



For and on behalf of
Central Milton Keynes Town Council

EXAMINATION OF MILTON KEYNES CITY PLAN 2050 MATTER 2 HEARING STATEMENT

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1.0 INTRODUCTION

- 1.1 This response to Matter 2 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 has also requested to appear at the Examination on behalf of Central Milton Keynes Town Council.

2.0 MEETING MILTON KEYNES HOUSING NEEDS

Issue 2

Whether the Plan will deliver an appropriate mix of housing to meet the various housing needs over the Plan period and whether these are justified, effective and consistent with national policy.

Relevant Policies – HQH1, HQH2, HQH3, HQH4, HQH5, HQH7

Questions

Appropriate Mix of Housing Overall

Q2.12 Is the Council's evidence for the mix of housing for supported and specialist homes justified? Is it up-to date?

- 2.1 The Council's evidence for the mix of supported and specialist housing is not fully justified. Whilst the HEDNA (2024) and HEDNA Update (2025) provide evidence of overall housing needs, including the needs of older and disabled people, the Plan does not clearly demonstrate how this evidence has informed the proposed mix, location and delivery of supported and specialist homes across the Plan period.
- 2.2 The evidence identifies a significant need for accessible and specialist housing, including a substantial proportion of projected growth arising from older age groups. However, the approach does not adequately consider how the identified needs of different groups will be met spatially, particularly in areas such as Central Milton Keynes (CMK) where viability constraints and the proposed 10% affordable housing requirement may limit the delivery of affordable and accessible specialist accommodation. There is a risk that those requiring affordable accessible housing, including younger disabled people, are not adequately catered for within all parts of the City which would result in the Plan not being consistent with Paragraph 63 of the NPPF.
- 2.3 The evidence also appears to take an annualised approach to meeting need rather than clearly addressing the existing unmet need identified in the HEDNA Update (2025). This risks delaying the provision of specialist and supported homes for households already living in unsuitable accommodation. The Equalities Impact Assessment also does not adequately consider the potential consequences of delayed delivery for disabled people and others with specific housing requirements.
- 2.4 Therefore, further evidence is required to demonstrate the type, tenure, affordability and location of supported and specialist housing needed as required in paragraphs 61-63 NPPF and how the Plan's policies will ensure need, including current unmet need, is met throughout the Plan period as per paragraphs 61-66 NPPF.

Q2.13 Should the requirements for older persons and specialist housing be set out within a strategic policy rather than the reasoned justification? Is the Plan effective as a result?

No Response

Q2.14 Is the Plan's approach to meeting the identified needs for older persons and specialist housing within the strategic city extensions justified? Will it be effective?

- 2.5 Paragraph 63 of the NPPF requires the size, type and tenure of housing needed for different groups in the community, including older persons and those with disabilities, to be assessed and reflected in planning policies. However, the Plan's approach is not sufficiently justified to demonstrate that the identified needs for older persons and specialist housing will be effectively met within the strategic city extensions and so it is not consistent with national policy. The evidence identifies substantial needs for specialist accommodation including older persons' housing, but the approach relies heavily on a general requirement for strategic city extensions to provide an element of supported and specialist accommodation without clearly demonstrating how the type, tenure and timing of provision has been derived from identified needs.
- 2.6 This is particularly important given the scale and long delivery periods associated with the strategic city extensions. For example, GS14 Eastern City Extension is due to deliver 16,000 homes, but only 7,750 are within the Plan period. Furthermore, the majority of development associated with the strategic city extensions is expected later in the Plan period and so does not effectively address current unmet need or need arising early in the Plan period. Proposals for several of the allocations, including GS17 South of Bow Brickhill Strategic City Extension and GS18 Levante Gate Strategic City Extension, have not yet come forward and no estimated commencement date is given by the Council. The sites are therefore likely to come forward towards the end of the Plan period. Similarly, the Plan also identifies significant housing growth of 2,250 at the East of Wavendon Strategic City Extension to be delivered, but commencement is not permitted prior to 2038.
- 2.7 In summary, the Plan does not provide sufficient certainty that the identified needs for older persons and specialist housing will be met at the right time or in the right locations. The reliance on strategic city extensions, many of which will deliver predominantly in the later stages of the Plan period, risks delaying provision despite existing unmet specialist need, contrary to NPPF Chapter 5 including Paragraph 63. The approach is therefore not sufficiently justified or demonstrated to be effective, and is not consistent with national policy.

Q2.15 Should the Plan identify the number of bedspaces expected to be developed for older persons and specialist housing within the respective strategic city extension policies? Is the Plan positively prepared as a result?

No Response

Policy HQH1 – Healthy Homes

Q2.16 Is Policy HQH1 positively prepared, justified, effective and consistent with national policy? Responses should specifically address the following:

a) Are the proposed tenure splits and proportions of different house sizes justified? Does it provide sufficient flexibility?

No Response

b) Does the operation of the policy anticipate future alterations to the Council's evidence on housing mix? Would this affect viability?

No Response

- c) **what evidence is there to support the requirement for the inclusion of the Nationally Described Space Standards (NDSS)? Should this be included within the policy itself?**

No Response

- d) **What is the evidence to support the requirement for 5% of the total dwelling plots on sites of 100 homes and above to be for custom and self build?**

No Response

- e) **Are the requirements for 75% of all affordable and market homes to be built to Building Regulations Part M4(2) accessible and adaptable dwellings, and 5% of all market homes and 10% of affordable homes to be built to Building Regulations Part M4(3) wheelchair accessible standard justified? Is it viable?**

No Response

Policy HQH2 – Affordable Homes

Q2.17 Is Policy HQH2 positively prepared, justified, effective and consistent with national policy? Responses should specifically address the following

- a) Are the percentages of affordable housing justified? Are they viable?**

- 2.8 The percentages of affordable housing are not fully justified by the evidence and there remains uncertainty as to whether they are viable across the different areas of Milton Keynes. The policy is therefore not consistent with national policy as Paragraph 72 states that planning policies should take into account likely economic viability when identifying a mix of sites. The Whole Plan Viability Study Residential Update Note (2025) recommends a differentiated approach, with 30% in Housing Viability Area 1, 40% on Greenfield Strategic Sites, 20% in Housing Viability Area 2 and 10% in Housing Viability Area 3. The Plan instead applies a 40% requirement across Housing Viability Area 1, including the strategic sites, which is not consistent with the recommendations of the viability evidence.
- 2.9 There is also concern with the policy's presumption against schemes providing more than 50% affordable housing unless specific criteria are met. While it is appropriate for viability and the creation of balanced communities to be considered, the evidence does not demonstrate why a 50% level should effectively operate as a ceiling where a higher proportion could be viable and would contribute towards meeting the identified affordable housing need. The 50% ceiling also means that should several sites within Viability Area 1 face viability issues which results in less than 40% affordable housing, there are limited opportunities to recoup this lost affordable housing in remaining sites in Viability Area 1 and in Viability Area 2. Overall, the approach could unnecessarily restrict opportunities to maximise affordable housing delivery on sites where higher levels are achievable.
- 2.10 There are already clear indications of viability pressures in CMK, where the Plan proposes a 10% affordable housing requirement. Recent schemes demonstrate that even this relatively low requirement can be difficult to achieve on high-density developments. For example,

application reference PLN/2025/2013 for 306 residential apartments at Campbell Park Northside which has a resolution to grant¹ does not propose any affordable housing due to viability constraints. The Sustainability Appraisal also recognises that there will be “*limited potential to deliver affordable housing*” within CMK. This raises a concern as to whether the 10% requirement can be consistently secured across the significant amount of residential development proposed in CMK.

- 2.11 Overall, whilst applying different requirements according to local viability circumstances is appropriate in principle, the specific percentages have not been sufficiently aligned with the Council’s own viability evidence. There is also existing evidence that even the proposed 10% requirement in CMK may not be achievable on some schemes (policy is required to consider viability at paragraph 72 NPPF). The Plan therefore has not demonstrated that the requirements are justified, viable and effective across the range of sites to which they will apply.

b) What evidence is there to justify each of the respective viability areas?

- 2.12 The Council’s viability evidence does provide a basis for distinguishing between areas of differing viability. However, there is a clear inconsistency between that evidence and the requirements included in the Plan. As stated in our above response, the Whole Plan Viability Study Residential Update Note (2025) recommends 30% affordable housing in Housing Viability Area 1 and 40% on Greenfield Strategic Sites. The Plan instead applies a 40% requirement across Housing Viability Area 1, including the strategic sites. The evidence therefore supports the principle of different requirements reflecting viability, but does not justify the Plan’s decision to apply the 40% requirement uniformly across Area 1.
- 2.13 This distinction is important because the Greenfield Strategic Sites have been assessed separately in the viability evidence, reflecting their different development characteristics and viability. Combining them with the wider Area 1 designation in the policy, without explaining why the 40% figure should apply to the whole area, is not adequately justified by the evidence.
- 2.14 There is also a particular issue in relation to CMK, which is identified as Housing Viability Area 3 and is subject to a 10% affordable housing requirement. Despite this relatively low requirement, the evidence recognises the more challenging viability position in CMK, and there is already evidence from recent schemes that even a 10% requirement can be difficult to achieve. For example, the Campbell Park Northside proposals (PLN/2025/2013) do not contain any affordable housing on viability grounds. The fact that economic viability is not considered within the Plan is inconsistent with national policy which states that this should be taken into account when considering a sufficient supply and mix of sites (NPPF Paragraph 72).
- 2.15 The Council should therefore explain why the Plan departs from the recommendations of its own most recent viability evidence in relation to Housing Viability Area 1, while also demonstrating that the requirements applied across all of the viability areas remain achievable. In particular, the evidence from CMK suggests that viability pressures are already affecting delivery at the proposed 10% level. The Plan has therefore not fully

¹ The application was approved at Planning Committee on 5th March 2026 subject to a satisfactory s106 agreement being signed within 28 days. This has not occurred. Therefore, the intention of Milton Keynes City Council has been determined, but a decision cannot yet be issued without the s106.

demonstrated that the respective requirements are justified, viable and effective and in accordance with Chapter 5 of the NPPF.

c) Is the housing mix justified? Is it sufficiently flexible to allow for changing circumstances?

- 2.16 The proposed housing mix is supported by the HEDNA Update (2025) evidence and the overall tenure proportions for affordable housing are therefore justified. The Policy also provides some flexibility by allowing the stated tenure mix to be varied where site-specific considerations justify an alternative approach.
- 2.17 However, this flexibility will be important in CMK, where the high-density, predominantly flatted form of development creates particular constraints on the range of housing that can be delivered. The Sustainability Appraisal recognises that there will be limited potential to deliver affordable housing and family housing in CMK. The housing mix therefore needs to respond to the particular characteristics and constraints of individual sites rather than applying the indicative tenure mix rigidly.
- 2.18 This is particularly important over the long Plan period, during which housing needs, market conditions and viability may change. Paragraph 61 of the NPPF states that the overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types. Paragraph 66 specifically addresses the need to ensure the mix of affordable housing meets local needs. In order to be consistent with national policy, the Policy should therefore be sufficiently flexible to allow the mix to respond to updated evidence and site-specific circumstances, while still providing a clear starting point for securing the identified need. Subject to the flexibility within the Policy being applied appropriately, the housing mix is broadly justified.

d) How are off-site contributions to be calculated and is this set out in the submitted Plan?

- 2.19 Policy HQH2 allows for off-site affordable housing provision or equivalent financial contributions in justified and exceptional circumstances, with the Council's Affordable Housing SPD identified as the mechanism for determining how this is to operate. For Build-to-Rent schemes, Policy HQH2(B) is more accepting of a financial contribution in lieu of on-site affordable housing, subject to viability and a review mechanism. However, the submitted Plan does not provide sufficient detail on how the level of an off-site contribution is to be calculated or how it will be used to secure an equivalent level of affordable housing.
- 2.20 The Policy also provides for review mechanisms where affordable housing falls below the identified requirements, including for Build-to-Rent schemes. However, the mechanism is relatively vague as it states that the format will vary according to the type of development, tenure and funding model, but it does not state when reviews should take place, what assumptions should be tested or how any resulting additional affordable housing would be secured.
- 2.21 There is also no clear indication that financial contributions secured from CMK developments would be used to provide affordable housing within CMK. This is important given the identified need for affordable and accessible housing in the city centre. If contributions are used to provide affordable housing elsewhere, there is a risk that households requiring

affordable or accessible accommodation will have fewer opportunities to live within CMK.

- 2.22 The approach is therefore capable of being effective, but greater clarity is required on the calculation and use of off-site contributions and the operation of review mechanisms in accordance with NPPF paragraphs 34, footnote 38, paragraphs 127 and 138. This would provide greater certainty that the affordable housing requirement will be delivered and that contributions will effectively address the identified need.

Policy HQH3 – Supported and Specialist homes

Q2.18 Is the policy sufficiently clear what types of supported and specialist homes will be permitted?

No Response

Q2.19 Is the policy sufficiently flexible in terms of the locational requirements for new supported and specialist homes?

No Response

Q2.20 How will an over-concentration of these types of home be assessed?

No Response

Q2.21 What quantum of supported and specialist homes will be sought on strategic housing allocations and what level of off-site contribution would be required should it not be provided on-site? Have the implications of this requirement on development viability been assessed? In order to be effective, should this requirement and detail be set out in the site allocation policies?

No Response

Policy HQH4 – Homes for co-living

Q2.22 Taking each of the criteria of Policy HQH4 in turn, are these justified, effective and consistent with national policy?

No Response

Q2.23 How will over-concentration of homes for co-living be assessed? Will it be effective?

No Response

Policy HQH5 – Houses in Multiple Occupation

2.24 Is Policy HQH5 positively prepared, justified, effective and consistent with national policy? Responses should specifically address the following:

- a) **what is the evidence to justify the requirements in part 3 of the policy regarding the percentage HMOs within a 100m buffer of the centre of an application property?**

No Response

- b) **is there clear evidence to justify the requirement in part 3b of Policy HQH5 regarding the sandwiching of properties between two HMOs?**

No Response

Policy HQH7 – Accommodation for boat dwellers

- Q2.25 Taking each of the criteria of Policy HQH7 in turn, are these justified and consistent with national policy?**

No Response

- Q2.26 Having regard to the identified evidence of need for 139 boat dwellings, is Policy HQH7 positively prepared in this regard?**

No Response

- Q2.27 Does Policy HQH7 reflect the role of the Canal and River trust when the locations of new moorings are agreed?**

No Response

- Q2.28 Is the Council's suggested modification to Policy HQH7 in Document CD28 necessary for soundness?**

No Response

Policy HQH8 – Exception Sites

- Q2.29 What is the justification for the differing size limits in criterion A.1 of the policy?**

No Response

- Q2.30 Is the criteria under paragraph A sufficiently flexible to allow for the delivery of exception sites to meet local needs?**

No Response

- Q2.31 Is the limit on 35% market housing within paragraph B of the policy justified by the evidence?**

No Response

Q2.32 Is paragraph C of the policy sufficiently clear and unambiguous that it is evident how a decision maker should react to development proposals for First Home exception sites?

No Response

Q2.33 Is the criteria under paragraph D of the policy justified, effective and consistent with national planning policy with regard to community engagement and community benefits?

No Response

Q2.34 Is the Council's suggested modification to the policy set out in Document CD28 necessary for soundness?

No Response

Policy HQH9 – Children's Homes

Q2.35 Is Policy HQH9 justified, effective and consistent with national planning policy and is it sufficiently clear and unambiguous that it is evident how a decision maker should react to development proposals for new children's homes?

No Response

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