

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

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 16<sup>th</sup> February 2026** 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	KEITH	
Last Name	GREGORY	
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: Mr K Gregory

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.

Milton Keynes City Plan 2050 – Regulation 19 Consultation

As recent new residents of Little Brickhill we consider that the City Council have not properly explored Reasonable Alternatives, with the choices made resulting in unsustainable forms of development. The proposed allocation of land at Levante Gate (GS18) and the land south of Bow Brickhill will destroy the special, rural character of the area that first attracted us to it from alternative locations across the East Midlands.

**Reasonable Alternatives**

While the Council states that reasonable alternatives have been considered, the evidence shows that the approach taken is not justified and therefore not sound.

The Sustainability Appraisal (page 5, SA Report) demonstrates that alternatives which exclude Policy GS18 and land south of Bow Brickhill perform more positively overall, particularly in relation to landscape impact, sustainability and connectivity. Despite this, the Council has selected a preferred option that includes GS18, without providing a clear or convincing justification for doing so.

The inclusion of Policy GS18 appears to be driven by the desire to meet the upper (arguably unnecessary) ambition of the housing target, rather than by evidence that this is an appropriate or sustainable location for development.

The inclusion of GS18 relies on un-evidenced assumptions that the landscape harm can be mitigated and that connectivity issues can be resolved at a later stage, neither of which can be supported by the evidence base.

Other reasonable alternatives still deliver sufficient housing within the plan period while avoiding development in sensitive landscapes and poorly connected locations. These alternatives are more consistent with the Sustainability Appraisal findings and with the stated objectives of the Plan.

For these reasons, Policy GS18 fails the test of soundness, particularly because it is not justified. The Plan has not demonstrated that this is the most appropriate strategy when considered against reasonable alternatives, and the Inspector should not support Policy GS18.

#### **Unresolved and significant landscape sensitivities**

The SA analysis and concept masterplan commentary explicitly identify unresolved and significant landscape sensitivities across Shenley Dens (GS19), South of Bow Brickhill (GS17) and Levante Gate (GS18). These include:

- The need to minimise encroachment on the Greensand Ridge and sprawl along the river corridor at Levante Gate.
- Growth in proximity to ancient woodland at Shenley Dens; and
- Development on or affecting rising / raised land and connections to Brickhill Woods at South of Bow Brickhill.

These matters are framed as issues requiring further consideration, careful design and future mitigation, rather than being resolved at plan-making stage.

Paragraph 6.11.4 concludes that, although there is a preference for the lowest growth scenario under this topic and a recognition of “moderate or uncertain” negative effects where significant growth is directed to an SLA, the lowest growth scenario may be discounted because the Plan could “struggle to progress to adoption without additional allocations”.

This reasoning is Unsound and not evidence-led. The potential difficulty in progressing to adoption is not a sustainability consideration and does not justify allocating development to landscape-sensitive areas.

Furthermore, paragraph 6.11.5 explicitly acknowledges the Preferred Option (Scenario 5) entails growth in “more landscape-sensitive” locations, including the Brickhill’s SLA, and relies on the assertion that landscape-led development *could* occur without fundamentally undermining landscape qualities.

This is a speculative assumption and is Unsound, not supported by secured, plan-level mitigation or binding landscape capacity testing.

Taken together, these paragraphs demonstrate that:

- The SA identifies material landscape harm and uncertainty.
- The Preferred Option is selected despite this, based on short term deliverability concerns rather than sustainability performance; and
- Critical landscape constraints and mitigation are deferred to later stages, rather than being resolved through the choice of spatial strategy.

### Conclusion

The inclusion of allocations and policies GS17, GS18 and GS19 are all 'Unsound', as the Preferred Option is not justified or the most sustainable strategy and is 'Legally deficient' as the City Council fail to demonstrate that likely significant landscape effects have been properly addressed at plan level, contrary to the purpose and requirements of the SEA Regulations to inform strategy selection.

---

(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.

We respectfully request that Policy GS 18 and its explanatory text be deleted from the Local 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:

**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.*