

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

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Gloucester House, Silbury Boulevard  
Milton Keynes

On behalf of Euro Property Investments Ltd

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December 2025

Ref: 1228

## 1 Introduction

- 1.1 These representations have been prepared by Smith Jenkins Planning & Heritage on behalf of Euro Property Investments Limited in response to the Milton Keynes City Plan Regulation 19 consultation in respect of Gloucester House, Silbury Boulevard. Gloucester House forms part of the C1 grid square in Central Milton Keynes that is identified as being a 'Justice Quarter' both in Figure 8, Central Milton Keynes Quarters of the Plan, and also in the proposed Policy Map.
- 1.2 The site is wholly occupied by a single building, Gloucester House and its associated car parking (located to the rear of the building). Pedestrian access is taken from Silbury Boulevard, and vehicular access from North Sixth Street. The building is arranged over three floors plus a partial basement floor created as a result of the change of levels across the site. The building is used for offices, its constructed purposes.
- 1.3 The site is owned by Euro Property Investments Limited who are the freeholder.
- 1.4 Euro Property Investments Limited (EPIL) are wholly concerned with the potential development of this site and its relationship with the identified Justice Quarter. This includes the potential viable re-use of the site to support the broader plan objectives and vision for CMK of the creation of a thriving, modern city. EPIL are supportive of the provision of a new Justice Quarter but not to the extent that the plan potentially jeopardises the redevelopment opportunities of Gloucester House given it is in private ownership and wholly unrelated to the current use of the adjacent buildings.
- 1.5 One of the key purposes of the Regulation 19 stage is to assess whether the draft City Plan is sound, as defined by Paragraph 36 of the National Planning Policy Framework (2024). Accordingly, our representations are structured to address the four tests of soundness:
- **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
  - **Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
  - **Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
  - **Consistent with national policy** – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant*
- 1.6 These representations:

1. Assess whether the Plan is sound against the tests in Paragraph 36 of the NPPF; and
  2. Set out the modifications needed to make the Plan sound where deficiencies remain.
- 1.7 We trust that these representations will assist the Council in finalising the Plan and ensuring that it proceeds to examination in a sound form. We would welcome continued dialogue with officers on any of the matters raised.

## 2 Representations

### Site Background and Development Context

- 2.1 Gloucester House is located to the north of Silbury Boulevard, on the corner of Silbury Boulevard and North Sixth Street. It is located adjacent to the west of the County Court, and to the north the extended grounds of the CMK Police Station. The building extends to three storeys above ground with a partially exposed basement. A limited amount of parking is located to the rear (north) of the building, accessed via a controlled barrier.
- 2.2 The site is located in a highly accessible and sustainable location within Central Milton Keynes (CMK), immediately adjacent to employment opportunities but within walking distance of the shopping centre, and other services to meet the everyday needs of residents. It benefits from excellent public transport opportunities including being within walking distance of key bus routes, Metro Corridor, and the train station.
- 2.3 The site has been the subject of initial pre-application discussions with MKCC concerning the demolition of the building and replacement with a tall building. It is the intention of EPIL to progress with a residential scheme on this site in due course.

### Representations on the Draft Policy

- 2.4 EPIL support the Council's objectives for CMK of creating a more modern, thriving city, including increasing the amount of residential development given the sustainable nature of development in this location. We support a broader mix of uses within CMK and the move away from a rigid CBD, which limits the ability to create vibrancy in parts of the City Centre that lack life outside of office hours. The development proposals within CMK must be sufficiently flexible to meet the changing requirements of the population, reflected in market trends. The current Local Plan identified a series of objectives for CMK around the 'Central Milton Keynes Renaissance', which included the identification of 5 development schemes planned for the City Centre, of which four of them have not progressed (Paragraph 4.76, Plan:MK 2019).
- 2.5 EPIL support the creation of a 'Midtown Quarter' with a greater mix of uses, including for residential use. We also support the creation of the Justice Quarter, with the provision of improved facilities for the City. However, Figure 8 including the whole of 'Blocklet' C1.1 and C1.2 within the Justice Quarter without considering alternative existing land uses that occupy this part of the City, namely Gloucester House.
- 2.6 Policy CMK1, Central Milton Keynes Development Framework Area, includes an additional 16,000 new homes, which we support. We however object to the wording in Part C, 2 of the Policy which states: "Development proposals on Block C1 must not undermine, and will be supported where they enable, the delivery of improvements to the City's justice, law, and governance provision, including provision for a Crown Court." Block C1 includes far more land than just the existing law courts and police station as it extends between Witan Gate and Saxon Gate. The description in the policy should be limited to the area of land actually set out on the associated plans and Policy Map. In addition, the policy as worded has the potential to prevent the development of any other land not in the

ownership or under the control of the justice system. It should be re-worded to be more precise and to not prevent the redevelopment of surroundings buildings, including Gloucester House.

- 2.7 Policy CMK2, Placemaking Principles, includes Section F, density and height. Part D sets some specific density ranges for residential development in CMK. The limitation on the density of development is contrary to the provisions in Paragraph 129 and 130 of the NPPF which state that developments should make an efficient use of land, taking into account the identified need for different types of housing; local market conditions and viability; availability and capacity of infrastructure and services; and the desirability of promoting regeneration and change. The NPPF does not provide a maximum development density but advocated for either minimum density or a range of densities that reflect the accessibility and potential of different areas within a plan area. Those proposed in CMK2 are not a 'range' but are specific.
- 2.8 Limiting the density of sites that are already highly sustainable reduces the plan's ability to make efficient use of land, taking into consideration policies in the NPPF. Further, the historic dissection of CMK into 'blocklets' results in redevelopment proposals with very high densities due to the creation of sites with small footprints. This does not result in poor development outcomes, as highlighted in recent appeal and planning decisions on City Centre sites at Bank House, the Jaipur and Saxon Court.
- 2.9 Limiting the density of sites also impacts the potential of achieving the Policy CMK1 objective of an additional 16,000 residential dwellings in CMK. Each site should be assessed on its own merit, in respect of the relevant site context, and against the other policies in the development plan, to determine whether matters such as height and density are appropriate.
- 2.10 Policy CMK3, Milton Keynes Skyline and Tall Building Strategy is based on the Tall Building Strategy (TBS) prepared by Montague Evans, which provides the basis for the building height thresholds in the Policies Map and in Figure 9, Central Milton Keynes Building Thresholds Plan. The TBS takes into consideration a number of parameters in designating the heights of buildings in CMK, including non-designated heritage assets. It should be noted that both the County Court and Magistrate Buildings are NDHA as identified in the New Town Heritage Register, however the underlying assumption within the Plan is that both buildings will be demolished to make way for the new Justice Quarter. Therefore the limitation on building heights in Block C1 based on this assessment must be flawed, and should allow for taller buildings in this location.
- 2.11 Paragraphs 176 and 177 under the heading Divergence from the Tall Buildings Strategy are welcomed, but are not reflected in the Policy. In the absence of these paragraphs being included in the policy, they have limited effectiveness in the determination of any planning application which deviates (for good reason) from the policy wording. We consider that the policy should include more detail as set out in Paragraphs 176 and 177.
- 2.12 Policy CMK3 should therefore be amended to clarify that the height zones are indicative and that additional height maybe acceptable where supported by an assessment addressing townscape, visual impact, heritage, microclimate, amenity and design.
- 2.13 The restriction on density and lack of clarity within the policy makes the plan **unsound** for the following reasons.

## **Soundness**

### ***a) & b) The Plan is not Positively Prepared or Justified***

- 2.14 There is no justification for the density limits in Policy CMK2 and 3, specifically when read in the context of the supporting text which seeks a contextual analysis of individual sites to make the best use of land, and the provision of an additional 16,000 dwellings in CMK. This is an internal conflict in this approach.

### ***c) The Plan is not Effective***

- 2.15 The limitation placed on sites within CMK will prevent making the best use of brownfield land in sustainable locations.

### ***d) The Plan is not Consistent with National Policy***

- 2.16 The National Planning Policy Framework (NPPF) recognises the importance of achieving appropriate densities taking into account the specific context of sites, and that development make optimal use of potential sites (NPPF paragraph 129 and 130).

## **Requested Modifications**

- 2.17 Policy CMK1 should be more specific to the Justice Quarter, which in itself, should only make reference to the buildings currently identified for judicial or governance purposes.
- 2.18 Policy CMK2 should including wording to confirm that building height, massing and density are established through a design led approach (supported through the existing requirement for DRP), and which is supported by proportionate assessments.
- 2.19 Policy CMK3 should state that the height parameters are indicative, and additional height will be acceptable where subject to the design led approach set out in the amended Policy CMK2.



**Milton Keynes City Plan 2050**  
Proposed Submission Stage Representation Form

**Ref:**  
**(For official use only)**

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

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 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

Mrs

First Name

Jennifer

Last Name

Smith

Job Title  
(where relevant)

Director

Organisation  
(where relevant)

Euro Property Investments Limited

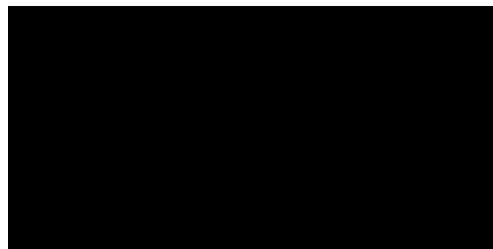
Smith Jenkins Planning & Heritage

E-mail Address

Address Line 1

Line 2

Line 3



Line 4

Post Code



Telephone Number

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

Name or Organisation:

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

Paragraph

Policy

CMK1

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.

Policy CMK1 part C 2 extends the description of the Justice Quarter across the whole of Block C1, which is factually incorrect by reference to Figure 8 on page 92 of the Plan. Gloucester House is located within Block C1 but does not form part of the buildings currently forming part of the justice buildings within this block. The plan should not protect this building from being redeveloped given the historic separate uses and landownership. The plan as currently written has the potential to prejudice the redevelopment opportunities for this site, which would prevent it making a wider contribution to the objectives of the Plan as they relate to CMK.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have

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

To be found sound, the text in the Plan should accurately reflect the Policy Map and map extract in Figure 8 of the Plan.

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

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

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

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

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

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

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

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

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### **Sharing your personal details**

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**Part A**

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Title

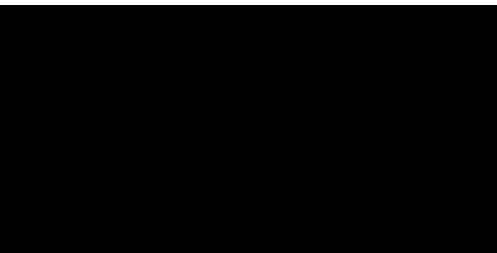
First Name

Last Name

Job Title  
(where relevant)

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E-mail Address



Address Line 1

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Post Code



Telephone Number

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

Name or Organisation:

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

Paragraph  Policy  Policies Map

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

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

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Policy CMK2 prescribes the density of development in CMK. This is contrary to Paragraphs 129 and 130 of the NPPF which set out to optimise the use of land. Paragraph 130 states specifically that plans should include a minimum density requirement, but not prescriptive as Policy CMK2 does. This will allow for the significant uplift in residential development required in CMK to meet the wider plan objective of increasing the number of residential units in CMK by 16,000 over the plan period.

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

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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 plan should be modified to either use 'minimum' density requirements, or to state that the density of redevelopment sites should be determined on a site by site basis having regard to the context within the wider city centre.

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

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Title

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Jennifer

Last Name

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(where relevant)

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Organisation  
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Euro Property Investments Limited

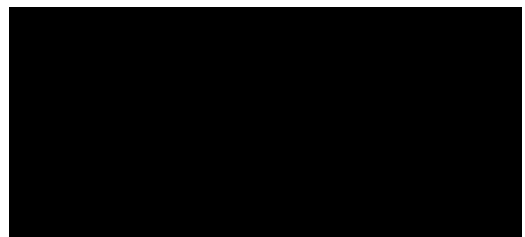
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Policy CMK3 in respect of the Justice Quarter is based on an assessment which includes having regard to the County Court and Magistrates Court buildings being NDHA. However, central to the redevelopment proposals of the Justice Quarter is that both buildings will be demolished. Any building height assessment in the Block C1.1 and C1.2 therefore should be disregarded, and the height determined on a site based assessment as part of a future planning application.

The policy is unsound.

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

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