

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 16th February 2026** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at ncp.engagement@milton-keynes.gov.uk

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*

boxes below but complete the full contact details of the agent in 2.

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Aaron"/>	<input type="text"/>
Last Name	<input type="text" value="Gallavan"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>

Line 4

Post Code



Telephone Number

Part B – Please use a separate sheet for each representation

Name or Organisation: Aaron Gallavan

3. To which part of the Local Plan does this representation relate?

Strategic City Extensions: South of Bow Brickhill & associated cross-boundary movement/landscape policies.
Movement Policies (strategic transport, cross-boundary capacity). Landscape Policies relating to Brickhills SLA.
Infrastructure First / Deliverability Sections.

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the Duty to co-operate

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached next sheet

(Continue on a separate sheet /expand box if necessary)

5. Why the Plan is not legally compliant / not sound / fails Duty to Co-operate Continued.....

A. Not Effective / Not Deliverable — Infrastructure First claims are not evidenced

The Plan claims an “infrastructure first” approach requiring timely delivery of transport, education, health and utilities infrastructure.

However, the South of Bow Brickhill allocation and associated movements are dependent on shared infrastructure across multiple settlements (including Levante Gate), without demonstrating *how or when* this infrastructure will be funded or delivered.

This creates a significant risk that Bow Brickhill and nearby settlements will experience severe congestion, safety impacts, and service overload. [\[mkfm.com\]](http://mkfm.com)

B. Landscape Harm to Brickhills Special Landscape Area

The Plan admits the allocation sits within a sensitive landscape and states a “landscape-led” approach is needed, requiring further assessments at later stages. %20-%20PDF%20version%202.pdf) %20-%20PDF%20version%202.pdf) %20-%20PDF%20version%202.pdf)

Deferring key evidence demonstrates the allocation has not been justified at plan-making stage, and the plan is thus not sound (not justified, not effective). [\[Regulation...version 2 | PDF\]](#)

C. Soundness issue — Reliance on uncertain strategic transport systems

The Plan depends on future strategic public transport (e.g., Metro system) and yet-unconfirmed road capacity improvements to justify major growth.

There is no binding evidence these systems can or will be delivered within the plan period. This contradicts its own movement policy that developments must avoid “severe impacts” on capacity and safety. %20-%20PDF%20version%202.pdf) [\[Regulation...version 2 | PDF\]](#)

D. Fails Duty to Co-Operate — insufficient evidence of cross-boundary transport planning

The Plan does not demonstrate an adequately co-ordinated approach with neighbouring authorities regarding major traffic redistribution through Bow Brickhill, Woburn Sands, A5 corridor, or rural links into Central Bedfordshire.

E. Cumulative Growth Impacts Not Assessed

The Plan acknowledges major surrounding growth areas, including SEMK SUE, South Caldecotte and the Strategic Land Allocation. %20-%20PDF%20version%202.pdf)

However, no robust cumulative impact assessment is presented. Without this, the Plan is not positively prepared.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Infrastructure certainty

Require binding, evidenced infrastructure delivery plans prior to allocation, including:

- Confirmed transport mitigation for Bow Brickhill,
- Evidence-based capacity modelling for Station Road, Woburn Sands Road, A5 junctions and rural lanes,
- Delivery-timed education, health and utilities plans.

2. Landscape protection

Reduce or remove the South of Bow Brickhill allocation unless independent landscape capacity evidence demonstrates development can occur without unacceptable harm to the Brickhills Special Landscape Area. %20-%20PDF%20version%202.pdf)%20-%20PDF%20version%202.pdf)%20-%20PDF%20version%202.pdf)
[Regulation...version 2 | PDF]

3. Cross-boundary transport agreement

Insert a binding requirement for a cross-authority transport strategy covering Milton Keynes / Central Bedfordshire, including Bow Brickhill and Woburn Sands.

4. Cumulative impact testing

Require a comprehensive, transparent cumulative impact assessment that includes SEMK, South Caldecotte, the SLA and all Strategic City Extensions.

(Continue on a separate sheet /expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

Representations cannot be treated as confidential and will be published on our website alongside your name. *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*