



For and on behalf of
Central Milton Keynes Town Council

EXAMINATION OF MILTON KEYNES CITY PLAN 2050 MATTER 7 HEARING STATEMENT

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1.0 INTRODUCTION

- 1.1 This response to Matter 7 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 CENTRAL MILTON KEYNES

Issue

Whether the approach to Central Milton Keynes is justified, effective and consistent with national policy.

Questions

Q7.1. How has the identification of around 16,000 new homes in Central Milton Keynes been derived? What proportion of this amount of development has not commenced or have the benefit of planning permission?

- 2.1 The identification of around 16,000 new homes in Central Milton Keynes (CMK) is derived principally from the capacity assessment in the Council's SHLAA 2025. The SHLAA assesses the development potential of sites using assumed residential densities and development scenarios. The principal scenario applies the Regulation 18 Policy and Growth Study density assumptions, producing a total theoretical capacity of approximately 18,550 dwellings. This capacity is then used to support the Plan's identification of around 16,000 homes in CMK.
- 2.2 The density assumptions are therefore fundamental to the overall identified capacity. The SHLAA tests a number of scenarios to understand the effect of different development assumptions. The principal scenario applies the Regulation 18 Policy and Growth Study densities across the identified sites. An alternative scenario reduces the density applied to the Rows to 100 dwellings per hectare, producing a total capacity of approximately 16,115 dwellings. A further scenario reduces the density on the Rows to 60 dwellings per hectare, resulting in capacity of approximately 15,726 dwellings. Another scenario assumes that only half of the land within the Rows and Gates comes forward for residential development, reducing capacity to approximately 15,166 dwellings. Finally, applying the draft policy densities to the Inner and Outer areas, with the Rows and Gates at 100 dwellings per hectare, produces a capacity of approximately 13,681 dwellings.
- 2.3 The testing is important because it demonstrates that the 16,000 dwelling figure is dependent upon the delivery of high densities across the identified sites and a substantial proportion of the land being capable of coming forward for residential development. Under several of the alternative scenarios, the resulting capacity is below 16,000 dwellings. The figure should therefore be understood as being derived from a capacity assessment based on assumed densities, rather than from 16,000 homes being identified through a corresponding number of specific, committed development proposals.
- 2.4 The actual delivery position also highlights the scale of reliance on future development. Of the approximately 16,000 dwellings identified, 3,323 have the benefit of planning permission, equivalent to around 21% of the total. However, only 1,070 dwellings have commenced, equivalent to approximately 7% of the overall figure. This leaves approximately 12,677 dwellings, or around 79% of the total, which have neither commenced nor secured planning permission. The majority of the proposed supply is therefore dependent upon sites coming forward in the future and achieving the densities assumed within the SHLAA.
- 2.5 The distinction between the theoretical capacity and committed delivery is particularly important in CMK. The SHLAA capacity needs to be considered alongside the proposed Quarter structure and the requirement for CMK to continue providing a range of other city-centre uses. Not all land identified as having residential potential can necessarily be treated as residential land in isolation, given the need to accommodate employment, retail, leisure,

community, cultural and other uses within the CMK area. There are also practical considerations associated with developing some of the identified areas, including the redevelopment of surface-level parking and associated service roads and infrastructure. These considerations are explored further in our responses below.

- 2.6 To summarise, the 16,000 dwelling figure is derived from the identified capacity within the SHLAA, which is heavily dependent on the density assumptions applied to CMK. Only 1,070 dwellings have commenced and 3,323 have planning permission, meaning around 79% of the proposed 16,000 homes have neither commenced nor secured planning permission and remain reliant on future sites coming forward at the assumed densities.
- 2.7 In light of the above, a Main Modification is required to reduce the amount of residential development expected to be accommodated within CMK. The revised figure should be based on a robust assessment of capacity which takes account of the density ranges proposed in Policy CMK2, though in any case it should be materially below the 16,000 dwellings currently identified. A lower housing figure for CMK would allow the Plan to retain its overall strategy for CMK whilst providing greater flexibility to accommodate the range of uses and infrastructure necessarily to maintain its role as a town centre.

Q7.2. Is Policy CMK1 positively prepared, justified, effective and consistent with national policy? Responses should specifically address the following:

- a) **Is there clear evidence to justify the requirement in Policy CMK1(c)(1) for 80% of active non-ancillary floorspace to be for office, education, research and development?**
 - b) **What is the justification for requiring the masterplan for block B4 to be approved in advance of the grant of any planning permissions?**
 - c) **Does the policy text provide sufficient guidance to determining proposals along the boulevards? Will it be effective?**
 - d) **Is the boundary of the justice quarter justified? Will it be effective?**
- 2.8 Policy CMK1 is positively prepared in seeking to secure a mix of uses across CMK. However, in its current form, the policy is not sufficiently justified or effective in a number of key areas. Considered together, the issues raised in parts (a) to (d) point to a broader omission. The policy places controls on individual elements without establishing a clear and consistent compliance, masterplanning and phasing framework across all quarters and blocks.
- 2.9 Firstly, in relation to the 80% requirement in CMK1(c)(1), it should be made clear that this requirement applies only within the Downtown Business Quarter. There does not appear to be sufficiently clear justification for the specific requirement that 80% of active non-ancillary floorspace should comprise office, education, research and development uses. To be sound, the policy should explain the evidence base for this particular threshold and demonstrate why this will support the intended role of the Quarter.
- 2.10 Secondly, the singling out of Block B4 for an approved masterplan in advance of the grant of any planning permission is not clearly justified. There is a need for control over the scale, mix and distribution of uses within B4, but the same principle applies more widely across CMK. The policy should instead establish a consistent compliance and masterplanning approach across all blocks and quarters. This will ensure that each quarter functions effectively as a whole, with an appropriate mix of uses and supporting infrastructure, and that

proposals demonstrate compliance with an agreed spatial framework. This would provide a more coherent approach and better reflect the need for coordinated development across CMK.

- 2.11 Thirdly, the policy text does not provide sufficient guidance to determining proposals along the Boulevards and therefore it is unlikely to be fully effective. This is particularly important in relation to the potential redevelopment of Rows which is complex and dependent on wider infrastructure being (the MRT) delivered and servicing being rerouted first. The policy does not explain how the relevant Boulevard and Row proposals will interact with one another, how development will be phased, or how they relate to the wider CMK plans. In order to be sound, a clearer compliance and phasing framework is therefore required with a clear trigger relating to the MRT being secured so that individual proposals can be assessed against the delivery of necessary infrastructure and the wider masterplanning strategy.
- 2.12 Finally, similar overarching concerns arise in relation to the boundary of the Justice Quarter. Whilst we do not have a specific comment on the Justice Quarter, the issue illustrates the need for the policy to provide a clearer and more comprehensive framework explaining how the various quarters relate to each other and how development within them will be coordinated and assessed. The effectiveness of individual quarter boundaries depends on there being sufficient clarity in policy as to their role within the wider CMK strategy.
- 2.13 Overall, whilst the broad objectives of Policy CMK1 are supported, the policy requires a more comprehensive and consistent framework for compliance, masterplanning and phasing across all of the CMK quarters and blocks in order for the Plan to be sound under paragraphs 85, 90 and 135 (NPPF 2024). The current approach identifies controls for particular areas such as B4, but does not adequately explain why those controls apply there alone or how individual development proposals will deliver a coherent CMK. The policy must therefore be strengthened to require coordinated masterplanning and demonstrate compliance across quarters in accordance with Chapter 12 (NPPF 2024). There must be clear requirements relating to land use, infrastructure and the delivery of the MRT and servicing. This would provide a properly justified, effective and consistent basis for decision-making and would ensure that development comes forward coherently.
- 2.14 The need for coordinated development is particularly important in the first five years of the Plan period to ensure the remaining development is not compromised, which is a key risk of piecemeal development as opposed to a comprehensive framework. We propose that there should be a clear trigger to review the Plan within two or three years of adoption should development proposals not come forwards as anticipated.

Q7.3. Are the Council's suggested modifications to Policy CMK1, as shown in Document CD28, necessary for soundness?

No Response

Q7.4. Is Policy CMK2 positively prepared, justified, effective and consistent with national policy? Responses should specifically address the following:

a) Does Policy CMK2 provide sufficient guidance to support the delivery of the Metro along Midsummer Boulevard?

- 2.15 No. Policy CMK2 does not provide sufficient guidance to support the delivery of the Metro

along Midsummer Boulevard. While the policy recognises the importance of the Metro and its relationship with Midsummer Boulevard, it does not provide sufficient detail on how the transport infrastructure is to be integrated with development, including the required land, alignment, access arrangements and relationship with surrounding development. This is particularly important because the MRT route through Midsummer Boulevard would require access through Midsummer Place in accordance with the Walkway Agreement, which includes a 20-metre strip along the centre line of the Boulevard reserved for 80 years from the grant of permission for a potential public transport system. The Policy does not explain how these existing arrangements would be relied upon or secured as part of the proposed MRT route which is not consistent with Paragraph 109b of the NPPF.

- 2.16 Given the importance of the Metro to the Plan's wider growth strategy, greater certainty is required to demonstrate that its delivery has been properly planned and safeguarded. In its current form, Policy CMK2 is therefore not sufficiently effective or justified.

b) Is the requirement for safe pedestrian links to Campbell Park through a 'Green Bridge' justified?

No Response

c) Are the proposed density ranges in CMK2(f)(4) justified and supported by evidence? Are they consistent with the findings of the Heritage Impact Assessment?

- 2.17 The proposed density ranges in Policy CMK2(f)(4) are not sufficiently justified by the evidence base and are not clearly demonstrated to be consistent with the findings of the Heritage Impact Assessment.
- 2.18 The SHLAA 2025 relies on densities derived from recently permitted schemes to inform its capacity assumptions and proposed density ranges. While the application of capacity assumptions to specific sites is generally more consistent with policy and guidance regarding land availability assessment there is a far bigger risk to the effectiveness of such an approach within the finer-grained setting of CMK where it relies on an average and a relatively small sample of permitted development.
- 2.19 However, a number of those schemes themselves exceed the density ranges proposed in CMK2. Of the 15 existing commitments assessed, 10 exceed the relevant density limit in the Regulation 19 Plan, with some schemes achieving exceptionally high densities (see below table). The Former Jaipur Restaurant scheme achieves the highest density at 2,745 dph despite a proposed limit within CMK2 of 425 dph. This raises a concern that the evidence used to establish appropriate densities is, in part, based on development which would not comply with the proposed policy.

Site Name	Site Area (ha)	Capacity (Planning Docs)	Proposed Density Limit (Reg 19 Plan)	Site Density (dph)
Canalside Marina	4.54	128	135	28
Land to North Of Glebe Roundabout	1.15	60	135	52
Campbell Park View (MK Theatre MSCP)	0.48	285	425	594

Site Name	Site Area (ha)	Capacity (Planning Docs)	Proposed Density Limit (Reg 19 Plan)	Site Density (dph)
Park Square (Former Wyevale Garden Centre)	0.65	329	350	506
Bowback House	0.26	306	350	1177
Silbury Court	0.57	154	425	270
Westminster House	0.76	376	350	495
Tempus House	0.22	100	425	455
Technology House	0.09	53	350	589
Station House Upward Extension	0.34	64	350	188
Land Southeast of Saxon Court	0.34	288	350	847
Former Jaipur Restaurant	0.11	302	425	2745
The Point	0.87	487	425	560
Bank House	0.34	355	425	1044
Sovereign Court Upward Extension	0.17	42	425	247

Source: DLP Analysis of SHLAA Appendix 8 and 8.1

- 2.20 The HIA reinforces the need for density to be considered alongside height, scale, massing, views and the setting of heritage assets. It identifies the importance of the established horizontal character of a number of CMK's early buildings and the intervisibility between heritage assets, including the Shopping Building, Central Library and Civic Centre. It also identifies Campbell Park as a particularly sensitive asset, with views towards the CMK skyline forming part of its setting. The HIA's review of previous decisions demonstrates that taller and denser development can have heritage consequences where it changes these relationships. The planning history of Campbell Park Northside provides a practical example, where the scale and massing of the original 397-dwelling scheme¹ were considered to cause harm to Campbell Park and the subsequent scheme reduced the number of dwellings to 306², with a density of approximately 130 dph. The changes also required amendments to the established grid structure, including a reduction in road width. This directly conflicts with CMK2(f) which states proposals will be supported where they '*maintain Central Milton Keynes' existing grid structure*'.
- 2.21 The proposed density ranges should therefore be reviewed. The evidence should demonstrate that the ranges are appropriate to the specific character and heritage sensitivity of the relevant blocks and can be achieved without unacceptable impacts on the setting and significance of heritage assets. The Council should also demonstrate that the proposed densities are viable and capable of delivering an appropriate range and mix of housing, including affordable and family housing. The recent delivery of very high density schemes has contributed to a development model which is increasingly reliant on Built-to-Rent schemes. The form and viability of such development constrains the delivery of larger family homes and affordable housing. Based on the evidence currently available, the ranges are

¹ Planning Application 24/01612/FUL

² Planning Application PLN/2025/2013

not sufficiently justified or demonstrated to be effective.

d) does the policy text and reasoned justification to Policy CMK2 provide sufficient guidance to applicants how parking should be managed in Central Milton Keynes? Is the approach to parking in Policy CMK2 justified and effective?

- 2.22 No. Policy CMK2 does not provide sufficient guidance or certainty as to how parking should be managed alongside the proposed growth of CMK, despite Paragraph 109 of the NPPF requiring this issue to be considered from the earliest stages of plan-making and identifying parking as integral to the design of schemes. The policy states that the phased reduction of surfaced car parking should take place in tandem with improvements to public transport provision. However, there is a significant disconnect between this policy expectation and the current delivery position. The MRT remains at Outline Business Case stage, with no secured funding or confirmed delivery programme, while parking is already being lost through development. There is no clear policy trigger requiring the MRT or other transport improvements to be in place before existing parking areas can be redeveloped.
- 2.23 This is already occurring in practice. For example, application 24/00036/FUL at Milton Keynes Theatre was permitted in 2025 and involves the demolition of the existing multi-storey car park and construction of 285 residential units. This demonstrates that the loss of parking is not simply a longer-term consequence of the Plan which will occur once the MRT is operational, rather parking capacity is being reduced now and in the near term, before the infrastructure which is intended to support the transition has been delivered.
- 2.24 The scale of reliance on existing parking land is also significant. Analysis of the SHLAA sites shows that between 44.3% and 61.3% of deliverable homes across the density scenarios would be located on existing car parking and local service road land. Under Density Scenario 1, 9,812 of 16,015 deliverable homes (61.3%) are proposed on such land. In total, 36 proposed housing sites are located on existing parking and local service roads. The issue is therefore not limited to isolated sites but is fundamental to the delivery of the CMK strategy.
- 2.25 Furthermore, surface parking performs a wider function. The local service roads provide access and servicing to existing buildings and businesses and form part of the established CMK grid. Their redevelopment therefore needs to demonstrate how parking, servicing and access will be maintained or satisfactorily re-provided. This is particularly important as CMK's population increases and demand for transport infrastructure rises at the same time as the land available for parking is reduced.
- 2.26 The evidence does not demonstrate that the MRT will provide a sufficient or timely alternative. The Traffic Modelling Review prepared by DLP's Transport & Infrastructure team identifies that the MRT is anticipated to account for only around 1.8% of all trips, while its delivery is also predicted to increase congestion on some routes through the reallocation of carriageway space. The Plan therefore cannot rely on the MRT as a substitute for existing parking and highway capacity without greater certainty over its funding, delivery and timing.
- 2.27 The approach to parking in Policy CMK2 is therefore not sufficiently justified or effective. The policy should establish a clear and deliverable relationship between the loss of existing parking and the delivery of replacement parking, servicing infrastructure and public transport improvements. In particular, there should be a clear mechanism to ensure that the redevelopment of parking areas does not run materially ahead of the delivery of the transport infrastructure intended to support that reduction.

Q7.5. Are the Council's suggested modifications to Policy CMK2, as set out in Document CD28, necessary for soundness?

No Response

Q7.6. Is Policy CMK3 positively prepared, justified, effective and consistent with national policy? Responses should specifically address the following:

a) How have the areas for taller buildings been identified? Are they justified and supported by evidence?

- 2.28 The areas identified for taller buildings have been derived from the Central Milton Keynes Growth Opportunity Study and Tall Buildings Strategy, which informed the Building Height Thresholds Plan. The approach directs greater height towards the centre of CMK, Midsummer Boulevard, key transport locations and gateways, with lower heights towards the edges of CMK and around sensitive heritage assets.
- 2.29 The broad spatial approach is understood. However, the evidence needs to demonstrate not only that these locations are potentially suitable for taller buildings, but that the specific height thresholds and resulting development capacity are justified by the characteristics and constraints of each area. This should also include consideration of viability, including whether the scale and height of development envisaged can realistically come forward having regard to construction costs and housing mix, in line with Paragraph 72 of the NPPF. The justification for taller buildings is considered further under part (b).

b) Are the indicative building height thresholds for each area justified and supported by evidence?

- 2.30 The indicative height thresholds are not adequately supported by the evidence when tested against existing commitments in CMK. Analysis presented in the table below of the 15 existing commitments identified in the SHLAA demonstrates that five exceed the maximum height identified for their respective locations. The most significant examples are Land Southeast of Saxon Court, at 34 storeys against an 8-storey threshold, the former Jaipur Restaurant, at 33 storeys against a 15-storey threshold, and Campbell Park View, at 25 storeys against a 15-storey threshold.

Site Name	Proposed Building Height Threshold (Regulation 19 Plan)	Max Actual Building Height (Planning Docs)
Canalside Marina	8 Storeys	8 Storeys
Land to North Of Glebe Roundabout	8 Storeys	4 Storeys
Campbell Park View (MK Theatre MSCP)	15 Storeys	25 Storeys
Park Square (Former Wyevale Garden Centre)	15 Storeys	11 Storeys
Bowback House	8 Storeys	14 Storeys
Silbury Court	15 Storeys	6 Storeys
Westminster House	15 Storeys	9 Storeys

Tempus House	20 Storeys	5 Storeys
Technology House	15 Storeys	5 Storeys
Station House Upward Extension	15 Storeys	8 Storeys
Land Southeast of Saxon Court	8 Storeys	34 Storeys
Former Jaipur Restaurant	15 Storeys	33 Storeys
The Point	15 Storeys	21 Storeys
Bank House	20 Storeys	20 Storeys
Sovereign Court Upward Extension	20 Storeys	5 Storeys

Source: DLP Analysis of SHLAA Appendices 8 and 8.1

- 2.31 The analysis demonstrates inconsistency between the Plan's housing target and the building height thresholds set out in Policy CMK3. The Policy establishes strict height thresholds for CMK, designed to ensure a distinctive skyline without creating negative visual, functional or environmental effects. However, several existing committed developments included within the 16,000-home target already exceed these thresholds.
- 2.32 This is particularly significant because the 16,000-home capacity is partly based on these existing commitments. If the height thresholds in Policy CMK3 are intended to represent the appropriate scale of development for each area, the Plan has not demonstrated how commitments which exceed those thresholds have been reconciled with the housing capacity assumptions. Conversely, if those heights are considered acceptable, the evidence does not explain why the thresholds in Policy CMK3 are set at lower levels.
- 2.33 Furthermore, there is perhaps not necessarily much scope to limit storey height without also facing potential other restrictions on site capacity. The approach to storey heights and density needs to recognise that sites must also accommodate mixed uses, servicing and utilities, which can change plot ratios and reduce the developable area. This highlights the difficulty of applying average density assumptions to individual sites, particularly where those assumptions do not reflect the mixed-use nature of development. The 2025 SHLAA's site-specific approach therefore risks overstating capacity.
- 2.34 The indicative height thresholds are therefore not sufficiently justified by the evidence currently available. The Plan needs to demonstrate how the thresholds for each area have been derived, how they relate to the development already committed, and how the resulting capacity has been established having regard to the other constraints affecting individual sites.

c) How are local or strategic views to be identified for the purposes of interpreting Policy CMK3(c)(1)? Is the plan sufficiently clear about their location?

- 2.35 Policy CMK3(c)(1) requires development proposals for taller buildings to demonstrate that they would not have an unacceptable impact on strategic and local views, but the Plan does not clearly identify where those views are located or provide a sufficiently defined framework for applicants and decision-makers to apply this requirement consistently.
- 2.36 This is important in CMK because views are integral to the planned character of the City, particularly the key visual corridors along the Boulevards and open spaces. Whether taller buildings are acceptable or not will therefore depend heavily on their impact on particular views. However, without clearly identifying the relevant strategic and local views, there is

considerable uncertainty as to which views should be assessed and what constitutes an unacceptable impact.

- 2.37 The Tall Buildings Strategy and Heritage Impact Assessment provide some supporting analysis of key views and townscape sensitivities, but this evidence does not translate into sufficiently clear policy guidance within CMK3 itself. The Plan should identify the principal strategic views and provide a clear methodology or criteria for identifying and assessing local views at application stage.
- 2.38 Accordingly, the Plan is not sufficiently clear or effective in its current form. Greater clarity is required through the policy to establish the location and significance of the relevant strategic and local views. This would provide applicants and decision-makers with a clear and consistent basis for interpreting Policy CMK3(c)(1).

d) Does Policy CMK3 adequately reflect the potential for effects on designated heritage assets and their settings, including those outside the central Milton Keynes boundary? Is it consistent with national policy?

- 2.39 Policy CMK3 recognises the need to consider heritage, but it does not provide sufficient clarity on the potential effects of taller buildings on designated heritage assets and their settings, including assets outside the CMK boundary.
- 2.40 The Heritage Impact Assessment demonstrates that the impacts of taller buildings can extend beyond the immediate development site, particularly through changes to key views, visual prominence and the setting of heritage assets. It also identifies the potential for cumulative effects where a number of taller buildings are developed within CMK. The example of the Shopping Building is particularly relevant, with the HIA identifying potential harm to its setting through changes to views and its relationship with surrounding development. The HIA also demonstrates that heritage considerations are not confined to assets within the CMK boundary.
- 2.41 Policy CMK3 should therefore make clear that proposals for taller buildings must consider the impact on designated heritage assets and their settings both within and outside CMK, where relevant, and should address cumulative impacts and important views. As currently drafted, the policy does not provide sufficient guidance to ensure these matters are consistently addressed and is therefore not fully justified or effective, or sufficiently consistent with the heritage protection requirements of national policy.

e) Should the requirement for proposals to follow the Exceptional Design Process be included within Policy CMK3?

No Response

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