

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm on Monday 22nd December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at ncp.engagement@milton-keynes.gov.uk

This form has two parts –

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

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Title

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

E-mail Address

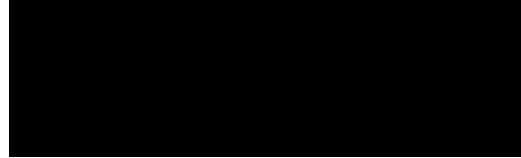
Address Line 1

Line 2

Line 3

Line 4

Post Code



Telephone Number

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph

Policy

GS11

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 GS11- Cross Boundary Growth is tentatively welcomed due to its implicit recognition that the future development of Milton Keynes may occur on land which is outside of the current administrative boundary. However, we do not consider as currently drafted that it is **effective** as it will be reliant on the Development Management decisions of neighbouring planning authorities to implement.

Please see attached letter for further detail.

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 test the soundness of the local plan on this matter the Council should provide evidence including statements of common ground to demonstrate effective and ongoing co-operation during the preparation of this local plan and where it has impacted on the strategy and policies, and particularly GS11.

We suggest Statements of Common Ground are published when the plan is submitted for examination and welcome an additional Statement of Common Ground between Bedford Borough, Central Bedfordshire and Milton Keynes in respect of cooperation around land at the Aspley Triangle and a commitment to cooperate to ensure the proper planning of land within this location (but within Central Bedfordshire).

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:

At present, we do not consider it necessary to participate in the examination into the New City Plan in person, and that the matters raised in this letter in relation to the effectiveness of GS11 can be considered by the appointed Inspector as part of the Examination Process.

However, our client is happy to review this position if the Inspector determines it would assist them.

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.*

18th December 2025

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

By email: ncp.engagement@milton-keynes.gov.uk

Our Ref: 5221

Dear Sir,

**MK CITY PLAN 2050 (Regulation 19)
On behalf of Thomas White Properties**

I write on behalf of Smith Jenkins' client, Thomas White Properties, in response to the Regulation 19 publication of the MK City Plan (2050).

Our client holds significant land interests immediately to the east of the City of Milton Keynes (wholly within Central Bedfordshire) at Hayfield Farm, which is in an area locally known as the 'Aspley Triangle'. Our Client's land ownership extends north and south of the Marston Vale railway line, joining with the A421 to the north, and the City Boundary to the west. The extent of the land ownership is shown on the enclosed plan.

Whilst this land is entirely within Central Bedfordshire, it is functionally related to the east of Milton Keynes and the proposed allocation East of Wavendon City Extension (Policy GS15). Moreover, it is considered to be of sub-regional significance both in terms of its potential to accommodate homes, but also due to its strategic access to East-West Rail and the Strategic Road Network (SRN) both East-west via the A421 and North-South on the M1.

Our client does not wish to comment on the detail of the wider strategy for the growth of Milton Keynes, the specifics of the allocations (i.e. scale and distribution) set out within MK City Plan as submitted nor the detailed development management policies.

Nevertheless, they consider it prudent to highlight the role of their land in relation to future cross-boundary working and strategic planning for the future growth of Milton Keynes beyond the current administrative boundaries and, to ensure alignment with the emerging spatial planning for Central Bedfordshire and ensure policies are *effective* in that they do not inadvertently prejudice strategic planning through any forthcoming Spatial Development Strategy (SDS) across wider geographies.

Policy GS11- Adjacent and Cross Boundary Growth (Land at the Aspley Triangle (East Milton Keynes))

Our Client's land is functionally well related to the City, as well as other nationally significant projects including Universal Studios at Kempston Hardwick which was granted permission via a Special Development Order on the 16th December 2025 which will attract up to £50bn in inward investment,

including the creation of 20,000 construction jobs, 8,000 permanent positions with approximately 80% of these going to local workers including from Milton Keynes.

It is therefore important that opportunities for future growth are not limited and, the plan is able to respond flexibly across administrative boundaries. To this end, policy GS11- Cross Boundary Growth is tentatively welcomed due to its implicit recognition that the future development of Milton Keynes may occur on land which is outside of the current administrative boundary. However, we do not consider as currently drafted that it is **effective** as it will be reliant on the Development Management decisions of neighbouring planning authorities to implement.

Accordingly, we consider the most effective way for this policy to operate is to ensure that it reflects the importance of the choices and cross-boundary agreements to be reached at the Plan Making stage with authorities such as Central Bedfordshire Council. This could, for example, be a series of aligned policies, masterplans, Statements of Common Ground or similar dependent on the facts and circumstances of each site and ensuring the tool is appropriate so as not to impede delivery.

Land at the Aspley Triangle:

The land at the Aspley Triangle has long been considered a sustainable location for new homes, including promotion through the Milton Keynes and South Midlands Sub-Regional Strategy (MKSM-SRS) published in 2005. Since 2005 there have been several active promotions including Hayfield Farm: a planning application for the development of one village (Hayfield Park) in 2017 for 650 homes; and then latterly within the Central Bedfordshire Local Plan. Moreover, we note the consideration of the site through the previous Local Plan, with the Sustainability Appraisal assessing the land as part of the 'MK Edge' housing sites option stating:

"In short, it is clear that there is feasibility for the opportunity to complete the eastwards expansion of MK in this direction, and for the expansion to cross over in to the 'Aspley Guise Triangle' part of Central Bedfordshire."

The most recent draft Central Bedfordshire Local Plan (adopted in 2021) identified land in this broad location as a 'reserve' site. Notably, this land scored better than several of the alternatives within the Central Bedfordshire Plan in terms of connectivity. However, due to uncertainty at the time regarding the route of the Oxford to Cambridge Expressway the site was removed. Nevertheless, the Inspector's report into the Central Bedfordshire Plan highlights that the principle of directing significant growth to the broad area was justified- something we continue to advocate for.

The policy as drafted, is unlikely to provide an appropriate basis for bringing this site forward- either as an allocation within the Central Bedfordshire Local Plan or, as a planning application whether that to be to complement the planned growth Milton Keynes City (as allocated) or to assist Central Bedfordshire in sustainably meeting its housing needs. This is of further importance given the emphasis in the consultation draft of the Framework published on Tuesday to support proposals located close to existing and planned stations which would be of relevance to the emerging proposals to move Ridgemont Station to the west of the Motorway. Whilst we appreciate the MK City Plan will not be examined against this document, it does serve to highlight the need for continued flexibility for policy GS11.

Furthermore, in respect of new homes, we note the current intention for East MK is that delivery will commence around 2038 with 2,250 homes to be delivered in the period until 2050. The planned growth is intended to *commence* once the currently planned growth to the south and south-east of the city is *substantially completed*, going on to highlight that *"this would enable the full effects on*

infrastructure to be demonstrable and factored into the planning of the East of Wavendon Strategic City Extension”.

Whilst our client does not comment on the justification, detail and evidence behind the timing of MK East specifically, they do wish to highlight that together with the allocation of sites and alignment of Local Plans, there needs to be flexibility built into the timing and delivery to ensure that the comprehensive delivery of cross boundary growth is not prejudiced particularly where it would contribute to delivering emerging national priorities. We therefore specifically request that additional flexibility is built into this policy to enable delivery to come ahead of this date to support wider regional growth to respond to the emerging changes to the Framework.

Duty to Cooperate:

For the avoidance of doubt, we do not consider our comments above amount to a ‘failure’ of the Duty, rather they are intended to ensure effective strategic-scale planning. Moreover, in a recent Written Ministerial Statement (27th November 2025), it has been confirmed that the Duty to Co-operate will not be maintained and consideration as to the legal duty will no longer be a factor when considering local plans. However, this does not mean there is no longer a need for co-operation on strategic cross boundary matters. Whilst co-operation may not be a legal test where failure results in the plan being withdrawn, but it remains a key test of soundness in relation to paragraphs 24 to 28 of the Framework.

To test the soundness of the local plan on this matter the Council should provide evidence including a statement of common ground to demonstrate effective and ongoing co-operation during the preparation of this local plan and where it has impacted on the strategy and policies, and particularly GS11. At present the Duty to Co-operate Statement provides limited evidence as to the issues and discussions that have taken place around areas such as the Aspley Triangle, and we would suggest that Statements of Common Ground are published when the plan is submitted for examination.

We would therefore welcome an additional Statement of Common Ground between Bedford Borough, Central Bedfordshire and Milton Keynes in respect of cooperation around land at the Aspley Triangle and a commitment to cooperate to ensure the proper planning of this area.

Conclusion

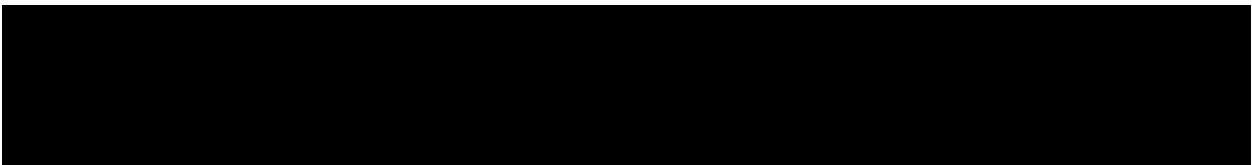
Our client, Thomas White Properties, is a significant landowner in the 'Aspley Triangle'. Our comments are intended to ensure that growth in this important area is not prejudiced through choices made in individual local plans and that flexibility including the timing of the delivery of the eastern expansion can be coordinated with development in this area.

At present, we do not consider it necessary to participate in the examination into the New City Plan in person, and that the matters raised in this letter in relation to the effectiveness of GS11 can be considered by the appointed Inspector as part of the Examination Process.

Yours sincerely



Jennifer Smith MRTPI
Director
Smith Jenkins Ltd



Hayfield Farm

