

**Name of the Local Plan to which this representation relates:**

Milton Keynes City Plan  
2050

Please return by **5.30pm on Monday 22<sup>nd</sup> 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](mailto: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	Mr	
First Name	Gavin	
Last Name	Chinniah	
Job Title	Head of Planning and Building Control	
(where relevant)		
Organisation	Bedford Borough Council	
(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: Bedford Borough Council

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

Paragraph	Vision	Policy	GS10: Movement and Access	Policies Map	
Other	Evidence Base				

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

4.(1) Legally compliant	Yes	<input checked="" 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 checked="" type="checkbox"/>

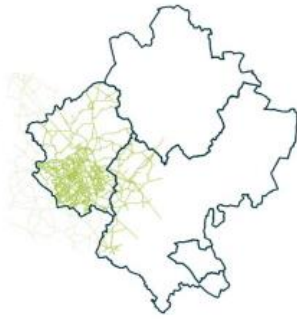
5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate,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

Transport and Universal Studios

Transport is a strategic matter, critical to the overall future success of the area.

Following the recent announcement of Universal Studios—where the government approved planning permission via an SDO on 16 December 2025 (laid before parliament and coming into force on 12 January 2026) - the transport modelling should be updated to reflect all national projects scheduled during the plan period, as well as the additional impacts of growth on network capacity across the sub-region and all transport modes. Particular attention should be given to the A421, A422, and the M1, both within and beyond Milton Keynes.

In particular, the cumulative impacts that the site allocations will have upon the transport network within Bedford Borough should be more thoroughly assessed (particularly the A421 / M1). Currently, the MK transport model has very limited coverage of the strategic highway network within Bedford, as shown in the extract below. This does not provide us the comfort that impacts from the proposed 16,000 homes at the Eastern Strategic City Expansion (ESCE) allocation have been fully considered on roads leading into and out of Bedford Borough, in particular, the M1 (J13 and J14), the A421, and the A422. In addition, other local roads such as Crawley Road, Cranfield Road, and Bedford Road are likely to experience an increase in traffic as a result of the ESCE, but this is not clearly demonstrated in the submission



In comparison, our transport model covers significant parts of Milton Keynes and Central Bedfordshire, as shown below.



We recognise that:

- page 283 of the submission plan [Planning Benchmarks – Transport] states that: *“MK Multi-Modal Model (MK MMM) is ongoing at the time of writing.”*
- it goes onto say: *“MKISS estimates of daily trips generated to/from committed and newly identified sites by sub area presented in MKISS are expressed by mode (highway vehicle trips, rail/bus, active mode and freight) and have been estimated using a standard set of trip rates derived from TRICS (a system of multi-modal trip generation analysis for developments in the UK and Ireland). These trip estimates will not necessarily take into account site-specific characteristics which may influence the number of trips and modal split. Furthermore, these estimates will not necessarily be aligned with those derived from the MK MMM which represent peak hours and does not cover all modes of travel.”*

However, we are uncomfortable that during the production of the plan (while the detailed MK MMM modelling was unavailable), assumptions have been made throughout the plan and supporting evidence base which are based upon available TRICS data. TRICS data is generally used by transport colleagues for individual housing scheme assumptions (on a standalone basis) rather than applied at a district-wide scale (as TRICS doesn't account for background traffic or future growth – as it is not intended to be used as a modelling tool). There is also a need for very careful interpretation of the TRICS data and assumptions being filtered from this dataset (accuracy and validity), as well as consideration of the quality of the original datasets. To demonstrate the soundness of the model, MK will need to:

- ensure that TRICS and MK MMM assumptions are aligned and reconciled to maintain a coherent evidence base across transport modelling and planning.
- assess how background traffic growth has been factored into TRICS outputs for the area and confirm how any variance has been addressed in the modelling process
- review how the MK MMM transport model outputs have influenced the plan's strategy, vision, and site/infrastructure development, given its late completion confirm how these outputs have been incorporated into the MKISS Infrastructure Study, underlying assumptions, and whole-plan viability testing and
- verify how the Sustainability Appraisal/Strategic Environmental Assessment addresses transport impacts if it was prepared prior to the completion of the transport model report.

Consequently, we would like certainty that:

- the assumptions made in the evidence base are both consistent and up to date across all the evidence base documents (where there are dependencies/carry across i.e. transport modelling and mitigation measures to whole plan viability to IDP, etc);
- the assumptions are going to be robust enough (as they do not include Universal Studios within them); and
- the correct transport planning tools have been used to support the site allocations as proposed.

**Infrastructure provision: MKISS**

- Taking an ‘infrastructure first’ approach (for 10 or more dwellings or 1,000 square metres or more employment floorspace) is ambitious and we would be interested to explore this with you, particularly in relation to any positive approaches which have been identified to find *“alternative mechanisms which will create new ways of funding and delivering the infrastructure needed to support our city’s growth.”*
- We object to the assumptions made within this document (including the lack of proposed highway infrastructure mitigation) regarding highway infrastructure, as it is based upon TRICs outputs rather than assignment, public transport, and variable demand modelling (based on SATURN). In addition, there is no clarity on funding mechanisms, resultant capacity levels at pressure points on the network (both roads and/or junctions) or the ‘knock on’ impacts on our area as a neighbouring authority (with strategic highway network links between MK and Bedford).
- *Investment strategy: MK states that they will assess each site against their delivery and funding priorities.* We support the clarity provided from the ‘Infrastructure Prioritisation Framework’ (Annex E of the plan), particularly in relation placing critical highways network connections between the two authorities in ‘category A’ which is required to unlock sites [i.e. *“we can’t unlock/get development on site without it”* – also referred to as ‘blockers/showstoppers’ which must happen to enable growth].

	<b>Category A (unlocking sites)</b>	<b>Category B (mitigation from early occupation)</b>	<b>Category C (longer term policy priority)</b>	<b>Category D (making a better place to live)</b>
Transport	<ul style="list-style-type: none"> <li>• Highways and structures</li> <li>• Public transport (incl. MRT)</li> </ul>	<ul style="list-style-type: none"> <li>• Active modes</li> </ul>	<ul style="list-style-type: none"> <li>• Rail</li> <li>• Freight/distribution</li> </ul>	

In summary, we object to:

- the lack of a transport model during the development of the regulation 19 plan;
- the overall coverage of the MK MMM transport model (being focused principally upon MK, Bucks and Central Bedfordshire highway network), which does not appear to consider the relationship of the allocation being proposed close to the administrative area of Bedford (16,000 homes at Eastern Strategic City Expansion) or the resultant movements on the network being made towards Bedford, nor the MRT proposal to provide a service between MK and Universal Studios;
- the absence of quantification/extent of mitigation solutions/options which are deliverable, achievable and suitable;
- lack of clarity of funding streams/delivery streams of the highways mitigation measures:
  - Does the evidence show that the plans full commitments/coverage are deliverable, achievable and viable? For example, is the plan deliverable when ‘the whole plan’ measures are input?
  - Is there a funding gap to deliver the mitigation necessary for the plan to be deliverable?

- Has feasibility testing been undertaken/planned?
- Is there a reasonable prospect that the mitigation will be delivered?
- Is there an identified, obvious or deliverable solution identified?
- insufficient consideration has been given to the anticipated impacts of Universal Studios across the sub-region/authority area across the evidence base (including socioeconomic matters (such as housing and employment forecasting) and transport modelling). With regards to updating the transport modelling to account for Universal Studios the approach must align with the agreed methodology between National Highways and Bedford Borough Council. National Highways have advised us that each individual transport model in the sub region must account for Universal Studios using the same methodology that we have recently agreed with National Highways.

The MK City Plan 2050 is considered unsound on the following grounds:

- positively prepared (not accounting for Universal Studios which is open from 2031 onwards with potential unmet socioeconomic needs not being met (having not been forecast through the projected modelling)).
- justified (evidence base is neither robust nor up-to date as it fails to consider the cumulative impacts of Universal Studios).
- effective (cross-boundary impacts have been deferred until after regulation 19). There have been no joint working meetings on the cross-boundary issue of the Universal theme park and future traffic modelling between Bedford and Milton Keynes (see paragraph 36(c) of the NPPF). Furthermore, the evidence base does not clearly identify the impacts on Bedford Borough i.e. the transport model does not extend into our area (apart from a small part of the A421)).
- consistent with national policy (the plan does not reflect the Universal Studios planning permission, which was laid before Parliament on 16<sup>th</sup> December 2025 and comes into force on 12 January 2026).
- duty to cooperate: engagement has not been continuing ongoing, proactive and sustained with you, as your plan-making processed.

Further questions:

At paragraph 268 of the plan, it says: *“The Housing and Economic Development Needs Assessment (HEDNA) indicates that single person households represent only a small proportion of the overall household growth. However, it also indicates that the increase in ‘other’ households represents 23% of the projected growth (an increase of 11,700). Other households include multi-generation living, student households and houses in multiple occupation.”* We require clarification on whether consideration has been given to how changes in household forecasting may influence transport journey patterns both within and beyond Milton Keynes. Confirmation is also needed on whether Milton Keynes has utilised England’s Economic Heartlands forecasting and modelling to inform and influence the plan.

Further to this, paragraph 26 of the plan says: *“MK City is one of the fastest growing areas in the UK in terms of both population and jobs. MK City has more jobs than its working-age population. Most jobs are service sector jobs with a high proportion of knowledge economy jobs. The wholesale and retail trade is the largest sector in the local economy, making up 16.6% of jobs in 2023.”*

Paragraph 32 of the plan says: *“to maintain a suitably skilled and educated workforce (without over relying on in-commuting), the development of institutions that create the skills to meet the needs of local employers must be a priority.”* It appears that there are currently more jobs than working age residents in MK. However, there is a skills mismatch between the high skill jobs available and some residents with lower skills, with many local jobs are filled by employees living elsewhere and commuting into MK. At present, many local jobs are filled by employees living elsewhere and commuting into MK. This trend will be emphasised by the delivery of Universal Studios where there is an assumption that approximately 80% of employees will come from Bedford, Central

Bedfordshire, Luton and Milton Keynes. Therefore, Milton Keynes will need to ensure that commuting and out-commuting patterns, and their likely changes up to 2050, have been fully considered in terms of their impact on the highway network.

The plan is supported by a Whole Plan Viability Report and IDP (MKISS). We are unclear on what is being reflected/assumed within the Whole Plan Viability Report/IDP as there appears to be no MRT (Mass Rapid Transit) assumptions. Of the contributions being assumed towards strategic infrastructure and mitigations (like education, transport, travel, health, open space, and the like, it would appear a significant amount of significant strategic infrastructure needs to be funded to deliver the vision of the plan – is this viable and deliverable, particularly if MRT is being funded through the plan. Historically, this work assumed 25,000 per unit and up to £50,000 (2024). We recognise that the latest sensitivity testing increased up to £75,000 per unit due to the uncertainty over overall costs of strategic infrastructure and mitigation (until the IDP was completed) (as set out in the ‘supporting growth with infrastructure’ section of the MK Whole Plan Viability Study, paragraphs. 5.27 to 5.29).

- *How much of the funding is directed towards MRT?*
- *How much is government anticipated to contribute towards MRT?*
- *How much is the new town funding?*

Since the evidence base has been developed in parallel with the drafting of the plan, clarification is required on how the conclusions within the plan and the supporting evidence base—such as whole-plan viability, the Infrastructure Delivery Plan (IDP) and forecasting models (socioeconomic and transport)—have influenced each other. Until this relationship is clear, we cannot determine whether the viability and deliverability of the proposals may have negative implications for Bedford.

A principal concern regarding mitigation is that despite the main dualling project at M1 J13, capacity concerns in other sections and at specific junctions persist along the A421 corridor in Bedford and Milton Keynes but these are not currently being addressed as part of ongoing local plan process infrastructure delivery strategies. This is particularly exacerbated in the absence of early and strategic detailed modelling. It is also critical to note that all the proposed mitigation packages and funding mechanisms will need agreement from National Highways.

Planning benchmarking is held within appendix F of the plan. In summary, the transport section does not include any infrastructure calculations/benchmarking/metrics at this stage [extract below]. The approach appears to have been taken due to the plan being drafted before the transport modelling and mitigation measures had been finalised. It is unclear how we as neighbouring authority can gain satisfaction that the necessary infrastructure will be provided on time and has clear funding streams to achieve the assumptions.

### Planning Benchmarks – Transport

Infrastructure Calculation	Metric	Source
<b>Highways &amp; Structures</b>	N/A	N/A
		<p>Project based requirements only, based on engagement with MKCC transport stakeholders, National Highways and neighbouring highway authorities;</p> <p>MK Multi-Modal Model (MK MMM), which is ongoing at the time of writing, models projected development impacts and scenarios and identifies estimates of trip generation, distribution and assignment onto the transport network. Site specific requirements and connections will also be further determined on an individual application basis, including the potential requirement for local (e.g. junction) modelling evidence.</p> <p>MKISS estimates of daily trips generated to/from committed and newly identified sites by sub area presented in MKISS are expressed by mode (highway vehicle trips, rail/bus, active mode and freight) and have been estimated using a standard set of trip rates derived from TRICS (a system of multi-modal trip generation analysis for developments in the UK and Ireland). These trip estimates will not necessarily take into account site-specific characteristics which may influence the number of trips and modal split. Furthermore, these estimates will not necessarily be aligned with those derived from the MK MMM which represent peak hours and does not cover all modes of travel.</p>
<b>Rail</b>	N/A	N/A
		<p>Project based requirements only, based on engagement with MKCC transport stakeholders, Network Rail and train operators; Site specific requirements and connections will also be further determined on an individual application basis, including consideration of potential additional passenger throughput at stations.</p>
Infrastructure Calculation	Metric	Source
		See also above note on MK MMM and TRICS based estimates of trips.
<b>Public Transport</b>	N/A	N/A
		<p>Same as above for Highways &amp; Structures; Modelling takes into account evidence on mass rapid transit (MRT) proposals. Site specific requirements and connections will also be further determined on an individual application basis, including consideration of meeting local requirements, including accessibility to services, e.g. bus stops within specific distance of development site.</p>
<b>Active Modes</b>	N/A	N/A
		<p>Project based requirements, based on engagement with MKCC transport stakeholders, Active Travel England and local groups; Site specific requirements and connections will also be further determined on an individual application basis, including consideration of an indication of potential trips made on foot and by bike, the availability and quality of local connections, and accessibility and desire lines to local trip attractors.</p> <p>See also above note on MK MMM and TRICS based estimates of trips.</p>
<b>Freight / Distribution</b>	N/A	N/A
		<p>Project based requirements, based on engagement with MKCC transport stakeholders and freight industry bodies; mainly applicable to commercial developments which generate Heavy and Light Goods Vehicle trips (although road freight is also a consideration in Construction Management Plans during development build-out). Site specific requirements and connections will also be further determined on an individual application basis.</p> <p>See also above note on MK MMM and TRICS based estimates of trips.</p>

The MK plan mentions that “we are preparing an extensive evidence base, and business case, to secure the necessary investment to deliver this network alongside our growth proposals” [for the Metro/Mass Rapid Transit (MRT) System] but there is limited support available publicly alongside this plan to demonstrate that the proposal is viable, deliverable, achievable and certain (an outline business case for MRT, alongside transport testing and transport model seeking to primarily consider existing infrastructure capacity). There appears to be no mention of MRT (Mass Rapid Transit) assumptions.

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.

Ensure robust evidence base supports the plan:

#### Transport modelling

- Transport modelling must include a greater quantum of the highway network within Bedford and be updated to include the impact of Universal Studios (which is scheduled to open in 2031).
- The Universal update’ must align with the agreed methodology between National Highways and Bedford Borough Council. National Highways have advised us that each individual transport model in the sub region must account for Universal Studios using the same methodology that we have recently agreed with National Highways.
- the overall coverage of the MK MMM transport model (being focused principally upon MK, Bucks and Central Bedfordshire highway network), which does not appear to consider the relationship of the allocation being proposed close to the administrative area of Bedford (16,000 homes at Eastern Strategic City Expansion) or the resultant movements on the network being made towards Bedford, nor the MRT proposal to provide a service between MK and Universal Studios;

- Mitigation measures should be quantified and costed, with greater certainty provided on delivery streams.

**Other matters**

- The whole plan viability assessment must incorporate the transport mitigation requirements (including MRT).
- The Infrastructure Delivery Plan (MKISS) must take full account of the anticipated transport mitigation impacts (including MRT).
- Submission documents should reflect the conclusions of the above updated evidence base documents.
- References to Universal Studios within the plan need to be updated to reflect the latest announcements including the government approval of the planning permission (via SDO) on 16<sup>th</sup> December 2025<sup>1</sup> when it was laid before Parliament, which comes into force on 12 January 2026.
- All relevant parts of the evidence base should be updated to reflect the anticipated impacts of the Universal Studios theme park across the sub-region/authority area (including socioeconomic matters such as housing and employment forecasting, transport modelling, retail and leisure, tourism/visitor demand (including visitor accommodation needs) in Milton Keynes City and the wider sub region).
- The plan should explicitly clarify its relationship with the emerging ‘renewed town’ proposal for Milton Keynes, which aims to revitalise the city centre, expand the northern and eastern periphery, and reshape travel patterns through a new mass rapid transit system. At present, it is unclear how the two initiatives interact and whether there is any overlap or risk of double counting between these separate delivery routes. Clear differentiation and alignment are essential to avoid duplication and ensure coherent infrastructure planning.

The ideal position would be that there would be a:

- sub-regional transport model developed together strategically and locally consider the national infrastructure/projects proposed/occurring in the wider area (including neighbouring authority growth levels and preferred sites).

**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:

<sup>1</sup> [Arrival of Universal comes one step closer as Government grants planning permission | Bedford Borough Council The Town and Country Planning \(Entertainment Resort Complex, Bedford\) Special Development \(No. 2\) Order 2025 Special Development Order: Entertainment Resort Complex and Associated Development in Bedford - GOV.UK](#)

To ensure that the evidence base to the MK City Plan 2050 fully reflects recently announced national projects (Universal Studios, New Towns, East West Rail, Luton Airport expansion in the broader sub-region) - it is essential that the resultant impacts on neighbouring authority areas are clearly identified through broadening the transport model coverage within Bedford to show likely congestion and connected traffic flows. This, in turn, will limit significant negative impacts on the sub-regional strategic road network, in particular, the M1 (J13 & J14), A421, A1 (Sandy and Biggleswade) and A422 (linked to junction 14).

In the short-term, this could involve a far more collaborative approach to transport modelling, with an opportunity to 'stitch together individual transport models. It would be beneficial to work towards closer joint working and production of a sub-regional, vision-led evidence base. In turn this would enable all the authorities in the sub region to carefully consider the impacts of Universal Studios/new towns/East West Rail strategically and for us all to provide a strong justification of the benefits of this 'one voice and source of the trust' across key authority areas.

To ensure that full consideration is given to Universal Studios across the evidence base (including socioeconomic matters (such as housing and employment forecasting) and transport modelling), retail and leisure, tourism/visitor demand (including visitor accommodation needs) in Milton Keynes City and ideally the wider sub region.

***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.***

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**Part B – Please use a separate sheet for each representation**

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Name or Organisation: Bedford Borough Council

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

Paragraph	10, 90, 371	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Other	Evidence base				

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

4.(1) Legally compliant	Yes	<input checked="" 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 checked="" 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.

Duty to co-operate

We recognise that there have been two meetings between Bedford and MK during the production of the MK City Plan 2050 up to this submission consultation period (as detailed in the 'Duty to Cooperate Statement'):

- 24/10/2022
- 17/09/2024

We also met during the regulation 19 consultation period on 5<sup>th</sup> December 2025 (MKCC and BBC) and as part of a newly formed sub-regional working group called 'Beds MK sub-regional planning policy forum' on 9<sup>th</sup> December 2025 (initiated by Bedford Borough Council). Overall, there has been a lack of cross boundary engagement and cooperation during a time of significant change/proposals in the sub region, either since the regulation 18 plan was drafted or the announcement of Universal Studios (April 2025).

While we acknowledge that MKCC began the consultation process with the requirement to meet the duty to cooperate soundness and legal tests, the government has announced its intention to remove the legal duty part way during the consultation<sup>2</sup>. The NPPF (December 2024<sup>3</sup>) includes significant additional paragraphs around the duty to cooperate and maintaining

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<sup>2</sup> [Written statements - Written questions, answers and statements - UK Parliament Plan-making - GOV.UK](#)

<sup>3</sup> [National Planning Policy Framework](#)

effective cooperation (paragraphs 24 to 28). While we had anticipated continuing ongoing, proactive and sustained engagement as your plan making progressed, we must raise concern over the soundness of the submission plan in relation to the evidence base and coverage of the plan and lack of meaningful and positive engagement during its production, notably coverage on national growth/projects emerging/being delivered in the sub region i.e. Universal Studios (which is one of a number of emerging national projects in the sub region).

We strongly feel that consideration should be given to possible impacts of the Universal Destinations and Experiences theme park on employment, housing, retail and leisure, tourism/visitor demand (including visitor accommodation needs) and transport in Milton Keynes as part of this plan process, particularly in light of the recent planning permission approval (via an SDO) on 16<sup>th</sup> December 2025<sup>4</sup> (when it was laid before Parliament, which comes into force on 12 January 2026).

Although MK's City Plan vision acknowledges the delivery of Universal Studios as a nationally important scheme, there has been no attempt to develop a joint evidence base within the sub region or to engage with Bedford Borough Council since the government's announcement in April 2025, the SDO planning application in July 2025 or the subsequent planning permission. This lack of collaboration has prevented the establishment of a shared evidence base - providing 'one source of the truth' - and joint aspirations or strategic solutions to address the likely sub-regional impacts. Publicly available documentation to date indicates that construction of the project will commence in 2026 (following approval on 16<sup>th</sup> December<sup>5</sup>).

The connections between Bedford and MK are set out in the plan as follows:

- The vision on page 85 says: *"The city centre is well connected locally, regionally and nationally with much faster East to West train and road connections, and greater capacity in the North to South rail network. Car use is lower thanks to well-developed and affordable public transport systems – including the Metro – which gives quick access to destinations such as Universal Studios, Silverstone and Luton Airport."*
- Page 200 says: *"Universal Destinations & Experiences have confirmed plans to build the company's first ever European Theme Park and resort in the UK near Bedford. The Theme Park, which is expected to open as early as 2031, will be the UK's largest tourist attraction. It is projected to welcome approximately 8.5 million visitors annually in its opening year, with numbers expected to climb to 12 million by 2051. Notably, around 30% of guests are anticipated to travel from abroad, underscoring its global appeal.*

*With its strategic location and excellent connectivity by road and East-West Rail, Milton Keynes City is well placed to benefit from this development. Our Retail and Commercial Leisure Study forecasts that the Theme Park would boost city hotel occupancy rates as well as encouraging further hotel investment, with over 500 additional hotel bedrooms to suit all needs needed in Milton Keynes City. Central Milton Keynes and Central Bletchley are likely to be the most attractive locations to benefit from this increased interest and investment in hotels within Milton Keynes City, due to their railway accessibility to the Theme Park via the planned East-West Rail link."* (approach supported by Policy ECP4: Hotel and visitor accommodation).

- Page 14 says: *"In preparing the MK City Plan 2050, we have liaised with neighbouring planning authorities through the Duty to Cooperate. Proposals for future growth, including those aligned to any new national initiatives or investment, that emerge after the MK City*

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<sup>4</sup> [Arrival of Universal comes one step closer as Government grants planning permission | Bedford Borough Council The Town and Country Planning \(Entertainment Resort Complex, Bedford\) Special Development \(No. 2\) Order 2025 Special Development Order: Entertainment Resort Complex and Associated Development in Bedford - GOV.UK](#)

<sup>5</sup> [Arrival of Universal comes one step closer as Government grants planning permission | Bedford Borough Council The Town and Country Planning \(Entertainment Resort Complex, Bedford\) Special Development \(No. 2\) Order 2025 Special Development Order: Entertainment Resort Complex and Associated Development in Bedford - GOV.UK](#)

*Plan 2050 has been prepared and submitted for examination would need to be addressed either through the review of the plan or the preparation of a Supplementary Plan.”*

We consider that the strategic connections/functional links and drivers for engagement between Bedford and MK include the following:

- Ox-Cam growth corridor
- Bedford to Milton Keynes Waterway Park – noting its absence from the vision
- East West Rail opportunities
- Universal factors (transport, housing, employment, tourism/visitors and wider economy)
- New towns (MK and Tempsford)
- Strategic road network: M1, A421, A509 and A422.

It is therefore essential that the MK City Plan 2050 demonstrates how these wider strategic planning matters are being addressed across the broader area to ensure alignment and avoid missed opportunities to integrate infrastructure delivery and growth.

While we acknowledge MK’s preferred approach, we believe the plan should:

- incorporate the Universal Studios assumptions across the evidence base, particularly within the supporting transport model. By virtue of the SDO submission (and now the permission), the proposed Universal Studios development meets the requirements set out in TAG for inclusion in scenario testing in this local plan transport model (being either ‘more than likely’/‘near certain’ and therefore should form part of the ‘core scenario’);
- ensure its inclusion in the MK Multi-Modal Model using the agreed methodology developed by Bedford and National Highways). Without this, the resulting conclusions and mitigation measures risk being abortive, as they do not reflect the immediate and emerging context within the sub-region. For example, planning permission has been given via Parliament on 16<sup>th</sup> December 2025, construction of Universal Studios is expected to begin in 2026, with the park opening in 2031 (attracting around 8.5 million visitors) and reaching full capacity by 2051—all of which falls within the MK plan period;
- acknowledge the proposed shuttle bus service between Milton Keynes and Universal Studios (delivered via the proposed MRT). The evidence should demonstrate the likely impact of this proposal on the road network within MK and Bedford; and
- reject the proposal on page 14 to defer consideration of future growth initiatives to a subsequent plan review or supplementary plan. Instead, we strongly advocate that Milton Keynes ensures the evidence base underpinning this submitted plan is sound, robust and fully reflects initiatives that are either ‘more than likely’ or ‘near certain’ to come forward in the core scenario within the plan period (to 2050). This includes Universal Studios, which has now been formally laid before Parliament.

Bedford Borough Council met with officers from MK during the regulation 19 consultation period (5<sup>th</sup> December 2025) and raised that additional strategic matters should be recognised/categorised on ‘Annex A: matrices of cross boundary strategic matters’ (extract below). An email followed this meeting to confirm our view that more strategic matters required ongoing engagement than was previously agreed upon in September 2023. These are set out below and highlighted in **bold text** to show changes in categorisation or additional strategic matters - which we feel enhance/reinforce the critical interrelationships between Bedford and MK:

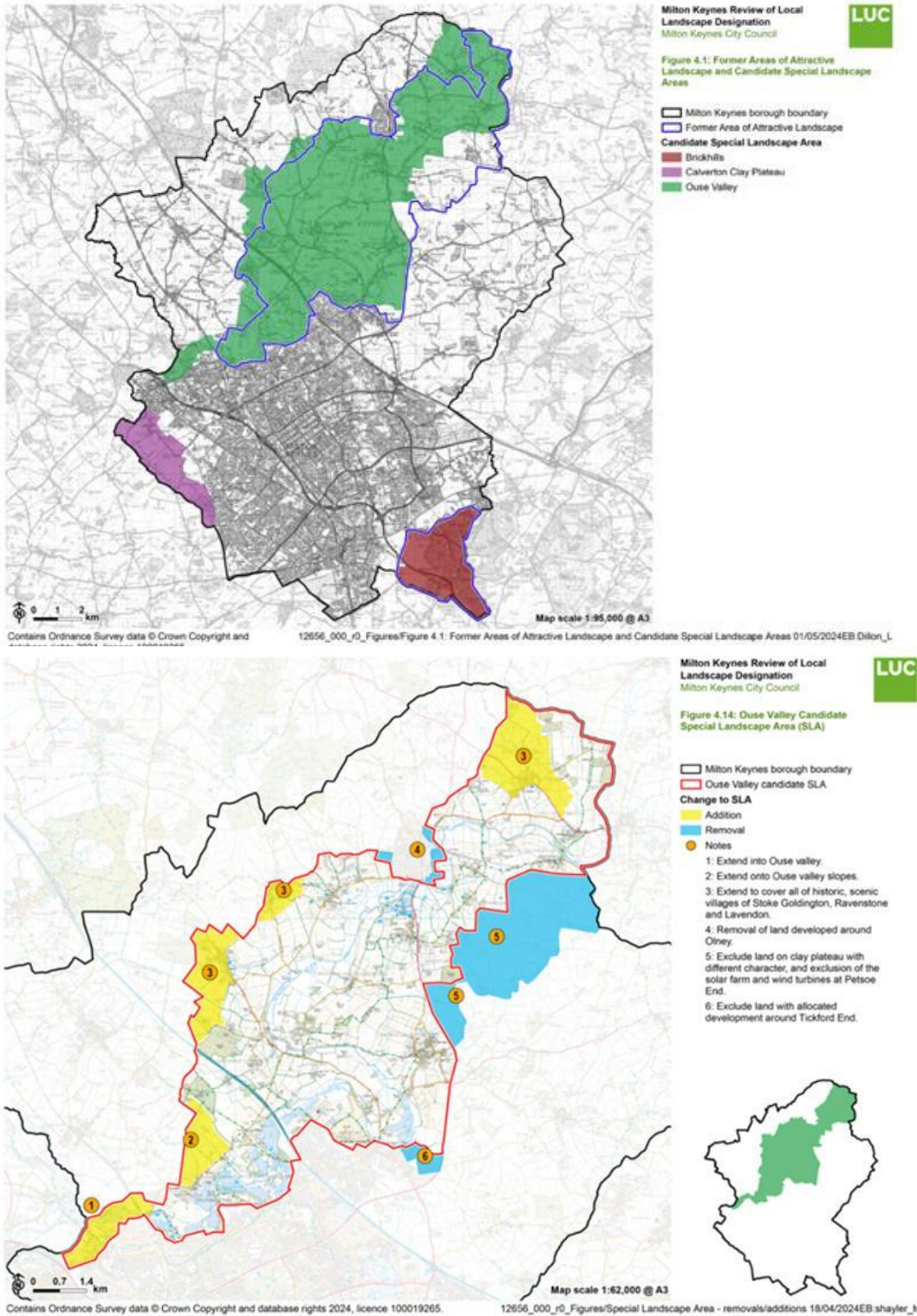
Strategic matter	Proposed level of engagement
Transport	Strategic road network – M1 (J13 & J14), A421, A1 (Sandy and Biggleswade), A422 (linked to J14)
Housing Needs	
Natural Environment, (including landscape and green infrastructure)	
Employment	
Gypsy and Traveller and Showperson Accommodation	
Flood risk	
Water management (supply and wastewater treatment)	
Retail	
<b>Strategic sites</b>	<b>Eastern Strategic Urban/City Extension – 16k homes</b>
Health	
Digital infrastructure	
Energy infrastructure	
Education (primary, secondary and higher education)	
Historic Environment	
Leisure provision	
Climate Change	
<b>East West Rail</b>	<b>Station patronage and travel route to Universal Studios</b>
<b>Rail</b>	<b>Station patronage and enabling modal shift</b>
<b>Universal Studios</b>	<b>Cumulative impacts primarily upon socioeconomic and transport infrastructure impacts</b>
<b>New Towns (Temsford and Renewed MK)</b>	<b>Cumulative impacts resultant from growth, requiring strategic and early, ongoing engagement</b>
<b>Infrastructure water quality, telecoms, security</b>	<b>Are there potential cumulative impacts on water quality? Corporate priorities:</b> <ul style="list-style-type: none"> <li>• Bedford-MK Waterway (Milton Keynes to Bedford Canal)</li> </ul>
<b>Ox Cam Growth Arc</b>	<b>Cumulative impacts resultant from wider growth. Aim to achieve ‘best outcomes’ for residents/ administrative area</b>
<b>Luton Airport</b>	<b>Increases the attractiveness of sub-region The relationship between Luton Airport and Universal Studios</b>
<b>Sub regional evidence base</b>	<b>Cumulative impacts resultant from growth Benefits of joint working and joint evidence base</b>

Please note: Minerals and waste matters are deemed strategic (but out of scope of this plan).

	Strategic matter that will require ongoing engagement;
	Strategic matter that may require ongoing engagement;
	Strategic matter that is not <i>envisaged</i> to require ongoing engagement

An example of where greater sub regional collaboration and evidence base would be beneficial for the wider area is the proposed changes tabled through the [Review of Local Landscape Designations \(May 2024\)](#). For example, the impacts of the changes to boundaries would have

greater value if they were extended to the 'natural'/defensible extents of the landscape areas rather than only being considered to administrative boundaries.



In summary, we object to:

- the lack of a robust transport model during the development of the regulation 19 plan;
- the overall coverage of the MK MMM transport model (being focused principally upon MK, Bucks and Central Bedfordshire highway network), which does not appear to consider the relationship of the allocation being proposed close to the administrative area of Bedford (16,000 homes at Eastern Strategic City Expansion) or the resultant movements on the network being made towards Bedford, nor the MRT proposal to provide a service between MK and Universal Studios;

- the absence of quantification/extent of mitigation solutions/options which are deliverable, achievable and suitable;
- a lack of clarity of funding streams/delivery streams of the highways mitigation measures:
  - does the evidence show that the plans full commitments/coverage are deliverable, achievable and viable? For example, is the plan deliverable when 'the whole plan' measures are input?
  - is there a funding gap to deliver the mitigation necessary for the plan to be deliverable?
  - has feasibility testing been undertaken/planned?
  - is there a reasonable prospect that the mitigation will be delivered?
  - is there an identified, obvious or deliverable solution identified?
- insufficient consideration has been given to the anticipated impacts of Universal Studios across the sub-region/authority area across the evidence base (including socioeconomic matters (such as housing and employment forecasting) and transport modelling). With regards to updating the transport modelling to account for Universal Studios the approach must align with the agreed methodology between National Highways and Bedford Borough Council. National Highways have advised us that each individual transport model in the sub region must account for Universal Studios using the same methodology that we have recently agreed with National Highways.

The MK City Plan 2050 is considered unsound on the following grounds:

- positively prepared (not accounting for Universal Studios which is open from 2031 onwards with potential unmet socioeconomic needs not being met (having not been forecast through the projected modelling)).
- justified (evidence base is neither robust nor up-to date as it fails to consider the cumulative impacts of Universal Studios).
- effective (cross boundary impacts have been deferred until after regulation 19). There have been no joint working meetings on the cross-boundary issue of the Universal theme park and future traffic modelling between Bedford and Milton Keynes (see paragraph 36(c) of the NPPF). Furthermore, the evidence base does not clearly identify the impacts on Bedford Borough i.e. the transport model does not extend into our area (apart from a small part of the A421).
- consistent with national policy (there is a lack of alignment to national agendas i.e. the plan does not reflect the Universal Studios planning permission, which was laid before Parliament on 16<sup>th</sup> December 2025 and comes into force on 12 January 2026).
- duty to cooperate: engagement has not been continuing ongoing, proactive and sustained with you as your plan-making processed.

#### Comments:

- We note that the Bedford-MK Waterway Park project is not referenced within the overall vision. Given its status as a joint corporate priority, its delivery should be explicitly recognised and celebrated within the plan/vision.
- East West Rail – Central Bletchley. We recognise that paragraph 181 states: *“We support the development of East West Rail (EWR) including the Aylesbury spur connecting Milton Keynes to Aylesbury. Services from Oxford to Bletchley and Central Milton Keynes are set to begin in late 2025 with connections to Cambridge in the 2030s. Central Bletchley seeks to benefit from being at the intersection of strategic East to West and North to South rail routes linking the key cities of Oxford and Cambridge, Birmingham, and London, attracting investment and facilitating its redevelopment and renewal.”* At this point, the Bedford/Universal Studios/Tempsford rail connections are not referenced. These stations and lines should be included in the plan. The modal shift (via the East West trainline/MRT)

will be critical to the success of Universal Studios while ensuring maximum capacity is preserved on the strategic road network – and therefore enhancements will be at the heart of the success of this national project – benefiting the region as a whole. The plan should demonstrate that the opportunities presented by East West Rail have been fully recognised and integrated, including measures to enhance connectivity, unlock economic growth and support sustainable travel patterns across the region.

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.

The supporting evidence base to the plan must incorporate the relevant assumptions relating to the construction and implementation of the Universal Studios theme park (which is scheduled to open in 2031 (following approval on 16<sup>th</sup> December 2025<sup>6</sup>, when it was laid before Parliament, which comes into force on 12 January 2026).

#### Transport modelling

- Transport modelling must include a greater quantum of the highway network within Bedford and Universal Studios (which is scheduled to open in 2031).
- The Universal update' must align with the agreed methodology between National Highways and Bedford Borough Council. National Highways have advised us that each individual transport model in the sub region must account for Universal Studios using the same methodology that we have recently agreed with National Highways.
- the overall coverage of the MK MMM transport model (being focused principally upon MK, Bucks and Central Bedfordshire highway network), which does not appear to consider the relationship of the allocation being proposed close to the administrative area of Bedford (16,000 homes at Eastern Strategic City Expansion) or the resultant movements on the network being made towards Bedford, nor the MRT proposal to provide a service between MK and Universal Studios;
- Mitigation measures should be quantified and costed, with greater certainty provided on delivery streams.

#### Other matters

- The whole plan viability assessment must incorporate the transport mitigation requirements (including MRT).
- The Infrastructure Delivery Plan (MKISS) must take full account of the anticipated transport mitigation impacts (including MRT).
- Submission documents should reflect the conclusions of the above updated evidence base documents.
- References to Universal Studios within the plan need to be updated to reflect the latest announcements including the government approval of the planning permission (via SDO) on

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<sup>6</sup> [Arrival of Universal comes one step closer as Government grants planning permission | Bedford Borough Council](#)  
[The Town and Country Planning \(Entertainment Resort Complex, Bedford\) Special Development \(No. 2\) Order 2025](#)  
[Special Development Order: Entertainment Resort Complex and Associated Development in Bedford - GOV.UK](#)

16th December 2025<sup>7</sup> when it was laid before Parliament, which comes into force on 12 January 2026.

- All relevant parts of the evidence base should be updated to reflect the anticipated impacts of the Universal Studios theme park across the sub-region/authority area (including socioeconomic matters (particularly housing and employment forecasting), transport modelling, retail and leisure, tourism/visitor demand (including visitor accommodation needs) in Milton Keynes and the wider sub region.
- MK must also provide greater explanation of how the growth in this 2050 plan relates to the emerging 'renewed town' proposal in Milton Keynes (which seeks to reinvigorate the city centre and expand the city periphery (northwards and eastwards) whilst reshaping the way people travel, via a new mass rapid transit system). It should also confirm the extent of any overlap or potential double counting between these two delivery routes to ensure transparency and avoid duplication.

The ideal position would be that there would be a:

- sub-regional transport model and socioeconomic forecasting developed together strategically and locally consider the national infrastructure/projects proposed/occurring in the wider area.

**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:

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<sup>7</sup> [Arrival of Universal comes one step closer as Government grants planning permission | Bedford Borough Council](#)  
[The Town and Country Planning \(Entertainment Resort Complex, Bedford\) Special Development \(No. 2\) Order 2025](#)  
[Special Development Order: Entertainment Resort Complex and Associated Development in Bedford - GOV.UK](#)

To ensure that the evidence base to the MK City Plan 2050 fully reflects recently announced national projects (Universal Studios, New Towns, East West Rail and Luton Airport expansion in the broader sub-region) - it is essential that the resultant impacts on neighbouring authority areas are clearly identified (through broadening the transport model coverage within Bedford to show likely congestion and connected traffic flows). This, in turn, will limit significant negative impacts on the sub-regional strategic road network, in particular, the M1 (J13 & J14), A421, A1 (Sandy and Biggleswade) and A422 (linked to junction 14).

In the short-term, this could involve a far more collaborative approach to transport modelling with an opportunity to 'stitch together individual transport models. It would be beneficial to work towards closer joint working and production of a sub-regional, vision-led evidence base. In turn, this would enable all the authorities in the sub region to carefully consider the impacts of Universal Studios/new towns/East West Rail strategically and for us all to provide a strong justification of the benefits of this 'one voice and source of the trust' across key authority areas.

To ensure that full consideration is given to Universal Studios across the evidence base, including socioeconomic matters (particularly housing and employment forecasting), transport modelling, retail and leisure, tourism/visitor demand (including visitor accommodation needs) in Milton Keynes and the wider sub region.

***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.

**Part B – Please use a separate sheet for each representation**

Name or Organisation: Bedford Borough Council

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

Paragraph Objectives  
(page 9) Policy CEA11,  
CEA1 Policies Map

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

4.(1) Legally compliant	Yes	<input checked="" 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 checked="" 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.

Infrastructure and Sustainability and climate change

We are supportive of the progressive approach to tariffs which the MKCC Plan includes, such as:

- urban greening, trees and woodland charge (Policy CEA11: £300-£400 per dwelling),
- a carbon offset fund: carbon price of £7,350 per tonne of CO2 (Policy CEA1),
- the objectives on page 9: “*New homes and commercial buildings to be net zero-carbon by 2030 and carbon negative by 2050*”, and
- a progressive green walls approach (Policy CEA1).

Together with the aspirations set out for a ‘infrastructure first’ delivery and the commitments to deliver MRT (mass rapid transit), we wish to ensure that these commitments realistic, deliverable and achievable so there are no unintended consequences on Bedford.

The MK City Plan 2050 is considered unsound on the following grounds:

- positively prepared (not accounting for Universal Studios which is open from 2031 onwards with potential unmet socioeconomic needs not being met (having not been forecast through the projected modelling)).
- justified (evidence base is neither robust nor up-to date as it fails to consider the cumulative impacts of Universal Studios).
- effective (cross boundary impacts have been deferred until after regulation 19). There have been no joint working meetings on the cross-boundary issue of the Universal theme park and

future traffic modelling between Bedford and Milton Keynes (see paragraph 36(c) of the NPPF). Furthermore, the evidence base does not clearly identify the impacts on Bedford Borough i.e. the transport model does not extend into our area (apart from a small part of the A421).

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.

We would like certainty that:

- the assumptions made in the evidence base are both consistent and up to date across all the evidence base documents (where there are dependencies/carry across i.e. transport modelling and mitigation measures to whole plan viability to IDP, etc); and
- the assumptions are going to be robust enough (as they do not include Universal Studios within them).

**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:

To ensure that the evidence base to the MK City Plan 2050 fully reflects recently announced national projects (Universal Studios, New Towns, East West Rail, Luton Airport expansion in the broader sub-region) - it is essential that the resultant impacts on neighbouring authority areas are clearly identified.

To ensure that full consideration is given to Universal Studios across the evidence base (including socioeconomic matters (such as housing and employment forecasting) and transport modelling) and that this is fully considered throughout the supporting Whole Plan Viability report and IDP.

**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.

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**Part B – Please use a separate sheet for each representation**

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Name or Organisation: Bedford Borough Council

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

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.

Site Allocations

We acknowledge that the plan proposes to provide 59,779 homes over the plan period (which appears to be MK's local housing need plus a 19% flexibility buffer), with an aim of meeting the minimum housing requirement and support the growth ambitions set out within it.

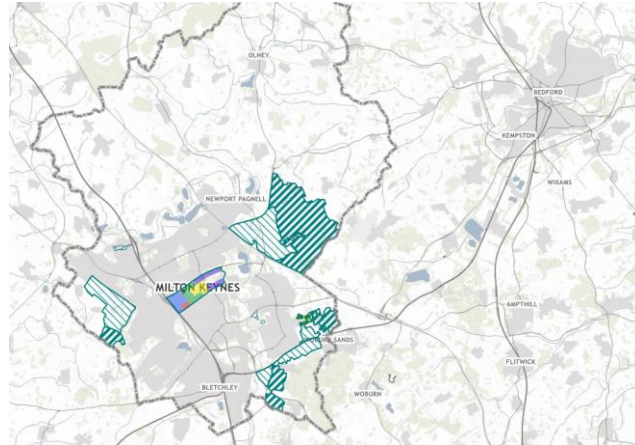
The plan confirms that through previous local plans, neighbourhood plans and planning permissions (excluding CMK), there are already around 23,000 new homes due to come forward by 2050. This means the MK City Plan 2050 seeks to allocate land to deliver around 37,000 additional homes by 2050 by seeking to maximise growth in the most sustainable locations. It has identified development of around 20,500 new homes within the existing built-up area of MK City (63%).

While there are no draft allocations adjacent to BBC administrative area, those most relevant to Bedford are:

- the 'Eastern Strategic City Extension'(ESCE) which is estimated to provide around 16,000 homes in total (7,750 by 2050). The site is proposed to provide additional employment land and an opportunity to deliver gypsy and traveller pitches, with paragraph 103 of the plan stating that: *"The delivery of ESCE will extend beyond 2050, potentially into the 2080s given its scale."*
- the 'East of Wavendon Strategic City Extension' has the potential to deliver around 2,250 new homes between 2038 and 2050. The plan says that the delivery of the site will allow MKCC to

explore opportunities for cross-boundary growth with CBC, should land adjacent to MK be allocated in CBC 's emerging local plan (paragraph 18 of the plan).

It is also recognised that these new allocations are proposed in the context of some additional historic allocated growth in the plan through retained strategic allocations close to Newport Pagnell and Woburn Sands, which are likely to result in greater cumulative impacts from growth in the south and eastern parts of the city:



South eastern corner of MK:

- East of Wavendon 2,250 homes (2038 to 2050) – covered in detail above
- South East Milton Keynes 3,000 homes (up to 2031 and beyond)
- South of Bow Brickhill and Caldecotte South [retained allocation] 1,300 homes. B8 and B2 employment floorspace.
- Levante Gate: 1,250 homes

Milton Keynes East Strategic Urban Extensions - delivery of around 5,000 new homes, including at least 1,475 homes by 2031

North East:

- Eastern Strategic Urban/City Extension – 16,000 homes by 2080 (7,750 by 2050) – covered in detail above

MK recognises that there is also growth already delivered in the south of the city (B2/B8 and B1) and south of MK and South Caldecotte (B2 and B8) and policies DS2, HN1, HN2, HN3, HN4, HN5 (adjacent to Wavendon Gate and South of Magna Park).

We recognise that the plan states the following in relation to these sites:

#### Eastern Strategic City Extension:

Paragraph 17: *“The largest of these is our Eastern Strategic City Extension. We estimate it can provide around 16,000 homes in total (7,750 by 2050) which would represent a major extension to the city, consisting of separate built areas within it. This site will expand the city boundaries beyond the already planned Milton Keynes East Strategic Urban Extension, which was allocated in Plan:MK and has received planning permission. A key characteristic of this growth location will be its transit-oriented layout and design. New homes and community facilities would be built around new Metro services and new active travel routes, founded upon our people-friendly and healthy places principles, to support more sustainable modes of movement.”*

#### East of Wavendon:

Paragraph 107: *“This includes infrastructure delivery associated with ongoing growth in the area, notably South East Milton Keynes which is due to complete in 2037/38 and may include new road and transport infrastructure linked to the roll out of new East West Rail services to Bedford and*

*Cambridge (currently planned for 2030). This will likely affect the East of Wavendon allocation's relationship with Woburn Sands. Equally, greater clarity on potential growth areas immediately adjoining the allocation eastward beyond Milton Keynes City will have been reached through the preparation of the next Central Bedfordshire Local Plan, which may potentially offer a different context for considering and agreeing detailed design and layout matters within allocation."*

Paragraph 18 states: *"Delivery of East of Wavendon beyond 2038 will also allow us to explore opportunities for cross-boundary growth with Central Bedfordshire, should land adjacent to Milton Keynes in this area be earmarked for development by Central Bedfordshire Council in their emerging local plan. As with the Eastern Strategic City Extension, this site will also be shaped around new Metro services, with a route and link through the site, to support more sustainable modes of movement."*

We will await to see if there is any quantum of growth proposed in the emerging Central Bedfordshire Local Plan alongside the MK proposed East of Wavendon site to fully understand if there are any sub regional/Bedford ramifications from the proposed levels of growth in this area.

In light of the above considerations, concerns we have around this quantum of growth (in combination with the sub-regional growth/national projects coming forward in the area) are as follows:

- We need to understand the cumulative impacts of the sites proposed without currently having the evidential information on matters such as landscape across the wider sub region.
- With a heavy reliance upon regeneration/large-scale extensions with an 'infrastructure first delivery' approach, further justification is needed on how the housing supply aligns with the housing trajectory/assumptions. We want to ensure that MK's growth needs are not going to be transferred to Bedford in the short to medium term if MK are unable to meet its growth assumptions at pace, while retaining a 'infrastructure first approach', particularly in light of the recent Universal Studios announcement (planning permission laid in Parliament on 16<sup>th</sup> December). As Universal Studios comes forward, it will inevitably create its own draw/demand, and this need will need to be accounted for within the sub region through its evidence base and emerging local plans, such as socioeconomic matters (especially housing and employment forecasting), transport modelling, retail and leisure, tourism/visitor demand (including visitor accommodation needs).
- To demonstrate soundness, Milton Keynes will need to provide greater certainty about the relationship between the new towns (MK and Tempsford) and the housing supply targets set out in the MK City Plan 2050 and seek advice from PINS and MHCLG on this matter before the plan is submitted to the secretary of state. For instance, Tempsford is an early front runner and is expected to commence within the first five years of the plan. Modelling work will need to consider the impact of the new towns as a potential scenario up to 2050. In densely built-up areas like MK, accommodating a new town as an addition to local housing need is not feasible; that need would have to be met elsewhere within the plan area. Therefore, clarification from MHCLG and PINS will be essential to ensure the plan moves forward with a clear and robust direction. MK also need to explain how much 'double counting' is occurring between the new Town and the MK City 2050 Plan, and whether any remaining 'Renewed New Town' growth is planned (north of MK/floodplain). At this stage it is unclear how much effect this level of planned growth in MK could have upon Bedford Borough (particularly on the transport infrastructure and landscape impacts). This requires further work to justify the Eastern Strategic City Extension site allocation.
- With relation to 'Eastern Strategic City Extension'(ESCE), we recognise that at this stage there is an allocation for 7,750 homes by 2050 (with the indication of expanding the sites growth up to around 16,000 homes in total). Due to the long-term nature of this site (either in a future

local plan or via the new towns programme) it increases the uncertainty or identification of the likely impacts of such a sizeable development on the eastern edge of MK and its interrelationships with Bedford from the outset. It is a shame that more strategic, sub regional work has not been undertaken for this proposal.

- Universal Studios and its direct and indirect impacts will need to be reflected in the regulation 19 version of the MK City 2050 Plan.

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.

- Submission documents should reflect the conclusions of the updated evidence base documents (transport, socioeconomic, viability and IDP).
- References to Universal Studios within the plan need to be updated to reflect the latest announcements including the government approval of the planning permission (via SDO) on 16<sup>th</sup> December 2025<sup>8</sup> when it was laid before Parliament, which comes into force on 12 January 2026.
- All relevant parts of the evidence base need to be updated to reflect the anticipated impacts of the Universal Studios theme park across the sub-region/authority area, including:
  - socioeconomic matters such as housing and employment forecasting;
  - transport modelling, including traffic flows between MK and Bedford;
  - retail and leisure patterns; and
  - tourism/visitor demand (including visitor accommodation needs) in Milton Keynes and ideally the sub region.
- We would greatly appreciate the opportunity to work collaboratively with you and other local authorities in the sub-region to develop shared evidence and fully assess these impacts within a spatial context and identify what mitigation measures are needed to offset them.
- MK should provide clarity on how the growth in this 2050 plan relates to the emerging 'renewed town' proposals in Milton Keynes (which seeks to reinvigorate the city centre and expand the city periphery (northwards and eastwards), whilst reshaping the way people travel, via a new mass rapid transit system). The plan must provide clarity on the extent of any overlap or potential double counting between the two proposed delivery routes.

**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)?

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<sup>8</sup> [The Town and Country Planning \(Entertainment Resort Complex, Bedford\) Special Development \(No. 2\) Order 2025 Special Development Order: Entertainment Resort Complex and Associated Development in Bedford - GOV.UK](https://www.gov.uk/guidance/special-development-order-entertainment-resort-complex-and-associated-development-in-bedford) (see <https://www.gov.uk/guidance/special-development-order-entertainment-resort-complex-and-associated-development-in-bedford>)

**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:

To ensure that the evidence base to the MK City Plan 2050 fully reflects recently announced national projects (Universal Studios, New Towns, East West Rail and Luton Airport expansion in the broader sub-region) - it is essential that the resultant impacts on neighbouring authority areas are clearly identified.

To ensure that full consideration is given to Universal Studios across the evidence base (including socioeconomic matters (such as housing and employment forecasting) and transport modelling), retail and leisure, tourism/visitor demand and the economy (including visitor accommodation needs) in Milton Keynes City (and ideally the sub region).

***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.

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**Part B – Please use a separate sheet for each representation**

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Name or Organisation: Bedford Borough Council

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

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.

Boat Dwellers – evidence base

Paragraph 274 of the plan says: “...In line with draft government guidance published in 2016, our Boat Dweller Accommodation Assessment (BDAA) identified boat dweller accommodation needs for the period 2023–2040.”

MKCC has not identified the needs for the period 2040 to 2050 (due to taking an approach to allocate specific sites for the first 5 years of supply and broad locations for growth in years 5 to 10 with a reasonable prospect for delivery/only where possible in years 11 to 15+).

We recognise that there is a proposed criteria-based policy through Policy HGH7 (Accommodation for boat dwellers), but it is unclear how these needs post 2040 have been identified and are proposed to be met and what the ramifications are on Bedford.

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.

MKCC should provide evidence and or justification supporting the plan which covers the 2040 to 2050 period as local plans should bring forward sufficient land to meet objectively assessed needs across the entire plan period.

**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:

To ensure that the needs of boat dwellers are met across the entire plan period.

**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.

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**Part B – Please use a separate sheet for each representation**

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Name or Organisation: Bedford Borough Council

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 checked="" 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 checked="" 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.

Gypsy and Traveller Accommodation

The strategy in MK's plan and supporting GTAA provides 69 additional pitches for gypsy and traveller accommodation needs over the plan period (with significant provision in the 0 – 5 and 6 – 10-year period of the plan). Pitches are proposed as part of Eastern Strategic City Extension (31 pitches – Policy GS14), Shenley Dens (15 pitches – Policy GS19), South East Milton Keynes Strategic Urban Extension (7 pitches – Policy GS22), Willen Road (1 pitch – Policy HQH6) and West of Whaddon (15 pitches – Policy HQH6).

This is reinforced through paragraph 272 of the plan, which says: *“We will seek to meet our identified need through the allocation of new Gypsy and Traveller sites within strategic sites in South East Milton Keynes, Eastern Strategic City Extension, Shenley Dens City Extension, as well as a new site West of Whaddon Road. These sites will be required to be brought forward within early phases of these new strategic developments.”*

The plan and evidence base go onto say that a further 6 pitches would be provided by household dissolution (due to the current age of the occupants) over the period to 2050, helping to fulfil the total need for a total of 75 pitches by 2050.

The plan appears to rely on household dissolution as a potential source of supply to meet gypsy and traveller pitch needs. However, this approach seems to represent existing pitches becoming vacant—potentially offered to those on the housing register if publicly owned—rather than the provision of new pitch delivery. This does not equate to meeting the identified need for 75

additional pitches. To ensure delivery, these 75 pitches should be explicitly provided as part of allocated sites within the plan rather than relying on turnover within the existing stock.

We are concerned over whether this is an acceptable approach to be taken and if this would have any negative, unintended ramifications on neighbouring authorities through frequency of incursions or length of time of the incursion (being longer term).

We note that paragraph 273 of the plan says: *“The GTAA also reviewed the requirements for transit sites within our area, with unauthorised encampment activity being a good indicator of transit need in the area. It is recommended that the council pursue identifying land through negotiated stopping arrangements.”* We would be interested to understand the outcome/progress made with identification of transit sites within MK so that we can ensure that provision is appropriately made for encampments without it negatively impacting on neighbouring authority areas.

We recognise that the GTAA has also identified a need for 10 plots for travelling showpeople with no provision currently made. The plan proposes to handle this identified need through provision of a criteria-based policy, justifying this approach by stating they have no provision. Bedford would wish to ensure that this need is fully considered within MK and that no negative ramifications are placed upon neighbouring authorities due to identified need not being pro-actively allocated/delivered.

The MK City Plan 2050 is considered unsound on the following grounds:

- justified (evidence base identifies a need of 75 pitches for gypsy and traveller pitches – while the plan identifies 69 additional pitches and 6 pitches via household dissolution (through already existing pitch provision)).

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 allocate 75 pitches to meet the identified gypsy and traveller need in MK up to 2050 rather than rely on household dissolution (to, ‘in effect’, deliver 6 pitches).

**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:

To ensure that the needs of gypsy and travellers are met across the plan period.

***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.*

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**Part B – Please use a separate sheet for each representation**

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Name or Organisation: Bedford Borough Council

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="GS3"/>	Policies Map	<input type="text"/>
Other	<input type="text" value="Table 2 and 3"/>				

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

4.(1) Legally compliant	Yes	<input checked="" 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 checked="" 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.

Employment

We recognise that the plan:

- requires 550,000-650,000 sqm of office floorspace (350,000-460,000 net) by 2050.
- supports the creation of smaller units or workshops for start-ups and smaller businesses.
- creates 26,900 additional jobs in Central Milton Keynes across a range of sectors including tech, digital and knowledge-intensive businesses, education, the creative and cultural sectors, as well as retail and hospitality.

Logistics and warehousing

Para 87(b) of the NPPF says *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for... storage and distribution operations at a variety of scales and in suitably accessible locations...”*.

We recognise that provision for B8 can be challenging and that the plan says:

- Paragraph 30: *“The logistics industry has exhibited strong growth in recent years. In 2023 it employed 17,000 workers, 9.1% of all jobs in MK City, significantly higher than the GB average of 5%. While demand in this sector remains strong, opportunities for further growth are diminishing due to the lack of suitable sites to accommodate the specific needs of this sector.”*
- Paragraph 38: *“If suitable sites for warehousing development are not available in MK, developers will seek to develop sites where suitable sites are available”*.

It is recognised that the MK City Plan 2050 is relying on warehousing and logistics evidence produced through a HEDNA (needs assessment)<sup>9</sup> which is already compromised as it was drafted without consideration of impacts from Universal Studios across the plan period and sub region (having been published prior to the proposal being publicised). We anticipate that Universal Studios will have numerous direct and indirect 'knock on effects' in terms of distribution and supply which are not accounted for in its assumptions.

The plan does not allocate a sufficient supply of land to meet the identified requirements in table 3 (page 26)<sup>10</sup>, particular for warehousing and logistics growth/need).

To demonstrate soundness, Milton Keynes will need to provide greater certainty about how needs will be met including strategic and locally identified need. MKCC have not engaged with neighbouring authorities through duty to cooperate discussions to explore delivery options. Equally, exploration could have been made to identify suitable, available and achievable sites in the area to meet this need, outside of any site promotions being made by developers/agents. MK also suggested they would *"consult on how we deal with warehousing in the future including inviting further promotion of land for warehousing"* (July 2024, Economic and Cultural Prosperity Topic Paper).

Policy GS3 sets out (table 4) where 207.5 hectares of employment land will be developed, and which uses will be permissible.

We are concerned that unmet need in MK will have consequential impacts on Bedford and the wider sub region. We acknowledge that MKCC has identified a lack of suitable sites for warehousing and logistics development leading to the proposed approach in the plan. Although there is a high likelihood that occupiers will look for alternatives that can meet their needs i.e. large flat sites with excellent strategic access, in other surrounding areas, this could place unnecessary pressure upon land within Bedford to meet needs generated in MK. A coordinated sub-regional approach to logistics and warehousing supply is therefore strongly advocated to ensure a balanced and sustainable distribution of provision.

The MK City Plan 2050 is considered unsound on the following grounds:

- positively prepared (not accounting for Universal Studios which is open from 2031 onwards with potential unmet socioeconomic needs not being met (having not been forecast through the projected modelling)). The new Universal theme park in Bedford, UK, is predicted to create significant jobs across its supply chain, with estimates suggesting that for every park job, 1.5 additional roles emerge in supporting industries like hospitality (hotels, restaurants), logistics, retail, construction, and local businesses, generating thousands of construction jobs (20k) and tens of thousands of operational roles (8k+ direct, many more indirect).
- justified (evidence base is neither robust nor up-to date as it fails to consider the cumulative impacts of Universal Studios).
- duty to cooperate: engagement has not been continuing ongoing, proactive and sustained with you as your plan-making processed with unmet need.

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

<sup>9</sup> [MK HEDNA](#) (March 2024)  
[Milton Keynes HEDNA](#) (October 2025)

<sup>10</sup> The Plan also considers forecast need for around 448-458 hectares of land for warehousing and general industrial purposes to 2050, most of which (370-380 ha) is for warehousing.

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.

Update the employment evidence base for the 2050 plan to include:

- how MK intends to ensure that their need is met and it cannot be met in MK what steps are being taken to address this;
- separate local and strategic employment need - recognising MK have a local need in tandem with the wider sub-regional picture (including national initiative which are coming forward, such as Universal Studios); and
- a sub-regional analysis in collaboration with other neighbouring local authorities to enable us to look at meeting and identifying both local and strategic needs in the wider area., including logistics and warehousing needs. This could be undertaken as a 'frontrunner' to any emerging Spatial Development Strategies in the sub region.

**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 identified logistics and warehousing need has not been addressed/allocated in the plan and MKCC have not engaged with neighbouring authorities through duty to cooperate discussions to explore delivery options. As a result, there is uncertainty regarding the potential direct or indirect impacts of this unmet need on Bedford up to 2050.

**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.

**Part B – Please use a separate sheet for each representation**

Name or Organisation: Bedford Borough Council

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

Paragraph		Policy	CEA14	Policies Map	
Other	Evidence base				

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

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

Water Management Study: Phase 2 (October 2025)

Due to the use of double negatives and conflicting wording in the referenced paragraphs, the conclusions regarding the likely impacts of growth downstream of Milton Keynes are unclear. Greater clarity is required to understand the potential implications for Bedford and the wider sub-region. There is a word change between the two extracts (highlighted in **bold**).

- In paragraph 6.5.1, conclusions to the 'water quality and environmental impact' section of the study says: *"The modelling indicates that growth during the MKCP plan period could result in a significant deterioration in ammonia downstream of Cotton Valley, Lavendon, Newport Pagnell, North Crawley, and Olney WRCS. The deterioration downstream of Cotton Valley, North Crawley, and Olney is predicted to occur for several kilometres downstream towards Bedford. Treatment to TAL is shown to reduce deterioration to 0%. Growth alone will not prevent good ecological status **being prevented in the future** should improvements in upstream water quality be made. An assessment was also made of the impact downstream on protected sites (such as SSSIs, SAC and Ramsar sites). A significant deterioration in watercourses adjacent to protected sites was predicted (Felmersham Gravel Pits SSSI and Stevington Marsh SSSI), but this can be prevented by improvements in treatment upstream, including but not exclusively at the WRCS serving Milton Keynes."*
- In paragraph 8.1.3, the water quality and environmental impact section of the study says: *"The modelling indicates that growth during the MKCP plan period could result in a significant deterioration in ammonia at Cotton Valley, Lavendon, Newport-Pagnell, North Crawley, and Olney WRCS. The deterioration downstream of Cotton Valley, North Crawley, and Olney is*

*predicted to occur for several kilometres downstream towards Bedford. Treatment to TAL is shown to reduce deterioration to 0%.*

*Growth alone will not prevent good ecological status **from being achieved in the future**, should improvements in upstream water quality be made.*

*An assessment was also made of the impact downstream on protected sites (such as SSSIs, SAC and Ramsar sites). A significant deterioration in water courses adjacent to protected sites was predicted (Felmersham Gravel Pits SSSI and Stevington Marsh SSSI) but this can be prevented by improvements in treatment upstream, including but not exclusively at the WRCs serving Milton Keynes.*

*Where a WRC is shared with a neighbouring authority, coordination of growth plans in collaboration with Anglian Water is essential to ensure that infrastructure is in place prior to development to prevent a breach of the environmental permit.”*

We are therefore unable to determine whether to support or object to these conclusions, as the referenced paragraphs appear to conflict and may be conveying different messages. The wording seems to imply that a reduction in ammonia is negative, which creates ambiguity. We seek clarification on how the proposed level of growth will affect Bedford—both directly and indirectly—up to 2050.

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 that the water management study conclusions are clear/accurate and that these are appropriately mitigated for within the plan/met across the plan period.

To ensure that there are no negative impacts on Bedford (downstream of MK).

**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:

To ensure that the water management study conclusions are clear, reflected in the plan and that these do not negatively impact Bedford (downstream of MK).

**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.*