

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	Mr	
First Name	Jon	
Last Name	Balaam	
Job Title (where relevant)	Director of Development	
Organisation (where relevant)	The Greensand Trust	
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: The Greensand Trust

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

Paragraph

19

Policy

Policies Map

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

4.(1) Legally compliant

Yes

X

No

4.(2) Sound

Yes

X

No

4.(3) Complies with the Duty to co-operate

Yes

X

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.

We support the important point made in this paragraph, stating that development “will need to be landscape led” and the need to “ensure the important landscape setting and context of the Brickhills Special Landscape Area are sensitively responded to”. Reference to the “landscape setting and context” are particularly welcomed, as they ensure that impacts on adjacent landscapes are part of considerations.

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

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

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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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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.*

Part B – Please use a separate sheet for each representation

Name or Organisation: The Greensand Trust

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 type="checkbox"/>	No	<input checked="" type="checkbox"/>

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This policy requires strengthening with reference to protected landscapes and ecological networks in cross-boundary locations, such as the Greensand Ridge Nature Improvement Area (recognised by the Bucks and MK Natural Environment Partnership).

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

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Make reference to protected landscapes and ecological networks in cross-boundary locations, including those identified in either the Bucks and MK Local Nature Recovery Strategy or the Bedfordshire LNRS.

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Part B – Please use a separate sheet for each representation

Name or Organisation: The Greensand Trust

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

Paragraph

Policy

GS14

Policies Map

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

4.(1) Legally compliant

Yes

No

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Yes

No

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Yes

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While we are generally supportive of the policy, it fails to have regard for the ecological networks and landscape of the Greensand Ridge.

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Criteria 12 (Part C) needs to reference the LNRs in both Bucks & MK (formally adopted) and Bedfordshire (to be adopted in December 2025) and the Greensand Ridge NIA.

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Although the sensitive environment including heritage and ecological assets is noted, there is insufficient reference to responding to the sensitive landscape of the Greensand Ridge. In Figure 2 (Concept Plan) it is clear that the built form extends to the eastern and south-eastern edges of the area, adjacent to the sensitive landscape of the Greensand Ridge, with not buffer.

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

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The design of this SCE needs to better respond to the adjacent sensitive landscape, and identify the need to mitigate for impacts on it, in a similar way to Policy GS17. The Greensand Ridge in this area is part of the context of the Brickhills Special Landscape Area.

In terms of responding to ecological needs and priorities, reference must be made to supporting Priorities and Measures within both the Bucks & MK LNRS and the Beds LNRS, and identified within their Local Habitat Maps. Although reference is made to 'Nature, Green & Blue Infrastructure Strategy', no reference is made to LNRSs which were mandated by the Environment Act (2021). Local Planning Authorities must have regard to LNRSs and demonstrate how LNRSs are considered in planning decisions. This point is relevant across **all** relevant policies, including all GS policies, not just this one.

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While we welcome important reference to factors affecting place and context, there is a need to include a requirement for integrating and enhancing nature and connections in line with principles highlighted in documents/guidance cited within this section of the Plan, including the National Design Guide (Fig 12) and the Building for a Healthy Life Toolkit (Fig 13).

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

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Elevate consideration of the natural environment from the list of 'shoulds' to being a requirement, in line with the Bucks & MK LNRS and its urban-related priorities and measures in particular.

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The Local Plan fails to demonstrate how it has regard for Local Nature Recovery Strategies, and fails to demonstrate how the LNRS will be considered in planning decisions. The Green and Blue Infrastructure Strategy is referenced, but throughout the Plan there is a lack of clear narrative demonstrating how priorities and measures identified within the Bucks & MK LNRS (adopted Nov 2025) and its Local Habitat Map are taken into account, or how delivery of them could be supported by the Local Plan.

One of the very few mentions of the LNRS (para 311) mentions how the LNRS can be used to identify 'wider environmental benefits'. While an important function of the LNRS, this is not its key purpose, so while relevant it is insufficient in terms of demonstrating how it has been taken into account.

The Nature, Green & Blue Infrastructure Strategy cannot be used as a demonstration of this either, as it pays little attention to the LNRS.

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The Local Plan must clearly demonstrate how it has regard to LNRSs (Bucks & MK LNRS plus those of surrounding areas) and embed within all relevant policies to ensure it demonstrates how the LNRS can be considered in planning decisions. This is vital, because it will not only support the delivery of the LNRSs, it will also demonstrate how this can be **facilitated** through growth (including through BNG and the 15% uplift provided to areas within the priorities identified in their Local Habitat Maps). It is vital that the Local Plan highlights how nature is not a 'blocker' to growth, and how the LNRS can help shape development to ensure it is as good as possible.

Policy CEA19 is an example of where reference to nature recovery and the LNRS can demonstrate how development can facilitate nature recovery.

Policy CEA10 also shares a large amount of common ground with the LNRS but fails to make the appropriate reference.

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While we welcome policy identifying Special Landscape Areas including the Brickhills, there is insufficient reference to their context. The Brickhills SLA is part of the wider landscape of the Greensand Ridge, and is not a landscape in isolation.

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Part C should make specific reference to the context of SLAs.

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Paragraph

Policy

CEA14

Policies Map

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Yes

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No

4.(3) Complies with the Duty to co-operate

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While we support this policy, it lacks reference to the physical form and natural processes of watercourses, and therefore does not help address the significant amount of habitat degradation resulting from modification.

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Policy should make reference to protecting and enhancing natural form and function in Part B.

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