



For and on behalf of
Central Milton Keynes Town Council

EXAMINATION OF MILTON KEYNES CITY PLAN 2050 MATTER 1 HEARING STATEMENT

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1.0 INTRODUCTION

- 1.1 This response to Matter 1 of the Inspector's MIQs in respect of the Milton Keynes City Plan 2050 has been prepared by DLP Planning Limited on behalf of Central Milton Keynes Town Council. This statement builds upon the objections raised previously in our response to the Regulation 19 consultation and our other submitted EiP statements. We have only responded to those questions that are relevant to our previous objections.
- 1.2 This examination is being conducted under the transitional arrangements of the NPPF 2024 and so all references to the NPPF relate to the 2024 version rather than the 2026 version.
- 1.3 DLP Planning have also requested to appear at the Examination on behalf of Central Milton Keynes Town Council.

2.0 PROCEDURAL, LEGAL AND OTHER REQUIREMENTS

Issue 1

Whether the preparation of the Plan has complied with the relevant procedural, legal and other requirements.

Questions

Plan Preparation

Q1.1 Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Town and Country Planning (Local Planning) (England) Regulations?

No Response

Q1.2 Has the preparation of the Plan been carried out in accordance with the Local Development Scheme?

No Response

Q1.3 Is the Plan sufficiently clear whether there are any policies from the existing development plan that would not be superseded by its adoption?

No Response

Habitats Regulation Assessment

Q1.4 How was the Habitats Regulations Assessment (HRA) carried out and was the methodology appropriate?

No Response

Q1.5 What potential impacts of the Plan were considered?

No Response

Q1.6 What were the conclusions of the HRA and how has it informed the preparation of the Plan?

No Response

Q1.7 Have any concerns been raised regarding the HRA and if so, what is the Council's response to these? How has Natural England been involved?

No Response

Sustainability Appraisal

Q1.8 Does the Sustainability Appraisal (SA) meet the requirements for a Strategic Environmental Assessment?

No Response

Q1.9 How has the SA informed the preparation of the Plan at each stage? How were options/reasonable alternatives considered?

- 2.1 The SA demonstrates that it has informed the preparation of the Plan through the identification and appraisal of alternative growth scenarios, followed by appraisal of the preferred strategy and the Plan as a whole. The SA explains that its purpose is to consider the effects of the emerging Plan and reasonable alternatives, with a view to minimising adverse effects and maximising positive effects, and that the findings should be taken into account when finalising the Plan.
- 2.2 The Plan's approach is based on a substantial level of growth being accommodated within the existing built-up area of Milton Keynes, alongside a number of Strategic City Extensions. The Plan identifies approximately 20,500 homes within the existing built-up area, with a particularly significant role for Central Milton Keynes (CMK), together with growth at Central Bletchley and other locations. The approach is intended to support sustainable transport, reduce carbon emissions, maximise affordable housing delivery and provide for the Council's identified housing needs.
- 2.3 The SA alternatives principally varied the greenfield strategic allocations, rather than testing fundamentally different levels of intensification within CMK. The SA considered six growth scenarios with Scenario 5 selected as the Preferred Option (PO):
 - Scenario 1: PO excluding South Bow Brickhill, Levante Gate, and Shenley Dens
 - Scenario 2: PO excluding East Wavendon
 - Scenario 3: PO excluding South Bow Brickhill, Levante Gate, and Shenley Dens including West Olney
 - Scenario 4: PO excluding East Wavendon including West Olney
 - Scenario 5: PO (Eastern Strategic City Extension, East of Wavendon, South Bow Brickhill, Levante Gate and Shenley Dens)
 - Scenario 6: PO including West Olney
- 2.4 However, the scope of alternatives considered is an important limitation. Whilst the six scenarios tested different combinations of strategic and greenfield growth, they did not test materially different levels of intensification within the existing built-up area, and in particular within CMK. This is significant because the submitted Plan relies heavily upon approximately 16,000 homes being delivered within CMK and Campbell Park.
- 2.5 It is not understood why a different level of intensification within CMK was not tested in the SA when the SHLAA 2025 considers a range of growth scenario based on varied densities on Rows and Gates as shown below. These scenarios demonstrate that CMK has a range of potential capacities depending on the density and land-use assumptions applied, ranging from 13,681 to 18,550 dwellings. There is no reason why a level of growth lower than 16,000 dwellings would render the Plan unsound and so a scenario involving a lower level of CMK intensification should therefore have been tested, with the resulting homes distributed to other sustainable locations rather than treating the 16,000 figure as a fixed assumption

underlying the preferred strategy.

	Total Capacity
Density Scenario 1 - Reg 18 Policy & Growth Study Densities	18,550
Density Scenario 2 - As per scenario 1, but densities on Rows at 100 dph	16,115
Density Scenario 3 - As per Scenario 1, but densities on Rows at 60 dph	15,726
Density Scenario 4 - Scenario 1 but assume only half of the land on the Rows and Gates come forward for residential	15,166
Density Scenario 5 - Inner and Outer densities as per draft policy, but Gates and Rows at 100 dph	13,681

- 2.6 The SA itself recognises that the proposed urban supply figure is based on detailed assumptions regarding density, use mix, design and the types of site that will be developed. It also acknowledges an element of delivery risk, including uncertainty associated with the CMK supply and the Metro Corridors, and recognises that there is a case for exploring a lower urban supply figure. However, it does not appear to test a corresponding alternative spatial strategy based on a lower level of CMK growth and the redistribution of the balance of development to other suitable locations.
- 2.7 Paragraph 33 of the NPPF requires local plans to be informed throughout their preparation by an SA and for the appraisal to demonstrate how the plan has addressed relevant economic, social and environmental objectives. Importantly, it requires significant adverse impacts to be avoided and, wherever possible, alternative options which reduce or eliminate such impacts to be pursued. Testing a lower level of CMK intensification through the SA would have allowed the Council to properly assess the relative sustainability, infrastructure and deliverability implications of concentrating 16,000 homes in CMK compared with distributing a greater proportion of growth to other suitable locations. There is no clear reason why a lower level of growth than 16,000 homes would prevent the Plan from meeting its overall housing requirement, and the absence of this alternative means that the SA has not demonstrated that opportunities to reduce or avoid potential adverse effects associated with the proposed scale of CMK growth have been adequately considered.
- 2.8 This is particularly important because it remains uncertain whether the full 16,000 homes can be delivered within CMK whilst also accommodating the other functions required of a major city centre. The capacity assumptions need to take account of town centre uses such as employment, retail and leisure functions, servicing, parking and the other infrastructure necessary to support CMKs role as the principal centre.
- 2.9 Overall, the SA has clearly informed the Plan through the assessment of the preferred strategy. However, its consideration of reasonable alternatives is substantially more extensive in respect of different strategic and greenfield growth locations than in respect of the scale of urban intensification, which was used as a background assumption for all growth options. Given the substantial reliance placed on approximately 16,000 homes in CMK, the Council's own evidence demonstrating a range of potential capacity outcomes, and the requirements of Paragraph 33 of the NPPF, the SA does not demonstrate that materially

different approaches to CMK growth were adequately considered. Further testing of alternative levels of CMK intensification would have provided a stronger basis for demonstrating that all reasonable alternatives were considered. As such, the preferred option has not been fully justified and the Plan is not demonstrated to be sound.

Q1.10 Have the reasonable alternative options in the SA been assessed to the same level of detail as the preferred options?

- 2.10 The reasonable alternative growth scenarios were assessed using the same Sustainability Appraisal framework and objectives as the preferred strategy. In that respect, the scenarios were subject to a consistent appraisal process, enabling their broad sustainability effects to be compared.
- 2.11 However, the principal concern is whether the alternatives were sufficiently developed to allow for a meaningful comparison with the preferred strategy. The six scenarios comprised different combinations of Strategic City Extensions and other greenfield growth locations. They did not test materially different levels of intensification within the existing urban area, particularly CMK.
- 2.12 This is significant because the submitted Plan relies on approximately 16,000 homes being delivered within CMK and Campbell Park. As set out in our response to Q1.9, the Council's own SHLAA identifies a range of potential CMK capacities depending on the density and land-use assumptions applied. The lack of alternative levels of CMK growth tested within the SA means that it did not assess the sustainability implications of a materially different approach to one of the most significant components of the preferred strategy.
- 2.13 The issue is therefore not that the preferred strategy was assessed in greater detail as the Plan evolved. This would be expected as part of an iterative Sustainability Appraisal process. Rather, the issue is that the alternatives were not developed to allow for different levels of CMK intensification to be tested and compared to the preferred option in the same level of detail. In particular, there was no assessment of a scenario involving a lower level of CMK growth and the redistribution of the balance of housing to other suitable locations. This is relevant to Paragraph 33 of the NPPF which requires the SA to demonstrate how the Plan has addressed relevant economic, social and environmental objectives and, wherever possible, to pursue alternative options which reduce or eliminate significant adverse impacts.
- 2.14 Overall, whilst the alternatives were assessed consistently against the SA framework, they were not assessed on an equivalent basis to the range of spatial options available to the Council. The absence of an alternative testing a lower level of CMK intensification limits the extent to which the SA demonstrates that the preferred strategy was selected following a full assessment of reasonable alternatives. The Plan is therefore not demonstrated to have been fully justified.

Q1.11 What were the conclusions of the SA and how has it informed the preparation of the Plan?

- 2.15 The SA concludes that Scenario 5 is the Preferred Option, identifying it as providing the most appropriate balance between meeting the Plan's housing and employment requirements and the environmental, social and economic considerations assessed through the appraisal. Scenario 5 comprises the Eastern Strategic City Extension, East of Wavendon, South Bow Brickhill, Levante Gate and Shenley Dens. The SA considers that the Preferred Option

performs positively in relation to meeting housing needs and supporting economic growth, while also identifying a number of potential adverse effects and mitigation requirements.

- 2.16 The SA has informed the Plan by providing the basis for selecting the overall spatial strategy and by identifying the likely sustainability effects of the proposed growth. It has also informed the development of policies and allocations through consideration of environmental constraints, infrastructure requirements and opportunities to avoid, minimise or mitigate adverse effects.
- 2.17 However, the way in which the reasonable alternatives were framed has also influenced the conclusions reached. The alternatives principally tested different combinations of strategic and greenfield growth locations, while the proposed level of urban intensification, particularly the approximately 16,000 homes proposed within CMK and Campbell Park, was effectively carried through as a common component of the growth scenarios rather than being tested as a variable.
- 2.18 Consequently, the SA has informed the Plan primarily by helping the Council determine where the additional growth beyond the existing urban supply should be located, rather than by testing whether the scale of growth assumed within CMK is itself the most appropriate. This is significant because the Council's own 2025 SHLAA identifies a range of potential CMK capacities depending on the density and land-use assumptions applied, while the SA itself recognises that the urban supply is based on detailed assumptions and identifies delivery risks associated with the urban supply and Metro Corridors.
- 2.19 The absence of a lower-CMK-growth alternative means that the SA has not informed the Council as to whether reducing the level of CMK intensification and redistributing the balance of housing to other suitable locations would result in a more sustainable, deliverable or infrastructure-led spatial strategy. This is not consistent with Paragraph 33 of the NPPF which requires significant adverse impact on economic, social and environmental objectives to be avoided and, wherever possible, alternative options which reduce or eliminate such impacts to be pursued. The SA therefore supports the selection of Scenario 5 from the alternatives that were tested, but does not demonstrate that the underlying assumption of approximately 16,000 homes in CMK is itself the most appropriate approach.
- 2.20 Overall, whilst the SA has informed the preparation of the Plan at a strategic level, its conclusions are limited by the scope of the reasonable alternatives considered. Further testing of alternative levels of CMK intensification would be necessary to demonstrate that the detailed distribution of growth within the preferred strategy is justified and represents the most appropriate strategy when considered against reasonable alternatives.

Q1.12 Are the likely environmental, social and economic effects of the Plan adequately and accurately assessed in the SA?

- 2.21 Paragraph 33 of the NPPF requires SAs to demonstrate how the Plan has addressed relevant economic, social and environmental objectives, and that significant adverse impacts on those objectives are avoided or reduced through alternative options. The SA provides a comprehensive assessment of the likely environmental, social and economic effects of the Plan at a strategic level. It considers the Plan against a range of sustainability objectives and identifies both positive and negative effects, together with proposed mitigation measures. However, there are concerns as to whether the assessment fully captures the implications of the proposed scale and distribution of growth, particularly within CMK.

- 2.22 The principal concern is the assessment of the cumulative effects arising from the concentration of approximately 16,000 homes within CMK and Campbell Park. The SA assesses the sustainability effects of the overall growth strategy, but does not appear to sufficiently test whether the infrastructure, transport, parking, servicing and community facilities required to support this scale of growth can be delivered alongside development. These matters are particularly important given the proposed redevelopment of existing parking and service areas and the reliance on the future delivery of the MRT.
- 2.23 There are also potential social and economic effects which require further consideration. The proposed level of residential growth needs to be considered alongside CMK's established role as the City's principal centre for employment, retail, leisure and cultural uses. There is a risk that the cumulative delivery of residential development could reduce the availability of land for these uses or affect the accessibility and servicing arrangements necessary for them to function effectively. The consequences could include impacts on the vitality of the centre, employment opportunities and the ability of CMK to provide the services and facilities required by its growing population.
- 2.24 The assessment of infrastructure-related effects is also important. The evidence identifies significant requirements for education and early years provision, as well as other community infrastructure, but much of this provision is expected later in the Plan period. Given the scale of early residential delivery proposed and the lack of current education infrastructure provided in CMK (no schools, pre-schools or SEND provision at present), the SA should demonstrate that the potential impacts of development occurring before the necessary infrastructure is available have been adequately assessed.
- 2.25 Overall, whilst the SA provides a substantial assessment of the Plan's environmental, social and economic effects, it does not sufficiently demonstrate that the cumulative and delivery-related effects of the proposed scale of growth in CMK have been fully and accurately assessed. To ensure consistency with Paragraph 33 of the NPPF, further assessment is required to demonstrate the implications of growth where infrastructure is not delivered in step with development and to ensure that the potential effects on CMK's wider economic and social functions have been properly considered. On this basis, the SA does not currently provide sufficient evidence to demonstrate that the Plan is sound.

Climate Change

Q1.13 Does the plan accord with s19(1A) of the Planning and Compulsory Purchase Act (2004) (as amended) by including policies that are designed to secure that the development and use of the land in the area contribute to the mitigation of, and adaptation to, climate change?

No Response

Equality and Diversity

Q1.14 Having regard to the Equality Impact Assessment [CD19], in what way does the Plan seek to ensure that due regard is had to the three aims expressed in Section 149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

No Response

Other Matters

Q1.15 What evidence is there that the Council has complied with Regulation 10 of the Town and Country Planning (Local Planning) (England) Regulations?

No Response

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