

Our Growth Strategy.

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 explaining our preferred growth strategy at this stage in preparing the MK City Plan 2050, and how we think this helps us achieve our Ambition and Objectives.

An integrated strategy

Our approach

- 2.1 **The MK City Plan 2050 will take forward our Strategy for 2050ⁱ which sets out a bold and ambitious vision for Milton Keynes that will bring transformational change, whilst protecting that which is unique to Milton Keynes and will play an important role in our future success. An integrated plan is one that will consider and balance a range of difficult, and at times competing, things and do this in a way that helps growth to be virtuous and beneficial to the communities living in Milton Keynes today and tomorrow.**
- 2.2 The range of things we need and want the MK City Plan 2050 to respond to typically includes our need for homes, creating jobs and supporting business, how we move around the city, our changing climate, our natural and built environment, design of streets, and the places which support our everyday lives such as schools, shops and surgeries. This is reflected in our overarching Ambition for the MK City Plan 2050 set out below. However, a driving force of the plan is helping to make Milton Keynes a more people-friendly and healthy place to live, work and enjoy. A focus on health is not at the cost of other issues that the plan responds to. Providing more good quality and affordable homes helps people find a home and gives them security, which we know has a positive impact on people's mental and physical health. We know that creating opportunities for more jobs and an affordable and accessible way of getting to work supports people's wellbeing and ability to lead healthier lifestyles. Providing quality open and green space, schools and services in the right places creates a sense of community and belonging and encourages physical activity, which we know improves physical and mental health, as well as supporting our aims around biodiversity and climate change. With a focus on health, the MK City Plan 2050 can address the wide range of matters we need and want it to in virtuous and integrated way.
- 2.3 We are currently at the draft stage of preparing the MK City Plan 2050, what is often referred to as the Regulation 18 draft plan due to the legislation that governs the preparation of local plansⁱⁱ. The draft MK City Plan 2050 is slightly unusual compared to most local plans at the Regulation 18 stage.

Thanks to the work and engagement carried out to prepare the Strategy for 2050, which is adopted as Council policy, the draft MK City Plan 2050 can articulate a more thoughtful and comprehensive growth strategy and suite of supporting policies than would ordinarily be the case. This will hopefully allow you, our communities and stakeholders, to see and comment on more substantial proposals rather than broad or vague ‘issues and options’.

- 2.4 Even though the draft MK City Plan 2050 is relatively comprehensive and defined, we want informed challenge and different points of view on what we are proposing to ensure the plan is the right approach.

Ambition and Objectives

- 2.5 Building upon the long-term vision of the Strategy for 2050, we consulted with our communities and stakeholders in early 2023 on how far our Ambition should reach and what the Objectives that guide us should be. We have continued a conversation about this with community groups and stakeholders since then, through online surveys and face to face workshops and our continued and wide-ranging technical work. Using the evidence and feedback we received, we have settled on the Ambition and Objectives shown here.

- 2.6 Our Ambition and Objectives provide the ‘golden thread’ to guide the development of our spatial strategy – how much growth do we plan for, where should it go, and how can it be delivered – as well as policies that guide this growth to ensure we achieve our objectives.

By 2050, Milton Keynes City and its rural area will be an innovative and successful place, founded upon its unique history and special characteristics. Well-planned ambitious growth has created prosperity and a better quality of life and wellbeing for all. People living and working in our city enjoy good-quality affordable homes that meet their needs, green and valued open spaces, more jobs, more business investment, a diverse cultural offer, and people-friendly healthy places supported by infrastructure that makes for a thriving and sustainable place. A city that is Better by Design.

Our objectives

People-Friendly and Healthy Places

Objective 1 Create inclusive and safe places that encourage greater physical activity, social interaction, and healthier lifestyles.

Objective 2 Create streets and neighbourhoods that prioritise walking, cycling and wheeling for access to shops, services, community facilities, and parks and open space.

Objective 3 Provide a suitable range of facilities and infrastructure in the right places at the right time to promote walkable neighbourhoods and good physical and mental health.

High Quality Homes

Objective 9 Provide a range of homes for those most in need including affordable homes, and to meet the wider market demand for housing.

Objective 10 Support renewal and regeneration within neighbourhoods and communities that would benefit from it.

Objective 11 Support delivery of social infrastructure to enable people to prosper and have a high quality of life.

Climate and Environmental Action

Objective 4 New homes and commercial buildings to be net zero carbon by 2030 and carbon negative by 2050.

Objective 5 New growth prioritises active travel and public transport to reduce carbon emissions.

Objective 6 Support the efficient use of resources as part of a circular economy.

Objective 7 Create space for nature and deliver significant gains in biodiversity.

Objective 8 Ensure that communities and nature can cope with and bounce back from negative climate impacts and environmental change.

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.

Technical evidence

2.7 We have prepared a comprehensive evidence base across a range of issues to help us prepare the MK City Plan 2050. This is important as our growth strategy and all policies within the plan need to be justified to be found 'sound' by the Secretary of Stateⁱⁱⁱ. The range of technical evidence we have prepared is illustrated below, and the full suite of evidence has been published alongside the draft MK City Plan 2050 consultation. These evidence studies have also been informed by their own dedicated engagement and consultation work. This has normally focussed on expert technical bodies and stakeholders, but has also included engagement with parish and town councils (e.g. landscape, open space and carbon and climate) as well workshops and survey work focussed on people-friendly and healthy places, as outlined below.

People-friendly places and active travel	Carbon and Climate	Site Assessments	CMK Growth Opportunities	Nature Green and Blue Infrastructure
Gypsy and Traveller Accommodation	Integrated Water Management	Mass Rapid Transit and Active Travel	Retail and Leisure	Infrastructure
Landscape	Transport Modelling	Housing & Economic Needs	Open Space	Viability

How much growth do we need to plan for

2.8 The Housing and Economic Development Needs Assessment (HEDNA) identifies the minimum annual local housing need figure for Milton Keynes of 1,902 homes per year, or around 53,000 homes for the MK City Plan 2050 period (2022-2050). This has been produced using the standard method calculation set out in national planning practice guidance. Within the 53,000 homes, the HEDNA identifies an overall affordable housing need of 14,331 homes over the 28-year period 2022-50, equivalent to an average of 512 per annum. The HEDNA also considers the higher growth target set out in the Strategy for 2050, based on reaching a population of 410,000 by 2050. This would require housing delivery to average 2,265 dwellings per year, around 63,000 homes in total. Further information is provided in the High Quality Homes Topic Paper.

2.9 Due to our successful record of proactive plan-making, we already have around 29,000 homes being built, with planning permission or allocated within Plan:MK and Neighbourhood Plans. This means that we will need to allocate a minimum of 23,000 homes in the MK City Plan 2050, but in reality a higher figure – by adding a buffer - to ensure we do provide enough homes,



protect ourselves from speculative development in locations we don't want growth to occur, and to match our Strategy for 2050 aspirations.

2.10 Our HEDNA sets out how much employment land might be required to support economic growth over the plan period, and has identified several challenges and trends:

- Need to replace and repurpose ageing stock of commercial floorspace (office, industrial and warehousing floorspace) within the area. The amount of floorspace required to replace ageing commercial floorspace is greater than the amount of floorspace forecast to be required by economic growth.
- Forecast need for around 480,000 – 520,000 square metres of office floorspace. Most of this office development, at around 300,000 square metres will be in the 'Downtown quarter' of CMK around the railway station.
- Forecast need for around 420-580 hectares of land for warehousing and general industrial purposes, most of which is for warehousing. Taking account of land already due to come forward and new employment sites totalling 275.5 hectares, this means a remaining need of 144.5 to 304.5 hectares of land.



Identifying our options

- 3.1 **To identify options for where we could grow to provide a minimum of 53,000 homes, we combine a ‘bottom-up’ approach of land being promoted to us by developers and identifying possible urban growth locations ourselves, with a ‘top-down’ approach with a wide range of strategic considerations.**
- 3.2 Most prominent of these is the Council’s vision for growth and Recommended Growth Option within the Strategy for 2050, but also our development needs and wider evidence base, national planning policy, our current supply of land for development, and opportunities arising through emerging investment and infrastructure projects. We then use our technical evidence and engagement work outlined above to inform our site assessment and Sustainability Appraisal of growth options and arrive at a preferred strategy. The following sections outline the basic ‘bottom-up’ steps we have taken to identify and assess options. Section 4 outlines how we have then considered these by combining the ‘top-down’ approach through the Sustainability Appraisal to arrive at a preferred strategy for the draft MK City Plan 2050.

Call for Sites

- 3.3 The first step in developing our growth strategy and identifying where growth could occur is a Call for Sites. This is an open-ended process where landowners can propose that their land should be developed for various uses, but typically for housing. This is a standard process taken in all local plans and is set out in national planning policy. A Call for Sites was commenced in March 2023 when we launched our consultation on the Ambition and Objectives and Sustainability Appraisal Framework consultations. The Call for Sites process is open-ended and we have to consider any site promotions from developers we receive throughout the process of preparing the plan until we have consulted on our the final ‘Regulation 19’ version of the MK City Plan 2050 in early 2025.
- 3.4 As a result of the Call for Sites process to date, we have been presented with 527 sites to be considered for allocation in the MK City Plan 2050. Virtually all the land promoted to us falls in the rural area beyond the boundaries of the city and the towns of Olney, Newport Pagnell and Woburn Sands. Whilst the historic towns of Olney, Newport Pagnell and Woburn Sands may contain small to medium sites that offer potential for development, very few have been promoted through the Call for Sites to date. This may be because the majority of any (re)development opportunities have already been built out or are allocated in Neighbourhood Plans. Historically, local plans for the borough of Milton Keynes have directed growth to within or adjoining the city itself, without relying on smaller scale growth to occur in the smaller towns. Nonetheless, significant growth has occurred in these towns, particularly since the advent of Neighbourhood Plans. As a result, the sites promoted to us are primarily in the rural areas and range from small sites that could only provide a handful of homes, through to strategic-scale new settlements or extensions to the city (and to a lesser extent to



Olney) that could provide many thousands of new homes, community facilities, space for business and other uses.

Opportunities within urban areas

- 3.5 Due to the history of how Milton Keynes was established as a new city, most of the land promoted by private owners falls within the rural areas beyond the city. Most of the undeveloped land within the urban areas, or areas where redevelopment could occur, is typically owned by the public sector and primarily Milton Keynes City Council or its arms-length body, the Milton Keynes Development Partnership.

Strategic Brownfield Opportunities

- 3.6 Most vacant land in Milton Keynes, in planning terms, is not classed as brownfield as it has never been built upon. There are a limited number of options on brownfield land that have been promoted to us by other parties for consideration, namely the former Wolverton railway works and the Open University Walton Campus. The former railway works in Wolverton has previously had planning permission to be redeveloped for residential mixed use, and so this option is being considered again. The Open University are considering options for the future of this iconic MK institution, with their current favoured option entailing a move to the city centre meaning the current campus may be available for partial or whole redevelopment. However, there isn't much other land in the urban area that provides brownfield opportunities or may be promoted by private owners. Consequently, we have looked to identify ourselves where growth could occur within the built-up area of Milton Keynes.

City centre

- 3.7 Our focus has been on the city centre, Central Milton Keynes, where we are already seeing more homes being promoted privately but in a piecemeal way. As most of the land in the city centre is publicly owned, we have a huge opportunity to shape how the city centre will grow and change through to 2050. To help do this, we commissioned the Central Milton Keynes Growth Study to investigate what growth could come forward in a comprehensive joined up way, alongside potential changes to open space, public realm and transport, through a design and placemaking-led approach. This study has identified opportunities for significant growth in the number of homes and office space, alongside some small and large-scale changes to open space and transport, to create a vibrant city centre founded on its unique identity. We are continuing to work on this, and better understand what would be needed to support a far larger number of people living in the city centre, and what investment and conditions are needed for this growth to occur successfully where and when we want it to.

Central Bletchley

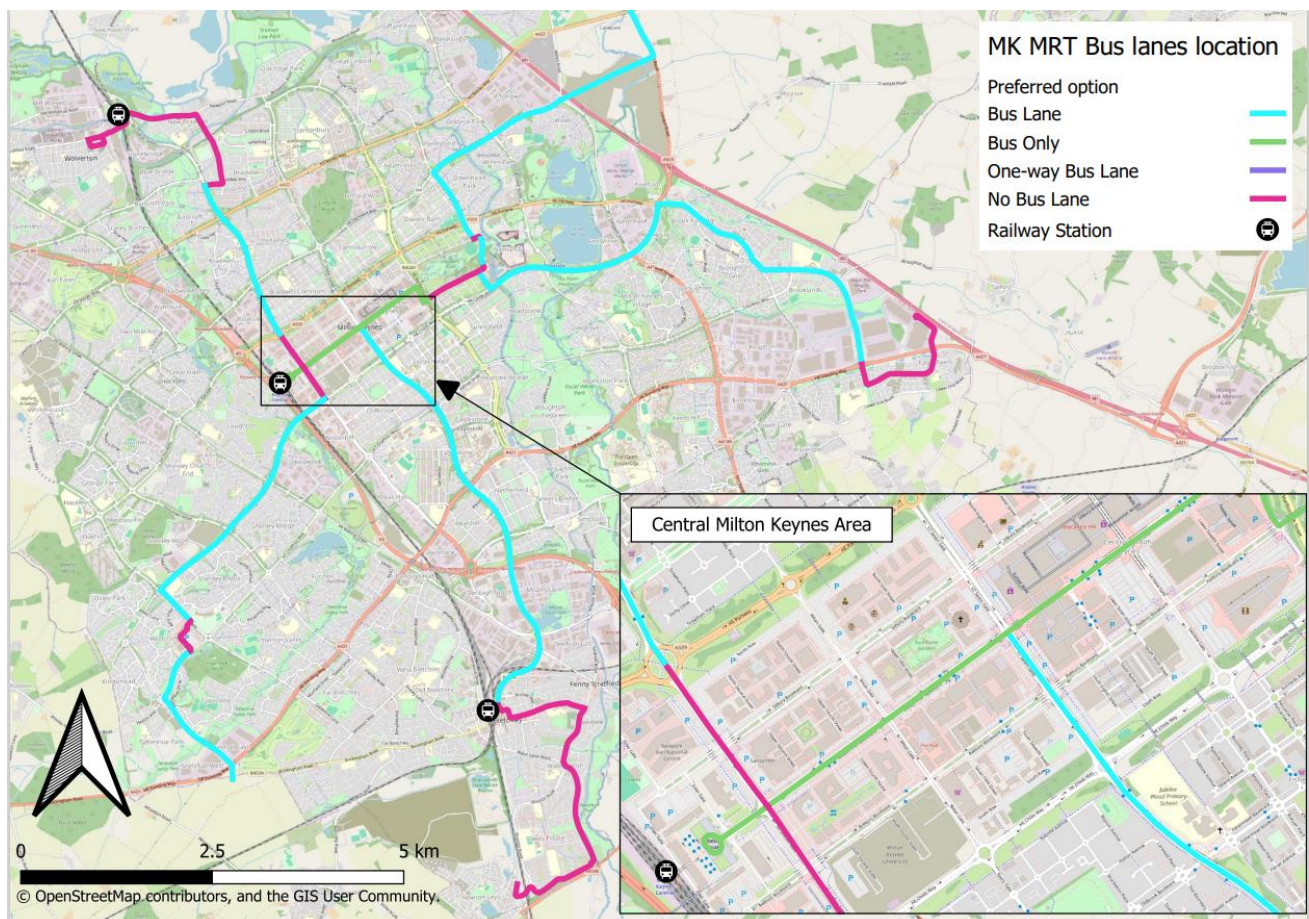
- 3.8 Beyond the city centre, we have looked at what other opportunities there may be. There has already much discussion with local leaders and communities in Bletchley and Fenny Stratford about how this area may be improved and what opportunities there are for (re)development, linked to the East West Rail project^{iv} and a successful Town Fund Deal^v. This dovetails with and reinforces the

approach set out in the Central Bletchley Urban Design Framework which was adopted in 2022 in line with Plan:MK’s positive vision for Central Bletchley^{vi}.

Transport hubs

3.9 Opportunities for development are likely to become available because of a new Mass Rapid Transit (MRT) system. Dedicated work to prepare a business case for a new MRT system has resulted in five indicative routes crossing the urban area of Milton Keynes. These have provided broad areas within which we can identify specific locations that could be used for development that would benefit from enhanced public transport, and in turn support the MRT system itself. Work to define and investigate any opportunities will continue as the MK City Plan 2050 moves towards its final version. This will include better understanding what infrastructure would be needed to make those opportunities successful locations for growth, and whether this is already in place or could be newly provided.

Figure 1 Emerging Mass Rapid Transit routes, March 2024 (Draft Mass Rapid Transit Outline Business Case, Unpublished)



Small brownfield sites and Regeneration

3.10 Alongside allocated strategic growth locations and sites, it is typically the case that much smaller sites come forward within urban areas during the course of a plan period. These are traditionally known as small brownfield sites or windfall sites, and come forward through planning applications. Under Plan:MK we made an allowance of 95 homes per year to come forward in this way. Since

Plan:MK was adopted, we have seen a higher number of homes from small brownfield and windfall sites come forward than anticipated. These sites and homes have been suitable and sustainable locations and have been given permission by the Council accordingly. Given past trends, we have made a reasonable estimate that 115 homes per year could come forward over the period 2024-2050 in this way, providing 3,000 homes in total.

- 3.11 We have also sought to investigate small to medium parcels of vacant land within the estates across Milton Keynes that could potentially be developed for housing or other uses. Whilst many sites have been identified, these are in most cases currently designated as open space within estates that may be subject to local conversations about regeneration of their neighbourhoods. As explained further below, we do not consider regeneration of estates in the city to have the required level of certainty around them to rely upon them within the MK City Plan 2050 to provide a significant number of additional homes.

The Strategic Housing Land Availability Assessment

- 3.12 The Strategic Housing Land Availability Assessment (SHLAA), alongside the Sustainability Appraisal, is our main method for assessing and defining growth options from the various sources outlined above. A SHLAA report has been published separately as part of our evidence base, providing more detail on the methodology and outputs, but a summary is given here.
- 3.13 We have invested in a new digital tool to assess sites through the SHLAA in a more consistent and automated way. This has enabled us to consistently map and assess the 527 sites identified through the Call for Sites and our own review of opportunities in the urban area, excluding CMK. For CMK, we have taken a bespoke place making approach to better understand the scale and nature of the growth opportunity our city centre offers. This is explained further in the Central Milton Keynes Topic Paper and CMK Growth Opportunity Study.
- 3.14 Following a Call for Sites exercise and collation of all housing sites already known to us, the SHLAA moves into two distinct stages. Stage 1 sifts out sites which are entirely unsuitable for housing or employment based on fundamental constraints (e.g. flood plain and SSSIs). Due to the where Milton Keynes' location and characteristics, there are very few fundamental or overriding constraints^{vii} that would cause a site to be excluded outright. After sieving sites through stage 1 and also discounting sites that already had planning permission and/or were under construction, we were left with 398 sites to assess in Stage 2 of the SHLAA. Stage 2 of the SHLAA uses a range of information provided by our evidence base and expert advice from colleagues to determine whether:
- the site is available (i.e. there is a willing landowner);
 - the site is suitable or not for housing or employment use, and what it's development potential is (i.e. number of homes, or employment floorspace); and
 - the site is achievable (i.e. is it broadly viable).
- 3.15 When assessing the suitability and development potential of a site we consider the matters below and remove parts of a site that are patently unsuitable for development, and/or score the remaining parts of the site down if necessary due to other constraints or issues within or close to

the site. As a result of this analysis, 252 sites were deemed unsuitable in Stage 2 and **166 new sites were considered to be suitable, available and achievable for housing and capable of being allocated in the MK City Plan 2050.**

Figure 1 Matters considered in Stage 2 of the Strategic Housing Land Availability Assessment when assessing suitability for housing

Remaining river, surface & ground flood risk	Listed buildings and Schedule Monuments	Registered Parks and Gardens	Quality of farmland
Ancient woodland	Biological Notification Sites	Priority Habitats	Local Wildlife Sites
SSSI	Wildlife Corridors	Churchyards, cemeteries, village greens, common land	Natural and semi-natural green space
Allotments	District and Linear Park	Paddocks	Pocket Parks

Potential number of homes

3.16 Our SHLAA, together with the CMK Growth Opportunity Study, has identified suitable and deliverable or developable options for housing which altogether could provide up to around 59,000 new homes in total, or just over 38,000 new homes that could come forward by 2050. This would be in addition to the 29,000 homes that already have planning permission or planned to come forward through Plan:MK by 2050. This gives a total potential of around 67,000 new homes by 2050 or 88,000 new homes in total, including beyond 2050. Whilst options for new Freestanding Settlements were submitted, our assessment of them has concluded that they are currently considered to be unsuitable and/or undeliverable.

Figure 2 Summary of potential homes from different sources). Number of homes indicated are approximate. Detailed figures per site or growth option are available in the SHLAA.

<p>Central Milton Keynes 11,000 homes by 2050 (15,500 homes total) 355k to 492k sqm office space</p>	<p>Bletchley 1,000 – 1,300 homes</p>	<p>Brownfield redevelopment 2,000 homes</p>
<p>Small brownfield sites (windfall) 2,500 – 4,000 homes</p>	<p>Transport hubs c.2,500 homes by 2050 (10,000 total est.)</p>	<p>Strategic City Extensions 14,250 homes by 2050 (22,750 homes total), plus employment</p>
<p>Olney expansion Up to 1,000 homes</p>	<p>Rural villages Up to 2,300 homes</p>	<p>Regeneration Unknown</p>

- 3.17 Further work will be carried out to investigate what potential development could come from transport hubs to refine this figure for the Regulation 19 version of the MK City Plan 2050. Our assessment of opportunities within Central Bletchley has indicated there is capacity for between 1,000 to 1,300 new homes. This is based on the existing acceptable density range in Plan:MK (150 - 250 dwellings per hectare) being applied on a case by case to the eight sites found to be suitable, available, and achievable.
- 3.18 At this time, it is not possible to determine with any certainty whether and how much growth could come from potential regeneration of estates in the city. This is an ongoing conversation with local communities, and it is not felt appropriate to ascribe any housing numbers to regeneration efforts in such estates within the MK City Plan 2050.

Opportunities for commercial development

- 3.19 In terms of commercial development, our CMK Growth Opportunity Study has identified opportunities for around 300,000 square metres of office floorspace within the 'Downtown' quarter around the railway station. This location aligns with both occupier and policy requirements for directing office development to town centres, and the area around the railway station is an accessible and well-connected location for business and workers. Outside of CMK, our established employment sites (some of which are still vacant) and certain Strategic City Extensions do provide opportunities for new employment land to support the creation of high-quality jobs in different sectors. This is explained in greater within the Employment Land Study. What we do not have are any new options to accommodate large-scale warehousing and logistics. This is most likely because land in the most preferred locations (close to junctions on the strategic road network) has already been exhausted for warehousing and logistics or other development. Land or sites further afield from junctions on the strategic road network are not seemingly attractive enough to the market for landowners to promote their land for these uses.
- 3.20 Central Milton Keynes is already a regional centre for retail and leisure with the Shopping Centre and Xscape areas providing a wide offer of comparison retail and leisure. Our Call for Sites and other work has not identified any significant new sites for retail and leisure that could be allocated in the MK City Plan 2050. However, we expect that, subject to market demand, additional floorspace could come forward within our Primary Shopping Areas and town centres in accordance with supportive planning policy that seeks to protect and enhance the role of CMK as a regionally importance centre.

Sustainability Appraisal and Reasonable Alternatives

- 3.21 Having identified a range of options through the SHLAA using a bottom-up approach, we then consider how these options map to our ambition and objectives and other strategic considerations using a 'top-down' approach. This process is carried out within the Sustainability Appraisal, which is an ongoing process, to identify a proportionate range of different growth strategies – referred to as Reasonable Alternatives in planning legislation. These Reasonable Alternatives are then tested to see whether they are likely to perform positively or negatively against the Sustainability Appraisal Framework Objectives (SA Framework) and associated plan objectives. The SA Framework has been

established based on our overall Ambition and Objectives for the MK City Plan 2050, as well as other strategies of the council and national planning policy. It was consulted upon in early 2023, and the finalised SA Framework Objectives are shown below.

Figure 3 MK City Plan 2050 Sustainability Appraisal Framework Objectives

No.	MK City Plan 2050 Theme	Objective
1	High Quality Homes and Neighbourhoods; Healthy Places; Climate and Environmental Action	Support establishment of walkable neighbourhoods in existing and new areas by 2050, by improving access to health, community and leisure facilities for all people in MK.
2	Healthy Places; High Quality Homes and Neighbourhoods	Support improvements to physical and mental health through well designed places and by improving availability of and access to health facilities and good quality green and blue infrastructure for all people in MK by 2050.
3	Climate and Environmental Action	Provide and improve accessibility for communities in line with our modal shift targets, promote active travel, and minimise car dependent communities.
4	High Quality Homes and Neighbourhoods; Healthy Places	Over the plan period provide a supply and mix of market and affordable good quality housing, that meets our calculated needs and aspirations.
5	Climate and Environmental Action; Healthy Places	Over the plan period, new development supports reduction of greenhouse gas emissions from the built environment and supports communities that can 'bounce-back' from environmental challenges, helps protect human and environmental health, and supports reductions in fuel poverty.
6	Economic and Cultural Prosperity	Designated and non-designated archaeological, built heritage, natural and biodiversity, and cultural assets are protected and enhanced over the plan period.
7	Climate and Environmental Action	Support creation of a zero-waste economy in MK by 2050.
8	Climate and Environmental Action	Increased water efficiency, including through water reuse and recycling measures, and contributes to improved water quality by 2050.
9	Economic and Cultural Prosperity	By 2050 Milton Keynes has a prosperous, diverse, inclusive, and resilient economy enabled by a high skilled workforce.

3.22 It is important to acknowledge that Reasonable Alternatives are different growth strategies consisting of different combinations of sites or options, rather than individual sites in isolation. Sustainability Appraisal is not concerned with assessing and comparing every individual site in detail in the style of a 'beauty parade'. Assessing individual sites or options against the SA Framework is helpful in dismissing clearly poor performing sites and identifying positive aspects of others in relation to our objectives. However, it is important to evolve this further and compare combinations of sites as different possible growth strategies and understand how they perform overall in fulfilling our plan objectives.

3.23 The background to this is the amount of growth we are planning for. As noted above, reaching a population of 410,000 equates to around 63,000 homes between 2022-2050, higher than our identified Local Housing Need of 53,256. We are proposing that our housing requirement for the

MK City Plan 2050 is a range between 53,256 and 63,000 (1,902 – 2,250 homes per annum), with the bottom end of this range (1,902) being used to calculate our five-year housing land supply and Housing Delivery Test. However, the upper end of the range represents our vision for growth and would also provide a buffer on our Local Housing Need, equating to around 18%. Taking growth of around 63,000 homes as our reference point, we have considered possible growth strategies that could deliver this.

3.24 Our starting point has been the Recommended Growth Option set out within the Strategy for 2050 (RGO), which is shown below. We have then evolved this through the SA process by considering growth locations or sites that have been identified through the ‘bottom-up’ and ‘top-down’ processes explained earlier. Certain growth locations or sites clearly perform very well in supporting our plan objectives and conforming with national planning policy. These are CMK and Campbell Park, Central Bletchley, Strategic Brownfield Sites and Transport Hubs. These growth options are considered to form the heart of our growth strategy, complemented by housing from suitable small and brownfield sites which traditionally come forward for development over time. Different combinations of strategic greenfield sites can then complement these. This has resulted in six Reasonable Alternatives being identified which are summarised below. The full appraisal of them can be found within the Sustainability Appraisal Report.

Figure 4 Recommended Growth Option from the Strategy for 2050

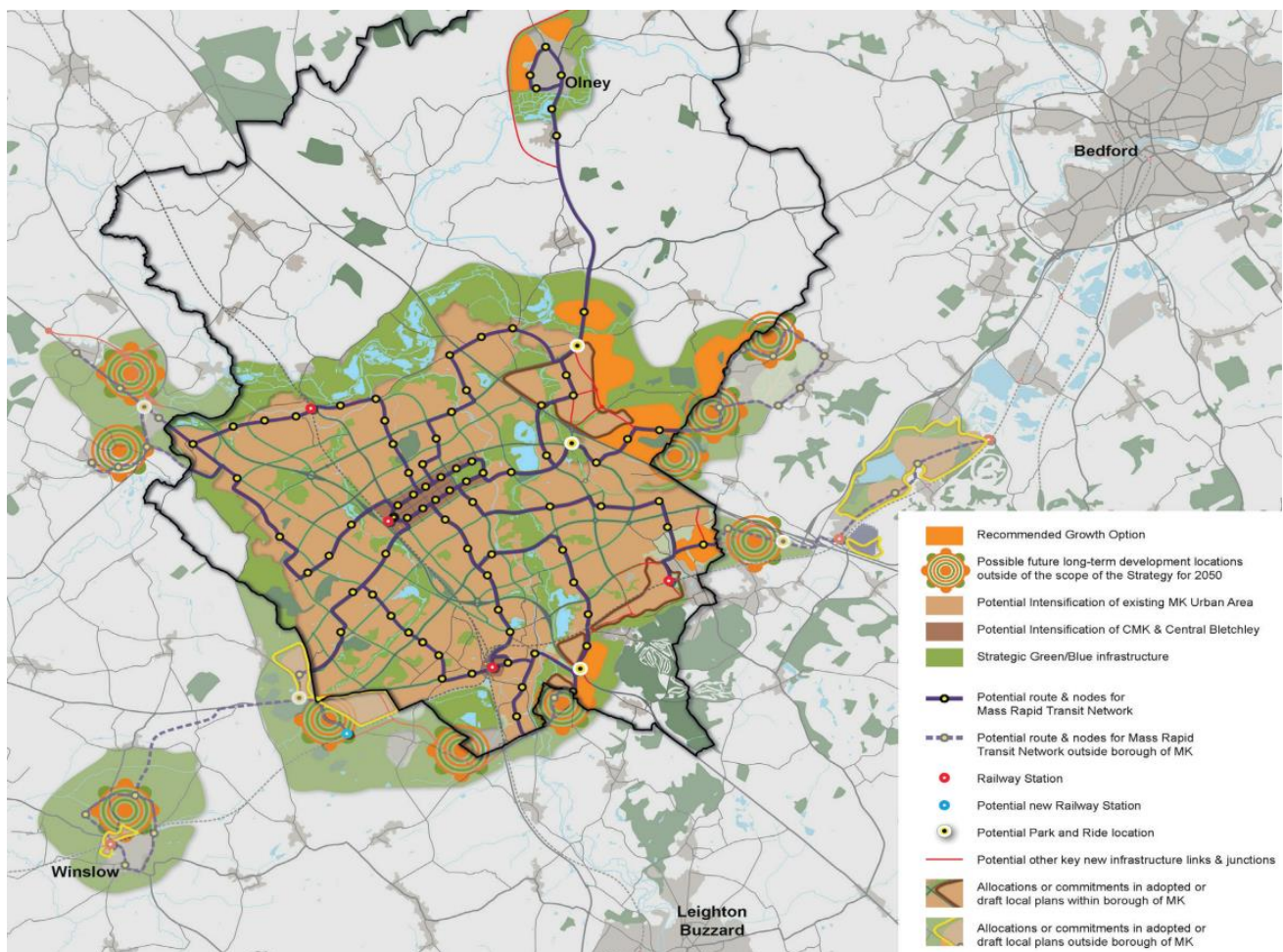


Figure 5 Summary of Reasonable Alternative Growth Strategies focused on housing

<p>Core growth locations (45,575 homes by 2050)</p> <p>Existing Commitments and Completions 2022-2050 (29,075)</p> <p> CMK (11,000)</p> <p> Central Bletchley (1,000)</p> <p> Walton Campus Strategic Brownfield Site (1,600)</p> <p> Wolverton Works Strategic Brownfield Site (400)</p> <p> Transport Hubs (2,500)</p>	
<p>Reasonable Alternative 1</p> <p>Core growth locations (45,575) +</p> <p> Eastern (7,500)</p> <p> E. of Wavendon (post 2038) (3,000)</p> <p> South of Bow Brickhill (1,500)</p> <p> Levante Gate (1,250)</p> <p> Shenley Dens (1,000)</p> <p> Other small and brownfield sites (3,000)</p> <p>Total = 62,825 homes</p>	<p>Reasonable Alternative 2</p> <p>Core growth locations (45,575) +</p> <p> Eastern (7,500)</p> <p> E. of Wavendon (3,000)</p> <p> Other small and brownfield sites (3,000)</p> <p>Total = 59,075 homes</p>
<p>Reasonable Alternative 3</p> <p>Core growth locations (45,575) +</p> <p> Eastern (7,500)</p> <p> E. of Wavendon (3,000)</p> <p> W. of Olney (1,000)</p> <p> Other small and brownfield sites (3,000)</p> <p>Total = 60,075 homes</p>	<p>Reasonable Alternative 4</p> <p>Core growth locations (45,575) +</p> <p> Eastern (7,500)</p> <p> South of Bow Brickhill (1,500)</p> <p> Levante Gate (1,250)</p> <p> Shenley Dens (1,000)</p> <p> W. of Olney (1,000)</p> <p> Other small and brownfield sites (3,000)</p> <p>Total = 60,825 homes</p>

Our preferred strategy

Housing and infrastructure

4.1 **Based on our evidence and assessment, Reasonable Alternative 1 best aligns with our plan objectives and performs best against the SA Framework, is an appropriate strategy to follow, and is therefore our Preferred Growth Strategy.**

4.2 The Preferred Growth Strategy can deliver 62,625 homes which matches our ambition for growth and ensures an ample buffer is provided so that we will deliver against our Local Housing Need of 53,256 homes by 2050.



4.3 The Preferred Growth Strategy has a mix of very large to relatively smaller scale strategic sites and a small but not insignificant allowance for smaller brownfield and windfall sites. Together, these are eminently deliverable and do not face significant infrastructure uncertainties, unlike other Reasonable Alternatives (particularly those involving West of Olney). Coupled with the comprehensive development of our city centre, Bletchley and brownfield sites, the Preferred Growth Strategy would avoid piecemeal development in the rural area and growth in locations that have significant infrastructure or site constraints that question the deliverability of infrastructure. The Preferred Growth Strategy would enable an ‘infrastructure first’ approach to be taken so that key community amenities and other infrastructure can be provided viably and in a timely way.

4.4 The Preferred Growth Strategy contains a very large growth location (Eastern Strategic City Extension at around 16,000 homes in total) which is of a scale that would dwarf almost all others in England. Ordinarily, an allocation like this would be seen as a new settlement separate from existing built development and infrastructure that would take many years to masterplan and commence. However, the Eastern Strategic City Extension is conceived of as an extension to the current city, as a continuation of infrastructure-led growth occurring in Milton Keynes East. Further work is required to understand the concept of this growth location, but it can nonetheless tap into and complement new infrastructure coming forward through Milton Keynes East in its early phases, allowing growth here to come forward quicker than might ordinarily be the case for such a large-scale site. Meanwhile, the Preferred Growth Strategy contains smaller and more readily developable strategic sites (including sites within CMK and Bletchley) that can boost housing supply in the short to medium term of the plan period as current growth under Plan:MK begins to tail off. Towards the end of the plan period, the East of Wavendon Strategic City Extension would then begin to add further housing supply in the latter part of the plan period. Overall, this approach should enable a consistent level of housing supply and delivery over the plan period.

4.5 The Preferred Growth Strategy contains around 14,250 homes coming forward on strategic greenfield sites. Our evidence tells us these sites can provide up to 40% of homes as affordable and are likely to provide a greater share of family homes than our core growth locations are likely to. Coupled with affordable housing coming forward through existing commitments and new urban

sites in the city, our Preferred Growth Strategy can provide around 16,800 affordable homes. This is more than our identified need of 14,331 affordable homes, and around 32% of our Local Housing Need of 53,000 homes.

4.6 A key objective of the plan is reducing cumulative carbon emissions from growth, and creating new communities that are resilient to a changing climate. Our Carbon and Climate Study shows that concentrating growth in the city is the best option for reducing cumulative carbon emissions, principally due to reduced emissions from transport. This is particularly the case in Milton Keynes where we are seeking to establish a new Mass Rapid Transit system across the city to encourage more people to choose public transport and active travel, over the car, to move around the city. In contrast, growth dispersed across the rural area tend to result in much higher cumulative carbon emissions over the long term due to reliance on the car to get around. Meanwhile, new growth in the city (or urban areas more generally) is potentially less resilient to climate change than other options, namely due to urban heat island effects.



4.7 Of the Reasonable Alternatives assessed, our Preferred Growth Strategy would result in a further 16,500 homes located in the city. This represents around 48% of the additional growth under the Preferred Growth Strategy, or 68% of our Local Housing Need, being in locations that would mutually benefit from Mass Rapid Transit and greater public transport services and are the most carbon efficient. Most of the remaining growth in the Preferred Growth Strategy would be within Strategic City Extensions. Whilst these are not as carbon efficient as growth in the city, they are more efficient than growth in the rural area. They also provide greater opportunities for creating climate resilient communities than growth in the city, given the greater opportunity to provide large scale green and blue open spaces. Overall, the Preferred Growth Strategy strikes the most optimal balance between reducing cumulative carbon emissions from growth whilst ensuring growth overall is as resilient to a changing climate as it can be.

Commercial development and high-quality jobs

4.8 Whilst there is a much smaller range of options available for providing land for employment, retail and leisure, nonetheless the Preferred Growth Strategy does provide good opportunities for creating high-quality jobs. It would do so through 300,000 square metres of office floor space in CMK (centred around the railway station) with a focus on jobs within technology and innovation in Block B4. It would also provide around 40 hectares of land for offices, research and development and light industry in the Eastern Strategic City Extension. This site sits between the city and Cranfield which both offer existing knowledge and innovation networks to tap into, linked by a proposed Mass Rapid Transit system and good transport infrastructure through the Eastern Strategic City Extension. Whilst other large-scale options, such as MK North or Hardmead, may in theory be capable of providing land for high quality jobs, the wider infrastructure and site constraints they face make this less likely than in the Eastern Strategic City Extension.

- 4.9 As noted earlier in this paper, we do not have any suitable options for strategic scale warehousing and logistics development to address projected market demand in this sector. This is something we will seek to reconsider through a review of the MK City Plan 2050 later. However, the Preferred Growth Strategy still provides a great opportunity to create new high-quality jobs with a focus on technology and innovation.

Conclusions and next steps

- 5.1 **Our reasoning behind the Preferred Growth Strategy contained in the Regulation 18 stage of the MK City Plan 2050 has been set out above. In summary, this has emerged from the Strategy for 2050, a wide and deep range of evidence, and stakeholder engagement. It is considered the Preferred Growth Strategy best aligns with our plan objectives and SA Framework, and would help us achieve our overall vision and ambition for growth.**
- 5.2 As a Regulation 18 draft plan, we want to hear your thoughts on whether this Preferred Growth Strategy would achieve what we think it will. Equally, we want to hear if you think we have mischaracterised other options we've identified, or whether there are options we haven't considered at all.
- 5.3 Your feedback along with our continuing evidence base work will help us check, reassess, and evolve the draft MK City Plan 2050 towards the next and most critical stage in its development – the final Regulation 19 version of MK City Plan 2050. This will be our fixed and chosen view on the growth strategy to be contained in the MK City Plan 2050. We expect to consult on this in early 2025 before it is submitted, along with your representations, to the Secretary of State in June 2025 for consideration by an independent Planning Inspector through an Examination in Public.
- 5.4 As we progress through the plan-making process to Regulation 19, submission and examination stages, 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.

ⁱ [MK Futures 2050 | Milton Keynes City Council \(milton-keynes.gov.uk\)](#)

ⁱⁱ [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](#)

ⁱⁱⁱ To be found sound by an independent inspector appointed by the Secretary of State, all local plans must meet the four tests of soundness: positively prepared; justified; effective; and consistent with national policy. See paragraph 35 of the National Planning Policy Framework for further see [National Planning Policy Framework \(publishing.service.gov.uk\)](#)

^{iv} [East West Rail | Project overview](#)

^v [Bletchley and Fenny Stratford Town Deal | Milton Keynes City Council \(milton-keynes.gov.uk\)](#)

^{vi} See Policy SD16 of Plan:MK [Plan:MK | Milton Keynes City Council \(milton-keynes.gov.uk\)](#)

^{vii} For example, national or international nature protection sites such as Special Areas of Conservation and Ramsar Sites; Areas of Outstanding Natural Beauty; Green Belt; Nutrient Neutrality, etc.)