



Planning
Inspectorate

Examination of Milton Keynes City Plan 2050 - Matters, Issues and Questions identified by the Inspectors

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Introduction

The hearing sessions will take place over a number of weeks between **15 September 2026** and **January 2027**. The Matters, Issues and Questions (MIQs) are structured to deal with matters of strategy and policies before considering site specific matters. These MIQs should be read in conjunction with the separately published guidance note for people participating in the Examination.

Further information about the Examination, hearing sessions and the format for written statements is provided in the accompanying Guidance Note, and the Planning Inspectorate's Procedural Guide which should be read alongside the MIQs.

The deadlines for submitting statements in response to these MIQs is set out in the guidance note. Please note, that interested parties should only respond to questions below which are relevant to your representations on the Milton Keynes Local Plan.

Responses in hearing statements should also indicate whether there are any potential modifications to the policy and/or the reasoned justification that would be necessary to achieve soundness. Hearing statements are not an opportunity to introduce additional points that had not previously been raised in your representations on the Plan.

Matter 1 - 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

1.1 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?

1.2 Has the preparation of the Plan been carried out in accordance with the Local Development Scheme?

1.3 Is the Plan sufficiently clear whether there are any policies from the existing development plan that would not be superseded by its adoption?

Habitats Regulations Assessment

1.4 How was the Habitats Regulations Assessment (HRA) carried out and was the methodology appropriate?

1.5 What potential impacts of the Plan were considered?

1.6 What were the conclusions of the HRA and how has it informed the preparation of the Plan?

1.7 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?

Sustainability Appraisal

1.8 Does the Sustainability Appraisal (SA) meet the requirements for a Strategic Environmental Assessment?

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

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

1.11 What were the conclusions of the SA and how has it informed the preparation of the Plan?

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

Climate Change

1.13 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?

Equality and Diversity

1.14 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?

Other matters

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

Matter 2 - Meeting Milton Keynes Housing Needs

Issue 1

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to meeting housing needs.

Relevant Policies – GS2

Questions

Housing needs overall

2.1 Has the calculation of Local Housing Need (LHN) been undertaken correctly?

2.2 Has the correct median workplace-based affordability ratio been used to undertake the LHN calculation having regard to the date of submission of the Plan?

2.3 Are there any exceptional circumstances which justify an alternative approach to using the LHN standard method? If so, what are they, and what should the housing requirement be?

2.4 Are the additional 9,407 homes above the output from the calculation of the standard method to be provided as a buffer justified?

Housing requirement

- 2.5 Have there been any requests to accommodate unmet housing need from any other authorities? If so, from who and when were such requests made?
- 2.6 Should the housing requirement be altered as a result of the additional homes to be allocated above the standard method output?
- 2.7 Have any alternative options for the housing requirement been considered in the SA? If so, what were the results?

Plan period

- 2.8 Does Policy GS2 clearly set out the housing requirement for the plan period on an average annual basis?
- 2.9 Would the submitted housing and delivery strategy policies look forward 15 years from the anticipated adoption date of the Plan? Should it look further having regard to paragraph 22 of the Framework?
- 2.10 Is the commencement of the Plan period prior to the calculation date of the LHN justified?
- 2.11 Should the Plan period be altered? If so, what should the overall housing requirement be?

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

Appropriate mix of housing overall

- 2.12 Is the Council's evidence for the mix of housing for supported and specialist homes justified? Is it up-to date?
- 2.13 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?
- 2.14 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?
- 2.15 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?

Policy HQH1 – Healthy Homes

2.16 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?
- b) Does the operation of the policy anticipate future alterations to the Council's evidence on housing mix? Would this affect viability?
- 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?
- 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?
- 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?

Policy HQH2 – Affordable Homes

2.17 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?
- b) What evidence is there to justify each of the respective viability areas?
- c) Is the housing mix justified? Is it sufficiently flexible to allow for changing circumstances?
- d) How are off-site contributions to be calculated and is this set out in the submitted Plan?

Policy HQH3 – Supported and Specialist homes

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

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

2.20 How will an over-concentration of these types of home be assessed?

2.21 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?

Policy HQH4 – Homes for co-living

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

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

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?

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

Policy HQH7 – Accommodation for boat dwellers

2.25 Taking each of the criteria of Policy HQH7 in turn, are these justified and consistent with national policy?

2.26 Having regard to the identified evidence of need for 139 boat dwellings, is Policy HQH7 positively prepared in this regard?

2.27 Does Policy HQH7 reflect the role of the Canal and River trust when the locations of new moorings are agreed?

2.28 Is the Council's suggested modification to Policy HQH7 in Document CD28 necessary for soundness?

Policy HQH8 – Exception Sites

2.29 What is the justification for the differing size limits in criterion A.1 of the policy?

2.30 Is the criteria under paragraph A sufficiently flexible to allow for the delivery of exception sites to meet local needs?

2.31 Is the limit on 35% market housing within paragraph B of the policy justified by the evidence?

2.32 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?

2.33 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?

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

Policy HQH9 – Children's Homes

2.35 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?

Issue 3

Whether the plan will meet the needs of Gypsies, Travellers and Travelling Showpeople.

Relevant Policies –HQH6

Gypsies and Travellers overall

2.36 Do the Plan's housing policies provide sufficient clarity when the additional pitches for gypsies and travellers are required?

2.37 Paragraph 8.7 of the Gypsy and Traveller Accommodation Assessment (GTAA) identifies a net shortfall of 38 pitches for gypsies and travellers to 2031. Policy HQH6 identifies 23 pitches within the South East Milton Keynes SUE (7 pitches), West of Whaddon Road (15 pitches) and Willen Road (1 pitch) which are to be delivered by 2030. How does the Plan address the remaining shortfall of 15 pitches to 2031?

2.38 What provision is made within the Plan to address the shortfall of pitches by the end of the Plan period to 2050? Is the Plan positively prepared as a result?

2.39 Can the Council demonstrate a supply of specific deliverable sites sufficient to provide five years' worth of sites for gypsies and travellers against the requirement?

Policy HQH6 – Pitches for Gypsies and Travellers

2.40 Is Policy HQH6 positively prepared, justified, effective and consistent with national policy? Responses should specifically address the following:

- a) How have the locations for the proposed new gypsy and traveller allocations been selected? What methodology has been used? Have they been subject to SA?
- b) Taking each in turn, are the proposed site allocations for gypsies, travellers and travelling showpeople justified? Is each site deliverable?
- c) What is the justification for some Gypsy and Traveller pitches being required on allocations at different times?

- d) Is there clear evidence that the proposed pitches within strategic allocations will come forward when envisaged? How will the pitches be secured?
- e) What evidence is there to justify the total pitch limit of 16 pitches on new or existing sites within criterion D.1 of the Policy?
- f) Does the plan identify specific allocations for travelling showpeople? Is the approach to travelling showpeople justified and effective? Is Policy HQH6 positively prepared in this regard?

Matter 3 – 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

Employment overall and Policy GS3 – Strategy for economic prosperity

- 3.1 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?
- 3.2 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?
- 3.3 Is the Plan's distribution of employment land as set out in Policy GS3 justified and effective?
- 3.4 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?
- 3.5 Are criteria B-G of Policy GS3 sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?
- 3.6 Is the Plan consistent with national planning policy with regard to the provision for lorry parking facilities?

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

- 3.7 Is Policy GS8 justified, effective and supported by evidence?
- 3.8 Is Policy GS8 consistent with national policy in relation to designated heritage assets?
- 3.9 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?
- 3.10 Are the Council's suggested modifications in Document CD28 to Policy GS8 necessary for soundness?

Policy ECP1 – Protecting employment land and buildings

- 3.11 In order to be effective, should the policy be explicit about what use classes it applies to?
- 3.12 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?

Policy ECP5 – Supporting a diverse rural economy

- 3.13 Is the policy sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?
- 3.14 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?

Policy ECP6 – Horse-related development

- 3.15 Is the policy sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?
- 3.16 Do paragraphs D-F serve a clear purpose and avoid unnecessary duplication of policies as per paragraph 16(f) of the Framework?
- 3.17 Is the Council's suggested modification to the policy set out in Document CD28 necessary for soundness?

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

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

3.19 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?

Policy GS5 – Our retail hierarchy

3.20 Is the Plan's retail hierarchy set out in Policy GS5 justified and supported by evidence?

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

3.22 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?

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

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

3.24 Are the specific uses supported in the different areas covered by the policy justified by the evidence base?

3.25 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?

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

Policy ECP3 – Sequential and Impact tests

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

3.28 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?

3.29 Should paragraph B of the policy also refer to District Centres and Local Centres?

3.30 Are the thresholds for the impact test justified by the evidence base?

Policy ECP4 – Hotel and visitor accommodation

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

Matter 4 – The Spatial Strategy and distribution of development

Issue

Whether the Spatial Strategy and distribution of development are positively prepared, justified, effective and consistent with national planning policy.

Relevant policies – GS1, GS2, GS3, GS6, GS9, GS11

Questions

Spatial Strategy overall

4.1 Is the spatial distribution of development across the borough justified and what factors influenced the Spatial Strategy, for example physical and environmental constraints, effects on the highway network, the capacity of infrastructure to accommodate the proposed amount development?

4.2 What alternative options for the spatial strategy were considered?

4.3 Why was the submitted approach chosen and is it an appropriate strategy having regard to reasonable alternatives?

- 4.4 How has the settlement hierarchy been derived? Is it justified and supported by evidence?
- 4.5 Is there evidence of the need for any phasing of strategic allocations having regard to infrastructure improvements?
- 4.6 How has the amount of development in each location been derived?
- 4.7 Does the spatial strategy provide sufficient clarity on housing numbers for those preparing or updating Neighbourhood Plans in the area?
- 4.8 Does the plan's Spatial Strategy strike an appropriate balance between the identification of land for new homes and employment? Will there be sufficient jobs to meet the population growth associated with the housing proposed?
- 4.9 Is the Plan sufficiently clear how the requirements for strategic logistics and distribution will be addressed? Is the plan positively prepared as a result?
- 4.10 Is the Plan's overall strategy for the rural area sufficiently clear? Is it justified and will it be effective?
- 4.11 How will the Plan respond to any cumulative effects arising from the Universal Studios UK Resort which has been approved via a Special Development Order?
- 4.12 How would the Plan respond to the proposed new town within the Milton Keynes administrative area?
- 4.13 Taking into account the Council's response to question 1 of our Initial Questions (MKC1), how has the Plan's overall strategy taken into account any cumulative effects on the Strategic Highway Network? Is this justified and will it be effective?
- 4.14 Noting the Council's response to Question 2 of our Initial Questions (Document MKC1), what certainty is there that the Metro (mass rapid transit) will be delivered and what are the implications for the plan if the Metro is not delivered or is delayed?
- 4.15 Are the proposed metro corridors justified and evidence based?
- 4.16 Does the plan provide sufficient detail on the future Mass Rapid Transport network? Will it be effective in safeguarding the metro corridors?

Policy GS6 – Open Countryside

- 4.17 Are the settlement boundaries as defined by Policy GS6 justified and based on proportionate evidence?
- 4.18 Should Policy GS6 allow a greater range of development types within the Open Countryside?
- 4.19 Are the references to other policies in the plan in paragraph 3 of Policy GS6 correct, comprehensive and effective? Are there any other policies which should be referred to?

4.20 There are a small number of settlements which do not have a settlement boundary. Given that paragraph 125 of the Framework gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, is the policy's restriction on development in these settlements consistent with national planning policy?

4.21 Is the requirement in Policy GS6 for new development in the Open Countryside to maintain openness justified and consistent with national planning policy?

4.22 Are the requirements for replacement dwellings with regard to size and quality as set out in paragraph 7 of Policy GS6 justified and consistent with national planning policy?

4.23 Are the Council's suggested modifications to the policy as set out in Document CD28 necessary for soundness?

Policy GS9 – Supporting Transit-orientated development and estate regeneration

4.24 Is Policy GS9 positively prepared, justified, effective and consistent with national policy? Responses should specifically address the following:

a) Are the distance and density thresholds in GS9(B) justified? Will they be effective?

b) Are the interchange hubs clearly identified? Are they justified and supported by clear evidence?

Policy GS11 – Adjacent and cross-boundary growth

4.25 Is Policy GS11 justified? Will it be effective? Does it accord with paragraph 17 of the Framework insofar as it is a policy for the development and use of land in its area?

4.26 Is Policy GS11 necessary for soundness?

Matter 5 - Site Allocations

Issue

Whether the approach to the site allocations is justified, effective and consistent with national policy.

Relevant Policies - GS12, GS13, GS14, GS15, GS16, GS17, GS18, GS19, GS20, GS21, GS22, GS23 and Annex L.

Questions

Site selection

5.1 What methodology has been used to select the sites allocated in the Plan? Is the approach justified? Is it appropriate?

5.2 Have all of the site allocations and reasonable alternative sites been subject to SA?

Site allocations overall

5.3 Is the inclusion of some allocations within the Special Landscape Areas justified?

5.4 Due to the scale and nature of the strategic allocations, will they be able to satisfy the policy requirements for the Special Landscape areas?

5.5 How have the site allocations been informed by the Strategic Flood Risk Assessment (SFRA)?

5.6 Having regard to the risk of flooding, has each of the site allocations passed the sequential approach to site selection? Is this clearly set out in evidence? Has the latest SFRA been used to inform the sequential approach?

5.7 The Council's response to our Initial Questions (Document MKC1) indicates a potential modification to Policy GS2 to reflect the rolling forward of the sites in Annex L. However, this only indicates that these sites should be considered as part of the housing supply. Taking each in turn, do the sites in Annex L have planning permission or are under construction? If not, which policies in the submitted Plan give formal effect to the allocation of the small and medium housing sites in Annex L?

5.8 Have the sites in Annex L been subject to SA? What were the findings?

5.9 Is the Plan sufficiently clear on the development expectations for the sites in Annex L? Is the approach justified and will it be effective?

5.10 Policies GS12, GS13, GS14, GS15, GS17, GS18 and GS19 require the provision of an integrated low or zero carbon energy infrastructure from building-scale to neighbourhood or district scale. Is this approach justified and supported by evidence? Will it be effective?

5.11 What is the justification for Policies GS14, GS15, GS17, GS18 and GS19 requiring the Framework Masterplan and design codes prior to the grant of any planning permission? Does the plan need to provide sufficient clarity on what is required from Framework Masterplans and design codes and how they will be prepared and approved? How does this requirement relate to the guidance set out in paragraphs 242, 243 and Table 10?

Policy GS12 - Strategy for the Wolverton Railway Works Strategic Brownfield site

5.12 Having regard to the Council's schedule of proposed modifications (CD28), is the site deliverable?

5.13 Is the Council's suggested modification in Document CD28 to remove the site necessary for soundness?

Policy GS13 - Strategy for the Walton Campus Strategic Brownfield site

5.14 Is there sufficient certainty that the site will come forward for residential development within the plan period?

5.15 How has the overall number of homes for the allocation been identified?

5.16 Would the allocation result in the loss of any sports facilities?

5.17 Is there sufficient detail on the mix of community uses expected to be provided and is the catchment consistent with Policy GS4?

5.18 What quantities of green and blue infrastructure would be required to support the allocation? Is the plan sufficiently clear on the amount of such infrastructure?

5.19 Is there sufficient detail on the infrastructure and traffic management measures necessary to mitigate impacts on the wider highway network?

5.20 What is the Council's justification for the suggested modification (set out in Document CD28) to remove the requirement for 5% of plots to be for custom and self-build dwellings? Is it necessary for soundness?

Policy GS14 - Eastern Strategic City Extension

5.21 How has the overall number of homes for the allocation been identified?

5.22 Is the overall scale of housing envisaged overall, and in the plan period realistic and supported by robust evidence?

5.23 Is the allocation justified in principle?

5.24 Is Policy GS14 sufficiently clear on the amount of homes for older persons and specific and specialist needs housing that is expected to be developed within the allocation? Will it be effective?

5.25 Is the inclusion of two sites totalling 31 pitches for gypsies and travellers justified? Will they be able to come forward to meet the identified need for pitches in the timeframes envisaged?

5.26 Is the identification of 40 hectares of land for employment within the allocation justified? How has this been calculated? Does Policy GS14 provide sufficient clarity

on its location within the site? Is Policy GS14 sufficiently clear on the use classes of employment land envisaged and the accompanying amount of floorspace? Will it be effective in guiding future proposals?

5.27 What effect would the allocation have on landscape character? Is Policy GS14 sufficiently clear about the mitigation required to protect the character of the area?

5.28 What effect would the site have on designated heritage assets?

5.29 Are the requirements for new metro-related infrastructure, education provision, retail, sports and leisure, green infrastructure justified and will they be viable? How will these be funded?

5.30 What quantities of sports pitches and open space would be required to support the allocation? Is the plan sufficiently clear on the amount of such infrastructure?

5.31 Is there clear evidence that the allocation will not result in adverse effects on the strategic and local highway networks?

5.32 Are the transport measures set out in GS14(14) justified and supported by evidence?

5.33 Is Policy GS14 sufficiently clear about when the various aspects of the transport network are required by?

5.34 How will the required infrastructure be phased in relation to the development proposed and what mechanisms are there to ensure that these are provided at the right time?

5.35 Are the Council's suggested modifications to Policy GS14, as set out in Document CD28, justified and necessary for soundness?

Policy GS15 – East of Wavendon Strategic City Extension

5.36 Is the restriction on development prior to 2038 positively prepared, justified and consistent with national planning policy?

5.37 How has the overall number of homes for the allocation been identified?

5.38 Is the overall scale of housing envisaged realistic and supported by robust evidence?

5.39 Is the allocation justified in principle?

5.40 Are the references to growth on land outside of Milton Keynes administrative area justified and effective? Should there be reference to working with the neighbouring authority in the policy?

5.41 What effect would the allocation have on landscape character? Is the policy sufficiently clear about the mitigation required to protect the character of the area?

5.42 Is Policy GS15 sufficiently clear on the amount of homes for older persons and specific and specialist needs housing that is expected to be developed within the allocation? Will it be effective?

5.43 Are the requirements for new metro-related infrastructure, education provision, healthcare infrastructure retail, sports and leisure, green infrastructure justified and will they be viable? How will these be funded?

5.44 What is the justification for a 15 hectare District Park and what quantities of open space and sports and leisure facilities would be required to support the allocation in addition to the District Park? Is the plan sufficiently clear on the amount of such infrastructure?

5.45 Is the policy sufficiently clear on the number, scale and location of new retail facilities proposed within the allocation? Are they justified and supported by evidence? Will it be effective?

5.46 Is there clear evidence that the allocation will not result in adverse effects on the strategic and local highway networks?

5.47 Are the transport measures and requirements set out in criterion E.14 justified and supported by evidence? Is the Council's suggested modification to this criterion as set out in Document CD28 necessary for soundness?

5.48 Is the policy sufficiently clear about when the various aspects of the transport network improvements are required by?

5.49 How will the required infrastructure be phased in relation to the development proposed and what mechanisms are there to ensure that these are provided at the right time? Should there be specific reference to land value equalisation?

5.50 In order to be consistent with paragraph 193(c) of the Framework, should the policy make specific reference to the protection of veteran trees?

5.51 Is there unnecessary repetition between criteria E.4 and E.5 and should the District Park be referenced as a way of mitigating impact? Are the Council's suggested modifications to this part of the policy as set out in Document CD28 necessary for soundness?

5.52 Is the indicative concept plan in Figure 2 supported by evidence and should it be referenced in the policy?

5.53 Should the Policy include a criterion to ensure development does not conflict with or prejudice the delivery of East West Rail proposals?

Policy GS16 – Wavendon Strategic Buffers

5.54 Is the policy justified by the evidence, sufficiently flexible and is it clear and unambiguous so it is evident how a decision maker should react to development proposals?

Policy GS17 – South Bow Brickhill Strategic City Extension

5.55 How has the overall number of homes for the allocation been identified?

5.56 Is the overall scale of housing envisaged realistic and supported by robust evidence?

5.57 Is the allocation justified in principle?

5.58 What effect would the allocation have on landscape character and the proposed Special Landscape Area? Is the policy sufficiently clear about the mitigation required to protect the character of the area?

5.59 Is the policy sufficiently clear on the amount of homes for older persons and specific and specialist needs housing that is expected to be developed within the allocation? Will it be effective?

5.60 Are the requirements for education provision, healthcare infrastructure retail, sports and leisure, green infrastructure justified and will they be viable? How will these be funded?

5.61 What quantities of green and blue infrastructure would be required to support the allocation in addition to the District Park? Is the plan sufficiently clear on the amount of such infrastructure?

5.62 Is the policy sufficiently clear on the number, scale and location of new retail facilities proposed within the allocation? Are they justified and supported by evidence? Will it be effective?

5.63 Is there clear evidence that the allocation will not result in adverse effects on the strategic and local highway networks?

5.64 Are the transport measures and requirements set out in criterion C.10 justified and supported by evidence?

5.65 Is the policy sufficiently clear about when the various aspects of the transport network are required by?

5.66 How will the required infrastructure be phased in relation to the development proposed and what mechanisms are there to ensure that these are provided at the right time?

5.67 Is the indicative concept plan in Figure 3 supported by evidence and should it be referenced in the policy?

5.68 In order to be consistent with paragraph 193(c) of the Framework, should the policy make specific reference to the protection of Ancient Woodland?

5.69 Is it justified for the policy to require a pre-determination archaeological evaluation and is it clear what such an evaluation would involve? Should specific reference be made to the scheduled Magiovinium Roman town? Is the Council's suggested modification to this part of the policy as set out in Document CD28 necessary for soundness?

Policy GS18 – Levante Gate Strategic City Extension

5.70 How has the overall number of homes for the allocation been identified?

5.71 Is the overall scale of housing envisaged realistic and supported by robust evidence?

5.72 Is the allocation justified in principle?

5.73 Is Policy GS18 sufficiently clear on the amount of homes for older persons and specific and specialist needs housing that is expected to be developed within the allocation? Will it be effective?

5.74 What effect would the allocation have on the valued characteristics of the Brickhills Special Landscape Area? Is Policy GS18 sufficiently clear on any strategic landscape mitigation measures that may be necessary?

5.75 Is the requirement for contributions towards primary healthcare provision that would be located within other allocations justified?

5.76 Is Policy GS18 sufficiently clear on the number, scale and location of new retail facilities proposed within the allocation? Are they justified and supported by evidence? Will it be effective?

5.77 Is there clear evidence that the allocation will not result in adverse effects on the strategic and local highway networks?

5.78 Are the transport measures set out in GS18(9) justified and supported by evidence?

5.79 Is Policy GS18 sufficiently clear about when the various aspects of the transport network are required by?

5.80 How will the required infrastructure be phased in relation to the development proposed and what mechanisms are there to ensure that these are provided at the right time?

5.81 Are the expectations of the indicative concept plan sufficiently mirrored in Policy GS18?

5.82 Are any potential Main Modifications necessary to Policy GS18 for soundness?

Policy GS19 – Shenley Dens Strategic City Extension

5.83 How has the overall number of homes for the allocation been identified?

5.84 Is the overall scale of housing envisaged realistic and supported by robust evidence?

5.85 Is the allocation justified in principle?

5.86 What effect would the allocation have on landscape character and the proposed Special Landscape Area? Is the policy sufficiently clear about the mitigation required to protect the character of the area and should specific reference be made to impacts on landscape outside of Milton Keynes administrative area?

5.87 Is the policy sufficiently clear on the amount of homes for older persons and specific and specialist needs housing that is expected to be developed within the allocation? Will it be effective?

5.88 Is the inclusion of 15 pitches for gypsies and travellers justified? Will they be able to come forward to meet the identified need for pitches in the timeframes envisaged?

5.89 Are the requirements for education provision, healthcare infrastructure retail, sports and leisure, green infrastructure justified and will they be viable? How will these be funded?

5.90 What quantities of green and blue infrastructure would be required to support the allocation in addition to the District Park? Is the plan sufficiently clear on the amount of such infrastructure?

5.91 Is the policy sufficiently clear on the number, scale and location of new retail facilities proposed within the allocation? Are they justified and supported by evidence? Will it be effective?

5.92 Is there clear evidence that the allocation will not result in adverse effects on the strategic and local highway networks?

5.93 Are the transport measures and requirements set out in criterion C.11 justified and supported by evidence?

5.94 Is the policy sufficiently clear about when the various aspects of the transport network are required by?

5.95 How will the required infrastructure be phased in relation to the development proposed and what mechanisms are there to ensure that these are provided at the right time?

5.96 Is the indicative concept plan in Figure 5 supported by evidence and should it be referenced in the policy?

5.97 In order to be consistent with paragraph 193(c) of the Framework, should the policy make specific reference to the protection of Ancient Woodland?

5.98 Is a specific requirement for a Written Scheme of Investigation in criterion C.13 necessary for soundness?

Policy GS20 – Western Expansion Area

5.99 What is the justification for including this policy in the submitted Plan? Has it been subject to SA, and if so, what alternative options were considered?

5.100 What is the current planning status of the site? How many homes remain on the site without Planning Permission? What amount of employment land on site remains undeveloped?

5.101 Has the site been subject to the sequential test? Are there any reasonably available sites elsewhere at lower risk of flooding?

5.102 How has the amount of land for housing and employment development on the site been identified? Is it justified and supported by evidence?

5.103 Is Policy GS20 sufficiently clear about the amount of homes that are expected to come forward on the site?

5.104 Is the level of affordable housing on the site justified? Would it be consistent with Policy HQH2? Will this be viable?

5.105 Is the Policy consistent with national policy having regard to designated heritage assets and their settings?

5.106 Does the Plan include reasoned justification to support the inclusion of Policy GS20?

Policy GS21- Milton Keynes East Strategic Urban Extension

5.107 What is the justification for including this policy in the submitted Plan? Has it been subject to SA, and if so, what alternative options were considered?

5.108 What is the current planning status of the site? How many homes remain on the site without Planning Permission? What amount of employment land on site remains undeveloped?

5.109 Is the policy overall, justified and evidence-based? Is it necessary for soundness?

Policy GS22 – South East Milton Keynes Strategic Urban Extension

5.110 What is the justification for including this policy in the submitted Plan? Has it been subject to SA, and if so, what alternative options were considered?

5.111 What is the current planning status of the site? How many homes remain on the site without Planning Permission and what progress has been made towards a planning application for the remaining homes?

5.112 Is the policy overall, justified and evidence-based? Is it necessary for soundness?

5.113 Paragraph A of the policy refers to mixed use development. Other than housing and education uses, are any other uses proposed and if so should they be referenced in the policy?

5.114 What is the relevance of the reference to 2031 in paragraph A of the policy?

5.115 Are the requirements for education provision justified and will they be viable? How will these be funded? Is there any other infrastructure required to support the allocation?

5.116 Is the inclusion of 7 pitches for gypsies and travellers justified? Will they be able to come forward to meet the identified need for pitches in the timeframes envisaged?

5.117 What is the difference between the development framework required for this site and the Framework Masterplans required for the Strategic City Extensions?

5.118 Is there clear evidence that the allocation will not result in adverse effects on the strategic and local highway networks? Should the policy include further detail on phasing of highway and access works?

5.119 Should criterion B.5 have a specific requirement for a Written Scheme of Investigation?

Policy GS23 – South Caldecott Strategic Employment Allocation

5.120 What is the justification for including this policy in the submitted Plan? Has it been subject to SA, and if so, what alternative options were considered?

5.121 What is the current planning status of the site? How much land remains without Planning Permission?

5.122 Is the policy overall, justified and evidence-based? Is it necessary for soundness?

5.123 Is there clear evidence that the allocation will not result in adverse effects on the strategic and local highway networks?

5.124 What is the difference between the development framework required for this site and the Framework Masterplans required for the Strategic City Extensions?

5.125 Should criterion C.10 have a specific reference to the consideration of impacts on the scheduled Magiovinium Roman town and have a requirement for a Written Scheme of Investigation?

Matter 6 – Central Bletchley

Issue

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

Questions

Policy CB1 - Central Bletchley

6.1 What evidence supports the deliverability and developability of 1,000 new homes in Central Bletchley and what evidence supports the range of density set out in criterion A.1?

6.2 Are the principles under paragraph A of the Policy sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

6.3 Should the plan be clear on the number of homes expected from the redevelopment of the former Wilko store, former Brunel Centre, former Sainsbury's store, Stanier Square and the former Police and Fire Station sites?

6.4 In order to be effective and consistent with national planning policy, should the policy make reference to design, tenure, historic environment and natural environment considerations associated with development in Central Bletchley?

6.5 Should the Policy include a criterion to ensure development does not conflict with or prejudice the delivery of East West Rail proposals?

6.6 Are the Council's suggested modifications (set out in Document CD28) to the reasoned justification of Policy CB1 necessary for soundness?

Matter 7 – Central Milton Keynes

Issue

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

Relevant Policies – CMK1, CMK2, CMK3

Questions

Policy CMK1 – Central Milton Keynes Development Framework Area

7.1 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?

7.2 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?

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

Policy CMK2 – Central Milton Keynes Placemaking principles

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

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

Policy CMK3 – Central Milton Keynes skyline and tall buildings strategy

7.6 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?
- b) Are the indicative building height thresholds for each area justified and supported by evidence?
- 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?
- 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?
- e) Should the requirement for proposals to follow the Exceptional Design Process be included within Policy CMK3?

Matter 8 – People Friendly and Healthy Places

Issue

Whether the approach to planning for healthy environments is justified, effective and consistent with national planning policy.

Relevant Policies – GS4, PFHP1, PFHP2, PFHP3, PFHP4, PFHP5, PFHP6, PFHP7, PFHP8, PFHP9

Questions

Policy GS4 – Strategy for people-friendly and healthy places

- 8.1 Do the requirements of Policy GS4 serve a clear purpose and avoid unnecessary duplication of policies as per paragraph 16(f) of the Framework?
- 8.2 Are the catchment distances in Table 5 justified by evidence?
- 8.3 Is the movement hierarchy set out in criterion 2 justified, effective and consistent with national planning policy?
- 8.4 Are the Council's suggested modifications to the policy in Document CD28 necessary for soundness?

Policy PFHP1 – Delivering healthier places

- 8.5 Is the requirement for all new development to accord with the Milton Keynes Healthy Place Principles justified and effective?
- 8.6 Are the thresholds for Health Impact Assessment justified and supported by evidence? Is it justified and effective for the requirement for Health Impact

Assessments to apply to housing schemes for older people and hospital developments?

8.7 What evidence justifies the restrictions on the specific uses listed in paragraph D and E of the policy and are the requirements in these paragraphs sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

Policy PFHP2 – Provision and protection of community facilities

8.8 Under criterion B.1 of the policy, how would a developer demonstrate there is no need for an alternative community use?

8.9 Is it consistent with national planning policy for the criteria under paragraph B to apply to sports facilities? Are the Council's suggested modifications in Document CD28 to this part of the policy necessary for soundness?

8.10 Is the reference to commercial viability in criterion B.4 effective, given that non-commercial facilities could also be unviable?

8.11 Is the marketing period in criterion B.4 justified by evidence and in order to be effective should further detail be provided as to how a facility should be marketed?

Policy PFHP3 – New Local Centres

8.12 Are the requirements of the policy sufficiently flexible and do they serve a clear purpose and avoid unnecessary duplication of other policies as per paragraph 16(f) of the Framework?

Policy PFHP4 – Delivering a healthier food environment

8.13 Is it justified and effective to require all development proposals to contribute to an improvement in the food environment as per paragraph A of the policy?

8.14 Should the policy be explicit on what would constitute adequate private garden space under criterion C.2.?

8.15 Do paragraphs B and D of the policy serve a clear purpose and avoid unnecessary duplication of policies as per paragraph 16(f) of the Framework?

8.16 What evidence underpins the standard of 20 allotments per 1000 households in paragraph D? What amount of land would be required for community orchards and how is this justified? Is it justified to require on-site provision for all major residential developments?

8.17 What would the level of off-site contribution towards allotments be and should this be set out in the policy?

8.18 Are the requirements for hot-food takeaways in paragraph E of the policy consistent with national planning policy and is there evidence that a concentration of such uses is having an adverse impact on health in areas described in criterion E.2? Should the restrictions apply in Central Milton Keynes?

Policy PFHP5 – Designing People Friendly Places

8.19 Where will area-based design and site-specific design codes be set out? Is it appropriate for the policy to require developments to be in accordance with such codes if they do not form part of the development plan?

8.20 Are the principles set out in Table 10 justified, effective and consistent with national planning policy?

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

8.22 Is the Council's suggested modification to the policy in Document CD28 to refer to townscape as well as landscape in criterion B.3 necessary for soundness?

Policy PFHP6 – Designing healthy streets

8.23 Is the policy sufficiently flexible to deal with site-specific circumstances and is it sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

8.24 Are the requirements for consistent building lines in criterion 5 justified and effective?

8.25 Are the Council's suggested modifications to the policy in Document CD28 necessary for soundness?

Policy PFHP7 – Well-designed buildings and spaces

8.26 Is the policy sufficiently flexible to deal with site-specific circumstances?

8.27 Does criterion A.1 duplicate requirements in Policies PFHP5 and PFHP6?

8.28 Are the Council's suggested modifications to the policy in Document CD28 necessary for soundness?

Policy PFHP8 – Tall buildings outside central Milton Keynes

8.29 Is Policy PFHP8; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) How has the threshold for tall buildings outside central Milton Keynes been derived? Is it justified and supported by evidence?

- b) Is Policy PFHP8 consistent with national policy having regard to the consideration of tall buildings on the setting of designated heritage assets?
- c) How will existing and proposed buildings of significance be identified? Is it clear how a decision-maker should respond to proposals where significance has been identified? Is the Policy sufficiently clear in this regard?
- d) Is Policy PFHP8 sufficiently clear on what the important views and vistas are in the area?

8.30 Are the Council's proposed modifications to Policy PFHP8 necessary for soundness?

Policy PFHP9 – Amenity for healthy buildings and spaces

8.31 Is Policy PFHP9; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Is the reasoned justification to Policy PFHP9 sufficiently clear when additional surveys will be sought by the Council?
- b) Is Policy PFHP9 sufficiently clear as to how the acceptability of external space will be considered?
- c) Is the requirement for all new homes to meet the Nationally Described Space Standards justified and supported by evidence? Will it be viable?
- d) Are the Council's proposed modifications to Policy PFHP9 necessary for soundness?

Matter 9 – The approach to climate, biodiversity, sustainable construction and heritage

Issue

Whether the approach to policies for climate, biodiversity, sustainable construction and heritage is justified, effective and consistent with national policy.

Relevant Policies – GS7, CEA1, CEA2, CEA3, CEA4, CEA5, CEA6, CEA7, CEA8, CEA9, CEA10, CEA11, CEA12, CEA13, CEA14. CEA15, HE1

Questions

Policy GS7 – Wind and solar development spatial strategy and CEA6 – Low and zero carbon energy provision

9.1 Are the 'preferred areas' for solar and wind development as designated in Policy GS7 justified and supported by the evidence base?

9.2 Noting paragraph 008 of the Planning Practice Guidance on renewable and low carbon energy, are the 'preferred areas' consistent with national planning policy given they have excluded areas within buffer zones around residential dwellings?

9.3 Should the 'Special Landscape Areas' defined by Policy CEA12 be excluded from the 'preferred areas' for wind and solar?

9.4 What is the intended policy effect of the 'preferred areas'. Is it sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals within and outside of 'preferred areas'. How do the 'preferred areas' relate to criteria A and B in Policy CEA6?

9.5 Would it be effective for Policy GS7 to cross-reference Policy CEA6?

9.6 Is criterion D of Policy GS7 sufficiently clear so it is evident how a decision maker should react to development proposals for solar panels on car parks and other buildings – are there other requirements which might be relevant?

9.7 Are the requirements relating to community engagement and benefits for local people, as set out in paragraph 73 of the supporting text, consistent with national planning policy and, if so, should they be incorporated into the policy wording in order to be effective?

9.8 Are the criteria in Policies GS7 and CEA6 comprehensive and should the policies cross-reference other policies in the plan, for example Policy CEA12?

9.9 In order to be effective, should the policy make reference to the safeguarding of energy transmission infrastructure in the 'preferred areas'? Is the Council's suggested modification in Document CD28 to paragraph C of Policy GS7 necessary for soundness?

9.10 Are the requirements in paragraph C of Policy CEA6 justified, effective and consistent with national planning policy? Are the Council's suggested modifications in Document CD28 to paragraph C of Policy CEA6 necessary for soundness?

Policy CEA1 – Sustainable Buildings

9.11 Are the requirements of criteria A and B of the policy sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

9.12 Do the requirements of the policy which require energy efficiency standards which go beyond Building Regulations have a well-reasoned and robustly costed rationale which ensures that development remains viable and the impact on housing supply and affordability is considered in accordance with the Framework? How do the targets relate to the new Building Regulation requirements for energy efficiency which are due to have effect from March 2027?

9.13 Are the targets for whole lifecycle carbon emissions justified by the evidence, effective and consistent with national planning policy?

9.14 Are the requirements for 25% of electricity demand to come from on-site low/zero carbon generation in addition to the reduction in target emission rates in criteria C.1.a and C.2.a. If so is this approach justified and consistent with national planning policy?

9.15 For effectiveness, should the policy be clear how the requirements will apply to industrial development, warehousing, schools, not-for-profit organisations and local community halls and meeting places?

9.16 What is the level of financial contribution for the Carbon Offset Fund, is it justified and should the amount of financial contribution for the Carbon Offset Fund be set out in the policy?

9.17 Is it effective and practical to require monitoring of building performance?

9.18 Would the requirements in criterion F of the policy apply to all developments or just those where criterion C is relevant? Is the threshold justified? How will developers demonstrate compliance?

Policy CEA2 – Green roofs and walls

9.19 Is the policy effective and sufficiently flexible and are the requirements for green roofs and walls within the policy justified by the Plan's viability evidence?

Policy CEA3 – Resilient Design

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

9.21 Is it appropriate for the policy to require compliance with the CIBSE KS17 methodology and the Sustainable Construction SPD (or successor) given that these documents do not form part of the development plan?

Policy CEA4 – Retrofitting

9.22 Is criterion A of the policy sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

9.23 Is it necessary for soundness for the policy to reference climate change adaptation?

Policy CEA5 – Water Efficiency

9.24 Is the requirement for new residential development to achieve a water efficiency standard of 93 litres per person per day justified by evidence and consistent with national planning policy?

- 9.25 Are the BREEAM requirements for non-residential developments and the requirements of criterion C of the policy justified by the evidence and viable?
- 9.26 Should the requirement for a completion certificate be included in the policy?
- 9.27 Is there unnecessary repetition in the policy with regard to criteria C1 and C4?

Policy CEA7 – Mitigating wider environmental pollution

- 9.28 Are the requirements in the policy sufficiently detailed, clear and unambiguous so it is evident how a decision maker should react to development proposals?
- 9.29 Is it justified and proportionate for a lighting assessment to apply to all forms and scales of development in all areas?
- 9.30 In order to be effective is it necessary to make reference to the historic environment in paragraph A of the policy?
- 9.31 Is the policy consistent with national planning policy with regard to matters relating to noise?
- 9.32 Should paragraph M of the policy only relate to major developments and does the evidence base indicate that nutrient neutrality may be necessary during the plan period?
- 9.33 Are the Council's suggested modifications to the policy in Document CD28 necessary for soundness?

Policy CEA8 – Provision and protection of accessible open space

- 9.34 Are the standards set out in Annex B and C clear, justified and viable? What would be the level of contribution for off-site open space? Should this be referenced in the plan for each type of open space? Have the requirements for both onsite and offsite open space been robustly tested in the viability study?
- 9.35 Is the policy clear on what scale of residential development would be expected to provide open space onsite?
- 9.36 Is paragraph C of the policy sufficiently flexible to deal with multi-phased developments?
- 9.37 Is the criteria in paragraph D and E of the policy consistent with paragraph 104 of the Framework and should there be reference to the heritage value of open spaces? Is there unnecessary repetition between paragraph D and F and should the Playing Pitch Strategy be more explicitly referred to in the assessment of need and surplus?
- 9.38 How does the criteria in paragraph G relate to that in paragraph D with regard to the loss of open space to leisure, recreational or ancillary features? Is criterion 4 consistent with national planning policy on flood risk and Policy CEA15?

9.39 Should the policy make clear that Linear Parks are identified on the Policies Map and are the boundaries and extent of the Linear Parks as shown on the Policies Map justified?

Policy CEA9 – Biodiversity and habitats network

9.40 Is the policy justified and consistent with national policy and does it serve a clear purpose? Is it sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

9.41 Is the suggested modification to paragraph B of the policy by the Council in Document CD28 necessary for soundness?

Policy CEA10 – Protection and enhancement of the environmental infrastructure network, priority species and priority habitats

9.42 Wildlife Corridors are shown on the policies map under this policy, are they the same as the Nature, Green and Blue Infrastructure network referred to in paragraph A and if not should this network be shown on the Policies Map? Is the extent of the corridors justified by evidence?

9.43 Is it appropriate for the policy to require development proposals to be in line with the Nature, Green and Blue Infrastructure Strategy when it does not form part of the development plan?

9.44 Are paragraphs B,C,G and H consistent with national planning policy and do they serve a clear purpose and avoid unnecessary duplication of policies as per paragraph 16(f) of the Framework?

9.45 What is the justification for the 300 home threshold in paragraph I of the Policy? Are the requirements of paragraph I consistent with national planning policy and do they serve a clear purpose and avoid unnecessary duplication of policies as per paragraph 16(f) of the Framework?

Policy CEA11 - Urban greening, trees and woodland

9.46 Are the requirements for the Urban Greening Factor, Urban Tree Canopy Cover standard and woodland creation and protection sufficiently flexible, justified by robust evidence, and viable?

9.47 Should the level of financial contribution for off-site woodland creation be specified in the policy?

9.48 Should the policy be clear whether the requirements of this policy are in addition or would form part of the statutory requirements of biodiversity net gain?

9.49 Is the Council's suggested change in Document CD28 to paragraph 330 of the supporting text necessary for soundness and if so, should this be in the policy?

Policy CEA12 – Conserving and enhancing landscape character/ special landscape areas

9.50 Taking each of the criteria of Policy CEA12 in turn, is the Policy justified and effective?

9.51 Is there clear evidence to justify the principle and location of the Special Landscape Areas? Does the approach accord with the Framework and Paragraph 037 of the Planning Practice Guidance?

Policy CEA13 – Sustainable Drainage Systems and integrated flood risk and water management

9.52 Is Policy CEA13's requirement for proposals to result in measurable change to adopt an integrated approach to managing flood risk justified? Would it be effective if cumulative effects from smaller changes were identified?

9.53 Is Policy CEA13 sufficiently clear regarding design standards that SUDS are expected to be developed to?

9.54 Are the proposed changes to Policy CEA13 necessary for soundness?

Policy CEA14 – Protecting and enhancing watercourses

9.55 Taking each of the criteria in Policy CEA14 in turn, are they justified, effective and consistent with national policy?

9.56 Is the approach to buffer zones from watercourses justified and supported by evidence? Will it be effective?

9.57 Is the Council's suggested modification to Policy CEA14, as set out in Document CD28, necessary for soundness?

Policy CEA15 - Managing Flood Risk

9.58 Is Policy CEA15 justified, effective and consistent with national policy?

Responses should specifically address the following:

a) Is criterion B sufficiently clear to decision-makers as to how it will be applied?

b) Whether the approach to the sequential test is consistent with national policy insofar as it relates to the site allocations in the plan?

9.59 Are the Council's proposed modifications to Policy CEA15, as set out in Document CD28, necessary for soundness?

Policy HE1 – Heritage

9.60 Is Policy HE1 justified, effective and consistent with national policy? Responses should give specific regard to the following:

- a) Is criterion A consistent with the Framework insofar as it relates to the setting of heritage assets?
- b) Is criterion B justified where minor works may not require necessarily require a structural engineers report?
- c) Is the requirement in criterion D for schemes that would replace a non-designated heritage asset to be of greater architectural value justified?

9.61 Are the Council's proposed modifications to Policy HE1 and the reasoned justification, as set out in Document CD28, necessary for soundness?

Matter 10 – Infrastructure and Transport

Issue

Whether the approach to infrastructure and the policies for Infrastructure First and movement and access are justified, effective and consistent with national policy

Relevant Policies – INF1, INF2, GS10

Questions

Infrastructure overall

10.1 Does the Plan's strategy and strategic site allocations rely on critical infrastructure which must be in place prior to the delivery of new homes and employment development? Noting the Council's response to Question 2 of our Initial Questions (Document MKC1), is the categorisation of infrastructure in the IDP (Document INFR06) justified?

10.2 Will there be sufficient funding available to deliver the infrastructure necessary to support the development proposed in the Plan?

10.3 Does the plan clearly set out the requirements for infrastructure including, transport, telecommunications, security, water supply, wastewater, flood risk, health, education and cultural infrastructure and energy as required by paragraph 20 of the Framework?

10.4 What are the likely impacts of the proposed scale and distribution of development on existing infrastructure?

10.5 Is the Plan sufficiently clear on where the Milton Keynes Tariff will be used to deliver infrastructure and where bespoke section 106 agreements will be used to secure the provision of infrastructure? What is the policy basis for charging the Milton Keynes Tariff and where is the detail of the Tariff intended to be set out?

Policy INF1 – Infrastructure First Principles

10.6 Is the policy sufficiently flexible to deal with changing circumstances?

10.7 Should the policy be clearer on the specific requirements for strategic site allocations and how infrastructure will be delivered where there is a need shared infrastructure across more than one allocation? Is the Council's suggested modification to paragraph A of the policy as set out in Document CD28 necessary for soundness?

10.8 Are the infrastructure planning benchmarks set out in Annex F justified and informed by the evidence base?

10.9 Is the policy sufficiently clear and unambiguous and is it internally consistent, particularly with regard to criteria A and C?

10.10 Is it necessary for the policy to make reference to safeguarding existing infrastructure in order to be effective and consistent with national planning policy?

10.11 Should the policy make reference to the implications of cross-boundary infrastructure needs in order to be effective?

10.12 Are the Council's other suggested modifications to the policy as set out in Document CD28 necessary for soundness?

Policy INF2 - Infrastructure Planning and delivery principles for strategic allocations

10.13 Is the policy effective and consistent with national planning policy particularly with regard to the scenario where a Framework Agreement cannot be secured? Are the Council's suggested modifications in Document CD28 necessary for soundness?

Policy GS10 – Movement and Access

10.14 Should the policy make reference to the cumulative and cross-boundary implications of growth on the transport network and would it be effective?

10.15 Are the requirements of paragraph A of the policy consistent with national planning policy and do they serve a clear purpose and avoid unnecessary duplication of policies as per paragraph 16(f) of the Framework?

10.16 Are the criteria listed under paragraph B of the policy sufficiently clear and flexible and is there repetition within the criteria?

10.17 Are the parking standards in Annex D justified by evidence and consistent with national planning policy? Are the standards expressed as a minimum or maximum?

10.18 Is paragraph I of the policy sufficiently clear, and under what circumstances would lorry parking be appropriate in the Open Countryside?

10.19 Is it necessary for reference be made to enhancement of canals and associated towpaths within the policy in order for the policy to be sound?

10.20 In order to be effective, should the policy or another part of the Plan ensure safeguarding of rail infrastructure?

10.21 Are the Council's suggested modifications to the policy in Document CD28 necessary for soundness?

Matter 11 – Viability

Issue

Whether the cumulative effect of the Local Plan's policies would result in the overall strategy being viable

Questions

Viability overall

11.1 Is the Council's viability evidence proportionate and up-to-date having regard to relevant national policy and guidance, and has it taken full account of and influenced the policy requirements of the Plan?

11.2 Is there any clear evidence that the policy requirements of the Plan would affect the viability or deliverability of proposed site allocations or that any further changes are required to achieve soundness in those respects?

11.3 Are the requirements for contributions towards any key supporting infrastructure clearly set out in the Plan?

11.4 Does the Plan's housing mix and affordable housing percentages mirror the values tested in the Whole Plan Viability Assessment?

11.5 Is the affordable housing percentage in viability area 1 justified, having particular regard to the viability of the Strategic City extensions?

11.6 Overall, do the submitted policies clearly set out the contributions expected from development along with other infrastructure, and would these cumulatively not undermine the deliverability of the Plan?

Matter 12 - The supply and delivery of housing land

Issue

Whether the approach towards the supply and delivery of housing land is positively prepared, justified, effective and consistent with national policy.

Questions

Overall Supply

12.1 The Council's response to our Initial Questions (Document MKC1) indicates that housing supply at the most recent monitoring year is forecast as 50,390 dwellings. However, topic paper TP06 indicates that the supply would be 50,287. What is the justification for the difference?

12.2 What is the estimated total supply of new housing over the Plan period and how has this been determined?

12.3 What is the estimated supply from existing site allocations, proposed site allocations, existing planning permissions, other commitments (e.g. sites with resolution to grant planning permission subject to completion of planning obligations), together with other sources of supply such as broad locations, the new settlement and windfalls for the Plan period?

12.4 What informed the assumptions about the scale and timing of supply in relation to build-out rates and lead-in times from those various sources? Are the assumptions and estimates realistic and based upon up-to-date evidence?

12.5 Does the housing supply include any other sites which should not be considered developable during the Plan period?

12.6 Is there any evidence of previous allocations or planning permissions not being brought forward or delivered in a timely manner which justifies a lapse rate to be applied to the housing trajectory?

5 year housing supply

12.7 What is the requirement for the first five years following the anticipated adoption of the plan and what buffer should be applied?

12.8 What is the estimated total supply of specific deliverable sites for this period?

12.9 What is the estimated supply from each source for this?

12.10 What is the evidence to support this and are the estimates justified?

12.11 Is there any clear evidence that sites within the supply should not be considered deliverable within 5-years?

6-10 and 11-15 year land supply

12.12 What is the estimated total supply of specific developable sites or broad locations for growth for years 6-10 and 11-15?

12.13 What is the estimated supply from each source for this?

12.14 What is the evidence to support this and are the estimates justified?

Other

12.15 Is the windfall allowance justified?

12.16 Does the plan provide sufficient flexibility if any key sites do not come forward as anticipated?

12.17 Overall, would at least 10% of the housing requirement/target be met on sites no larger than one hectare?

Matter 13 - Monitoring

Issue

Whether the Plan would be able to be monitored effectively to ensure timely delivery of its proposals and allocations.

Questions

13.1 How would the implementation of the Plan be monitored? Would it be effective? How would the results of monitoring be acted upon?

13.2 What mechanisms are there to assist development sites to come forward/progress?

13.3 If a new Town was confirmed during the plan period, should the Plan include any specific indicators or triggers to reflect this possibility?

End.