

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd December 2025** 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

First Name

Last Name

Job Title

(where relevant)

Organisation

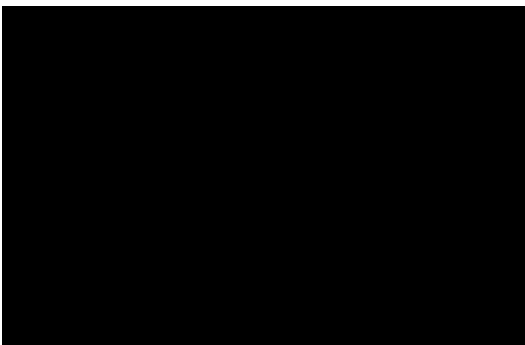
(where relevant)

E-mail Address

Address Line 1

Line 2

Line 3



Line 4

Post Code



Telephone Number

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

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

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

Please see submitted information.

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

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.

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

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

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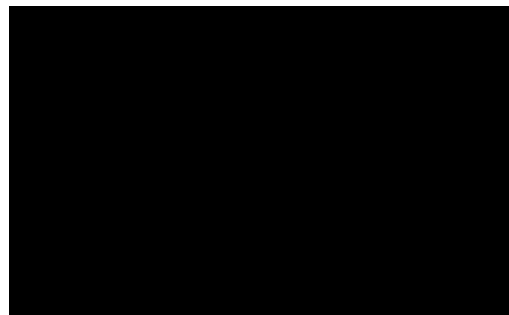
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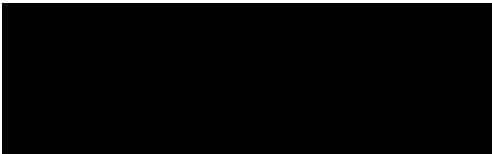
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Policies Map

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

Title

Mr

First Name

Billy

Last Name

Lloyd

Job Title

Principal Consultant

(where relevant)

Organisation

Warner Planning

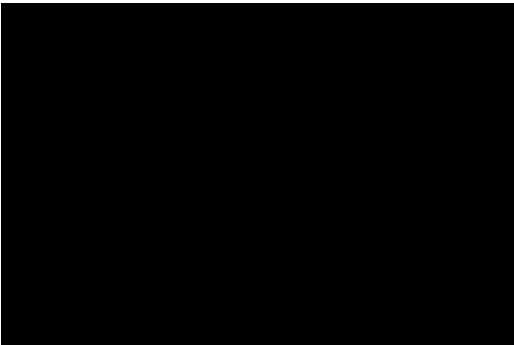
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WARNER

22nd December 2025

Development Plans,
Milton Keynes City Council,
1 Saxon Gate East,
Milton Keynes,
MK9 3EJ

Sent by email to ncp.engagement@milton-keynes.gov.uk

Dear Development Plans Team,

RE: MK City Plan 2050 – Regulation 19 Consultation

This Representation is prepared and submitted by Warner Planning on behalf of Erin and Sean Lydon and provides a response on behalf of their site at Land of Calverton Road, Stony Stratford to the current consultation, in relation to linear parks and future development of the site.

The site is situated to the south-west of Stony Stratford, and is circa 1.43ha in size, being located to the west of Calverton Road. The site itself comprises open land at present with no built form, and is utilised as space for a local Forest School. The site is well bound by mature vegetation, and the River Great Ouse abuts the south-west boundary of the site. In terms of the surrounding uses, the dominant type would be residential, with access onto the site achieved via Calverton Road.

We have summarised the planning policies for the site in the below table:



Attribute / Constraint	Comment
Within Settlement Envelope	Site abuts the development boundary on its northern and eastern boundaries.
Conservation Area	Site is not located within the Conservation Area for Stony Stratford
Listed Building	There are no listed buildings impacting upon the site.
Flood Zone	Majority of the site is located within Flood Zone 1, but the western portion of the site (not to be developed) is Flood Zone 2. Most of the site is not shown as being at risk from Surface Water Flooding, although there are pockets to the boundaries of the site.
Environmental Designation (such as SPA/SANGS/Wildlife Site)	The site is designated as a Linear Park.
Public Rights of Way	There is a PRow running along the western and eastern portion of the site.
Agricultural Land Classification	Grade 3 – Good to Moderate

It can also be highlighted that there are a plethora of services and facilities available locally to the site.

Looking at what could be delivered on the site, the land owner would like to bring the western portion of the site that runs along the River, forward as a Linear Park. To enable these works and to continue the site's existing community use, an enhancement of the Forest School provision, along with a modest residential element, some community meeting space and office space. In addition, the two PRow's which both abut the site would be linked and a further element of open space would be provided around the community/office space. All of which would be suitably designed and integrated into the site, to ensure a development that cohesively links to the community and provides greater access to the site and surrounding countryside.





Figure 1 – Proposed Site Plan

While we are generally supportive of the policy wording and guidance set out in the emerging Local Plan, but we would like to offer several comments and suggestions, aimed at enhancing its overall effectiveness.

Paragraph 36 of the NPPF sets out the requirements for new Plans and Policies to be deemed sound, and this will be the criteria to which our below assessment will be made. The requirements are as follows:

- ☼ **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²⁰; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- ☼ **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- ☼ **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- ☼ **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

We would greatly appreciate it if you could take the contents of this representation into consideration as part of the process for the Local Plan moving forward.

Firstly, as confirmed by the Policy Maps of the emerging Local Plan, the site continues to be designated as a Linear Park. However, owing to the site being in private ownership, the Council does not retain control of the land, and as such cannot force the site to be brought forward in its totality as a Linear Park. This means that the site itself is left in limbo, as at present the site is utilised as a Forest School, in association with Montessori Pre-School in the local community, with the children being able to walk to the site, but the prospects of this being an enhanced provision, for a greater number of students to utilise are muted by the designation and policy wording.

Given the ownership constraints, we would expect the Linear Park designation to be removed, but if the Council are minded for it to be retained, we would ask for a revision to the wording of Policy CEA8, because at present there is no mechanism to enable the delivery of Linear Park, meaning that it has not been positively prepared. If the wording of the policy was modified to allow modest enabling development on this site, it would mean an improved community Forest School, additional community facilities, a Linear Park provision along the river, which would be enabled by a provision of residential dwellings on a small portion of the site. As at present there are no plans for the site to be brought forward as a Linear Park, but this would unlock the site and its potential.

We would suggest amended wording to Policy CEA8 as follows:

Where land is identified for a Linear Park or strategic green infrastructure, the Council will support proposals that include appropriate enabling development, where it can be demonstrated that:

- a) the enabling development is necessary to secure the long-term delivery, management and public benefit of the Linear Park;*
- b) the scale and form of development are proportionate and do not undermine the primary green infrastructure function of the land;*
- c) the proposal delivers clear and demonstrable community, biodiversity and health benefits; and*
- d) the Linear Park and associated facilities are secured in perpetuity through appropriate planning obligations.*

However, in light of the above, we still feel that the site should not be allocated as a Linear Park, due to the fact that it is in private ownership, without any public access. The emerging policy in relation to this site sets out that development should not impact the primary function of Linear Parks which is as a publicly available space. Thus, in the site being designated and not publicly available for use, it is inherently in conflict with the policy and should be found unsound when assessing the policy, with the corrective mitigation to remove the designation from the site.



Additionally, Policy PFHP2 sets out the location of new community facilities, but again does not account for any enabling development that would support new provision, which is not positively prepared. Given that this site already has a provision on site, there is no policy support for the improvement of those facilities and spaces, and how this could be delivered to the betterment of the local community.

We would suggest the following amended wording for PFHP2:

The Council will support the retention, enhancement and provision of community facilities where they are accessible, inclusive and meet identified local needs.

Where the delivery, enhancement or long-term viability of community facilities cannot be achieved through public funding alone, the Council will support proportionate and well-designed enabling development, provided that:

- a) the primary purpose of the proposal is to secure the delivery, improvement or long-term sustainability of community facilities;*
- b) the scale, form and location of enabling development are proportionate and do not undermine the function or accessibility of the community facility;*
- c) the proposal delivers clear and demonstrable social, health, wellbeing or educational benefits for the local community;*
- d) any associated development is of high design quality and accords with other relevant policies of the Plan; and*
- e) the community facilities are secured in perpetuity through appropriate planning obligations.*

Proposals will be assessed positively where they demonstrate a clear and robust delivery strategy and provide long-term benefits to the community.

We would note that Policy GS1 does not offer a third tier, which would be for sites such as this one-off Calverton Road, that abuts the settlement envelope and can be demonstrated to be located sustainably in terms of transport provision and services/facilities. This would mean it is not consistent with national policy as it is currently drafted and contradicts Policy GS2, which makes a windfall provision for housing on sites which are adjacent to the settlement envelope.

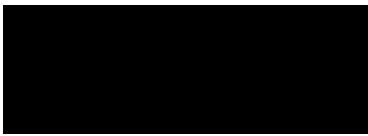
Given the recent publication of the emerging NPPF, we trust that the emerging Local Plan will take note of the changes, and will ensure that these are incorporated into the documentation, so that the Local Plan, once adopted still aligns with the NPPF. Without an explicit mechanism to enable delivery, the continued designation of the site risks rendering both the Linear Park and



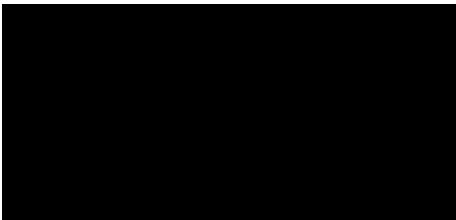
community facility objectives undeliverable. Introducing policy flexibility to support proportionate enabling development would ensure that the MK City Plan 2050 is positively prepared, effective and consistent with national policy, while securing meaningful long-term benefits for the local community.

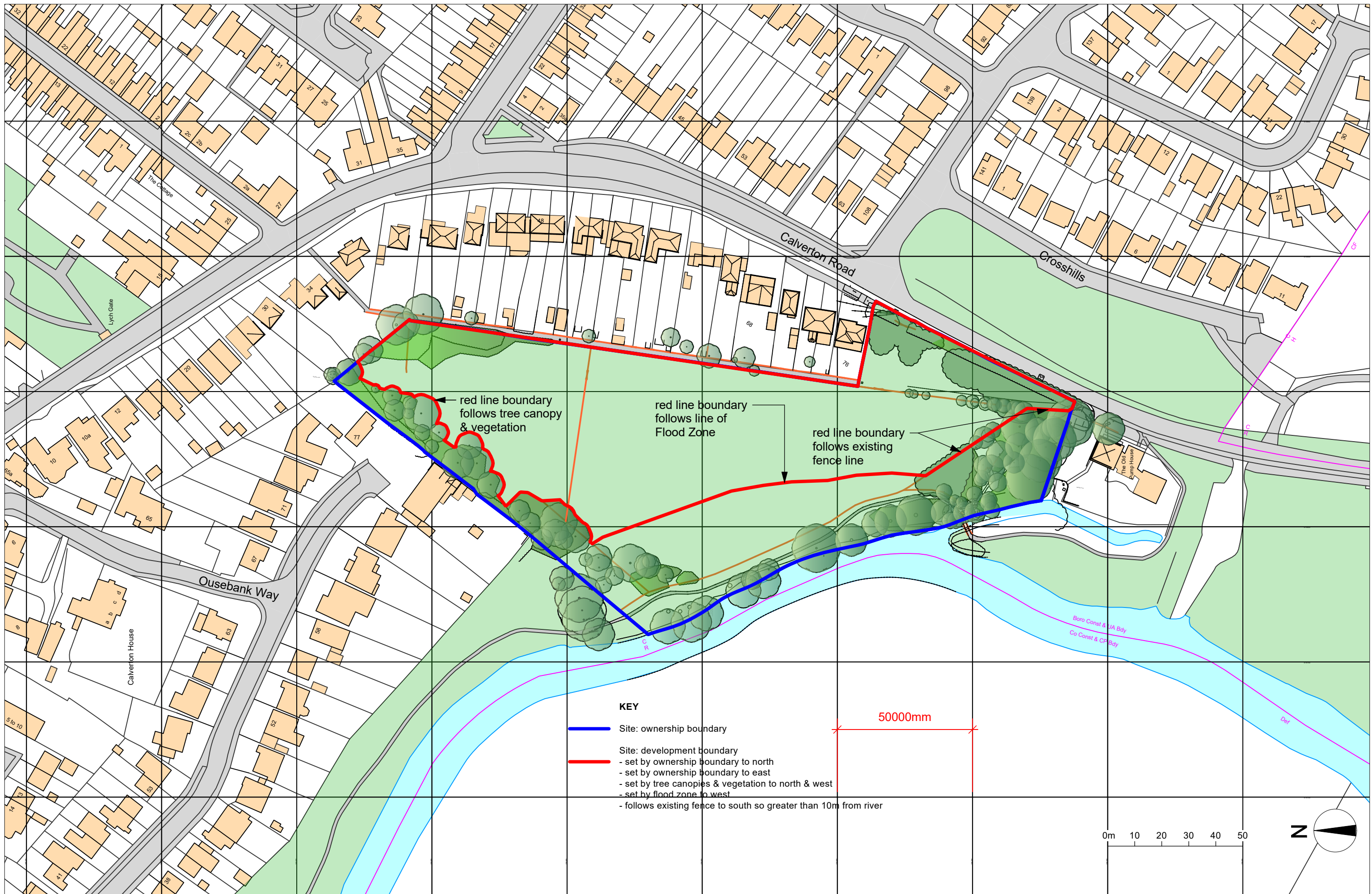
Whilst we are broadly happy with the drafting of the emerging Local Plan, we would suggest that some additional wording and tweaks to the policies are required to make them fit for purpose. This would also enable sites such as this to come forward positively for a range of community benefits, with a small provision of enabling development that is for the betterment of local provision. We trust that the above is sufficient, but if you require any further information or clarification, we would be happy to discuss this further.

Yours sincerely,



Billy Lloyd MRTPI
Warner Planning





red line boundary follows tree canopy & vegetation

red line boundary follows line of Flood Zone

red line boundary follows existing fence line

- KEY**
- Site: ownership boundary
 - Site: development boundary
 - set by ownership boundary to north
 - set by ownership boundary to east
 - set by tree canopies & vegetation to north & west
 - set by flood zone to west
 - follows existing fence to south so greater than 10m from river

50000mm

0m 10 20 30 40 50



DESIGNED & DRAWN BY
Rachel Lockett
CHECKED BY
Rachel Lockett

OTHER APPROVALS
PRE APPLICATION
CAD FILE NAME
HIGLINS PIECE CAD

TITLE
Location Plan

SIZE
A3

SCALE
1:1250

DRAWING NUMBER
1/01

REV
D

SITE ADDRESS
Higlins Piece, Stony Stratford, Milton Keynes, MK11 1HL



Public footpath to Forest School

Forest School entrance gate

Remove fencing between footpath and Office / Meeting Place area. Encourage public to stop, rest on benches and enjoy wildflowers.

Forest School area: Stony Stratford Montessori School in walking distance

Proposed public footpath linking existing east and west footpaths, allowing public access through the site. We understand this would cross a wildlife corridor so would not be hard landscaped.

Office: creates employment

Meeting Place: privately owned. Would be rented out space for activities such as yoga, toddler groups, art groups etc.

KEY
 Grass
 River Ouse
 Trees to be removed



- | | | |
|--|---|---|
| <p>KEY EXISTING</p> <ul style="list-style-type: none"> — Site ownership boundary — Site development boundary: under 10,000sqm — Existing fencing ● Existing trees Root Protection Area — Public Footpath — Vehicle access <math>\angle</math> Important views ▲ Site Entrance - - - Flood Zone 2 - - - Flood Zone 3 — Sewer existing (foul only) from Geodesys Map | <p>KEY LANDSCAPE</p> <ul style="list-style-type: none"> Gravel Firm & level ground Grass Existing Vegetation Proposed Grasscrete Proposed hedge Proposed Wildflowers Trees existing Trees proposed | <p>KEY BUILDING</p> <ul style="list-style-type: none"> Sedum roof Solar panels |
|--|---|---|

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