total Study Area	731,288	756,416	786,640	821,792	856,269	929,697	27.1%

Notes:
 1. Derived from Milton Keynes Retail and Commercial Leisure Study 2024 (Appendix C, Table 8a, Scenario A)
 2. Scenario A is based on Scenario 2b of the draft HEDNA, which proposes an average annual housing growth of 1,902 dwellings over the period 2022-2050, with a 2050 population of 384,000. Total 28-year growth: 53,200 (1,902 dpa)

TABLE 9A: COMPARISON GOODS PER CAPITA EXPENDITURE ACROSS STUDY AREA - LATEST EXPERIAN ESTIMATES, EXCLUDING SFT AT BASE YEAR

Zone	2023 (inc SFT)	Comparison Goods Expenditure Per Capita (£) - excluding SFT					
		2023	2026	2030	2035	2040	2050
Zone 1	2,985	1,943	1,961	2,150	2,432	2,763	3,571
Zone 2	3,555	2,314	2,335	2,560	2,897	3,290	4,253
Zone 3	3,098	2,017	2,035	2,231	2,524	2,867	3,706
Zone 4	3,544	2,307	2,328	2,552	2,887	3,279	4,239
Zone 5	3,442	2,241	2,261	2,479	2,804	3,185	4,117
Zone 6	3,331	2,168	2,188	2,399	2,714	3,083	3,985
Zone 7	3,259	2,122	2,141	2,347	2,656	3,016	3,899
Zone 8	4,144	2,532	2,555	2,801	3,169	3,599	4,652
Zone 9	3,864	2,516	2,538	2,783	3,148	3,576	4,623
Zone 10	4,310	2,806	2,831	3,104	3,511	3,988	5,155
Zone 11	3,619	2,211	2,231	2,446	2,767	3,143	4,063
Zone 12	3,774	2,306	2,327	2,551	2,886	3,278	4,238
Zone 13	3,634	2,220	2,240	2,456	2,779	3,156	4,080
Zone 14	3,841	2,347	2,368	2,596	2,937	3,336	4,313
Inner Zone (1-7,9-10)	-	-	-	-	-	-	-
Total Study Area	-	-	-	-	-	-	-

Notes:
 1. Expenditure per capita figures provided by Experian on 11/9/24 (2023-based estimates, converted to 2020 prices using comparison goods price indices identified in Experian Retail Planner Briefing Note 21 (February 2024). SFT has been deducted at 34.9% from the per capita figures in Inner Zones and 38.9% from per capita figures in Outer Zones (as detailed at Paragraph 4.19 of Retail Study).
 2. Figures at 2023 (excluding SFT) then grown using growth rates identified at Figure 7 of Experian Retail Planner Briefing Note 21 (Growth in sales volumes (retail spend) per head 2010-2040 (% per annum) adjusted for SFT).
 3. As specified in the Experian Retail Planner Briefing Note 20 and 21, to make use of the growth rates in the 'Exc all SFT' columns of Figure 7, the starting point should be a total that excludes all SFT. This has been calculated in the table above. The growth rates can then be applied to give a total that excludes all SFT, by the year of interest. No further adjustments are required to exclude all SFT, as this is accounted for in the starting input and the growth rates.

TABLE 10A: SCENARIO A (53,200 DWELLINGS) - TOTAL EXPENDITURE (£M) - LATEST EXPENDITURE & GROWTH RATES

Zone	Comparison Goods Expenditure (£m)					
	2023	2026	2030	2035	2040	2050
Zone 1	63.7	67.5	78.7	95.8	116.5	170.3
Zone 2	120.3	127.5	148.8	181.1	220.1	321.9
Zone 3	60.7	64.3	75.0	91.3	111.0	162.3
Zone 4	103.6	109.8	128.1	155.9	189.5	277.1
Zone 5	64.2	68.1	79.5	96.7	117.5	171.9
Zone 6	45.6	48.3	56.4	68.6	83.4	121.9
Zone 7	56.8	60.2	70.3	85.5	103.9	152.0
Zone 8	252.6	261.3	294.0	341.2	396.9	541.0
Zone 9	62.1	65.8	76.8	93.4	113.6	166.1
Zone 10	26.3	27.9	32.5	39.6	48.1	70.4
Zone 11	156.8	161.5	180.8	209.1	242.7	330.8
Zone 12	230.8	237.9	266.5	307.8	355.9	485.1
Zone 13	280.0	291.1	328.6	382.9	446.5	608.7
Zone 14	150.7	155.6	174.8	203.1	236.8	322.9
Inner Zone (1-7,9-10)	603.1	639.4	746.1	907.9	1,103.6	1,613.8
Total Study Area	1,674.0	1,746.8	1,990.8	2,352.0	2,782.4	3,902.3

Notes:
 1. Population in Table 8A multiplied by per capita expenditure in Table 9A.

TABLE 8B: POPULATION PROJECTIONS ACROSS STUDY AREA (2023-2050) - SCENARIO B (63,400 DWELLINGS) - DERIVED DIRECTLY FROM RETAIL STUDY

Zone	Population						Growth 2023-2050
	2023	2026	2030	2035	2040	2050	
Zone 1	32,754	34,731	37,367	40,662	43,957	50,547	54.3%
Zone 2	51,976	55,113	59,296	64,525	69,753	80,210	54.3%
Zone 3	30,076	31,891	34,312	37,337	40,363	46,414	54.3%
Zone 4	44,890	47,599	51,212	55,728	60,244	69,275	54.3%
Zone 5	28,665	30,395	32,702	35,586	38,469	44,236	54.3%
Zone 6	21,012	22,280	23,971	26,085	28,199	32,426	54.3%
Zone 7	26,766	28,382	30,536	33,228	35,921	41,306	54.3%
Zone 8	99,753	102,290	104,975	107,683	110,263	116,287	16.6%
Zone 9	24,676	26,165	28,151	30,634	33,116	38,081	54.3%
Zone 10	9,373	9,939	10,693	11,636	12,579	14,465	54.3%
Zone 11	70,906	72,382	73,902	75,558	77,204	81,422	14.8%
Zone 12	100,104	102,233	104,476	106,635	108,554	114,484	14.4%
Zone 13	126,106	129,920	133,869	137,809	141,477	149,206	18.3%
Zone 14	64,231	65,709	67,337	69,139	70,982	74,860	16.5%
Inner Zone (1-7,9-10)	270,188	286,495	308,240	335,421	362,601	416,960	54.3%
Total Study Area	731,288	759,029	792,799	832,245	871,081	953,219	30.3%

Notes:
 1. Derived from Milton Keynes Retail and Commercial Leisure Study 2024 (Appendix D, Table 8a, Scenario A)
 2. Scenario B is based on Scenario 3 of the draft HEDNA, which proposes an average annual housing of 2,265 dwellings over the period 2022-2050, with a 2050 population of 410,000. Total 28-year growth: 63,400 (2,265 dpa)

TABLE 9B: COMPARISON GOODS PER CAPITA EXPENDITURE ACROSS STUDY AREA - LATEST EXPERIAN ESTIMATES, EXCLUDING SFT AT BASE YEAR - SAME AS TABLE 13A ABOVE

Zone	2023 (inc SFT)	Comparison Goods Expenditure Per Capita (£) - excluding SFT					
		2023	2026	2030	2035	2040	2050
Zone 1	2,985	1,943	1,961	2,150	2,432	2,763	3,571
Zone 2	3,555	2,314	2,335	2,560	2,897	3,290	4,253
Zone 3	3,098	2,017	2,035	2,231	2,524	2,867	3,706
Zone 4	3,544	2,307	2,328	2,552	2,887	3,279	4,239
Zone 5	3,442	2,241	2,261	2,479	2,804	3,185	4,117
Zone 6	3,331	2,168	2,188	2,399	2,714	3,083	3,985
Zone 7	3,259	2,122	2,141	2,347	2,656	3,016	3,899
Zone 8	4,144	2,532	2,555	2,801	3,169	3,599	4,652
Zone 9	3,864	2,516	2,538	2,783	3,148	3,576	4,623
Zone 10	4,310	2,806	2,831	3,104	3,511	3,988	5,155
Zone 11	3,619	2,211	2,231	2,446	2,767	3,143	4,063
Zone 12	3,774	2,306	2,327	2,551	2,886	3,278	4,238
Zone 13	3,634	2,220	2,240	2,456	2,779	3,156	4,080
Zone 14	3,841	2,347	2,368	2,596	2,937	3,336	4,313
Inner Zone (1-7,9-10)	-	-	-	-	-	-	-
Total Study Area	-	-	-	-	-	-	-

Notes:
 1. See notes in Table 9A.

TABLE 10B: SCENARIO B (63,400 DWELLINGS) - TOTAL EXPENDITURE (£M) - LATEST EXPENDITURE AND GROWTH RATES

Zone	Comparison Goods Expenditure (£m)					
	2023	2026	2030	2035	2040	2050
Zone 1	63.7	68.1	80.3	98.9	121.4	180.5
Zone 2	120.3	128.7	151.8	186.9	229.5	341.1
Zone 3	60.7	64.9	76.5	94.2	115.7	172.0
Zone 4	103.6	110.8	130.7	160.9	197.6	293.7
Zone 5	64.2	68.7	81.1	99.8	122.5	182.1
Zone 6	45.6	48.8	57.5	70.8	86.9	129.2
Zone 7	56.8	60.8	71.7	88.2	108.3	161.0
Zone 8	252.6	261.3	294.0	341.2	396.9	541.0
Zone 9	62.1	66.4	78.3	96.4	118.4	176.0
Zone 10	26.3	28.1	33.2	40.9	50.2	74.6
Zone 11	156.8	161.5	180.8	209.1	242.7	330.8
Zone 12	230.8	237.9	266.5	307.8	355.9	485.1
Zone 13	280.0	291.1	328.8	382.9	446.5	608.7
Zone 14	150.7	155.6	174.8	203.1	236.8	322.9
Inner Zone (1-7,9-10)	603.1	645.3	761.1	937.1	1,150.6	1,710.3
Total Study Area	1,674.0	1,752.7	2,006.0	2,381.2	2,829.4	3,998.8

Notes:
 1. Population in Table 8B multiplied by per capita expenditure in Table 9B.

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REVIEW OF MK RETAIL AND COMMERCIAL LEISURE STUDY 2024 COMPARISON GOODS FLOORSPACE CAPACITY FIGURES

TABLE 11A: SCENARIO A (53,200 DWELLINGS) - REVISED COMPARISON GOODS CAPACITY ASSESSMENT FOR CMK

Assumes Equilibrium at Base Year and Constant Market Shares

THE FIGURES IN THE TABLE BELOW REFLECT USE OF THE LATEST EXPERIAN PER CAPITA FIGURES, DEDUCTION OF SFT IN THE BASE YEAR (2023) AND USE OF REVISED GROWTH RATES (EXCLUDING SFT) DERIVED FROM LATEST EXPERIAN RETAIL PLANNER BRIEFING NOTE 21 (FEBRUARY 2024). THE EXPENDITURE SPLIT DIRECTED TO CMK, TURNOVER OF COMMITMENTS AND FLOORSPACE EFFICIENCIES USED FOR BENCHMARK TURNOVERS / SALES DENSITIES ARE AS USED IN THE RETAIL STUDY.

% Market Share		2023	2026	2030	2035	2040	2050
Expenditure in the Study Area (£m)		£1,674.0	£1,746.8	£1,990.8	£2,352.0	£2,782.4	£3,902.3
Expenditure directed to Milton Keynes Council Area (£m)	58.9%	£986.0	£1,028.9	£1,172.6	£1,385.3	£1,638.8	£2,298.5
Expenditure directed to Central Milton Keynes (£m)	26.4%	£441.9	£461.2	£525.6	£620.9	£734.5	£1,030.2
Inflow (%)	2.0%	£451.0	£470.6	£536.3	£633.6	£749.5	£1,051.2
		2023	2026	2030	2035	2040	2050
STEP 1	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£451.0	£470.6	£536.3	£633.6	£749.5	£1,051.2
STEP 2	Total Forecast "Benchmark" Turnover of all Floorspace (£m):	£451.0	£467.3	£509.8	£585.3	£671.9	£885.6
STEP 3	Available Expenditure before commitments (£m):		£3.3	£26.5	£48.3	£77.6	£165.6
STEP 4	Turnover of all committed floorspace (£m):		£7.4	£8.1	£9.3	£10.6	£14.0
STEP 5	Surplus Expenditure (£m)		-£4.1	£18.4	£39.0	£67.0	£151.6
STEP 6	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:						
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m)	3,500.0	3,623.2	3,952.6	4,537.9	5,209.8	6,866.7
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		-1,140	4,660	8,602	12,863	22,081
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		-1,629	6,657	12,289	18,376	31,544
STEP 7	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:						
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m)	5,500.0	5,693.6	6,211.3	7,130.9	8,186.8	10,790.6
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		-726	2,965	5,474	8,186	14,051
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		-1,037	4,236	7,820	11,694	20,074

Notes:

1. Expenditure in Study Area derived from Revised Total Expenditure Comparison Goods Table 10A.
2. Market share percentage derived from Retail Study (Appendix C/D, Table 18a)
3. Inflow assumption at 2% derived from Retail Study. Turley calculations applied using this inflow figure. equivalent to the survey-derived turnover levels, with inflow). Average productivity growth rates from Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 20, are then used to project the available benchmark expenditure as used in the Retail Study.
5. Commitments taken from Retail Study Table 18c and not analysed by Turley.
6. Sales densities at 2023 estimated in Retail Study and grown using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 20 as in Retail Study.
7. Process within Steps 1 - 7 explained in detail in Retail Study.

MKCC Retail and Commercial Leisure Study (Update)
 Medium housing delivery target of 53,200 homes
 Revised Comparison Goods Capacity Identified at 2050
 when latest expenditure figures used with SFT deducted
 and latest growth rates adopted:

14,051 - 22,081 sq m net

REVIEW OF MK RETAIL AND COMMERCIAL LEISURE STUDY 2024 COMPARISON GOODS FLOORSPACE CAPACITY FIGURES

TABLE 11B: SCENARIO B (63,400 DWELLINGS) - REVISED COMPARISON GOODS CAPACITY ASSESSMENT FOR CMK

Assumes Equilibrium at Base Year and Constant Market Shares

THE FIGURES IN THE TABLE BELOW REFLECT USE OF THE LATEST EXPERIAN PER CAPITA FIGURES, DEDUCTION OF SFT IN THE BASE YEAR (2023) AND USE OF REVISED GROWTH RATES (EXCLUDING SFT) DERIVED FROM LATEST EXPERIAN RETAIL PLANNER BRIEFING NOTE 21 (FEBRUARY 2024). THE EXPENDITURE SPLIT DIRECTED TO CMK, TURNOVER OF COMMITMENTS AND FLOORSPACE EFFICIENCIES USED FOR BENCHMARK TURNOVERS / SALES DENSITIES ARE AS USED IN THE RETAIL STUDY.

% Market Share		2023	2026	2030	2035	2040	2050
Expenditure in the Study Area (£m)		£1,674.0	£1,752.7	£2,006.0	£2,381.2	£2,829.4	£3,998.8
Expenditure directed to Milton Keynes Council Area (£m)	58.9%	£986.0	£1,032.3	£1,181.5	£1,402.5	£1,666.5	£2,355.3
Expenditure directed to Central Milton Keynes (£m)	26.4%	£441.9	£462.7	£529.6	£628.6	£746.9	£1,055.7
Inflow (%)	2.0%	£451.0	£472.1	£540.4	£641.5	£762.2	£1,077.2
		2023	2026	2030	2035	2040	2050
STEP 1	Survey Derived (with Inflow) Turnover of all Floorspace (£m):	£451.0	£472.1	£540.4	£641.5	£762.2	£1,077.2
STEP 2	Total Forecast "Benchmark" Turnover of all Floorspace (£m):	£451.0	£467.3	£509.8	£585.3	£671.9	£885.6
STEP 3	Available Expenditure before commitments (£m):		£4.9	£30.6	£56.2	£90.3	£191.6
STEP 4	Turnover of all committed floorspace (£m):		£7.4	£8.1	£9.3	£10.6	£14.0
STEP 5	Surplus Expenditure (£m)		-£2.5	£22.5	£46.9	£79.7	£177.6
STEP 6	MAXIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:						
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m)	3,500.0	3,623.2	3,952.6	4,537.9	5,209.8	6,866.7
	(ii) MAXIMUM "Net" Floorspace Capacity (sq m):		-703	5,696	10,336	15,294	25,866
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		-1,004	8,137	14,765	21,848	36,952
STEP 7	MINIMUM FORECAST CAPACITY FOR NEW COMPARISON FLOORSPACE:						
	(i) Estimated Average Sales Density of New Floorspace (£ per sq m)	5,500.0	5,693.6	6,211.3	7,130.9	8,186.8	10,790.6
	(ii) MINIMUM "Net" Floorspace Capacity (sq m):		-447	3,625	6,577	9,732	16,460
	(iii) Assumed Net / Gross Floorspace Ratio:		70%	70%	70%	70%	70%
	(iv) Gross Floorspace Capacity (sq m):		-639	5,178	9,396	13,903	23,514

Notes:

1. Expenditure in Study Area derived from Revised Total Expenditure Comparison Goods Table 10B.
2. Market share percentage derived from Retail Study (Appendix C/D, Table 18a)
3. Inflow assumption at 2% derived from Retail Study. Turley calculations applied using this inflow figure. equivalent to the survey-derived turnover levels, with inflow). Average productivity growth rates from Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 20, are then used to project the available benchmark expenditure as used in the Retail Study.
5. Commitments taken from Retail Study Table 18c and not analysed by Turley.
6. Sales densities at 2023 estimated in Retail Study and grown using Figure 4b (density growth rate) of Experian Retail Planner Briefing Note 20 as in Retail Study.
7. Process within Steps 1 - 7 explained in detail in Retail Study.

MKCC Retail and Commercial Leisure Study (Update)
 Upper housing delivery target of 63,400 homes
 Revised Comparison Goods Capacity Identified at 2050
 when latest expenditure figures used with SFT deducted
 and latest growth rates adopted:

16,460 - 25,866 sq m net

REVIEW OF MK RETAIL AND COMMERCIAL LEISURE STUDY 2024 COMPARISON GOODS FLOORSPACE CAPACITY FIGURES

TABLE 12: SUMMARY OF COMPARISON GOODS CAPACITY SCENARIOS (RETAIL STUDY AND LATEST AVAILABLE DATA)

Population / Housing Scenario	Surplus Expenditure / Floorspace Capacity at 2050	Retail Study Figures		Latest Experian per capita expenditure (excluding SFT) and latest growth rates (excluding SFT)		Retail Study forecasts vs Latest Expenditure	
		Minimum	Maximum	Minimum	Maximum	Minimum	Maximum
Medium Housing Scenario (53,200 by 2050)	Total CMK Turnover of Floorspace at 2050 (£m)	2,155.6		1,051.2		-1,104.4	
	CMK Surplus Expenditure at 2050 (£m)	403.0		151.6		-251.4	
	Floorspace Requirement (sq m net)	37,348	58,690	14,051	22,081	-23,297	-36,609
Upper Housing Scenario (63,400 by 2050)	Total CMK Turnover of Floorspace at 2050 (£m)	2,207.1		1,077.2		-1,129.9	
	CMK Surplus Expenditure at 2050 (£m)	454.6		177.6		-277.0	
	Floorspace Requirement (sq m net)	42,125	66,196	16,460	25,866	-25,665	-40,330

Notes:

1. Derived from Tables 4A, 4B and 11A, 11B

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