

# MK City Plan 2050 Examination

Response to Inspectors' Initial Questions (ID 1)

June 2026



## Response to Inspectors' Initial Questions (ID1)

This document responds to the questions set out in [ID 1](#)<sup>1</sup>.

### Evidence Base

#### Question 1

**Representations from National Highways (RCCM-040) state that they consider further plan-level transport assessment is required. This is to include further consideration of the effects of proposed growth in the plan area on junctions along the A5 corridor and the implications of the Universal Theme Park Special Development Order on their network. The Council's response to this in Document CD21 suggests that the Council is undertaking further transport modelling work to address this matter. Could the Council confirm whether this work is in progress, the scope of this work and when it will be completed?**

- 1.1 Regarding the plan-level transport work referred to, we are currently scoping an update to the transport modelling evidence to:
  - a. update planning data within the Reference Case of the MK Multi-Modal Model (MKMMM);
  - b. test a range of highway interventions pertaining to National Highways' representation as well as interventions identified within the submitted IDP (INFR06)<sup>2</sup> and the Council's Local Transport Plan, and, where appropriate, in response to representations from neighbouring authorities; and
  - c. to test the effects of the Universal United Kingdom Resort consent (UUKR consent).
- 1.2 In relation to 'b' above, we consider that none of the highway interventions currently included in the emerging scope of work are strategic in nature and nor are they intimately related to the deliverability of the MK City Plan. The outputs of transport modelling to date indicates that the growth contained within the Mk City Plan would not have a significant impact on the function or safety of the highway. Where impacts are evident, these are not considered to represent absolute constraints to the plan's growth or major elements thereof, but instead are of lesser significance and capable of mitigation without strategic interventions being required to enable the plan's growth to occur. This has been borne out through discussion with National Highways and reflected in their representation RCRP-040. The additional modelling work set out in 1.1 above contains such non-strategic highway mitigation projects to help manage traffic and congestion to acceptable levels and/or provide improved access to proposed development sites.
- 1.3 We consider that the transport effects of the UUKR (with or without mitigation) are a matter outside of the scope of the MK City Plan and modelling these are not

<sup>1</sup> [Milton Keynes City Plan 2050 Examination](#)

<sup>2</sup> [260327 MK Submission IDP FinalClean.pdf](#)

necessary to demonstrate the plan's soundness. However, we are agreeable to testing the effects of the UUKR consent as a sensitivity test to better understand its interaction with the MK City Plan's own effects to aid National Highways in scoping and agreeing any highways and public transport interventions related to the UUKR. Nonetheless, it is our position that the MK City Plan and UUKR consent are separate matters which should not be conflated when considering the soundness of the submitted Plan.

- 1.4 Commissioning of the transport modelling work is currently underway, with the indicative programme showing that modelling outputs would be published in January 2027 subject to agreeing the brief and scope of the work with National Highways and, where appropriate, neighbouring authorities in a timely manner. Notwithstanding the recent announcement by the UK Government that a £1.3 billion package of funding will be made available to UUKR for transport improvements, information provided by National Highways relating to the UUKR consent for transport modelling purposes only extends to data on its effects (e.g. trip rates) and the modelling methodology to be followed. Information on planned transport interventions associated with the UUKR consent has not been made available to us by National Highways and/or relevant parties as yet. We are currently trying to secure this information, or at the very least understand the timescales for this information being made available. Given the uncertainty surrounding the availability and robustness of this information for modelling purposes, the programme for element 'c' referenced in paragraph 1.1 above carries a significant degree of uncertainty which is outside of our control. Once the overall scope of work set out in a-c in paragraph 1.1 has been agreed, and further information on UUKR interventions received, we will be able to subsequently update the Inspectors on the confirmed programme.

## Question 2

**The Infrastructure Delivery Plan (IDP) (Document INFR06) identifies a number of transport related infrastructure projects classified as "Category A – Unlocking Sites". Is there any supporting technical evidence which justifies the need for these projects and which provides detail on how they have been costed?**

- 2.1 The IDP classifies 52 projects under Category A (40 Highways/ Structures projects, and 12 public transport projects). This follows the principles set out in the Prioritisation Framework in Annex E. This categorises all projects falling under these infrastructure types as Category A which automatically assumes this infrastructure is required for delivery to commence, alongside access to power and water. This is intended to be a starting point. Paragraph 120 of the submitted MK City Plan acknowledges that priorities will evolve over time as we assess development proposals in more detail. Categorisation of infrastructure projects was carried out for the purposes of the Regulation 19 Plan and is reflected in the Submission version of the IDP as a result. This categorisation generally assumes that highway works are required to provide access or highway capacity to allow sites to be developed. However, as the further plan-level transport work outlined in paragraph 1.1 of this letter provides further evidence, the transport projects within the IDP may be re-categorised as Category B or C, either entirely or in part. In scoping the plan-level

transport work referred to in paragraph 1.1 of this letter, various highway projects we have already re-categorised around 30 projects from Category A to B or C. We will update the Inspectors on this aspect of the IDP as our further transport work is completed in line with the provisional programme set out paragraph 1.4. However, as we have stated in paragraph 1.2 of this letter, we do not consider that any of the transport interventions being tested are fundamental to the delivery of the plan or its soundness.

2.2 Of the 52 projects referenced above, 16 projects (all Highways/ Structures) relate to commitments in Plan:MK and are part of our planned highways capital programme, utilising Tariff funding associated with the respective Plan:MK allocations.

2.3 Of the remaining 36 projects:

- 32 projects are 'theoretical', with the same initial scope (*'Highway connections, onsite highways and existing highway capacity upgrades associated with new Development'*, or *'Connections to MK wide public transport infrastructure, capacity increases and on-site routes and stops associated with new Development'*). The project description goes on to say, *'Specifics of project requirements to be developed as sites are assessed in more detail'*, and then references specific roads, junctions, and possible works in the locality, depending on which site or location the project is attached to in the IDP (e.g. CMK, Bletchley, Wolverton, a Strategic City Extension). The associated costs were estimated based on experience of previous projects, or where there have been more specific discussions on projects with relevant stakeholders.
- One project is the Mass Rapid Transit project (MK Metro), which has been costed and is currently at Outline Business Case stage; and
- Three projects are proposed by the consortium of developers promoting the Eastern Strategic City Expansion site (ESCE), as part of their infrastructure planning. These projects have been scoped and outline costs have been provided by the consortium.

### Question 3

**We have identified that documents HO26 and HO27 in the examination library appear to be the same document. On opening, both are titled "Milton Keynes Whole Plan Viability Study – Residential Update Note – October 2025". Can the links to the documents the examination library be corrected. Furthermore, can the Council confirm whether the viability study has been updated since the Regulation 19 consultation, noting that the IDP and other infrastructure evidence has been updated?**

- 3.1 The Council has updated the Submission Documents List and accompanying links to show the following:

### Viability Study

HO26	Milton Keynes Whole Plan Viability Study- Residential Update Note (Reg 19 version)	Oct-25
HO27	Unused (Duplicated Document of HO26)	Oct-25

The following changes have been made to the Submission Documents list:

- HO27 is a duplication of document HO26.
  - The HO27 link has been removed, and the text has been amended to reflect the duplication.
- 3.2 No updated viability study has been produced since the Regulation 19 consultation. The Viability Evidence is set out in the June 2024 Whole Plan Viability Study (HO28)<sup>3</sup> and the October 2025 Residential Update Note (HO26)<sup>4</sup>.
- 3.3 Consideration was given to a further update to the October 2025 Residential Update Note; however, it was not considered necessary or proportionate. The October 2025 Residential Update Note acknowledged the uncertainty about the overall costs of strategic infrastructure and mitigation (pending completion of the IDP) so included sensitivity testing up to £75,000 per unit (being an increase from £50,000 per unit carried out in 2024) (HO26, paragraph 5.29).
- 3.4 Paragraph 4.37 in the Milton Keynes Infrastructure Study and Strategy, Investment Strategy - Final Report (March 2026) (INFR07)<sup>5</sup> states that “*While the 2024 WPVA remains up-to-date and is the appropriate document to support the next stage of the plan-making process, further advice was provided to MKCC in 2025 and 2026 on how recent changes to the appraisal inputs and to planning policy may impact on viability.*” The conclusion was that the viability of strategic sites had not materially changed because of the updated IDP.

<sup>3</sup> [Milton Keynes Whole Plan Viability Study.pdf](#)

<sup>4</sup> [MKCC Viability Study Residential Update Note October 2025](#)

<sup>5</sup> <AECOM Report>

## Question 4

**The link to Appendix 3 of the Strategic Housing Land Availability Assessment is directing to Appendix 2. Please can the Council arrange for this to be corrected.**

- 4.1 The Council have updated the Submission Documents List and replaced the link for Appendix 3 of the Strategic Housing Land Availability Assessment (HO11)<sup>6</sup> to ensure that it is showing the correct document.

## Infrastructure Contributions

### Question 5

**We note that the Council implements a 'Milton Keynes Tariff' implemented through section 106 of the Town and Country Planning Act in the area. Can the Council confirm whether it intends to apply the Milton Keynes Tarriff to each of the specified housing allocations in Policy GS2 and the 'retained strategic allocations' in policies GS20-GS22? If so, would there be an expectation for any developer contributions in addition to the tariff for these sites? If the Council does not intend to apply the tariff for some or all of these sites, could the Council set out where in the submitted evidence base the required infrastructure and costing to support the development of these sites has been identified and tested?**

- 5.1 Where we have implemented a Tariff through Section 106 Agreements for strategic greenfield sites, in multiple ownership, we set out the general principles and model Section 106 Agreements in a Framework Agreement for the original Tariff baseline programme in 2005. Individual Section 106 Agreements were signed for developments allocated in the 2005 Local Plan, following those general principles, as they came forward for planning consent.
- 5.2 Subsequent greenfield allocations in the 2013 Core Strategy, and 2019 Plan:MK have also followed those general principles from the original Framework Agreement in their Section 106 and Tariff arrangements, amended to meet newer policy requirements in the prevailing development plan.
- 5.3 The Tariff approach to infrastructure funding and delivery relies on an element of forward funding, which the Council has been successful in securing for previous Tariff programmes.
- 5.4 Paragraph 123 of the submitted MK City Plan states our support for continuing this model for Strategic City Extensions and potentially other growth locations, if forward

<sup>6</sup> [MKCC Strategic Housing Land Availabilit... - Full report with Appendices \(1\).pdf](#)

funding can be secured.

- 5.5 Policy INF2 also encourages this approach. This policy applies to Strategic Allocations for Growth (GS12-GS15, GS17-GS19) and sites in the CMK Development Framework Area (CMK2).
- 5.6 Policy INF2 does not apply to other sites listed in GS2 (Walton Campus, Central Bletchley, Wolverton Works, Metro Corridor sites, or Windfall sites) as we consider a standalone, negotiated Section 106 to be a sufficient mechanism to secure infrastructure contributions from these sites (noting that the Council has proposed removal of the Wolverton Works allocation – see CD28)<sup>7</sup>. This is because they are smaller in scale and not likely to require a more coordinated approach to infrastructure planning and delivery across multiple land interests.
- 5.7 Policy INF2 was also not intended to apply to the retained allocations in Policies GS20 – GS22 as these are already subject to Tariff arrangements. The Western Expansion Area (GS20) is substantially complete. Milton Keynes East (GS21) is currently under construction. Section 106 (Tariff) negotiations on South East MK (GS22) are at an advanced stage.
- 5.8 Where we take a Tariff-led approach to developer contributions, all matters to be secured by Section 106 are contained in the Agreement, including on-site affordable housing requirements. The Tariff payment is the developer contribution to infrastructure requirements in that agreement (affordable housing is not considered infrastructure in this context). The agreements may however also include requirements for providing land for infrastructure, principles for equalisation, and the Council's monitoring and management fees. There may also be requirements associated with Biodiversity Net Gain and Carbon Offset, depending on the eventual permitted scheme.
- 5.9 The evidence provided in the IDP (INFR06)<sup>8</sup> sets out the infrastructure requirements for all the sites listed in GS2. Profiles for the Infrastructure requirements for these start from page 230 in the IDP. These cross-refer to projects in the related project schedule, which starts at page 265.
- 5.10 For any other development that may come forward outside of the MK City Plan housing and employment allocations (such as Neighbourhood Plan sites), the benchmarks included at Annex F in the MK City Plan would provide the starting point for assessing infrastructure requirements.
- 5.11 The IDP also contains phasing, cost, and funding information for projects in the schedule. The Investment Strategy (Section 3) aggregates the costs and likely funding sources (excluding developer contributions) for all the infrastructure requirements identified in the IDP to understand the funding gap. This funding gap is the starting point for the likely Section 106 (or Tariff) contribution required.

<sup>7</sup> [CD28 MKCP 2050 - Schedule of Proposed Changes April 2026.pdf](#)

<sup>8</sup> [260327 MK Submission IDP FinalClean.pdf](#)

## Schedule of Proposed Changes

### Question 6

**We note that the Council has suggested a number of proposed changes to the submitted plan in Document CD28, some of which are in response to representations received during regulation 19. We acknowledge that these have not been consulted upon and do not form part of the submitted Plan and for the avoidance of doubt our examination will be of the submitted Plan. Nevertheless, we will discuss the need for Main Modifications to the plan, including those proposed in Document CD28, as we progress through the examination.**

- 6.1 The Schedule of Changes (CD28)<sup>9</sup> was produced to assist during the examination of the Plan rather than forming part of the Plan to be examined. The Inspectors' approach to considering the changes proposed in CD28 is noted and welcomed.

### Question 7

**We note that some of the Council's suggested modifications are minor typographical changes, which are unlikely to be necessary to make the Plan sound. Such modifications are known as 'Additional Modifications' and are matters for the Council. As such, these would not need to be included as proposed Main Modifications or included in the schedule as it emerges.**

- 7.1 The advice relating to Main and Additional Modifications is noted and welcomed, and future iterations of the Schedule of Proposed Changes will not contain Additional Modifications.

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<sup>9</sup> [CD28 MKCP 2050 - Schedule of Proposed Changes April 2026.pdf](#)

## Question 8

**We note that one of the Council's proposed changes is to the Policies Map. The Policies Map is not a development plan document and we do not have the power to recommend modifications to the Policies Map. However, it is possible as the examination progresses that there is a necessity for the Policies Map to be amended to reflect a Main Modification or to ensure that a policy which is represented on the Policies Map is sound. As such, the Council will, in due course, need to produce and maintain a separate schedule of potential changes to the submission version of the policies map which would be published alongside any schedule of Main Modifications later in the examination. This schedule will need to illustrate before and after maps and reference a specific Main Modification if relevant.**

- 8.1 The advice relating to the schedule of potential changes to the submission version of the Policies Map is noted and welcomed. A schedule, illustrating before and after maps and a reference to a specific Main Modification as relevant will be produced as the examination progresses.

## Housing Supply

### Question 9

**Having reviewed the 'Our Growth Strategy Topic Paper Addendum' (Document TP06), we note that the figures under paragraph 29 do not match those in Policy GS2 of the plan as submitted or as suggested to be modified in Document CD28. Furthermore, the table under paragraph 29 suggests there are 3,676 homes with the benefit of planning permission in the 'City Centre Area', however, table 3-4 of the 'Milton Keynes Infrastructure Study & Strategy' (Document INFR05) suggests that there are no commitments in this area. To help clarify matters, could the Council provide a conclusive table which sets out for each allocation/broad area in the plan (including those under Policies GS20-GS22) and each other source of supply, the following information:**

- a. Completions for each year from 2022 to 2026
- b. Dwellings with benefit of outline permission as of end 2025/26
- c. Dwellings with benefit of full/detailed permission as of end 2025/26
- d. Dwellings under construction as of end 2025/26
- e. Permitted dwellings remaining as of end 2025/26
- f. Number of dwellings without benefit of planning permission as of end 2025/26
- g. Total dwellings

- 9.1 The table outlined on the following page provides the most up-to-date version of the requested data with a base date of 1 April 2026.

	Completions				As at end of 2025/26					
	2022/23	2023/24	2024/25	2025/26	Dws with OUT Permission	Dws with detailed Permission	Permitted Dws U/C	Dws with detailed permission not U/C	Dws with no PP	Total dws (OUT + detailed + No PP)
<b>Strategic Growth Sites - Existing Allocations Total</b>	<b>1415</b>	<b>1336</b>	<b>1063</b>	<b>762</b>	<b>7607</b>	<b>1820</b>	<b>492</b>	<b>1328</b>	<b>3805</b>	<b>13232</b>
Eastern Expansion Area - Broughton/Brooklands	216	150	88	15	0	33	0	33	0	33
Kingsmead	24	46	0	0	0	0	0	0	0	0
Tattenhoe Park	146	289	139	119	0	407	150	257	0	407
Western Expansion Area 10 - Whitehouse	152	306	572	503	1014	351	157	194	0	1365
Western Expansion Area 11 - Fairfields	159	14	40	0	795	0	0	0	0	795
Strategic Land Allocation	619	418	173	38	0	350	0	350	0	350
Newton Leys	99	113	27	0	0	113	34	79	0	113
South East Milton Keynes	0	0	24	33	0	46	22	24	3455	3501
MK East	0	0	0	54	4868	520	129	391	350	5738
Tickford Fields, Newport Pagnell	0	0	0	0	930	0	0	0	0	930
<b>Strategic Growth Sites - MK City Plan Allocations Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13550</b>	<b>13550</b>
Eastern Strategic City Extension	0	0	0	0	0	0	0	0	7750	7750
South of Bow Brickhill Strategic City Extension	0	0	0	0	0	0	0	0	1300	1300
Levante Gate Strategic City Extension	0	0	0	0	0	0	0	0	1250	1250
Shenley Dens Strategic City Extension	0	0	0	0	0	0	0	0	1000	1000
East of Wavendon Strategic City Extension	0	0	0	0	0	0	0	0	2250	2250
<b>Strategic Brownfield Sites Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>150</b>	<b>150</b>
Walton Hall	0	0	0	0	0	0	0	0	150	150
Wolverton Railway Works	0	0	0	0	0	0	0	0	0	0
<b>City Centre Area Total</b>	<b>690</b>	<b>318</b>	<b>1045</b>	<b>207</b>	<b>0</b>	<b>3380</b>	<b>78</b>	<b>3302</b>	<b>12551</b>	<b>15931</b>
CMK/Campbell Park	690	206	861	207	0	3158	78	3080	11773	14931
Central Bletchley	0	112	184	0	0	222	0	222	778	1000
<b>Metro Corridor Growth Areas</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2500</b>	<b>2500</b>
<b>Regeneration Developments</b>										
Lakes Estate	0	0	0	183	0	0	0	0	376	376
<b>Non-Strategic Development Sites - Urban</b>	<b>546</b>	<b>297</b>	<b>210</b>	<b>610</b>	<b>0</b>	<b>1137</b>	<b>477</b>	<b>660</b>	<b>786</b>	<b>1923</b>
<b>Non-Strategic Development Sites - Rural</b>	<b>352</b>	<b>156</b>	<b>21</b>	<b>30</b>	<b>0</b>	<b>12</b>	<b>12</b>	<b>0</b>	<b>16</b>	<b>28</b>
<b>Windfall*</b>	<b>87</b>	<b>93</b>	<b>80</b>	<b>63</b>	<b>0</b>	<b>170</b>	<b>11</b>	<b>159</b>	<b>2530</b>	<b>2700</b>
<b>Totals</b>	<b>3090</b>	<b>2200</b>	<b>2419</b>	<b>1855</b>	<b>7607</b>	<b>6519</b>	<b>1070</b>	<b>5449</b>	<b>36264</b>	<b>50390</b>

\*Note: all completions (2022-2026) and all units outlined as currently permitted and U/C within the Windfall line are only from minor development sites as windfall permissions and completions on major development sites will be included within the data presented in the above lines. The future windfall allowance accounts for this by only including projections of windfall from major development sites from 2029/30 onwards.

## Question 10

**The table in Appendix 1 of document TP06 is not legible. Please could the Council provide us with a clear version of the table using the template recently published online at <https://www.gov.uk/government/collections/local-plans-housing-land-supply-evidence>. A copy should also be added to the examination library with a suitable reference.**

- 10.1 Completing and publishing templates for each of the 205 housing sites included in the Plan (including SHLAA sites for CMK and Metro Growth Corridors) is expected to take until the end of August 2026, subject to receiving guidance on their completion from yourselves as Inspectors (see below) and whether Matters, Issues and Questions are received before then, to allow us to consider resourcing.
- 10.2 In the absence of guidance within the Planning Practice Guidance webpages on how templates should be completed, and the lack of established practice from other examinations, we would be appreciative of additional guidance from you on the nature and extent of information expected within the templates with regard to 'Site Assessment' and 'Infrastructure Provision'. For example, is the 'site assessment' summary expected to include developer-led work prepared as part of representations and preparation for applications or just Council-led evidence? The Planning Practice Guidance landing webpage indicates that 'infrastructure provision' relates to grant funding bids, but this may be relatively limited information on overall infrastructure planning and delivery for a given site. We would also appreciate it if you as Inspectors could confirm whether Year 1 in the site template equates to 1 April 2028 or whether 1 April 2027 would be a reasonable position to take considering the plan was submitted on 22 April 2026 (this would be our preference).
- 10.3 In the meantime, the Table in Appendix 1 of TP06 has been published as a separate entry on the Submission Documents List (TP11)<sup>10</sup> as a read-only Excel document.

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<sup>10</sup> [TP11 - Appendix 1 \(TP06\).xlsx](#)

## Question 11

**Paragraphs 23 and 24 of Document TP06 indicate that 2,224 dwellings are projected to come forward from non-strategic sites which either already have extant planning permission or an allocation from a previous Local Plan or current Neighbourhood Plan. For those sites allocated in a previous Local Plan, which do not benefit from planning permission, what evidence is there that these sites will come forward in the absence of a positive allocation in this Local Plan? It is noted that these sites appear to be listed in Annex L of the Local Plan but there does not appear to be any reference to this Annex in any of the submitted polices. Could the Council confirm what is the purpose of this Annex?**

- 11.1 The purpose of Annex L was to carry forward existing allocations from Plan:MK and made Neighbourhood Plans to ensure their continued positive allocation within the MK City Plan. To achieve this, it was intended that Annex L be referenced within Policy GS2 however, this reference has been unintentionally missed.
- 11.2 It is proposed that a modification to correct this is made to “*Table 1. Housing land supply 2022-2050*” of Policy GS2. Modification to read:
- “Completions and Commitments 2022–2050 (as of 1 April 2024)  
*(includes completions 2022/23 and 2023/24, sites under construction, sites with planning permission outside of Central Milton Keynes, existing strategic and nonstrategic allocations from Plan:MK and made Neighbourhood Plans, shown in Annex A and Annex L)*”
- 11.3 All sites within Annex L were reassessed through the SHLAA and determined to be suitable, available and achievable.

## Milton Keynes Strategy for 2050

### Question 12

**The plan and some of the supporting evidence base documents make reference to the Milton Keynes Strategy for 2050. However, this is not currently before us. We would be grateful if this can this be added to the examination library.**

- 12.1 The Milton Keynes Strategy for 2050 has been added to the Submission Documents List, under the Core Documents as Milton Keynes Strategy for 2050 (Adopted in Jan 2021, refreshed Jan 2025) (CD31)<sup>11</sup>.

<sup>11</sup> [Strategy for 2050 FULL VERSION - Jan 2025\\_LR.pdf](#)

