

# Comments on Draft Milton Keynes Sustainability Strategy 2025-2050

## MK Green Party

### Summary

Given the scale and importance of climate change this is pretty thin stuff. It appears to be watered down from previous version in 2020. There has been good progress on MKCC activities (4% of CO2 emissions) but very little achieved on rest of city (96%). This response focusses on the latter.

There don't seem to be any targets, other than for 2030, so impossible to assess progress. MKCC claims that it wants to be a world leader in sustainability but according to assessment sites such as

[CouncilClimateScorecards.uk/councils/milton-keynes](https://CouncilClimateScorecards.uk/councils/milton-keynes) it is middle-ranking. If MK is actually to become a world leader in sustainability, and we think it should be, then more ambitious policies are required. Some of the policies from the 2020 Sustainability Strategy appear to have been weakened. Given that we are 5 years closer to the 2030 target year for climate neutrality they need to be strengthened not weakened.

Following the council approving a Climate Emergency motion in 2019 it set up a Climate Change Task and Finish Group (CCT&FG). The CCT&FG reported to council in early 2020 and some of its recommendations became part of the council's first Sustainability Strategy later that year. We have included below some of the CCT&FG recommendations where they are not included or adequately reflected in the strategy/action plan and we think that they should be.

We urge the Council to incorporate these recommendations from CCT&FG and others proposed below into the final Sustainability Strategy and Action Plan.

### Economy

There is too much emphasis in council policies on growth at the expense of sustainability. Sustainability should take priority over growth, not the other way round.

Climate change is happening now. Even if the policies in the strategy and action plan achieve their goals, something that we think is unlikely, the city and its residents will have to deal with the impacts of the climate change which is already in the system. This may take the form of droughts, floods, heatwaves, gales, fires, food shortages, water shortages, infrastructure failure, homes becoming uninhabitable, etc. The more CO2 that is emitted the worse these consequences will be. These impacts will adversely affect the people and the economy of MK.

The Sustainability Strategy must address the issue of Adaptation - how MK and its residents will adapt to the climate change impacts that are inevitable, whatever the outcome of this strategy.

Figure 3 of the Strategy identifies Hotspots, urban heat islands, in CMK, Wolverton, Bletchley, Kingston and Olney. Yet we can find no policies specifically to tackle

these. These are mostly areas with dense housing or large areas of car parking, or both. There should be policies such as street tree planting, solar panels over car parks, discouraging paving-over front gardens, etc to try to mitigate the impacts of these hotspots.

### CCT&FG recommendations

#### *Governance*

1. That the Council aligns all its strategies and policies to place its carbon neutrality and greenest city ambitions at the heart of all its work effectivity establishing a ‘green/golden thread’ throughout all its activity and ensuring that the reduction of carbon emissions is assessed as an impact in all reporting and decision making processes.
2. That the Council ensures that the appropriate staffing is in place to enable the delivery of the work programmes associated with its carbon neutral and greenest city ambitions.
3. That the Council establishes a permanent cross-party Council Advisory Group or Scrutiny Committee to provide ongoing oversight to the delivery of the Sustainability Strategy Action Plan.
4. That a climate change dashboard/scorecard is developed to report regularly the progress of the Sustainability Strategy Action Plan and on annual carbon budget and reduction targets.

#### *Procurement*

10. That the Council include an agreed sustainability/environmental statement within tender documents and implement a percentage weighting of supplier environmental performance in its supplier/contractor selection process.

## **Energy**

We welcome Milton Keynes City Council’s ambition to reach net zero by 2030 and recognise progress made in recent years in energy management, including reduced council energy use and investment in renewable generation.

However, much of what is presented as “flagship” (e.g. LED lighting, EPC retrofits) is business as usual across UK local government. To show true leadership, the Council must go further, faster, and move beyond incremental steps in energy reduction and management.

The current Energy section is too vague, lacks quantified targets, and risks overstating progress. To ensure the plan is credible, transparent and instills public confidence, we recommend the following improvements:

1. Local Area Energy Plan (LAEP) – Define Scope and Purpose

The strategy states an LAEP will be developed, but with no detail. A LAEP should be a decision-making tool, not a report. So the LAEP must:

- Map heat zones, grid constraints, EV demand, and opportunities for flexibility.
- Publish outputs as open data, updated at least annually but preferably on demand.
- Have a 12-month delivery timetable for the LAEP.
- Be co-designed with communities and businesses e.g. MK Community Energy

These recommendations would provide the evidence base for joined-up energy infrastructure and attract investment. It would also provide an excellent basis in both confidence that the council will hit the targets, as well as engage the community and business in achieving those targets.

## 2. Solar PV – Targets and Reporting

The plan around solar PV lacks baselines, targets, or milestones.

Annual reporting is too slow and needs to be significantly improved given the availability of data from the technology.

Recommendations:

- Publish a full asset audit of council roofs, car parks, depots and other council assets, including volume of installed PV and realised (not assumed) energy generation from each installation
- Set a clear 2030 PV target (MW), with annual milestones.
- Commit to quarterly reporting of installed PV and generation.

These recommendations ensure steady deployment, builds investor and community confidence, and avoids back-loaded delivery. It would also ensure that residents and businesses can be confident in the net zero ambitions of the council and make Milton Keynes a place where solar PV is welcomed.

## 3. District Heating – Realism and Consumer Safeguards

The current plan implies a “city-wide” heat network, but viability is limited to specific dense zones.

Achievements listed (policy paper, OBC, talks on £200m investment) are preparatory, not delivery.

Recommendations:

- Publish the Outline Business Case assumptions for district heating and zone maps highlighting where the heat will be available
- Identify anchor loads (hospitals, civic buildings, large developments).
- Set a carbon trajectory as incinerator heat will need to be replaced in future or the harmful emissions reduced to zero to hit net zero goals

- iv. Provide consumer protections on heat costs: tariff transparency, opt-in policies, fuel-poverty safeguards.

These recommendations avoid over-promising, ensure viability, and prevent businesses and residents being locked into unfair or high-carbon systems.

#### 4. Do More Than Business as Usual

Achievements such as LEDs and EPC upgrades are important but standard practice across the UK councils. MK must benchmark itself against leading UK cities and commit to next-generation energy measures, such as:

- Solar carports at car parks and depots.
- Microgrids with storage at civic sites and care facilities.
- Demand-side response pilots and local flexibility markets.
- Energy-positive new housing enforced by planning
- Council houses should be innovative and provide highly insulated properties with solar and batteries as standard
- Publish data to compare with other councils
- Provide significant support for skills development e.g. solar and battery installers

These recommendations would show significant ambition and position Milton Keynes as a genuine national leader in energy innovation, not simply catching up with or copying existing practice.

The Energy theme is central to achieving net zero 2030. To succeed, the strategy must move from broad statements to clear, measurable commitments with transparent reporting and clear leadership. By strengthening the LAEP, setting PV targets, taking a realistic approach to district heating, and going beyond business as usual, Milton Keynes could demonstrate genuine leadership and credibility on climate action.

#### CCT&FG recommendations

##### *Energy Efficiencies*

13. That the Council assesses the energy efficiency of all of its properties including offices, social housing and schools, and retrofit these properties to Energy Performance Certificate C or higher and that all new council owned or commissioned properties are built to at least this standard.

14. That the Council speed the progress of and complete the delivery of the switch to LED smart lights action across Milton Keynes.

15. That the Council develops a Strategy to tackle Fuel Poverty Borough wide.

## Housing

21. That in the review of the new Local Plan, and any related planning policy documents and building regulations, the Council prioritises policies to ensure that all existing and new residential and non-residential dwellings are built or retrofitted to achieve zero carbon standards.

## Energy Supply

26. That the Council explore the bulk purchase of renewable energy for example from offshore wind farms to provide lower cost sustainable energy options.

27. That the Council uses the carbon offset fund to establish a programme to deliver innovative and sustainable energy generation projects.

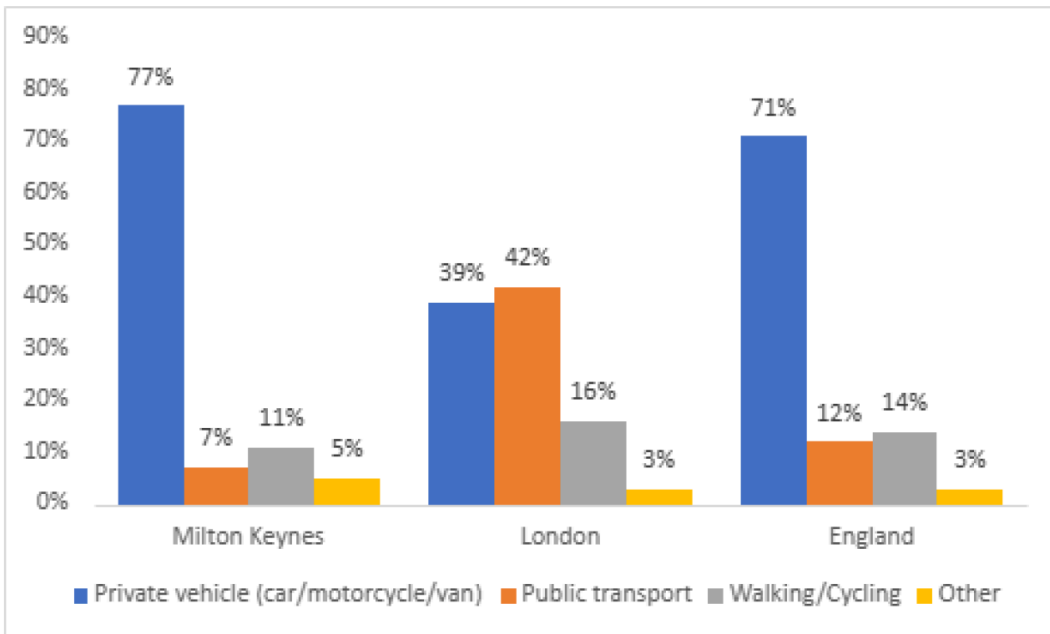
## Emissions

Most emissions come from the transport sector 30%, with housing at 28% (although one of the docs has those %s reversed). More information on transport will be in LTP5 but so far only a draft summary has been published. Another version of the draft summary will be out for consultation in Sept. We will respond in more detail to that.

The first LTP ( then known as Sustainable integrated Transport Strategy) was agreed in 2000. In that document's base year of 1997 77% of travel was by car. A quarter of a century later travel by car is .... 77%. And public transport use has fallen from 12% to 7% of journeys.

Table 1 SITS Targets (1999)

MODE	1997	2001	2006	2011
	%	%	%	%
Car	77	71	62	55
Pub Tran	12	15	20	25
Cycle	3	6	10	12
Walk	7	7	7	7
M/cycle	1	1	1	1



**Fig. 1 Modal Share in MK versus London & England Average**

Chart from draft summary LTP5 (2025)

Most CO2 emissions from transport are from cars. While the gradual change to EVs will reduce this over time that will not reduce other emissions from cars. All motor vehicles, whether ICE or EV, produce PM10 and PM2.5 particles from brakes and tyres. All motor vehicles, produce noise pollution from tyres on tarmac. All motor vehicles create congestion. So it is important that there is a modal shift from cars to more sustainable modes such as public transport, walking, cycling, etc . The Sustainability Strategy doesn't even mention modal shift. It should do so.

Emissions are proportional to the weight of the vehicle and the speed that it travels at. So emissions can be reduced by encouraging smaller vehicles, opposing the current trend for larger SUVs, and reducing speed limits on grid roads.

Fig 1 of the Sustainability Strategy shows that there was a slight fall in emissions from transport in 2019/20 (probably due to Covid) but that they have been unchanged since then. The Strategy should be proposing measures to address this but it fails to do so.

It is apparent that the measures taken over the last 25 years have failed to achieve modal shift away from cars. More effective measures are required. A consultants report commissioned by the council pointed this out nearly 20 years ago but it has not been acted upon.

Long Term Public Transport Vision LTPTV1

(MK Council, 2006) consultants Faber Maunsell

“Without measures to discourage car use, the public transport system would have to be of fantastic quality to persuade car users to leave their car at home.”

“Restraint on parking and other measures can bring the quality requirement to within more reasonable limits.”

In other words it is necessary to apply sticks as well as carrots. MKCC has been afraid to do this. If we are to reach net zero by 2030 more drastic measures are necessary. These might include higher parking charges, fewer parking spaces, workplace parking levy (as in Nottingham), lower speed limits, more priority for buses on road network, more Redways, etc. See separate docs on Speed Limits and Multiple (or High) Occupancy Vehicle lanes for more detail.

The proposals for public transport rely heavily on MRT (Mass Rapid Transit). While this is considerably cheaper than trams it still requires serious funding. A cost of £240m has been suggested for a fairly small network that would only cover about a third of MK. While this would be welcome as a first instalment there is no guarantee that it will happen and it still leaves large sections of MK dependent on regular buses. At best MRT is 3 years away, but more likely 5 years. In the meantime there is urgent need for improving bus services. The strategy should include proposals for improved bus services within the next year. Again see separate docs on speed limits and Multiple (or High) Occupancy Vehicle lanes for more detail.

#### Sustainability Action Plan

C3.1. “explore” very weak. Needs commitment.

C3.2. needs targets, eg 90% of residents to be within 400m of a bus stop served by an hourly or better service to CMK

C3.4. Not just “Develop and monitor travel plans“, do something if they are not delivered

C3.7 needs targets, incentives, carrots/sticks

More to say in our response to up-coming LTP5 consultation.

#### CCT&FG recommendations

##### *Transport*

17. That the Council utilise all measures open to it to ensure that bus services are convenient, frequent, accessible, affordable, reliable, punctual and low carbon emitting and that this ultimately leads to reducing the need for private car use across the Borough.

18. That the Council commit to pursuing franchising powers under the Bus Services Act 2017.

19. That the Council delivers a borough wide programme to increase the number of

journeys taken by walking and cycling.

20. That the Council considers the introduction of ultra-low emission zones where the air quality evidence suggests this mechanism would be beneficial.

## **Environment**

There should be a policy to improve wildlife corridors in Milton Keynes.

There should be a policy to encourage rewilding.

There should be a policy to support permaculture principles.

There should be a policy to support nature recovery.

The strategy should address food security and its relationship with the environment.

## **Biodiversity**

The concept of Sustainability in the 'Draft MK Sustainability Strategy' is almost wholly limited to mitigation of climate change (energy, GHG emissions, etc.), with scarcely any mention of wildlife conservation and biodiversity, although these are equally important issues for overall environmental sustainability. This is a disappointing virtual blind spot.

In the overview document, 'Loss of biodiversity' merely gets listed under 'The impacts of Climate Change' (p. 5), and only generalised references are made to biodiversity under 'Environment' (p. 10), without mention of specific policies.

Again, the mantra for 'Engagement' (p. 11) aims only for 'A city that encourages everyone to get involved in the Climate agenda': why no mention here of nature and biodiversity?

The 'Five Year Plan – Pathway to Net Zero 2023' makes only passing mentions of 'biodiversity, urban tree planting and procurement' (p. 3, also p. 7) and 'Biodiversity improvements, carbon sinks' (p. 8), without further elaboration.

The 'Milton Keynes Sustainability Action Plan (Council) 2025-2025' provides a little more policy information, simply citing five proposed actions (CC4.1-CC4.5) concerning urban trees, forest and marshland carbon sinks, biosecurity and offsetting options, but again with no further detail provided.

The 'Technical Summary for Rebaseline of Emissions' makes no reference to any of the biodiversity-related topics mentioned above.

The emphasis of the Strategy, moreover, is largely on what people (may) want at the expense of what nature needs. The latter deserves better. Wildlife (ranging from macro-, to microorganisms) is not just a nice-to-have luxury, but is integral to ensuring environmental sustainability, linking together climate, soil health, ecological 'services' (including pollination and hydrological regulation) and food production (not limited to farming) as well as human physical and psychological welfare.

(For example, under 'Environment' (overview, p. 10) this anthropocentric bias is reflected in such phrases as: MK being 'a great city in which to live and work';

green spaces being 'easily accessible to most of our residents and businesses'; and ensuring that 'the city remains a great place to live'.)

Under 'Environment' in the Overview (p. 10), unsupported reference is made to 'the biodiverse species that call our city home'. No citation of any independent assessment of the city's comparative biodiversity relative to other areas is given, nor to how it has changed as the city has grown. Without such an evidence-base the stated 'aim for Milton Keynes to be a leading green city' rings hollow.

An important omission is mention of any policy to discontinue the spraying of pesticides (particularly herbicides) in public spaces, despite the growing evidence of their threats both to wildlife and to people's health – and indeed growing public concern over these threats. This is an area where MKCC needs to catch up and stop dithering over its revision of policy.

However, some commendable past achievements from the first Sustainability Strategy relating to biodiversity are, by contrast, reported in 'Achievements to date: Milton Keynes Sustainability Strategy - Delivery and achievements since 2019', including: 'Green roofs were also installed on 15 bus stops across Milton Keynes, in total delivering over 8 tonnes of direct CO2 emissions savings' ('Emissions', p. 8); and under 'Environment' (p. 9), planting of '...over 8000 trees, including 10 forest gardens'; conversion of '...15 hectares of arable land to species rich meadow'; '...40m<sup>2</sup> of grass verges and underpass edges along the high-speed grid road network ... reworked and prepared for hydroseeding with a wildflower mix to encourage biodiversity', as a result of which 'the number of wildflowers planted in the city has increased. This has had a positive impact on more than 1,000 different species such as bees and beetles, and plants such as Bee Orchids are beginning to make a local comeback'; among other improvements to landscape maintenance. Moreover, under 'Engagement' (p. 12), it is noted that the Council 'Completed an 'Eco Champions' initiative for staff to increase awareness and participation in environmental initiatives'.

This record of past achievements contrasts strikingly with the relatively sparse attention given to policy relating to wildlife conservation and biodiversity noted in the bullet points above. As a result, the new proposals appear to be comparatively retrograde, seemingly reining back on such policies. MKCC can surely do rather better than lamely following the myopic Treasury-driven vision of the current Government in this regard.

#### CCT&FG recommendations

##### *Biodiversity*

22. That the Council delivers on a commitment for a Forest for the Borough of Milton Keynes of (at a minimum) an additional one million trees.

23. That the Council include a greater commitment to deliver sustainable planting of trees and increasing biodiversity as part of any planning proposals for 11 dwellings or more including encouraging rewilding projects.

## *Waste*

25. That the Council adopt circular economy waste policies as well as promoting residents and community sharing, reuse and recycling.

## *Flooding*

28. That the Council invests in service provision in areas such as highways drainage clearance to deal with the increasing number of flash flooding rainfall incidents.

## **Engagement**

The Engagement section is full of vagaries and little in the way of commitment or substance. It amounts more to a statement of principles than an actual strategy. It seems written to check a box and sound good for minimum effort, and not to actually produce results.

Public engagement is extremely important. These are the people with the will and the capability and the time to see the sustainability agenda through if they are given the opportunities to do so. They will provide free labour and it will make them feel better for doing so! It's a win-win for everyone. Every moment that is put into this will affect real people's lives, both in the short and long term.

Let's look at specific ways the statement can be improved.

"it will also bring together partners across the city who share its ambitions to deliver change for the people and businesses of Milton Keynes."

Which partners? How will different partners need to be engaged and how will it differ depending on the kind of partners? For businesses, will there be any formal agreements, and how will such conversations and agreements be publicised? For voluntary organisations, schools and the public, what strategies will MKCC use to engage them? How will the council work with Parish and Town Councils?

"We will work to better inform people and organisations about opportunities they have to get involved related to the climate"

What types of opportunities? What specific opportunities are upcoming that could serve as examples?

"and to promote and celebrate the great work being undertaken in the city on the sustainability agenda."

Give examples on what work is being undertaken that can be promoted and celebrated.

"What is Milton Keynes going to do? For MKCC work, we will focus on working across the organisation to share best practice between departments, other public sector bodies, and engage Council suppliers in the conversation about our climate aims."

The council has the power of the customer over its suppliers. How will the council engage with them to ensure they adhere to best practices?

"For our city wide work, we will focus on working with our citizens, organisations

and businesses to achieve the goal of a net zero Milton Keynes, recognising that MK City Council's direct impact alone cannot achieve our bold aims for the city.”

Like the rest, this is very nonspecific. How will the council work with them and how will that impact the plan?

The council should consider a Citizens Assembly on Sustainability/Climate Change, as has happened in some other towns and cities.

Overall the council needs to think creatively about how the population of the city can help it with its goals. How can the council ensure there are real, tangible results instead of empty promises and more token statements like this? How can we actually improve our city together?

#### CCT&FG recommendations

#### Communication, Engagement & Education

5. That the Council establishes a dedicated web and social media presence to provide information and news in support of its ambitions for a carbon neutral Milton Keynes.

6. That the Council establishes or supports the establishment of a climate change advice service for businesses and residents.

7. That the Council develops and delivers a climate change public engagement programme to engage and empower citizens, Town and Parish Councils, community groups, schools and businesses, possibly through a Citizens Assembly, to enable everyone across the borough to achieve the aim of being carbon neutral by 2030.

This would include establishing a Green Champions Community across Milton Keynes

#### Working in Partnership

24. That the Council establishes a ‘Climate Change Partnership’ to include a wide range of organisations in the public, private and voluntary sectors to work together to achieve a carbon neutral Milton Keynes by 2030 and that the Climate Change Partnership be responsible for developing and delivering a borough wide carbon neutral action plan.