



Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

Ref:
(For official use only)

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

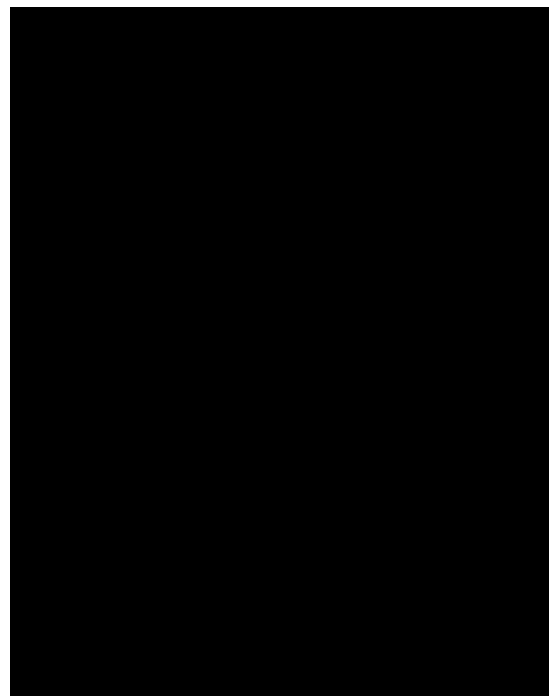
(where relevant)

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? – General comments

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.

The omission of the Milton Keynes Bowl from any leisure, cultural, or events allocation or policy in the draft MK City Plan 2050 renders the plan unsound. It is neither positively prepared, justified, effective, nor consistent with national or local policy.

Please refer to accompanying Statement for full details.

(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.

To ensure Milton Keynes retains its ability to offer large-scale leisure, cultural and community events, The Bowl must be explicitly allocated for leisure/cultural use under the new Plan. The plan should recognise that the Bowl is a suitable site for a training ground and such a use would be supported in planning terms. The site should also be removed from the Linear Park designation.

Please refer to accompanying Statement for full details.

(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:

The matters under Examination directly affect my client's interests and the soundness of the Local Plan. Participation in the hearings will allow me to explain my representations in person, respond to questions from the Inspector and clarify technical or site-specific issues that cannot be fully addressed through written submissions alone. Engaging in the Examination process will assist the Inspector in understanding the practical implications of the Plan's policies and evidence base, help resolve any points of disagreement, and contribute to a robust and effective Examination of the Local Plan.

***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.*

**Representations to the
MK City Plan 2050
Regulation 19 Draft**

The National Bowl, Watling Street,
Milton Keynes

On behalf of Stadium MK Ltd

December 2025

Ref: 723

Smith Jenkins Ltd



1 Introduction

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage on behalf of Stadium MK Ltd in response to the Milton Keynes City Plan Regulation 19 consultation in respect of The National Bowl. They should be read alongside, and in continuation of, the detailed Regulation 18 representations (October 2024), which accompany this submission as **Appendix 1**.
- 1.2 The Regulation 18 representations set out the background to the site, its planning history and the emerging development proposals for a comprehensive training ground which will facilitate the City Council's longstanding aim for the use of the underutilised site to be diversified and intensified.
- 1.3 The representations stated that the importance of The National Bowl as a city asset should be recognised in the New City Local Plan and that it should continue to be afforded its own permissive planning policy and/or allocation for commercial, leisure or recreational purposes. It was also proposed the site should be removed from the Linear Park designation.
- 1.4 One of the key purposes of the Regulation 19 stage is to assess whether the draft City Plan is sound, as defined by Paragraph 36 of the National Planning Policy Framework (2024). Accordingly, our representations are structured to address the four tests of soundness:
- **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; 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; and*
 - **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*
- 1.5 These representations:
1. Identify whether the Regulation 19 draft addresses the matters raised at Regulation 18;
 2. Assess whether the Plan is sound against the tests in Paragraph 36 of the NPPF; and
 3. Set out the modifications needed to make the Plan sound where deficiencies remain.

- 1.6 We trust that these representations will assist the Council in finalising the Plan and ensuring that it proceeds to examination in a sound form. We would welcome continued dialogue with officers on any of the matters raised.

2 Representations

- 2.1 The National Bowl currently benefits from its own permissive planning policy in the adopted Plan:MK (Policy L8) which supports commercial leisure and recreational development on the site and it is recognised as being part of the leisure, entertainment and cultural offering of the City in the supporting text.
- 2.2 The National Bowl Development Brief (2013) was produced to steer the future design of the site, primarily aimed at keeping the site in the ‘style’ of Milton Keynes. The development brief specifically states that use of the site by the MK Dons for a training facility would be an acceptable use.
- 2.3 It has been a longstanding aim of Milton Keynes City Council to diversify and intensify the use of the National Bowl through the provision of recreational facilities. The site represents a significant yet underutilised leisure facility in Milton Keynes and the site is in need of substantial investment to maximise its potential.
- 2.4 In July 2024, MK Dons Football Club and Stadium MK Group Ltd were acquired by new owners. A key ambition and high priority of the club is to establish a training ground at The National Bowl. The principle reason for the business acquiring The Bowl is to enable it to have a site that can accommodate the needs of the football club in the Championship and the Premier League. The previous owners spent over 20 years trying to identify and secure a suitable site for a training ground without success. The existing site at Woughton on the Green is only capable of supporting the needs of the Club in the lower leagues and as the Club only rents the space, it is not suitable or viable as a long term training facility.
- 2.5 Funding is now in place for a comprehensive training facility, alongside retaining its current use as an outdoor entertainment venue for concerts and events, providing significant social, economic, and environmental benefits to the city. A planning application is expected to be submitted in 2026.
- 2.6 Despite this established context, there is no reference to The Bowl in the Regulation 19 draft City Plan.
- 2.7 Given the existing policy position, the Council’s longstanding aim to diversify and intensify the site’s use, and the new owners’ commitment to deliver an enhanced training ground alongside events use, the failure of the draft MK City Plan 2050 to allocate The Bowl as a suitable site for a training ground and an ongoing leisure, cultural and events function, or contain a permissive planning policy, represents a significant omission. This omission renders the Plan **unsound** for the following reasons.

Soundness

a) The Plan is not Positively Prepared

- 2.8 The Bowl is one of the few sites in Milton Keynes with the scale, infrastructure, accessibility and character suitable for large-scale leisure, cultural or events use and leisure use. By omitting an explicit allocation or planning policy, the Plan fails to support and plan positively to meet known and foreseeable demand for such uses.

b) The Plan is not Justified

- 2.9 There is no realistic alternative site in Milton Keynes of comparable size, accessibility or capacity. Without specifically allocating The Bowl, a gap remains in the strategic provision of large-scale leisure, cultural and events space. This weakens the city's potential for events, tourism, performance, and community culture. There is no justification provided for omitting a site of such strategic importance.

c) The Plan is not Effective

- 2.10 The absence of designation creates some uncertainty over the future of The Bowl and weakens any assurance that it will remain available for leisure, cultural or events use. This undermines investor confidence and may dissuade promoters, event organisers and community organisations. The lack of a clear policy framework risks harming Milton Keynes' ability to attract and deliver major events and recreational opportunities.

d) The Plan is not Consistent with National Policy

- 2.11 The National Planning Policy Framework (NPPF) recognises that access to high-quality open spaces and opportunities for sport and recreation, including cultural and community facilities, contributes to the health, well-being and social cohesion of communities (Paragraph 103),
- 2.12 By omitting an allocation or policy for a well-established leisure and cultural venue, the Plan fails to maintain continuity and protection for a recognised community asset. This conflicts with both national policy expectations and local commitments to leisure, open space and cultural provision.

Requested Modifications

- 2.13 The MK City Plan 2050 should explicitly allocate the Milton Keynes Bowl for leisure, cultural, and events use on the Policies Map and in the textual policies, ensuring its long-term protection and enabling its potential intensification or redevelopment for such uses.
- 2.14 The Plan should retain or update the provisions of the existing Policy L8 (or equivalent), setting out requirements regarding transport, residential amenity, community access, biodiversity and ecology, and pedestrian/cycle/equestrian routes, or replicate equivalent safeguards in the new Plan.
- 2.15 The Plan should reference the existing National Bowl Development Brief (or an updated version) as the guiding framework for future proposals, ensuring design quality, environmental protection and community benefit.
- 2.16 The Plan should recognise The Bowl as a strategic leisure, cultural and events asset essential to delivering the vision and objectives of the City Plan.

Policy CEA8 Provision and protection of accessible open space

- 2.17 The draft Policies Map continues to identify the whole of the site as part of a designated Linear Park and, as a result, the land would fall under Policy CEA8. This blanket designation is considered **unsound** for the following reasons.

Soundness

b) The Plan is not Justified

- 2.18 The entirety of The Bowl is in private ownership and not freely accessible to the public. There are no public rights of way other than existing redways and Spring Rose Way which have public rights of way. Leisure route 51 is not a public right of way. The site therefore does not function as open, continuous, publicly accessible space and therefore does not meet the characteristics of a Linear Park. As such the site does not contribute meaningfully to formal or informal recreation or to the green-infrastructure network.
- 2.19 Applying the Linear Park designation across the entire site fails to reflect the varied land uses, ownership and accessibility characteristics of The Bowl. It imposes open-space protections across land that does not function as open space and was never intended to fulfil that role. The blanket designation is therefore not justified.

c) The Plan is not Effective

- 2.20 Although Policy CEA8 expresses support for leisure and recreation development within Linear Parks, this support is conditional on a number of criteria that are overly prescriptive and inflexible. When applied to the The Bowl, these criteria could inhibit appropriate and beneficial development aligned with the strategic vision for the site. As drafted, the policy risks constraining investment and limiting enhancement opportunities, while imposing disproportionate restrictions on areas that do not and cannot function as Linear Park land. The policy is therefore not effective in relation to the Bowl.

Requested Modifications

- 2.21 The National Bowl site should be removed from the Linear Park designation.

3 Conclusion

- 3.1 These representations have been prepared by Smith Jenkins Planning & Heritage on behalf of Stadium MK Ltd in response to the Milton Keynes City Plan Regulation 19 consultation.
- 3.2 The omission of the Milton Keynes Bowl from any leisure, cultural, or events allocation or policy in the draft MK City Plan 2050 renders the plan unsound. It is neither positively prepared, justified, effective, nor consistent with national or local policy. To ensure Milton Keynes retains its ability to offer large-scale leisure, cultural and community events, The Bowl must be explicitly allocated for leisure/cultural use under the new Plan. The plan should recognise that the Bowl is a suitable site for a training ground and such a use would be supported in planning terms. The site should also be removed from the Linear Park designation.
- 3.3 We therefore urge MKCC to revise the draft Plan accordingly before submission to ensure that it is sound.
- 3.4 We trust that these comments will be duly considered as the preparation of the Plan progresses.

APPENDIX 1

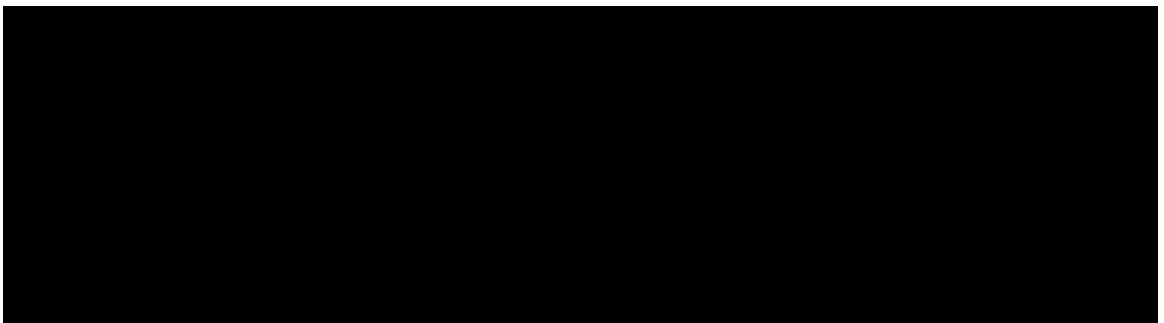
**Representations to the
MK City Plan 2050
Regulation 18 Draft**

The National Bowl, Watling Street,
Milton Keynes

On behalf of Stadium MK Ltd

October 2024

Ref: 723



1 Introduction

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage to the current MK City Plan 2050 Regulation 18 consultation on behalf of Stadium MK Ltd in respect of The National Bowl, Watling Street, Milton Keynes.
- 1.2 The representations set out the background to the site and the emerging development proposals for a comprehensive training ground for the MK Dons football team which will facilitate the City Council's longstanding aim for the use of the underutilised site to be diversified and intensified as is evidenced in the Council's Corporate Plan.
- 1.3 The representations state that the importance of The National Bowl as a City asset should be recognised in the New City Local Plan and that it should continue to be afforded its own permissive policy for commercial, leisure or recreational purposes. It is also proposed that the parts of the site which are not publicly accessible should be removed from the Linear Park designation.
- 1.4 We would welcome the opportunity to discuss the site with officers as the preparation of the new Local Plan continues.

2 The Site and Background

Site Description

- 2.1 The National Bowl is located within its own grid square to the north of V4 Watling Street and south of the A5(T), bounded to the west by Chaffron Way (H7) and approximately 2km to the south of Central Milton Keynes. Vehicular access to the site can be taken from Chaffron Way. The site is traversed by National and Millennium Cycle Route which join Redways on the perimeter of the site.
- 2.2 The site currently comprises an open man-made amphitheatre surrounded by tree planting which was constructed in the 1970s on the site of a former brick pit using surplus spoil from sites in the new town phase of Milton Keynes.
- 2.3 The site has been used for music concerts, car boot sales and cycling events and motorcycle training but is generally underutilised. The car parks have been occasionally used for park and ride to either the Stadium MK or Central Milton Keynes.
- 2.4 In the wider area an employment estate, known as Knowlhill, is situated to the north-west and Elfield Park Nature Reserve is located to the north-east. To the south of The Bowl, on the opposite side of Watling Street, is Furzton Lake, a large recreational open space. The closest residential development to the site is the eastern corner of Shenley Lodge housing estate on the opposite side of 'The Bowl' roundabout.
- 2.5 In terms of constraints, the site is largely within Flood Zone 1 with a small areas in Flood Zone 3 generally around the Loughton Brook.
- 2.6 The site has been considered previously by Milton Keynes City Council as a non-designated heritage asset by reason of its heritage significance deriving from its rarity, place in the history and identity of Milton Keynes, vast scale and the open, grassed character of its amphitheatre layout. The site has been considered for inclusion in the emerging New Town Heritage Register.



Figure 1 – Existing Site Plan

Background

- 2.7 It has been a longstanding aim of Milton Keynes City Council to diversify and intensify the use of the National Bowl through the provision of recreational facilities. The site represents a significant yet underutilised leisure facility in Milton Keynes and the site is in need of substantial investment to maximise its potential.
- 2.8 The National Bowl Development Brief (2013) has been produced to steer the future design of the site, primarily aimed at keeping the site in the 'style' of Milton Keynes. The development brief specifically states that use of the site by the MK Dons for a training facility would be an acceptable use. Section 4 of the document includes a list of appropriate buildings, facilities and uses that would be incorporated with a training ground proposal.

Current Planning Policy

- 2.9 The current Plan:MK Policies Map identifies the site and shows it as being within the Loughton Valley Linear Park with parts of the site being within a wildlife corridor.

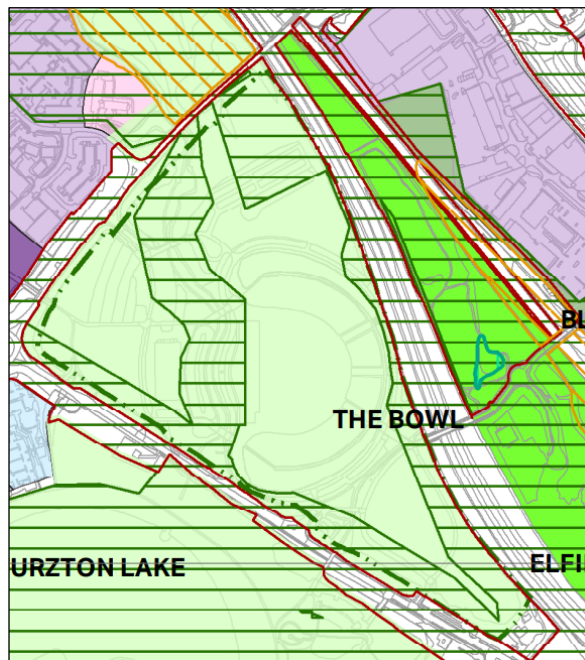


Figure 2 – Adopted Plan:MK Policies Map

- 2.10 Paragraph 6.40 of the adopted Plan:MK identifies The National Bowl as one of the major leisure, entertainment and cultural assets of the City as a large venue for outdoor concerts and entertainment.
- 2.11 The site is currently subject to a specific Policy L8 (Milton Keynes Bowl) which seeks to intensify the use of the Milton Keynes Bowl either for commercial, leisure or recreational purposes. This is subject to the following criteria being met:

1. Would not result in an unacceptable additional impact upon the highway network
2. Would have no significant adverse effect on the amenity of residential areas.
3. Where need can be demonstrated, training and other facilities should be safeguarded for community groups and sports clubs including use of cyclists, or make provision for an alternative, replacement facility, either on or off the site.
4. Are consistent with policies applying to Linear Parks and Biodiversity and Geological Enhancement.
5. Enhance the ecological and public access connectivity through the MK Bowl site.
6. Retain the existing cycle, equestrian and pedestrian routes across the site or make provision for suitable alternative routes.

2.12 Policy L7 of the Local Plan also notes the importance of retaining the existing Road Circuit for the use of Cyclists as part of future development at the Bowl.

Planning History

- 2.13 A full planning application on the site for the change of use from outdoor entertainment venue to mixed use outdoor entertainment venue and football training centre with associated works, including the installation of 2 football pitches and 4 training grids (reference 21/01550/FUL) was withdrawn in September 2021.
- 2.14 An outline planning application with all matters reserved except for access for the erection of a building, for a temporary period of 5 years, associated with the change of use of the site to a mixed use outdoor entertainment venue and football training centre (reference 21/01583/OUT) was also withdrawn in September 2021.
- 2.15 In February 2023, full planning permission was granted for the change of use from outdoor entertainment venue to mixed use outdoor entertainment venue and football training centre through the provision of football pitches and training grids (reference 22/02308/COU). The approval provided for two full sized grass football pitches and four training grids for the use by the MK Dons first team.
- 2.16 The permission remains extant but has not been implemented. The approved development formed Phase 1 of an intended larger development scheme for the intensification of the Bowl and relocation of the MK Dons first team and academy training grounds from Woughton playing fields to The National Bowl. Further changes to the wider site to facilitate the relocation of the rest of the football club were to be considered under future phases and applications. However, due to funding issues at the time further phases have not come forward.

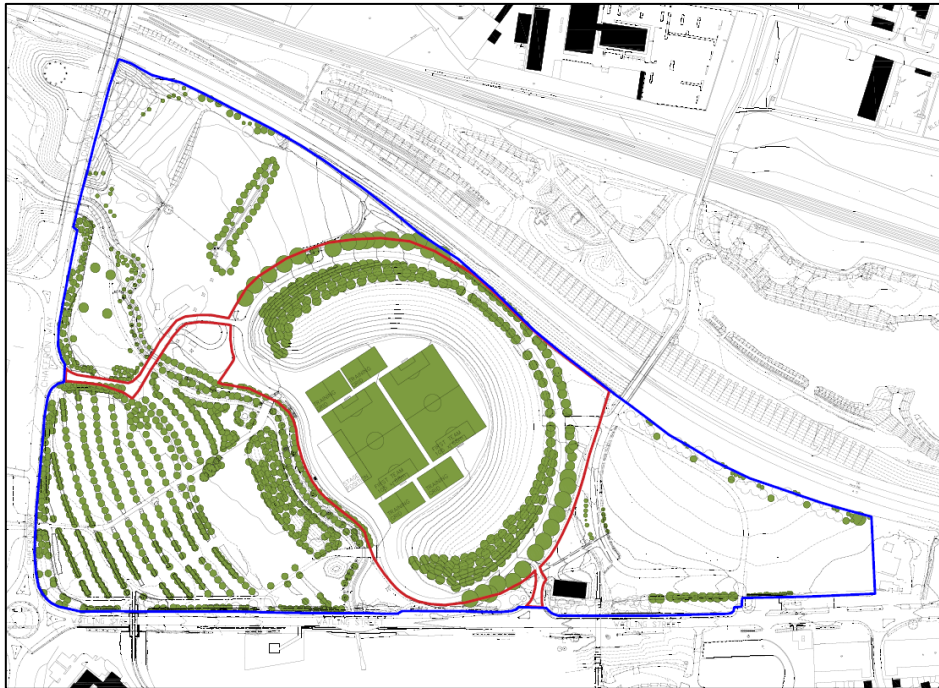


Figure 3 – Approved Training Ground

Current Position

- 2.17 In July 2024 MK Dons Football Club and Stadium MK Group Ltd was acquired by new owners. The newly appointed Chairman has recently confirmed that it is a key ambition and high priority of the club to establish and provide a training ground at The National Bowl. Funding is now in place for a comprehensive training ground redevelopment possibly including a hotel and padel courts together with retaining its current use as an outdoor entertainment venue for concerts and events which will provide significant social, economic and environmental benefits to the City.
- 2.18 High level discussions with senior management at the City Council have taken place recently and further discussions are expected to take place with Officers in due course prior to the submission of a fresh planning application on the site.

3 Representations

Overview

- 3.1 The MK City Plan 2050 Regulation 18 Plan sets out the ambitions, objectives and overall policy framework for delivering growth aligned with the Council’s vision contained within the Strategy for 2050.
- 3.2 Stadium MK Ltd welcomes the publication of the MK City Plan 2050 Regulation 18 Consultation and the opportunity to comment.
- 3.3 The responses are set out in relation to the various policies are set out under the various topic areas below.

Question 1(a) – our ambition and objectives for growth

Do you agree with our ambition and objectives for growth?

- 3.4 Agree.

Question 1(b) – our ambition and objectives for growth

Please say why you gave the answer to 1(a) above.

- 3.5 Stadium MK Ltd supports the ambition for Milton Keynes to be an innovative and successful place, founded upon its unique history and special characteristics. Stadium MK Ltd also support Objective 1 to create inclusive and safe places that encourage greater physical activity, social interaction, and healthier lifestyles and Objective 3 to provide a suitable range of facilities and infrastructure in the right places at the right time to promote good physical and mental health. Objective 13 to 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 is also supported. Finally, Objective 14 which supports the maintenance and creation of centres for leisure is supported.

Question 1(c) – our ambition and objectives for growth

Do you have any other comments or suggestions for this topic?

- 3.6 No.

Question 50(a) – Policy CEA8 Provision and protection of accessible open space

Do you agree with the draft policy?

3.7 No.

Question 50(b) – Policy CEA8 Provision and protection of accessible open space

Please say why you gave the answer to 50(a) above.

- 3.8 The entirety of the site is shown on the Policies Map as continuing to be being within a Linear Park and will be subject to new 'Policy CEA8 Provision and protection of accessible open space.' Whilst the proposed policy is supportive of development for leisure and recreation uses or related ancillary uses within Linear Parks this is subject to a number of criteria which might unnecessarily constrain development on the MK Bowl site.
- 3.9 Some areas of the site are in private ownership and not publicly accessible at all times. As such it is considered that these parts do not contribute to the function of Linear Park in terms of providing formal and informal recreation opportunities to residents and should be removed from the designation.

General Comments on the National Bowl

- 3.10 As identified above, The National Bowl currently benefits from its own permissive planning policy in the adopted Plan:MK which supports commercial leisure and recreational development on the site and it is recognised as being part of the leisure, entertainment and cultural offering of the City in the supporting text.
- 3.11 Despite this, disappointingly, all reference to the current policy, development opportunities and the identification of the site on the proposals maps are removed in the draft New City Plan.
- 3.12 There is only one reference the National Bowl in the draft New City Local Plan in regard to proposed Policy GS9 Supporting Growth with Infrastructure and the intention of the Milton Keynes Infrastructure Study and Strategy (MKISS) and Infrastructure Delivery Plan (IDP) to inform development to support assets that are of a city-wide scale 'such as the MK Bowl.'
- 3.13 Given the National Bowl is deemed a major leisure, entertainment and cultural asset of the City and in light of the Council's longstanding aim to diversity and intensify its use and the commitment by the new owners of the MK Dons to provide an enhanced training ground development on the site, the importance of the site should be recognised in the new Plan and it should continue to be afforded its own permissive policy for commercial, leisure or recreational purposes.

4 Conclusion

- 4.1 These representations have been prepared by Smith Jenkins Planning & Heritage to the current MK City Plan 2050 Regulation 18 Plan on behalf of Stadium MK Ltd in respect of The National Bowl, Watling Street, Milton Keynes.
- 4.2 The representations set out the emerging development proposals for a comprehensive training ground for the MK Dons football team which will facilitate the City Council's longstanding aim for the use of the underutilised site to be diversified and intensified as is evidenced in the Council's Corporate Plan.
- 4.3 In light of this, the Local Plan should recognise the importance of The National Bowl as a City asset and should continue afford it its own permissive policy for redevelopment. Parts of the site which are not publicly accessible should be removed from the Linear Park designation.
- 4.4 We trust that these comments will be duly considered as the preparation of the Plan progresses.