



Economic and Cultural Prosperity.



MK City Plan 2050
Topic Paper



July 2024
Regulation 18 Version

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Purpose of this Topic Paper

- 1.1 **This topic paper has been prepared to explain the approach we want to take in the MK City Plan 2050 and why. Whilst each of the individual topic papers we have prepared can be read in isolation, there are many linkages between them and the issues and opportunities they cover.**
- 1.2 The suite of topic papers will evolve through the plan-making process as we gather further evidence and receive feedback through engagement and consultation. The topic papers set out the more detailed justification for policies in the MK City Plan 2050, allowing the Plan itself to be a shorter, user-friendly document.
- 1.3 In this paper, our focus is upon the key economic and cultural challenges and drivers for change that Milton Keynes is facing in this area, and explaining our proposed policy approach to support investment, the creation of high-quality jobs and enhancing our cultural heritage and prosperity.

Background

Economy and Employment

- 2.1 **Milton Keynes is one of the most successful local economies within the UK and one of the fastest growing areas in the UK both in terms of population and jobs. By comparison with other cities Milton Keynes scores highly on factors such as on business start-ups per 10,000 population, innovation, and job creation.**
- 2.2 In the decade from 2012 to 2022, job numbers increased by 32,000 (19.7%) to 194,000 jobs in 2022. Milton Keynes has more jobs than its working-age population providing residents with opportunities to access a wide range of jobs. Milton Keynes experiences net in-commuting as more people commuted into the area to work than out. However, travel data shows car and taxi travel was 12% lower and the number of rail passengers using Milton Keynes Central Station was 36% lower in 2022 than in 2019, this is likely a response to changing working patterns.
- 2.3 As one of the largest settlements in the Southeast of England outside London, the city is of national economic importance, with an economy worth £16.2bn in 2022, larger than the city of Cardiff. Most jobs in Milton Keynes are service sector jobs many of which are in the knowledge economy. With a high proportion of private sector to public sector jobs (3.5 to 1) MK is less



dependent on the public sector than other areas and more resilient to downturns in public expenditure.

- 2.4 With around 30,000 employee jobs in 2022, the Wholesale and Retail trade is the largest sector in the local economy, making up 16.7% of jobsⁱ. Other major sectors of the local economy by jobs include Education 18,000 jobs (10%), Transportation and Storage, called Warehousing and/or Logistics throughout this report with 17,000 jobs (9.4%), Health and Social Work 17,000 jobs (9.4%), Administrative and Support Service Activities with 15,000 jobs (8.3%), Professional, Scientific and Technical Activities 14,000 jobs (7.8%) and Information and Communications 12,000 6.7%.



2.5 Sectors of the local economy, which Milton Keynes is specialised in (with a higher percentage of people employed locally than in Great Britain) include the Wholesale and Retail trade, Education, Logistics, Information and Communications, Financial and Insurance activities, Real Estate activities and Arts, Entertainment and Recreation.

- 2.6 With around 18 million people living within a 90-minute drive time of Milton Keynes. Milton Keynes is a popular location for warehousing and logistics reflecting its excellent location, transport access to the M1 corridor and availability of large-scale sites to accommodate warehousing. However, in the future opportunities for the further growth of warehousing in Milton Keynes are diminishing due to the lack of suitable land to accommodate the specific needs of this sector. The wider Southeast Midlands area of Milton Keynes, Bedfordshire and Northamptonshire has a significant warehousing and logistics sector, which is subject to considerable activity. The speed with which consumers switched to on-line retail (often at the expense of more traditional ‘bricks and mortar’ retailers) and wider changes in supply chains have made warehousing and logistics the most dynamic part of the commercial property market. Demand for large scale units has been extremely high, although demand is currently below its peak. The logistics industry has exhibited rapid growth in recent years with many large warehouses constructed within the city. With 9.4% of all employee jobs in Milton Keynes, employment within the logistics industry is significantly higher than the GB average of 5%.

- 2.7 Milton Keynes specialisation in Information and Communications reflects its strength in computer consultancy activities. The historic site of Bletchley Park in the city is widely regarded as one of the birthplaces of computer science and was the venue for the world’s first Artificial Intelligence (AI) Safety Summit in November 2023. Milton Keynes has several national and international companies involved in



financial and insurance activities, many of which are located within offices in the city centre. As demonstrated by Santander who have constructed their new UK headquarters (Unity Place) in the city centre by Milton Keynes Central Station, which hosts their European data science centre.

2.8 Apart from Santander other major employers within Milton Keynes include Network Rail, the Open University, the National Health Service, and the British Standard Institute. Other well-known names within the area include Aston Martin, Marshall, Mercedes-Benz and the Red Bull Racing Formula One team.

2.9 The City Council has a current focus on Technology, Digital, and Creative Industries as sectors, and has recently adopted its first five year 'Milton Keynes City Technology Smart City Digital and Creative Industries Strategy 2024-2029 aiming to achieve a world class reputation across these sectors. Already, as many as one in every three jobs in the cityⁱⁱ are estimated to be in technology, and the creative industries sector has experienced rapid growth in the past ten years. In the technology sector, focusses on data science, artificial intelligence, and high-performance engineering are emerging.



**MK has a high
start up rate**

**In 2023, 89% of
all businesses
had nine
employees or less**

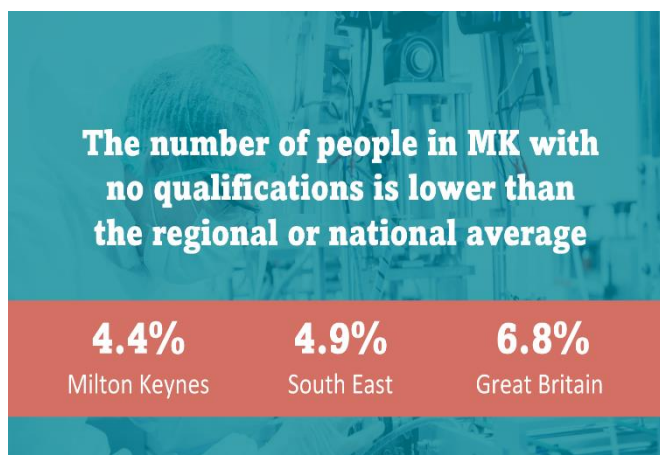
2.10 The City Council strategy sets an ambition for a technology, design, and innovation quarter within Central Milton Keynes to establish a physical home for the tech sector within the city. The city is already recognised as a leading UK Smart City, with its unique design allowing the city to be used as an urban testbed for innovative technologies, including connected and autonomous vehicles, drone deliveries, and advanced communications. A unique technological feature of Milton Keynes is its Starship robot delivery service which has been operating since April 2018.

2.11 The Council's refreshed Creative and Cultural Strategy 2018-2027 also focuses on developing the city's cultural sector including the arts and heritage sectors and creative industries.

2.12 The city's location – located halfway between London and Birmingham and between Oxford and Cambridge – is one of its core strengths. Another is its good connectivity to the rest of the UK by road along key transport corridors, with the M1, A421 and A5 all running through or by the city, and by rail via the West Coast mainline – which enables passenger to travel to central London within 35 minutes and direct connections to many other major British cities. East-West links will improve in the future with rail services from Oxford to Bletchley and CMK commencing in 2025 and passenger services running to Cambridge expected to be delivered in the mid-2030s. London Luton airport is the nearest international airport to Milton Keynes with Heathrow and Birmingham International airports within an approximate 60-minute drive time of Milton Keynes.

2.13 The combination of fantastic connections and a strong economy has made Milton Keynes a popular destination for people to live, work and visit. Despite having one of the highest levels of housing growth in the country, Milton Keynes continues to experience housing pressures and high house price growth. Those working in Milton Keynes also typically earn more than those living in Milton Keynes, which suggests that some residents are unable to benefit from living in an economically prosperous city.

2.14 The availability of skills is one of the key drivers and inhibitors of economic growth. Businesses in Milton Keynes frequently raise the lack of skills as of one their largest challenges, with 45% of businesses in the SEMLEP Business Survey 2023 reporting difficulty recruiting the right skills (down from 54% in 2021). At 4.7% in 2023, the number of people in Milton Keynes with no qualifications is now lower than that in the Southeast 5.1% or in Great Britain 6.5%.



2.15 To mitigate the impact of labour and skills shortages and encourage sustainable growth, the development of institutions that create the skills to meet the needs of local employers must be a priority. Despite being home to the world-renowned Open University, the city is the largest in Britain with no residential undergraduate university, which has implications for both skills' development and for the Milton Keynes economy itself. Many young people leave Milton Keynes to go to university never to return. The lack of a residential undergraduate university in the city is a major weakness, that the MK City Plan 2050 seeks to address. A dedicated residential university would support the development of a skills pipeline (from Further Education through to Post-Graduate) and complement the South-Central Institute of Technology offer on digital skills at MK College in Bletchley. Proposals for a residential university in CMK are detailed in the CMK Topic paper.

2.16 The Local Skills Improvement Plan approved by the Secretary of State for Education and prepared by a consortium of further education providers, businesses, local leaders, and other key stakeholders details several actions to improve skills and training across the Milton Keynes, Bedfordshire, and Northamptonshire area. Key priorities in the Improvement Plan include Green Skills, improving understanding and communication between employers and training providers and tackling the Digital skills gap.

2.17 Milton Keynes has a high start-up rate for new businesses and most businesses in Milton Keynes are micro-businesses employing nine employees or less. In 2023 there were 10,950 of them making micro-businesses, 89% of all businesses in Milton Keynes. Although hybrid working has increased, the number of micro-businesses in Milton Keynes emphasises the importance of maintaining a supply of affordable business space and start-up accommodation to meet future business needs.

2.18 Throughout this paper references to employment uses refers to 'traditional employment uses' e.g. Use classes E (g) (i-iii) including offices, research and development facilities, and light industry and use class B2 for General Industrial use and use class B8 for warehousing/storage and distribution use.

Retail and Leisure

- 2.19 When Milton Keynes was designated as a New Town in 1967, the main shopping centres were Bletchley, Wolverton, and Stony Stratford. Outside the New Town designated area several historic towns such as Newport Pagnell, Olney, and Woburn Sands catered for the shopping needs of the rural population. In developing the city, the Milton Keynes Development Corporation aimed to provide a wide range of shops and make them accessible to give residents maximum choice.
- 2.20 Their approach to retail provision within the city combined concentration in CMK as a shopping destination with dispersal of local shops to be within 500 metres of most new dwellings. Shops, services, and community facilities such as meeting places were provided in new residential areas to cater for the needs generated by the population. Provision for the sale of bulky comparison (non-food) goods in large retail warehouse units is focused in areas of the city such as Rooksley, Winterhill, Elder Gate in CMK, and MK1/Denbigh North in Bletchley.
- 2.21 The shopping offer of the city centre is dominated by two adjacent shopping centres, The Centre:MK (a grade II listed building) anchored by such well-known stores as Marks & Spencer, Primark and John Lewis and the shopping centre of Midsummer Place. As regional shopping destinations, these shopping centres cater not only for Milton Keynes residents but draw visitors from a wide catchment area. The Primary Shopping Area (PSA) of the city centre defined on the policies map stretches between Saxon and Marlborough Gate and Silbury and Avebury Boulevard. CMK is also the principal leisure and entertainment centre within the city. Town centres are more than just shopping destinations, leisure and cultural attractions form a key part of their 'offer' and attractiveness. Cafes, restaurants, community, and service uses, and the nighttime economy play an increasing part in the vibrancy of these centres.
- 2.22 The approach of the Council has followed that of the former Development Corporation, in line with national policy, main town centre uses such as shops, leisure and entertainment facilities have been developed within town centres such as CMK. Land has been set aside in new residential areas for the development of local shops and services. Housing has been designed to be near to shops and services to facilitate walking and cycling.
- 2.23 The Council and its partners are seeking to regenerate older town centres such as Wolverton and Bletchley. In Wolverton, the former Agora building has been demolished and the site is being redeveloped for a mixed-use scheme. A bid for Bletchley and Fenny Stratford to the Government's Town fund was successful resulting in the award of £22.7 million for various initiatives in the town. Policy CB1 (Supporting investment in Central Bletchley) in the MK City Plan details various proposals for improvements and the development of sites within the Central Bletchley area including Bletchley Town Centre.
- 2.24 Leisure, entertainment, and cultural activities are not only important in themselves but also as major generators of economic activity. They form part of the 'offer' of the area helping to retain and attract the skilled workers needed to drive forward the growth and development of the local economy.

- 2.25 Uses such as retail, leisure health education also generate jobs and many people work at home. Retail development is usually class E(a) but some forms of retail development are in a different use class. Shops not exceeding 280 square metres selling essential goods are in class F2(a) and retail warehouses are sui generis- in a class of their own.

Tourism

- 2.26 One of the priorities of the Council is to increase visitor and tourist numbers. Since 2018 the number of hotel bedspaces and hotels in Milton Keynes has increased significantly growing to 4,010 bedspaces in 46 hotels in 2023. In terms of quality most rooms are within budget hotels followed by 3-star and 4-star hotels, and a small number of rooms are in apartment-hotels. There is currently no 5-star hotel within the Council area.
- 2.27 Most available hotel rooms are located within CMK or within a one-mile radius of a defined centre. The number of rooms available in out-of-town locations is small, and very few are within Town and District centres. Occupancy is currently at 68.5%, below the national average and has not yet reached the occupancy rates achieved pre-Covid.
- 2.28 A Tourism Strategy for Milton Keynes is currently being co-produced between the City Council and Destination Milton Keynes, the City's destination management organisation. The city already attracts in significant business tourism and is aiming to increasing it and to establish Milton Keynes as a destination to visit.



- 2.29 Among our many attractions are Xscape (with indoor skiing, bowling, a casino, and cinema) an ice rink Planet Ice, the Milton Keynes Theatre, Stadium MK, and the National Bowl. The area has many museums and galleries, including Bletchley Park (which includes the National Museum of Computing), the Cowper and Newton Museum in Olney and the Milton Keynes Gallery in CMK.

- 2.30 The city is also home to the MK Dons football and the MK Lightning ice hockey teams. The recent announcement by Universal Studios that they are exploring opening a theme park in neighbouring Bedford Borough will bring increasing numbers of tourists to the local area. Other nearby attractions include Silverstone, Woburn Safari Park, and Center Parcs Woburn Forest.

Culture and Heritage

- 2.31 Milton Keynes has a rich, diverse, and varied cultural offer including a wealth of cultural organisations and venues including world-class contemporary art galleries, museums, theatres, heritage sites, performance, dance spaces and music venues, community arts centres & facilities, artist's studios, and workshops.

2.32 These leisure and cultural assets, along with the city's public spaces (such as our generous parks and open spaces and large city centre boulevards) lend themselves to hosting a range of local, national, and international events attracting thousands of visitors to the city annually. Milton Keynes has built a global reputation and audience, which continues to grow and diversify.

2.33 The Council's updated Creative and Cultural Strategy 2018 – 2027, reflects the ambitions and aspirations of this thriving, growing and increasingly diverse city. These new strategic priorities set out a commitment:

- To support the city's children and young people gain access to culture and find employment opportunities within the sector.
- To offer ongoing support to the city's cultural organisations and to diversify the cultural offer, taking full advantage of the opportunities that new technologies bring to reach and engage new audiences.

2.34 Public art commissioning has always been part of Milton Keynes' DNA and the city continues to deliver an ambitious and pioneering programme of public art projects, commissions, and programmes. The city currently has five Arts Council England National Portfolio Organisations and has attracted significant investment from external funders such as the National Lottery Heritage Fund, as well as continued and increased support from Milton Keynes City Council.

2.35 Milton Keynes has a rich heritage encompassing historic market and coaching towns, significant archaeology and one of the country's earliest railway towns at Wolverton. The codebreaking undertaken at Bletchley Park helped end WW2. Stony Stratford is mentioned in Shakespeare's play Richard III as it was where Edward V, one of the 'Princes in the Tower'



was captured. Olney is where the hymn Amazing Grace was written. Heritage features in Milton Keynes include over 1,100 listed buildings, 50 scheduled ancient monuments, 27 conservation areas and 5 registered park and gardens. Other heritage assets include assets on the MK New Town Heritage Register, non-designated heritage assets identified in neighbourhood plans and other local lists and other places, spaces, structures, and features which may not be formally designated but are considered to meet the definition of 'heritage assets' as defined in Annex 2 of the National Planning Policy Framework (NPPF). Further details about Milton Keynes heritage appear in Milton Keynes successful application for City status, detailed in Appendix A.

2.36 Milton Keynes is internationally renowned for being a New Town and the largest planned new settlement ever constructed within the UK. It is also celebrated for being 'Better by Design' which has contributed to its economic and cultural prosperity. The city's 'grid and

green' design heritage is extensive and best epitomised by its city centre, Central Milton Keynes, given its set-piece modernist buildings, infrastructure, and landscaping. Through its green framework design, the city uniquely unifies a diverse variety of settlements so that they form a fundamental part of the city's identity. Public art is an important part of the city's landscape, with residents and businesses given the opportunity to support the creation of over 270 artworks which have contributed to the city's character.

Strategy for 2050

- 3.1 **In January 2021, the Council adopted 'The Strategy for 2050'. Although the Strategy is not a statutory planning document, it is a pivotal document that sets out a long-term approach to spatial development and has been informed by a suite of evidence base studies and extensive stakeholder engagement.**
- 3.2 The Strategy for 2050, sets out a bold and ambitious vision for Milton Keynes over the next 28 years. The city plan builds on the objectives and aspirations for growth in the Strategy and the current Local Plan for Milton Keynes, Plan:MK. The Strategy for 2050 has seven big ambitions, three of which relate to this topic paper, as below.
- 1) Make Milton Keynes a Leading Green and Cultural City– by global standards!
 - 2) Provide Jobs for everyone by supporting our businesses and attracting new ones.
 - 3) Offer better opportunities for everyone to learn and develop their skills.

Objectives from the MK City Plan 2050

- 4.1 **The Ambition and Objectives document contains a positive ambition and set of objectives to provide a focus to the MK City Plan 2050 and shape the spatial strategy and policies that will guide the growth of the city up to 2050. It provides a framework for addressing housing needs and other economic, social, and environmental priorities and a platform for local people to shape their surroundings.**

- 4.2 Public consultation on the New City Plan Ambition and Objectives document took place between 31 January and 16 March 2023. This consultation was undertaken to ensure communities and stakeholders were involved at an early stage in setting the direction and scope of the NCP, before a single planning policy had been written. Following public consultation and ongoing engagement and discussion, the objectives of the Economic and Cultural Prosperity theme in the MK City Plan 2050 are now the following:

Economic and Cultural Prosperity

Objective 12 Enable better access to education, skills and training, and economic opportunities to strengthen our regional and national economic role, with Central Milton Keynes at the heart of a diverse and resilient economy.

Objective 13 Conserve our unique heritage and provide a greater diversity of places where culture can be produced and enjoyed strengthening our role as a national and international centre of cultural and creative significance.

Objective 14 Support the maintenance and creation of thriving high streets and centres for leisure.

Results from Engagement

- 5.1 **The New City Plan Ambition and Objectives and Sustainability Appraisal Scoping Report was published for public consultation between 31 January and 16 March 2023. The main issues raised in response to public consultation on the document in relation to Economic and Cultural Prosperity were:**

- Overall support for an ambitious economic strategy and for new employment and economic growth
 - Milton Keynes position in the sub-region should be given more emphasis.
 - Need to consider updating existing employment sites.
 - Need to consider link between employment and housing growth.
- Some specific suggestions on the design of new employment sites

Challenges and Drivers for Change

- 6.1 **The objectives for economic and cultural prosperity detailed in section 3 above will be achieved in a variety of ways in the MK City Plan 2050. They will be informed by the evidence and guided by our overall strategy and national policy. This section explores the key challenges and drivers for change.**

Economy and Employment

A. Growth in the Number of Workers and Jobs

- 6.2 The Council's Housing and Economic Development Needs Assessment (HEDNA) report provides evidence about future housing and employment needs in Milton Keynes over the plan period 2022-2050. The report also contains forecasts on the increases in the number of workers and jobs in the area over this period. Under the assumptions in scenario 2b of the HEDNA report, if the number of dwellings in Milton Keynes increases by 1902 dwellings per annum, over the period 2022-2050, growth in the number of workers (the economically active population) is forecast to increase by 49,100 and the number of jobs is forecast to grow by 61,700.
- 6.3 If, however, the delivery of dwellings is higher at 2,265 per annum (HEDNA scenario 3) to achieve a local population of around 410,000 in the area by 2050. Growth in the number of workers will increase by 63,100 and the number of jobs will grow by 79,400. Under scenarios 2b and 3 jobs growth of 61,700 and 79,400 would mean around 2,200 to 2,800 jobs per annum would be created over the plan period. In both scenarios 2b and 3 forecast growth in the number of jobs is greater than the increase in the number of workers. The implication of these figures, if realised is that over the plan period Milton Keynes will as now, continue to have a 'surplus' of jobs, with more jobs available than its working-age population, providing residents with additional opportunities to access a wide range of jobs.
- 6.4 The HEDNA report contains two sets of job forecasts one based on the housing figures described above and the other based on economic scenarios of forecasted jobs growth. There is a close alignment between the two sets of forecasts. Scenarios 2b and 3 forecast jobs growth of 2,200 to 2,800 jobs per annum, the middle and higher economic scenarios (figure 118 of the HEDNA report) forecast jobs growth of 2,100 and 2,700 over the same period. Figures on the number of jobs produced by both sets of forecasts is close to the 'historic' rate of jobs growth achieved in Milton Keynes. From 2000 to 2022, the Office of National Statistics (ONS) estimate the number of jobs in Milton Keynes grew by 58,000 or around 2,640 jobs per annum.



B. Growth Sectors in the Local Economy

- 6.5 The authors of the HEDNA report expect around 33% to 40% of future employment growth will come from 'traditional employment uses' such as offices and warehousing. A large proportion of future employment growth will occur in other sectors of the economy such as retail, leisure, health, education, and other services as well as homeworking and itinerant (travelling) jobs.

Table 1: Growth sectors in the local economy 2022-2050

Highest Forecast Job Growth Sectors 2022-2050			
Sector	Low	Mid	High
Warehousing (Transportation and Storage)	5,600	8,700	11,900
Accommodation and Food Services	3,900	5,900	7,900
Professional, Scientific, and Technical activities	7,800	9,350	10,900
Administrative and Support services	8,000	8,800	9,600
Health and Social care	7,100	8,300	9,600

6.6 Although over the plan period employment growth will be spread across a range of sectors offering job opportunities at a range of skills levels. Table 1 above illustrates that around two-thirds of all job growth will occur within the five sectors shown within the table. The middle forecast in this table forecasts the greatest job growth will occur in the Professional, Scientific, and Technical activities sector with 9,350 jobs, followed by Administrative and Support services 8,800 jobs and Warehousing 8,700 jobs. There is also a significant increase in the number of jobs forecast in the Health and Social Care sector 8,300 jobs (meeting the needs of an ageing population) and 5,900 jobs in the Accommodation and Food services sectors.

C. How much Commercial floorspace and land do we need in the future?

Table 2: Total estimated future sites and premises requirements in Milton Keynes 2022-2050. Figures in square metres and hectares (ha).

Use	Low forecast	Middle Forecast	High forecast	High replacement forecast
Office	447,000 (78 ha)	483,000 (85 ha)	520,000 (91 ha)	643,000 (113ha)
General Industrial	260,000 (71 ha)	300,000 (81 ha)	340,000 (90 ha)	470,000 (125 ha)
Warehousing and Logistics	1,230,000 (350 ha)	1,340,000 (384 ha)	1,460,000 (418 ha)	1,184,000 (525 ha)

Source: HEDNA Figures 125,128 and 131.

Note: Land figures quoted for office development in Table 2 should be treated with caution. For planning purposes offices requirements are best expressed in terms of floorspace as there can be big differences in the amount of land required to accommodate a tall or low-rise office building. Tall, multi-storey office development typically found in a city centre can have a development density of 100% or more, but a low rise, out-of-town office development with fewer storeys typically has a development density of 40%.

In Table 2 the low forecast land requirement figures assume a development density of 100% on all sites. The high forecast land requirement figures assume a development density of 40% across all sites. The middle range figure assumes that half of all new office development takes place at 100% development density, with the other half taking place at a 40% development density.

- 6.7 The HEDNA study contains several forecasts on the amount of commercial floorspace (office, industrial and warehousing) required from 2022 to 2050 based on different assumptions. The detailed methodology on how these forecasts have been arrived at is detailed in chapter 9 of the HEDNA report. In all forecasts, the amount of floorspace to replace ageing commercial floorspace (replacement provision) is greater than the amount of floorspace forecast to be required by economic growth (net additional requirement). Except for the high replacement forecast shown in table 2, most forecasts assume around 410,000 square metres (sq.m) of office floorspace, 450,000 sq.m of general industrial floorspace, and 1.3 million sq.m of warehousing and logistics floorspace will be needed to replace lost, dilapidated, or unsuitable premises within the existing portfolio of properties over the period of the plan.
- 6.8 Table 2 illustrates three future forecasts (Low, Middle, and High) on the amount of office, industrial and warehousing floorspace required in square metres and the estimated amount of land to accommodate that floorspace in hectares (ha). The greatest amount of floorspace and land is forecast for accommodating future warehousing requirements. Low and high forecasts for warehousing are for 350-418 hectares, which is more than that for general industrial purposes (71-91 ha) and offices 447,000 to 520,000 sq.m. (78-91 ha).
- 6.9 The highest forecasts in the HEDNA study shown in table 2 is from the high replacement forecast which is a combination of the middle forecast in table 2 plus 3% of the stock of buildings being replaced every year. Under this scenario the total floorspace requirements for offices is 643,000 sq.m. with an estimated land take of 113 ha. For general industrial the total floorspace requirements is 470,000 sq.m with an estimated land take of 125 ha. For warehousing the total floorspace requirements is 1,840,000 sq.m with an estimated land take of 525 ha.
- 6.10 To align to the upper end of economic ambitions, the authors of the HEDNA study suggest provision for 480,000 – 520,000 sq.m of office floorspace should be considered in the MK City Plan. This equates to 17,300 – 18,600 sq.m per annum. This requirement is 10-18% above the levels of office development achieved across Milton Keynes in recent years. Most of this office development around 300,000 square meters is expected to occur in CMK in line with both occupier and policy requirements.

D. Does Milton Keynes have enough Employment Land to meet forecast Industrial and Warehousing Requirements?

- 6.11 As far as industrial and warehousing needs are concerned the authors of the HEDNA study suggest that over the plan period there is a total potential requirement for 420-580 ha of land with around 80% of this total being accounted for by warehousing with industrial requirements accounting for around 20% of this total.
- 6.12 Excluding CMK, the current supply of employment land in Milton Keynes is around 275.5 ha which could contribute to this requirement with over 160 ha accounted for by South Caldecotte and by Milton Keynes East, both of which are currently under construction and will be developed early on in the plan period. On this basis an additional supply of 144.5 –

304.5 ha of land will need to be identified to meet forecasted industrial and warehousing requirements.

- 6.13 While some of these requirements could be met by the redevelopment of older commercial buildings and sites. Analysis of historic MKCC monitoring data from 2012 to 2022 by the HEDNA consultants has found around 29% of the total gross office requirements, 33% of gross general industrial requirements, and 15% of gross warehousing and logistics have been delivered on employment land previously used for these uses. Some of these requirements could be met by the intensification of development.
- 6.14 Warehousing is a footloose industry which goes where the most suitable sites are available. For over 20 years Milton Keynes has been allocating large greenfield sites like Magna Park, Glebelands, South Caldecotte and Milton Keynes East for warehousing development. But no obvious large-scale sites for such development have been identified and only a limited number of city expansion sites have been promoted for employment land uses through the call to sites. Our options for meeting this shortfall and mitigating risks to the MK City Plan 2050 include through Duty to Co-operate meetings, requests to neighbouring local authorities to accommodate our needs, and consult on how we deal with warehousing in the future including inviting further promotion of land for warehousing through the Regulation 18 consultation.

E. Hybrid Working

- 6.15 Like the rest of the UK, Milton Keynes has experienced considerable national/global headwinds to economic growth in recent years. The pandemic has changed the way people live and work, accelerating existing trends, such as online shopping and remote or hybrid working with more people working at home. Whilst there is uncertainty about the effects of hybrid working. It is clear hybrid working is here to stay and will not disappear. However, it is equally important not to overstate its impact; most economic activity occurs in urban areas focused on city and town centres. Despite the pandemic the city centre is still the largest area for jobs within the MKCC area.
- 6.16 Although increased levels of hybrid working could slow the growth of office floorspace in the future, it is not expected to reverse or eliminate the need for new floorspace, especially when much of the existing stock of office floorspace in Milton Keynes is ageing and no longer fit for purpose. Knowledge intensive, digital, and creative industries will continue to demand appropriate hubs that facilitate collaboration and growth.

F. Quality and Age of Commercial Property

- 6.17 One of the big challenges for the future is to replace and repurpose the stock of ageing commercial property within the area. Reflecting its history as a New Town there is a low proportion of commercial stock constructed before 1940. Milton Keynes' property stocks do not include the much older (typically Victorian) buildings that last well beyond the usual 25–35-year time horizon for a typical commercial unit. If buildings are replaced every 30 years (in line with the 25–35-year industry expectation), one would expect around 3% of all commercial employment property stocks to be replaced each year.

- 6.18 If the stock of commercial buildings is not replaced, its absence will inhibit not only our ability to attract new firms to the city but also our ability to retain existing firms, who need to move into more suitable accommodation.
- 6.19 The Government's Energy White Paper published in 2020 set out a commitment that rented commercial and industrial properties should reach Energy Performance Certificate (EPC) band B by 2030, where this is cost-effective. This could lead to increased investment in the refurbishment of premises or their replacement. There may be other considerations in the move to net zero that drive refurbishment rather than replacement, particularly where there is significant embedded carbon within existing structures.

G. Offices

- 6.20 Milton Keynes is one of the major office locations in the M1 corridor and North M25 region. Future demand for new office space is expected to be driven by expansion in the Milton Keynes economy and the need to replace or upgrade the substantial stock of ageing office buildings. Significant drivers for the growth of office floorspace are expected to come from Professional, Scientific, and Technical activities, as well as Information and communication, and Administrative and support services. Replacement requirements will also be driven by finance and insurance. Most of this growth will come from be concentrated within CMK in line with both occupier and policy requirements and because most ageing office floorspace is located there. However, the viability of new office development will remain challenging and therefore it may need to form part of mixed-use schemes to ensure deliverability, whilst enabling excellent amenities and a sense of place.
- 6.21 It is difficult to increase the supply of new office floorspace within the city for several reasons. A key characteristic of office development is it is 'lumpy'; an office block is constructed and then years go by before another one is built. This means office sites need protecting because if they are developed for another purpose, when there is demand for new office floorspace, the best and most suitable sites may no longer be available. Additionally, offices are expensive to build, so speculative office development by developers is rare. To reduce financial risks, developers normally seek to pre-let space in offices to tenants and it can take time for a developer to sign up a 'critical mass' of tenants before construction on the office block starts.
- 6.22 The Government's Energy White Paper published in 2020 which could lead to increased investment in the refurbishment of office premises, or their replacement has already been referred to. There is a flight to quality in the office market. A recent report on the Milton Keynes office market by Lambert Smith Hampton (South East Report 2024) commented on the lack of high quality options, with grade A office space making up just 16% of total supply and with the best space rapidly absorbed by the market most notable the Avebury building in CMK which was fully let within nine months of completion.
- 6.23 Despite both Silbury House and Northgate house in CMK being refurbished. Lambert Smith Hampton commented: *"Limited grade A supply is exerting upward pressure on rents, with recent transactions at the Avebury and The Park:MK driving prime headline rents onto new*

benchmarks for both the city centre and out of town markets, respectively. In town, the next phase of growth will be driven by the arrival of Silbury House, with prime headline rents set to leap from £28.50 per sq.ft currently into the early £30s by year end.”

H. Retail and Leisure

6.24 Retail and Leisure: Many of the key drivers for change in the retail and leisure sector and on the High Street such as the rise of on-line shopping have already been mentioned. Many factors such as increasing costs and competition from the rise of internet shopping and pressures for more non-retail uses to be located within town centres highlighted below are increasing the pressure on retailers. These centres will need to evolve and adapt to meet these pressures.

I. Changes to Permitted Development Rights and the Use Classes Order

6.25 Other major drivers of change are Government changes to Permitted Development rights and the Use Classes Order. Changes to permitted rights mean planning permission is often no longer required from the Council to change from one use to another, e.g., from a shop to residential use provided certain conditions are met.

6.26 The introduction of Class E in the Use Classes Order which applies to both Town Centres and out of centre locations is also significant as it combines many previously separate uses including retail, food, financial services, gyms, healthcare, nurseries, offices, and light industry into a single use class. Unless changes of use are restricted by planning conditions, the use of a property can change without requiring planning permission from the Council. Together these changes to the planning system can have unintended consequences both for town centres and other locations such as employment areas, which were never designed to accommodate residential development and lack facilities such as open space, shops schools etc. It will be important to monitor town centres to check that their vitality and viability are not being adversely affected.

6.27 If monitoring indicates town centres are being harmed, the Council could intervene. Firstly, to apply restrictive conditions to certain forms of development to restrict the authorised use to that which has been justified in the application submission. Secondly, in exceptional cases, the Council could take steps to implement an Article 4 Direction (A4D). Once in force an A4D removes permitted development rights, so that within the area covered by the direction an applicant wishing to change the use of a property from one use to another must apply to the Council for planning permission for the change of use. However, ministerial approval is required for the A4D to come into effect and the bar for approval of the Direction is a high one.

J. Other Economic Drivers

6.28 Amongst other drivers for change in the local economy are new and improved transport infrastructure:

1. The construction of a Mass Rapid Transport (MRT) system would transform the way residents and visitors get around in Milton Keynes. It would provide a sustainable mobility option that would make private vehicle journeys around the city less attractive. It would also provide economic growth opportunities by connecting various business hubs and creating new ones, making Milton Keynes a more attractive place to do business.
2. The completion of East-West rail will significantly improve transport connections to Oxford and Cambridge. This will support the Milton Keynes economy, providing local businesses and residents with improved access to internationally renowned research universities. Local businesses will also benefit from access to a greater pool of skilled workers. Land for employment development in Oxford is constrained and house prices in Oxford are cheaper than in Milton Keynes so the construction of the rail link may prompt Oxford businesses and residents to relocate to Milton Keynes. Through the Town Deal and East-West rail access, Bletchley has an opportunity to become a hub of new economic activity. Longer term the reinstatement of the Aylesbury spur will connect Milton Keynes by rail to Aylesbury and other towns in Buckinghamshire.
3. The completion of the High Speed 2 railway line from London to Birmingham, is expected to benefit Milton Keynes because its construction will increase the capacity for more trains to run on the West Coast Main Line to and from the city, further improving our connections to other parts of the country.
4. Additionally, the UK government is committed to achieving net zero by 2050. Net zero means that total greenhouse gas emissions would be equal to the emissions removed from the atmosphere, with the aim of limiting global warming and resultant climate change. Milton Keynes City Council has ambitions for Milton Keynes to become carbon neutral by 2030 and carbon negative by 2050. To achieve net zero, will require major changes to business behaviours and practices.

Retail and Leisure

How much Retail and Leisure floorspace do we need in the future?

- 6.29 A Retail and Commercial Leisure Study (RCLS) was commissioned by the Council from consultants Nexus to investigate how much retail and leisure floorspace would be required over the plan period. Part of this work involved the commissioning of a NEMS household telephone survey to investigate shopping and leisure patterns. In forecasting how much retail floorspace development is required in the future, a distinction is made between convenience floorspace (for essential items everyday like food) and comparison floorspace (for items not brought on a less frequent basis, for example televisions and white goods). Two sets of forecasts in the RCLS have been produced based on different forecasts of population and housing growth derived from the HEDNA study.
- 6.30 Scenario A assumes housing growth of 1,902 dwellings per annum with a 2050 population of 384,000 and Scenario B assumes housing growth of 2,265 dwellings per annum with a 2050 population of 410,000. The study distinguishes between the capacity for new convenience

(food) retail floorspace and comparison (non-food) retail floorspace in CMK and in the rest of the Milton Keynes City Council (MKCC) area outside CMK. One of the caveats around these RCLS forecasts is that they were prepared when the overall amount of future residential development was known, but not necessarily the precise distribution of that residential development across the Council area. As a main town centre use and in line with the sequential approach, new retail development will normally be accommodated within primary shopping areas.

Convenience Floorspace

- 6.31 Both scenarios A and B show there is no capacity in terms of expenditure to support additional convenience floorspace provision in CMK until after 2050. However, these CMK forecasts are heavily dependent on the assumptions made about the amount of residential development within the city centre.
- 6.32 Across the MKCC area the story is different under both scenarios, growth in population and spending is expected to generate a positive requirement for additional convenience floorspace from 2026 to 2050. By 2026 scenario A forecasts an additional 1,247 to 1,707 sq.m net and Scenario B forecasts an additional 1,428 to 1,955 sq. m net will be required across the MKCC area.
- 6.33 By 2035 the forecasts suggest an additional 5,628 to 7,704 sq.m net of convenience floorspace will be required under scenario A and 6,331 to 8,666 sq.m net under scenario B. Longer term forecasts for the MKCC area in 2050 indicate the requirement for convenience floorspace has risen to 14,005 to 19,172 sq.m under scenario A and 15,610 to 21,369 sq.m under scenario B. However, Nexus advises given current economic uncertainties and, more relevantly, pressures on the retail sector, the need to treat these long-term forecasts with caution.

Comparison Floorspace

Year	Scenario A	Scenario B
2026	228-358	756-1,189
2030	8,090-12,713	9,335-14,669
2035	14,634-22,996	16,757-26,332
2040	21,870-34,367	24,877-39,092
2050	37,348-58,690	42,125-66,196

Table 4: Floorspace for Comparison Goods Projections across the MKCC area in sq. m net		
Year	Scenario A	Scenario B
2026	-3,285 to -5,162	-2,637 to -4,144
2030	6,678 to 10,494	8,203 to 12,891
2035	14,377 to 22,593	16,980 to 26,683
2040	23,249 to 36,534	26,936 to 42,328
2050	42,227 to 66,356	48,083 to 75,558

- 6.34 Tables 3 and 4 illustrate forecasts for additional comparison (non-food) floorspace in CMK and across the MKCC area from 2026 to 2050. Table 3 illustrates the consultants are forecasting a positive requirement for additional comparison floorspace in CMK from 2026 to 2050 under both scenarios. This finding helps support the Council's policy of making the primary shopping area of CMK a regional centre for comparison shopping (Policy GS5 Our Retail Hierarchy).
- 6.35 By 2026 the requirement for comparison floorspace in CMK is forecast at a modest 228-358 sq.m net under scenario A and 756-1,189 sq.m net under scenario B. In the case of CMK short term pressures for additional comparison floorspace may be met by the occupation of vacant shop units rather than by the construction of new floorspace. By 2030, as the population of the area continues to grow, this requirement for comparison floorspace is forecast at between 8,090 and 12,713 sq.m net (Scenario A) or between 9,355 and 14,669 sq.m net (Scenario B). At 2050 capacity for comparison goods is estimated in CMK as being between 37,348 and 58,690 sq.m net under Scenario A and between 42,125 and 66,196 sq.m net under Scenario B.
- 6.36 Across the MKCC area it is not until 2030 there is a positive requirement for comparison floorspace, which continues to increase until 2050. By 2030 Nexus forecast a requirement for around 6,678 to 10,494 sq.m of floorspace under scenario A and 8,203 to 12,891 sq.m of floorspace under scenario B.
- 6.37 Among the other key points and recommendations arising from the RCLS are that:
1. A food store should be provided within Bletchley Town Centre following the closure of Sainsbury's store there. A proposal for a new convenience store in Bletchley features in planning policy CB1 in the MK City Plan 2050.
 2. The RCLS has analysed the existing provision of key services such as food shops, cash machines and post offices in terms of their location and accessibility. This exercise has identified 'food deserts' defined as areas which are poorly served by supermarkets and where residents struggle to access healthy food at a good price. Food stores are proposed in several locations such as Conniburrow which are poorly provided for shops.
 3. For most categories of leisure provision, the current provision of leisure facilities (cinemas, ten pin bowling) would support future populations. However, a deficit is

projected in the provision of facilities such restaurants and bars. This is around 3,500 sq.m in 2026 rising to around 8,470 sq.m in 2030. The growth of the population is also expected to support additional health and fitness centre provision rising from 13 centres in 2023 to 19/20 centres under scenarios A and B.

4. Hotel provision: As mentioned previously one of the priorities of the Council is to increase visitor and tourist numbers and since 2018 the number of hotel bedspaces and hotels in Milton Keynes has increased significantly. The consultants have forecast the future need for hotel rooms over the period 2023 to 2031. Under their low-growth scenario based on a 1% growth in hotel occupancy per annum hotel provision appears to be sufficient until 2031. However, under their high-growth scenario (2% growth in hotel occupancy per annum) additional hotel provision will be required from 2030. As a main town centre use new hotel provision should normally be within town centres.
5. Not to be confused with Health Check assessments on the vitality and viability of CMK and other Town and District Centres. Recognising the role these centres can play in supporting mental and physical health, the RCLS has assessed CMK and the Town and District Centres against a 'Healthy Centre Checklist' which identifies deficiencies in each centre, and makes recommendations about how these centres, both individually and cumulatively, can promote greater health.

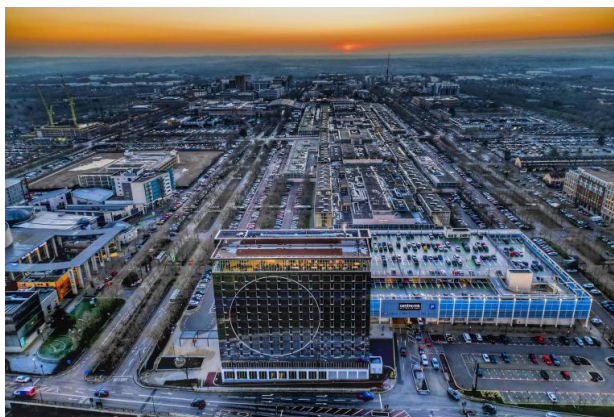
6. The RCLS has reviewed the Council's retail hierarchy but recommended no change to the classification of centres within it. However, it did suggest additional text be added on the role of each tier of the hierarchy. Most of this text appears in Table 4 accompanying policy GS5 (Our Retail hierarchy)



7. The RCLS has also reviewed Town Centre boundaries and the extent of Primary Shopping Areas (PSA) . In most cases these boundaries have not changed, the exceptions are the PSA of Wolverton, which has been amended to remove the Agora centre and the Square and industrial units between Glyn Square and McConnell Drive. The RCLS did not recommend adding PSA boundaries for Westcroft and Kingston because they would have been the same boundary at the town centre boundary i.e., because they are purpose-built retail parks, with hardly any step-change in uses or footfall. The proposed change to the Woburn Sands district centre boundary is not being proceeded with as the area proposed to be included within the district centre boundary is not within the MKCC area, it is in Central Bedfordshire. However, MKCC will discuss with Central Bedfordshire if it wishes to proceed to incorporate these properties into the town centre when it reviews its Local Plan. There is no requirement in the NPPF to designate Primary and Secondary Shopping Frontages but they have been retained for CMK because of their role in providing core retail functions but not for any other centre.

Culture and Heritage

- 6.38 Milton Keynes is better by design and will always have a distinctive identity. As the city grows, its heritage and culture will play an important, positive role in successful placemaking and maintaining the city's unique character.
- 6.39 Following the commissioning of a new Cultural Infrastructure Plan, MKCC have identified that Milton Keynes currently does not have sufficient cultural infrastructure to meet the needs of a growing city and needs to plan for a provision of and redesign of spaces for both the production and consumption of cultural outputs.
- 6.40 Emerging priorities from the Cultural Infrastructure Plan which has yet to be finalised include the provision of creative workspace; production and rehearsal space to facilitate homegrown cultural content; a flagship city-centre, multi-artform venue to spearhead Central Milton Keynes' renewal and additional outdoor capacity to facilitate cultural events.
- 6.41 Planning law and national and local planning policy make provision for designated heritage assets and provide a strong framework within which to make decisions. The National Planning Policy Framework (NPPF) instructs that 'great weight' should be given to the conservation of these assets. There is now also an increased awareness and appreciation of the heritage significance of the early new town era of Milton Keynes. To achieve the NPPF's definition of sustainable development, decisions about Milton Keynes' growth will also need to take these locally significant places in account.
- 6.42 Achieving economic growth and preserving Milton Keynes' culture and heritage are not mutually exclusive. The experience of other cities demonstrates that both goals can complement each other to produce characterful, vibrant places. There are however judgements to be made to bring about the optimum balance. Inflexibility and the failure to consider new, alternative options will prevent growth and the positive uplift that it can drive. Conversely, failing to recognise and preserve important local heritage will result in a characterless, bland city with no distinct history, depth, or sense of place. The decisions made today and tomorrow will play an important role in the future character of Milton Keynes.



Climate Change, Creative Re-Use and Local Identity

- 6.43 Climate change and the need for improved building performance can have an effect on heritage in numerous ways. Heritage assets are sensitive to change, particularly where measures to improve their thermal qualities and integrate renewable energy would alter their character or traditional construction. We also know that owners want to seek improved performance for their building to reduce energy bill and to reduce their carbon

footprint. We will seek to protect and preserve the unique significance of our heritage assets whilst taking advantage of opportunities to upgrade them.

- 6.44 It is yet to be seen how climate change will ultimately impact upon some types of heritage assets. The condition of archaeological sites can be particularly susceptible to increased rainfall or extended periods of hot weather. Equally these conditions can affect their investigation, placing a potential impact on subsequent development. Careful monitoring of developing trends will be required to effectively manage our archaeological sites and buildings. Whilst the concept of retaining and re-purposing buildings is not new, there is rapidly growing recognition that doing so can make an important contribution to reducing the carbon footprint of a development.
- 6.45 Retention of, and reinvestment in heritage assets in this fashion can also help in reinforcing a sense of place and local identity. This can be particularly beneficial to town and the city centres which have been subject to wider social and economic changes. The retention and promotion of heritage assets can play an important role in creating vibrant, interesting, culturally rich, experience-based places. These qualities are in turn important in creating successful places that attract investment. We will encourage the retention and the creative adaptation of heritage assets, particularly locally important (non-designated) assets whilst challenging the environmental credentials of schemes that replace them.

Locally Important Heritage

- 6.46 As above, both designated and non-designated heritage assets are important to the unique identity of Milton Keynes. Without statutory protection, it is the non-designated heritage assets that face greater challenges in decision making. Whilst the New Town Heritage Register identifies those from the new town era, there are many other, older, locally important assets that contribute to the character of Milton Keynes. The planning system allows for balanced decisions to be made, meaning that some assets may be lost through its application. When these are demolished, part of the local identity is lost, and in the case of post-1967 assets, the story of Milton Keynes new town is weakened. Where heritage assets are lost through the planning process, we will seek to ensure that the development that replaces it is of equal or greater quality in the respects that gave the original asset its heritage significance. Taking this positive approach to replacement development will improve the quality of places and may lead to schemes built within this plan period being Milton Keynes' heritage of the future.

Central Milton Keynes

- 6.47 Alongside the rich, green character of the linear parks and designed landscapes, and the infrastructure of the grid roads, Central Milton Keynes is perhaps one of the key characteristics of the post-1967 era of Milton Keynes. Its set-piece, bespoke, single minded architectural approach produced a place like no other, one that is readily recognised nationally and one that will not be repeated. Early phase, locally and nationally important buildings reinforce the design-led ethos of the time, whilst possessing their own heritage value. It is perhaps CMK that best represents the sheer scale of ambition and innovation that underpinned the new town era. This is however, not to say that it is perfect or must not

be altered in any way. As discussed in the CMK topic paper, some of the principles used in its design are no longer relevant, whilst some aspects have been, understandably, found to work better than others. This is common to all heritage assets, there will be points within their lifespan at which, important decisions need to be made about their future for them to remain relevant and to ensure their preservation. Successfully preserving those core aspects that make CMK a unique place whilst recognising and implementing those adaptations and improvements needed will ensure that it continues a desirable place to be. Successfully navigating this balance in the next stage of CMK's life can deliver a place with real depth and strength to its identity and appeal.

Expansion of Milton Keynes

- 6.48 As Milton Keynes expands, particularly where through large scale development, heritage assets will be affected. The allocation of land or granting of outline permissions can often have a negative effect on individual assets, groupings or areas that will be included within or close to the development. Where the assets are often blighted until the wider scheme is completed some years later, at detailed planning stage the nature and type of development may be incompatible with the heritage asset or its setting, for example, housing developments that wrap around a rural farmhouse and its barns. In order to mitigate against these impacts, we will seek to require landowners to manage their heritage assets responsibly through the interim period ensuring that they are preserved for future generations. We will expect schemes to sympathetically allow for the presence of these assets from the outset so that final designs positively reinforce their presence and setting.

Our Emerging Policy Approach

- 7.1 **The MK City Plan 2050 seeks to provide for our future needs and grow and develop the local economy. As a land use plan, a key function of the plan is to identify sites where new employment and other types of development can occur.**

Economic Development Strategy

- 7.2 What the MK City Plan 2050 seeks to do is:
- 1) To meet future economic needs and support growth in high-quality jobs
 - 2) To grow & develop the economy by identifying places for new development.
 - 3) To protect employment land & buildings
 - 4) To support the operation and expansion of further & higher education including an undergraduate university presence in CMK linked to a technology and innovation centre.
 - 5) To support proposals for training, learning and skills development.
 - 6) To support the Digital, Technology, Smart City and Creative Industry sectors and proposals for superfast broadband and research and development facilities.

- 7) To support and consolidate CMK as a regional shopping destination for comparison (non-food) shopping.
- 8) To grow and develop retail, leisure, tourism, and cultural facilities and support a strong and diverse rural economy.
- 9) To provide shops and services and other facilities in new areas of residential development
- 10) To capitalise on the greater connectivity of Bletchley and CMK with the operation of East-West Rail services to Oxford in 2025 and future links to Cambridge.

7.3 The MK City Plan 2050 seeks to meet our economic needs in the following ways by:

- Focusing around 300,000 sq.m of office development in the city centre in 'downtown' CMK in blocks A and B by the railway station
- By allocating new employment sites within the Plan such as Elfield Park east of the A5
- Developing our stock of vacant undeveloped employment land already allocated for development and reusing previously developed land.
- The refurbishment and replacement of existing buildings
- The intensification of development on existing employment land, for example where appropriate taller buildings.
- Supporting the provision of more flexible employment space, incubator units, ancillary workshops, and serviced office accommodation to enable businesses to start-up, grow and expand.

7.4 Sites for employment development (excluding CMK) are identified in Policy GCS3 Strategy for Economic Prosperity. The Council's retail hierarchy is defined in Policy GS5. There are five policies which deal with Economic and Cultural Prosperity in the MK City Plan 2050.

Policy ECP1 Protecting Employment Land and Buildings

7.5 Employment land and buildings are vulnerable to redevelopment or changes of use to higher value land uses such as residential. If this process was allowed to proceed unchecked, then the stock of employment land and buildings would gradually be eroded over time. Policy ECP1 seeks to strike a balance between protecting employment land and buildings and allowing redevelopment or a change to another use provided certain criteria are met. Among the criteria are marketing of the building and /or land for a period of twelve months to demonstrate there is no longer a reasonable prospect of it being used for current or other employment purposes.



Policy ECP2 Supporting the Vitality and Viability of Centres

7.6 The purpose of this policy is to support and maintain the vitality and viability of centres within the Council's retail hierarchy recognising that a balance needs to be struck between protecting the retail function of those centres and allowing non-retail uses within them. Relaxing restrictions on the proportion of non-retail units in centres can assist in the process of diversifying uses within the centre and can promote more night-time activity outside normal shopping hours.

7.7 Within the primary shopping area of CMK defined as the area between Saxon Gate, Marlborough Gate Silbury and Avebury Boulevard, the Council has defined Primary and Secondary Shopping Frontages. The Primary Shopping Frontages (PSF) cover the Centre:MK and Midsummer Place. Within the PSF area defined on the policies map the policy proposes that development for retail uses, food & drink and financial, professional, and other services, gyms, creche, leisure and cultural uses will normally be permitted. However, a greater variety of uses will be permitted within the defined Secondary Shopping Frontages (SSF) area at ground floor level which covers properties between Lower Twelfth Street and the MK Theatre within the primary shopping area and the Xscape building. Within the Secondary Shopping Frontages development for uses permitted in the PSF plus drinking establishments, medical and health services will normally be permitted.



7.8 Within the town centres of Kingston and Westcroft and the primary shopping areas of other Town Centres (Wolverton and Bletchley) and District Centres (Newport Pagnell, Olney, Stony Stratford, and Woburn Sands) at ground floor level. The policy proposes that development for retail, food & drink and financial, professional, and other services, gyms, creche, leisure and cultural uses and drinking establishments and hot food takeaways will normally be permitted. Within Town and District centres, the policy proposes use of upper floors within the primary shopping area for main town centre uses, town centre community or residential use will be supported.

7.9 Finally in local centres the policy proposes the expansion or redevelopment of a local centre will be supported where it would enhance the provision of local floorspace for main town centre uses; and it would not have a significant impact on a town or district centre. The Council would welcome feedback on this policy, particularly if the right balance has been struck between protecting the retail function of shopping centres and allowing non-retail uses within them.

Policy ECP3 Sequential and Impact Tests

7.10 Under the sequential approach to development the Council is seeking to focus retail development within the primary shopping area of town centres such as Central Milton Keynes and other main town centre uses such as leisure and office proposals within the

boundaries of town centres defined on the policies map. This helps not only to promote investment and create employment with these centres but also as the most central places and public transport hubs, these centres are usually the most accessible places to get to by means other than the car. Under the sequential approach to development, it is only if suitable sites for retail development are not available within the primary shopping area that edge of centre locations will be considered, and only if suitable edge of centre sites are not available or expected to be available within a reasonable period, that out of centre sites be considered. Please see the glossary for further details of terms such as edge of centre.

- 7.11 To assess the harm that retail and leisure proposals might do to centres within the retail hierarchy, an impact test will be applied to proposals for retail development outside a primary shopping area and for leisure development outside a defined town centre area and which are not on sites that are specifically allocated for such uses, provided the proposal is above the threshold of 900 sq.m (gross) in CMK and 350 sq.m in all other centres.

Policy ECP4 Supporting a Diverse Rural Economy

- 7.12 Large parts of Milton Keynes, especially to the north of the city have a strong rural character with a wide variety of small rural settlements. National planning highlights that development, which meets community and business needs in rural areas, may need to take place in locations that are not well served by public transport. This includes on sites that are adjacent to, or beyond, an existing settlement. The City Plan supports a strong and diverse rural economy.
- 7.13 Policy ECP4 has two main strands to it, firstly, it supports proposals for the expansion of an existing business or the diversification of agriculture or rural businesses requiring a rural location and rural tourism and leisure developments provided certain criteria are met. The second strand to the policy is the protection of community facilities. Planning applications that result in the loss of a village shop or public house will not be permitted unless the Council is satisfied that every effort has been made to retain them. Such proposals will need to be robustly evidenced with regards to financial and marketing evidence relating to the existing or last use of the facility. They must demonstrate that the business has been marketed for a minimum period of six months.

Policy ECP5 Heritage

- 7.14 Milton Keynes has a unique and varied heritage, which is a key part of its identity and attraction. Policy ECP5 is a development management policy which aims to firstly sustain and enhance the significance of heritage assets which are recognised as being of historic, archaeological, architectural, artistic, landscape or townscape significance. The policy defines what constitutes heritage assets including Listed Buildings, Conservation Areas, Scheduled Monuments and non-designated Archaeological sites, Registered Park and Gardens and assets on the MK New Town Heritage Register.
- 7.15 Additionally, the policy has several criteria setting out how the Council will assess development proposals which affect heritage assets and measures to avoid harm to them and what to do if a proposed development affects an unscheduled site of known

archaeological interest or with the potential to include heritage assets with archaeological interest.

Next Steps

- 8.1 **This topic paper accompanies the Regulation 18 consultation version of the Milton Keynes City Plan 2050 and sets out the detailed justification for the proposed policies relating to employment and cultural prosperity in the draft Plan. As we progress through the plan-making process to examination, we will continue to update the topic papers and relevant policies as we consider new evidence and feedback from the consultation. The topic papers are ‘living’ documents that will be updated through the preparation of the Local Plan.**
- 8.2 The topic papers highlight key issues and opportunities that the Local Plan should seek to address. They will help to shape and influence the direction and focus of policies and site allocations where applicable. A major issue identified in this Topic Paper is Milton Keynes is unable to accommodate forecasted needs for industrial and particularly warehousing floorspace over the plan period. Through the Regulation 18 consultation the Council will consult over how it should deal with this issue and if any developer /land owner wishes to promote land for warehousing.

Appendix A: Background documents

Documents relevant to the Economic and Cultural Prosperity agenda include:

- *Milton Keynes City Council Plan 2022-2026* explains the Council's priorities and key objectives for Milton Keynes to be a thriving city, a progressive city, and a sustainable city. <https://www.milton-keynes.gov.uk/your-council-and-elections/council-information-and-accounts/strategies-plans-and-policies/council>
- *Milton Keynes Strategy for 2050* sets out how Milton Keynes can deliver its ambitious long-term future vision. <https://www.mkfutures2050.com/strategy-for-2050>
- *Plan:MK* sets out a strategy for the positive enjoyment and policies for the preservation of the heritage of Milton Keynes. <https://www.milton-keynes.gov.uk/planning-and-building/developingmk/planmk>
- The *Housing and Economic Development Needs Assessment (HEDNA)* provides a wealth of evidence to assess the need for housing and employment land up until 2050. <https://www.milton-keynes.gov.uk/city-plan>
- The *Creative and Cultural Strategy 2018 – 2027*, was created in partnership with city-wide stakeholders, sets out an ambitious vision to deliver the city's cultural offer. The current Cultural Strategy has recently been refreshed and a new set of Strategic Priorities have been adopted. A shared Implementation Plan will be co-authored with the sector, partners, and other stakeholders in April 2024. Milton Keynes City Council appointed We Made That to deliver a Cultural Infrastructure Plan, to help plan and deliver cultural spaces in the short, medium, and longer-term. Due for delivery in May 2024, the Plan will directly inform the New City Plan and deliver to the MK 2050 Strategy. <https://www.milton-keynes.gov.uk/sites/default/files/2022-03/MK%20Creative%20and%20Cultural%20Strategy%202018-2027.pdf> (Link to unrefreshed version of the Cultural Strategy.)
- The *City of Milton Keynes Technology, Smart City, Digital, and Creative Industries Strategy 2024-2029*. This strategy describes how Milton Keynes will build on its strengths in Smart City Technology, Innovation and Tech employment and outlines various projects to achieve a world class reputation across the Digital, Technology, Smart City and Creative Industry sectors to be delivered between 2024 and 2029. [https://milton-keynes.moderngov.co.uk/documents/s17898/Milton%20Keynes%20City%20Technology%20Smart%20City%20Digital%20and%20Creative%20Industries%20Strategy%202024-2029 Annex.pdf](https://milton-keynes.moderngov.co.uk/documents/s17898/Milton%20Keynes%20City%20Technology%20Smart%20City%20Digital%20and%20Creative%20Industries%20Strategy%202024-2029%20Annex.pdf)
- The *Milton Keynes Economic Development Strategy 2017-2027* outlines how the Council, working with its partners, can work together to support strong inclusive

economic growth that benefits businesses and residents and sustains Milton Keynes' reputation as a prosperous, innovative, and culturally vibrant place.

<https://www.milton-keynes.gov.uk/sites/default/files/2022-03/F.6%20MKEMP005%20Milton%20Keynes%20Economic%20Development%20Strategy%202017-2027.pdf>

- The *Local Skills Improvement Plan for Milton Keynes, Bedfordshire and Northamptonshire* details priorities and actions to improve skills and training across the area. [LSIP | Milton Keynes Chamber of Commerce \(chambermk.co.uk\)](https://www.milton-keynes.gov.uk/sites/default/files/2022-03/F.6%20MKEMP005%20Milton%20Keynes%20Economic%20Development%20Strategy%202017-2027.pdf)
- The *Retail and Commercial Leisure Study* has investigated the future demand for retail and leisure floorspace up until 2050 and how town centres and the high street should adapt to face the challenges of the 21st Century. <https://www.milton-keynes.gov.uk/city-plan>
- The *MK New Town Heritage Register* looks to identify buildings, artworks, structures, places, and landscapes of the Milton Keynes Development Corporation era (1967-1992) that are of local architectural, cultural and design heritage significance. <https://www.milton-keynes.gov.uk/planning-and-building/conservation-and-archaeology/mk-new-town-heritage-register>
- *SEMLEP Warehousing and Logistics in the South East Midlands September 2022*. A study looking at the supply and demand for warehousing and logistics floorspace across Northamptonshire, Milton Keynes, and Bedfordshire. <https://www.milton-keynes.gov.uk/city-plan>
- *Milton Keynes application for City Status Platinum Jubilee Civic Honours Competition*. [Milton Keynes application for city status | Milton Keynes City Council \(milton-keynes.gov.uk\)](https://www.milton-keynes.gov.uk/city-plan) Details cultural and heritage aspects of Milton Keynes.
- *Lambert Smith Hampton (Thames Valley and South East Office Report 2024)*. A survey of the Milton Keynes office market. <https://www.lsh.co.uk/explore/research-and-views/research/2024/june/thames-valley-and-south-east-office-market-report-2024>
- *Office Space Study-Central Milton Keynes (CMK) Final Report*. A report by Bidwells for MKCC. A report on the CMK office market. <https://www.milton-keynes.gov.uk/city-plan>
- *SEMLEP Business Survey 2023*. A business survey by SEMLEP identifying the economic challenges and opportunities facing businesses across the SEMLEP area, an additional report covers Milton Keynes. <https://www.milton-keynes.gov.uk/city-plan>

Appendix B Extracts from the National Planning Policy Framework

Building a strong competitive economy

The Government's National Planning Policy Framework (NPPF) advises that planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Planning policies should:

- a) Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- c) Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- d) Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances. (NPPF paragraph 86)

Planning policies and decisions should also recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative, or high technology industries, and for storage and distribution operations at a variety of scales and in suitably accessible locations. (NPPF paragraph 87)

Supporting a prosperous rural economy

Planning policies and decisions should enable:

- a) The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;
- b) The development and diversification of agricultural and other land-based rural businesses;
- c) Sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d) The retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses, and places of worship. (NPPF paragraph 88)

Ensuring the vitality of town centres

Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management, and adaptation. Planning policies should:

- a) Define a network and hierarchy of town centres and promote their long-term vitality and viability- by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries allows a suitable mix of uses (including housing) and reflects their distinctive characters;
- b) Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.
- c) Retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
- d) Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.
- e) Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.
If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
- f) Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
(NPPF paragraph 90)

The NPPF further advises that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. (NPPF paragraph 91) and when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment...(NPPF paragraph 94)

Conserving and enhancing the historic environment

Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. (NPPF paragraph 195)

Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay, or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

- b) the wider social, cultural, economic, and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place. (NPPF paragraph 196)

Paragraph 198 of the NPPF says Local Planning Authorities should maintain or have access to a historic environment record containing up-to-date evidence about the historic environment in their area. This is to be used to assess the significance of heritage assets and the contribution they make to their environment and predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. NPPF paragraphs 200 to 204 give detailed advice on proposals affecting heritage assets and paragraphs 205 to 214 give advice on considering potential impacts.

Appendix C: MK City Plan 2050 Evidence Base

Policies in the MK City Plan 2050 must be based on relevant and up to date evidence related to the local and ‘larger than local’ context of Milton Keynes. This includes information that predicts future needs (including for jobs, homes, retail, and leisure), and information that gives an assessment of the current or future predicted situation and impacts (for example landscape character and flooding). Among the studies produced for the MK City Plan 2050 are the following:

Document	Purpose/Scope
Housing and Economic Development Needs Assessment (HEDNA) (Logistics study commissioned separately by SEMLEP)	The HEDNA assesses the housing and economic development needs for the Borough of Milton Keynes for the period 2022-2050. It includes data on population change, market signals, the economy and labour market, employment forecasts, a commercial market assessment and future employment land requirements for different types of employment floorspace.
Retail and Commercial Leisure Study (RCLS)	Provides an up-to-date, objective assessment of retail and leisure development needs in the Council area and considers possible strategic policy responses to any prevalent or emerging issues.
MK Infrastructure Study and Strategy (MKISS)	Identifies the various forms of infrastructure that are required to meet growth that may come forward through the Local Plan and through to 2050.
Land Availability Assessment (LAA)	Identifies a future supply of land which is suitable, available, and achievable for housing and economic development uses over the plan period. The assessment is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5-year supply of housing land.
Gypsies and Travellers Accommodation Assessment (GTAA) and Boat Dwellers Accommodation Assessment	To consider the housing needs of Gypsies and Travellers and transit and boat dwellers.
Carbon and Climate Study	To assess how the MK City Plan 2050 can deliver low- or zero-carbon and climate-adaptable growth. This will incorporate the air quality & air pollution study.
Whole Plan Viability Study	Addresses overall deliverability of the plan to determine whether the policy requirements can be viably delivered.

Equality Impact Assessment	A systematic and evidence-based tool, which enables us to consider the likely impact of work on different groups of people. Completion of equality impact assessments is a legal requirement under race, disability, and gender equality legislation.
Sustainability Appraisal	An assessment of the social, economic, and environmental effects of the plan's policies, alongside consideration of any significant adverse effects on protected biodiversity sites.

Appendix D: Glossary

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

Article 4 direction: A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.

Bulky goods: Goods of a large physical nature (for example DIY, furniture, carpets) that sometimes require large areas for storage or display.

Business Incubators: These are spaces often linked to Universities, Colleges or other organisations that may offer flexible 'easy in-easy out' lease agreements. Some offer shared workspace or 'hot-desking' arrangements usually linked to specialist support or advice from the host organisation and shared spaces for networking and exchange of ideas.

Central Milton Keynes/CMK: References to Central Milton Keynes cover both Central Milton Keynes and Campbell Park – i.e., the area bounded by the West Coast Mainline, Grand Union Canal, H5 Portway and H6 Childs Way. Therefore, references to the City Centre or Central Milton Keynes include Campbell Park and the blocks immediately adjacent.

Comparison goods/retail: Shopping for products which are usually higher value and purchased infrequently, for example household items, electrical goods, clothes, and shoes, and for which people tend to go to several shops to compare products before buying them.

Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Conservation Area: Conservation areas exist to manage and protect the special architectural and historic interest of a place. Most conservation areas are designated by the Council as the local planning authority. In conservation areas there are some extra planning controls and considerations in place to protect the historic and architectural elements which make the place special.

Convenience goods/retail: Shopping for goods which are bought frequently and with little decision-making required, for example at a supermarket or market.

Creative Industries: The [Department for Culture, Media and Sport](#) (DCMS) defined the creative industries as:

"Those industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property"

As of 2015 the DCMS definition recognizes nine creative sectors, namely:

- Advertising and marketing
- Architecture
- Crafts
- Design: product, graphic and fashion design
- Film, TV productions, TV, video, radio, and photography
- IT, software, and computer services
- Publishing
- Museums, galleries, and libraries
- Music, performing and visual arts

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Edge of centre: For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Employment Uses: Refers to the following uses E(g)(i) Offices, E(g)(ii) Research and development, E(g)(iii) Industrial processes, B2 General industrial and B8 Storage or distribution.

Employment Land: Unless otherwise stated, employment land throughout this plan refers to land used for the following use classes:

E(g)(i) Offices to carry out any operational or administrative functions,

E(g)(ii) Research and development of products or processes

E(g)(iii) Industrial processes,

B2 General industrial - Use for industrial process other than one falling within class E(g)

B8 Storage or distribution - This class includes open air storage. Sometimes storage and distribution uses are referred to as warehousing or logistics.

Health checks: These are recognised as important planning 'tools' for appraising and monitoring changes in the overall vitality and viability of town centres and informing both plan-making and decision-taking at the local level. Health checks cover several key performance indicators used to assess and monitor the overall health and performance of the centre such as retail composition and vacancies, rents and yields, commercial demand and accessibility and pedestrian flow.

Heritage asset: A building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic England: (officially the Historic Buildings and Monuments Commission for England) is an executive non-departmental public body of the British Government sponsored by the Department for Culture, Media, and Sport. It is tasked with protecting the historic environment of England by preserving and listing historic buildings, scheduling ancient monuments, registering historic parks and gardens and by advising central and local government.

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic environment record: Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

Impact Test: The purpose of the test is to consider the impact over time of certain out of centre and edge of centre proposals on town centre vitality/viability and investment. The test relates to retail and leisure developments (not all main town centre uses) which are not in accordance with up-to-date plan policies and which would be located outside existing town centres.

Incubator: A facility designed to nurture and accelerate the growth of new businesses. It typically provides resources such as office space, access to mentors and investors, shared services, and other resources to help entrepreneurs launch their business.

Knowledge economy: The knowledge economy, or knowledge-based economy, is an economic system in which the production of goods and services is based principally on knowledge-intensive activities that contribute to advancement in technical and scientific innovation. The key component of a knowledge economy is a greater reliance on intellectual capabilities rather than on physical inputs or natural resources.

Listed Buildings: Buildings and structures defined by the Secretary of State as being of “special architectural or historic interest.” They include buildings and structures that are deemed to be of importance on a national scale.

Local centre: A small group of shops, usually including a grocery shop and other shops and services of a local nature, to serve daily needs.

Local plan: The main planning policy document for the Borough, containing strategic and site-specific policies and detailed policies to guide the location and nature of development.

Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture, and

tourism development (including theatres, museums, galleries and concert halls, hotels, and conference facilities).

New Town Heritage Register: A 'local list' of assets from the Milton Keynes Development Corporation era (1967-92) which are considered to be locally significant.

Out of centre: A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Out of town: A location out of centre that is outside the existing urban area.

Permitted Development: Types of development, including building and change of use, that do not require planning permission. These rules are set by a Central Government through law called the General Permitted Development Order (GPDO).

Primary shopping area: Defined area where retail development is concentrated.

Primary Shopping Frontage: Primary shopping frontages (PSFs) are likely to include a high proportion of retail uses which may include food, drinks, clothing, and household goods.

Registered Parks and Gardens: The Historic England 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of particular significance. The Register provides a listing and classification system for historic parks and gardens similar to that used for listed buildings. Registered Parks and Gardens are recognised as 'designated heritage assets'.

Retail Capacity: Forecast resident spending within the catchment area, with which to support existing and additional retail floorspace.

Retail Floorspace: Total floor area of the property that is associated with all retail uses in square metres. May be expressed as a net figure (the sales area) or in gross (including storage, preparation, and staff areas).

Retail Impact: The potential effects of proposed retail development upon existing shops.

Scheduled Monuments: Nationally important sites and monuments are given legal protection by being placed on a 'schedule'. Historic England leads in identifying sites which are then placed on the schedule by the Secretary of the Department of Culture, Media, and Sport.

Secondary Shopping Frontage: Secondary shopping frontages (SSFs) provide greater opportunities for a diversity of uses such as restaurants, cinemas, and businesses.

Sequential Approach: A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites.

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's

Statement of Outstanding Universal Value forms part of its significance.

Sui Generis: Sui generis is a Latin term that means 'in a class of its own'. Certain uses are specifically defined and excluded from classification by legislation, and therefore become 'sui generis'. These are theatres, cinemas concert halls, live music venues, public houses, wine bars, or drinking establishments, drinking establishments with expanded food provision, hot food takeaways, nightclubs, casinos. This list is not comprehensive.

Town centre: Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Use Classes: The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. For example, an office would be use class E(g)(i) but a shop for the display and retail sale of goods, other than for hot food would be in use class E(a). A 'change of use' can occur within the same Use Class or from one Use Class to another.



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