



For and on behalf of
Central Milton Keynes Town Council

EXAMINATION OF MILTON KEYNES CITY PLAN 2050 MATTER 3 HEARING STATEMENT

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1.0 INTRODUCTION

- 1.1 This response to Matter 3 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 EMPLOYMENT AND RETAIL DEVELOPMENT

Issue 1

Whether the plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to employment development.

Relevant Policies – GS3

Questions

Q3.1 Are the forecasts for office, industrial and warehousing requirements as shown in Table 2 and Table 3 of the Plan robustly based and justified by the evidence?

No Response

Q3.2 Is the Plan positively prepared with respect to the amount of land proposed for offices, research and development, general industrial and warehousing and logistics as set out in Policy GS3?

- 2.1 The aspirations for economic growth set out in Policy GS3 are positively prepared as required by Chapter 6 of the NPPF 2024. However, there is no specific land use allocation in the Plan to secure the forecast level of floorspace and delivery is therefore dependent on Policies CMK1 and CMK2 and the wider strategy for CMK.
- 2.2 There is likely to continue to be significant inward commuting to CMK by car, as well as by rail and other transport modes, for business, study, retail and leisure purposes. The proposals to develop North and South Rows and existing parking areas for residential development, and to alter parts of the established road hierarchy, could constrain accessibility to the City Centre and are therefore potentially at odds with the Plan's economic growth ambitions.
- 2.3 This is important because constrained accessibility could prejudice the economic viability of existing businesses and facilities, including that of the Milton Keynes shopping centre, as well as the delivery of future employment growth. Adequate and appropriately located access, parking and servicing remain important to support the retail and wider non-residential offer within CMK. However, the Milton Keynes Retail & Commercial Leisure Study (2025) does not consider the implications of modal choice and parking provision for the economic viability of CMK, while the future delivery of the MRT remains uncertain with funding not yet secured. This is therefore contrary to paragraph 86(d) of the NPPF.
- 2.4 Overall, whilst the economic growth objectives of Policy GS3 are supported, the Plan has not demonstrated that they can be achieved alongside the scale of residential development proposed in CMK. The redevelopment of existing parking and local service roads for residential purposes, combined with uncertainty over the delivery of the MRT, has the potential to constrain the accessibility and servicing of the employment, retail and leisure uses which underpin CMK's economic role. The Plan therefore does not currently demonstrate that sufficient land and supporting infrastructure will be available to accommodate the identified employment needs and the approach is consequently not sufficiently justified or effective as required by paragraphs 85 and 86 of the NPPF.

Q3.3 Is the Plan's distribution of employment land as set out in Policy GS3 justified and effective?

- 2.5 The broad aspirations of Policy GS3 are positively prepared and no objection is raised in principle to the distribution of employment land. However, concerns remain regarding the effectiveness of the strategy as it relies on CMK as the principal location for future office and research and development floorspace.
- 2.6 The Plan expects around 80% of future office and research and development floorspace to be delivered in CMK. The continued economic success of CMK will therefore depend upon it remaining accessible to employees, businesses, customers and visitors, including those travelling into the city from outside Milton Keynes.
- 2.7 There is a potential conflict between this economic strategy and the proposed scale and form of residential intensification within CMK, including development on North and South Rows and existing parking and service areas. The loss of parking and changes to the established road hierarchy could affect access and servicing for existing and future businesses, particularly given the uncertainty surrounding the timing and delivery of the MRT. The Plan therefore needs to demonstrate that the proposed scale of residential development will not undermine the accessibility and functioning of CMK as its principal economic centre. In its current form, Policy GS3 is not effective.
- 2.8 In order to make the policy effective, and compliant with paragraph 86 of the NPFF we suggest a Main Modification requiring a clear and consistent framework for compliance, masterplanning and phasing across CMK, ensuring that the distribution and delivery of employment development is properly coordinated with residential development, transport infrastructure, parking, servicing and other supporting infrastructure. This should ensure that the cumulative effects of development across CMK are considered and that the delivery of residential development does not undermine the functioning of CMK as the principal economic centre.

Q3.4 How have the locations for the proposed employment allocations in Table 4 been selected? What methodology has been used? Have they been subject to SA?

No Response

Q3.5 Are criteria B-G of Policy GS3 sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals

No Response

Q3.6 Is the Plan consistent with national planning policy with regard to the provision for lorry parking facilities?

No Response

Issue 2

Whether the policies concerning employment development are justified, effective and

consistent with national policy.

Relevant Policies – GS8, ECP1, ECP5, ECP6

Questions

Policy GS8 – Hanslope Park

Q3.7 Is Policy GS8 justified, effective and supported by evidence?

No Response

Q3.8 Is Policy GS8 consistent with national policy in relation to designated heritage assets?

No Response

Q3.9 Does Policy GS8 provide sufficient guidance for decision-makers when determining proposals within the site, particularly having regard to the presence of known heritage assets?

No Response

Q3.10 Are the Council's suggested modifications in Document CD28 to Policy GS8 necessary for soundness?

No Response

Policy ECP1 – Protecting employment land and buildings

Q3.11 In order to be effective, should the policy be explicit about what use classes it applies to?

No Response

Q3.12 Paragraph 354 of the reasoned justification refers to the difficulties faced by religious groups in finding suitable accommodation and that it may be appropriate for such uses to be accommodated on employment sites. How would Policy ECP1 respond to the specific development needs of religious groups? Would it be effective?

No Response

Policy ECP5 – Supporting a diverse rural economy

Q3.13 Is the policy sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

No Response

Q3.14 Is the policy effective in referring to ‘employment uses’ when these are defined in the glossary as those within uses E(g)(i), E(g)(ii), E(g)(iii), B2 and B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended), given that the policy also supports tourism and countryside recreation?

No Response

Policy ECP6 – Horse-related development

Q3.15 Is the policy sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

No Response

Q3.16 Do paragraphs D-F serve a clear purpose and avoid unnecessary duplication of policies as per paragraph 16(f) of the Framework?

No Response

Q3.17 Is the Council’s suggested modification to the policy set out in Document CD28 necessary for soundness?

No Response

Issue 3

Whether the plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to retail and main town centre use development.

Relevant Policies – GS5

Questions

Retail Overall

Q3.18 Is the Plan sufficiently clear about where any need for additional convenience and comparison goods floorspace will be directed to?

No Response

Q3.19 Taking into account the convenience and comparison goods floorspace projections, is there a need for any site allocations for new retail development over the Plan period, but particularly in the period to 2031?

No Response

Policy GS5 – Our retail hierarchy

Q3.20 Is the Plan’s retail hierarchy set out in Policy GS5 justified and supported by evidence?

- 2.9 The retail hierarchy set out in Policy GS5 is generally justified and supported by the evidence. The Plan appropriately recognises Central Milton Keynes as the City's principal retail and leisure destination, with the Centre:MK and Midsummer Place forming the core of this offer. Protecting the primacy of the City Centre for comparison shopping, while supporting other town centre uses such as leisure and civic functions, is consistent with the role of CMK and national policy, particularly paragraph 90 of the NPPF.
- 2.10 However, the effectiveness of the retail hierarchy needs to be considered alongside the wider spatial strategy. The substantial quantum of residential development proposed within CMK creates competing demands for land which could affect the ability of the area to accommodate and support employment, retail and leisure uses contrary to paragraphs 85 and 86 NPPF. In particular, the proposed redevelopment of existing parking areas and local service roads for residential development could affect accessibility and servicing for existing town centre uses. Importantly, many of these developments do not propose ground floor leisure, retail and cultural units which further reduces the effectiveness of the policy.
- 2.11 The retail hierarchy is therefore supported in principle and is broadly justified by CMK's established role, but its successful implementation depends on the wider Plan policies not undermining the infrastructure necessary for the CMK to function as a retail centre (paragraph 90 NPPF). The Plan should ensure that the proposed scale of residential development does not compromise the land, access, parking and servicing requirements of the retail and leisure uses which Policy GS5 seeks to protect. There is therefore a need for a Main Modification to ensure the Plan provides a clear and consistent framework for masterplanning and phasing to ensure that residential development is appropriately coordinated with the land, access, parking and servicing requirements of the retail and leisure uses which Policy GS5 seeks to protect.

Q3.21 Is Policy GS5 sufficiently clear about which Strategic and City extensions will include Local Centres?

No Response

Q3.22 Are the Council's suggested modifications to the floorspace projections in Tables 6 and 7, as set out in Document CD28, justified and necessary for soundness?

No Response

Issue 4

Whether the policies concerning retail and main town centre use development are justified, effective and consistent with national policy.

Relevant Policies – ECP2, ECP3, ECP4

Questions

Policy ECP2 – Supporting the vitality and viability of centres

Q3.23 Is the policy sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

No Response

Q3.24 Are the specific uses supported in the different areas covered by the policy justified by the evidence base?

- 2.12 The specific uses supported within the different areas of Policy ECP2 are broadly justified by the evidence base. The Policy appropriately recognises that the role of centres extends beyond shopping to include leisure, cultural, community, restaurant, café and other town centre uses. The identification of CMK as the principal city centre, together with the approach to primary shopping areas and the distribution of other town centre uses, is therefore supported in principle (and is in accordance with Chapters 6 and 7 of the NPPF).
- 2.13 However, the effectiveness of the proposed distribution of uses needs to be considered alongside the wider development strategy for CMK. The substantial residential growth proposed within CMK, including development on North and South Rows and existing parking and local service roads, creates potential conflicts with the land and infrastructure needed to support the town centre uses identified in ECP2. These areas provide access, parking and servicing for existing and future commercial, leisure and cultural uses, and their redevelopment could affect the ability of those uses to function effectively.
- 2.14 This is particularly important given the uncertainty surrounding the delivery of the MRT. Until there is sufficient certainty that alternative transport infrastructure will be delivered, the Plan cannot assume that the loss of existing parking and access infrastructure will be adequately replaced. The servicing requirements of existing and future units also need to be considered, particularly where development would alter the established road and service network within CMK.
- 2.15 Accordingly, the specific uses identified in ECP2 are broadly supported by the evidence and there is no objection to the principle of the Policy. However, the Plan needs to demonstrate that the spatial distribution of these uses can be delivered alongside the proposed residential intensification without compromising the access, parking and servicing necessary to maintain the vitality and viability of CMK. In order to fulfil paragraphs 85, 86 and 87 of the NPPF, a clear and coordinated approach to masterplanning and phasing across CMK is therefore required as a Main Modification to ensure that the uses supported by ECP2 can continue to function effectively.

Q3.25 What are the implications of the Town and Country Planning (Use Classes) Order 1987 (as amended) and the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) on the restrictions of uses in certain areas within the policy?

No Response

Q3.26 Why does the policy not set out what would be supported on upper floors within frontages in Central Milton Keynes?

- 2.16 The Policy does not clearly identify the uses that would be supported on upper floors within frontages in Central Milton Keynes, although based on the wider Plan it is assumed that these areas will provide significant opportunities for residential development. Given the scale of residential growth proposed in CMK, it would be appropriate for the Policy to make this approach explicit and set out how residential use of upper floors should be considered

alongside the retention and provision of employment, leisure, cultural and other town centre uses.

- 2.17 This is particularly important because the Plan seeks to maintain CMK as the principal retail, employment, leisure and cultural centre in line with Paragraph 90 of the NPPF. The use of upper floors for residential development is likely to create potential conflicts surrounding servicing, access and amenity with the operation of town centre uses.
- 2.18 The Policy should therefore provide clearer guidance on the circumstances in which residential and other uses would be supported on upper floors within frontages, and how these proposals should be coordinated with the wider objectives for CMK. This would help ensure that residential intensification does not undermine the vitality and viability of the town centre which would be unsound and inconsistent with NPPF Paragraph 90.

Policy ECP3 – Sequential and Impact tests

Q3.27 Is the policy consistent with national planning policy in its operation of the sequential and impact tests?

No Response

Q3.28 In order to be effective, should the detail of the sequential test and the exemption for small-scale rural development and rural offices be set out in the policy rather than the supporting text?

No Response

Q3.29 Should paragraph B of the policy also refer to District Centres and Local Centres?

No Response

Q3.30 Are the thresholds for the impact test justified by the evidence base?

No Response

Policy ECP4 – Hotel and visitor accommodation

Q3.31 Does the policy serve a clear purpose and avoid unnecessary duplication of policies as per paragraph 16(f) of the Framework?

- 2.19 Policy ECP4 serves a clear purpose in supporting hotel and visitor accommodation within the City, in accordance with the wider town centre approach. Annex 2 of the NPPF (Glossary) considers a hotel as a main town centre use, and so according to Paragraph 90 there is a requirement to meet anticipated needs. The need for hotel accommodation is justified as part of the economic strategy for CMK, both as a destination in its own right and having regard to its proximity to other planned attractions in the wider region such as Universal Studios. The importance of hotel accommodation is also recognised in Policy CMK1.

- 2.20 However, the Policy does not address short-term lets and serviced apartments. These forms of accommodation can have implications for the supply and use of accommodation within CMK, but the Policy provides no clear framework for how they will be treated. Greater clarity is therefore required to ensure that these uses are properly addressed within the Plan's land use strategy.
- 2.21 There is also a wider issue regarding competing demands for land within CMK. Hotel and visitor accommodation contributes to the economic role and attractiveness of CMK but must compete with the substantial residential development proposed. The 16,000 dwelling capacity assumption therefore creates further pressure on the available land supply and could affect the delivery of hotel and visitor accommodation and the associated economic benefits.
- 2.22 The Policy therefore has a clear purpose and is not considered to unnecessarily duplicate other policies. However, it should provide greater clarity regarding short-term lets and serviced apartments and how these uses will be treated, particularly where they may contribute to the apparent delivery of residential development. This would ensure that the Plan properly accounts for the competing land use requirements within CMK and does not inadvertently displace hotel and visitor accommodation which are considered main town centre uses in the NPPF (Annex 2 Glossary) that supports the wider economic strategy.

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