



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

MR

First Name

PETER

Last Name

COX

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  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.

SEE ATTACHED

(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.

SEE ATTACHED

(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-notices/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.*



## 5. Why do you consider the Local Plan is not sound?

I consider the allocation of the Levant Gate and South of Bow Brickhill Strategic City Extensions to be **unsound**, as they are not justified, not effective, and not consistent with national planning policy.

Both sites lie within, or directly adjacent to, the **Brickhill Special Landscape Area** and the Greensand Ridge. This landscape is recognised for its distinctive character, elevated views, and its role in maintaining settlement separation between Milton Keynes and the Brickhill villages. Development at this scale would fundamentally undermine the purpose of the Special Landscape Area designation and set a damaging precedent for further erosion of protected countryside.

A planning application for a smaller residential development in this location was **refused in 2017** due to unacceptable landscape and urbanising impacts. The planning logic underpinning that refusal remains relevant and valid. The City Plan does not adequately justify why impacts previously considered unacceptable are now deemed acceptable, particularly given the significantly larger scale of development proposed. The Council's own **Sustainability Appraisal** demonstrates that both Levant Gate and South of Bow Brickhill perform poorly against key sustainability objectives. The sites are constrained, isolated, and remote from established community facilities, resulting in an inherently **unsustainable form of development** that would increase reliance on private car use.

Connectivity across the **A4146 and A5** is poor, public transport provision is limited, and the sites fall outside the **Redways network**. These constraints would exacerbate congestion on already busy rural and strategic roads and undermine the creation of accessible, low-carbon communities. There is also concern regarding the long-term viability of Bow Brickhill railway station, which further weakens the sustainability case. Neither site represents a sufficient critical mass to deliver the necessary infrastructure without significant upfront mitigation costs. This raises serious concerns regarding deliverability, long-term infrastructure maintenance, and the viability of achieving the Plan's aspiration of **40% affordable housing**.

I have been a resident of **Little Brickhill since 1988** and value the village's rural setting, open countryside, and access to long-established walking routes. The proposed developments would permanently urbanise this setting, erode settlement separation, and result in the loss of valued countryside. This conflicts with the objectives of the **National Planning Policy Framework**, which seek to recognise the intrinsic character and beauty of the countryside, promote healthy communities, and ensure development is sympathetic to local character.

For these reasons, the allocation of Levant Gate and South of Bow Brickhill is not justified by proportionate evidence, not effective in delivery terms, and not consistent with national planning policy.



## **6. What modification(s) are necessary to make the Local Plan sound?**

To make the Milton Keynes City Plan 2050 sound, the following modifications are required:

- **Remove the Levant Gate Strategic City Extension from the Plan**
- **Remove the South of Bow Brickhill Strategic City Extension from the Plan**
- **Retain the Brickhill Special Landscape Area and Greensand Ridge as protected landscape, maintaining settlement separation between Milton Keynes and the Brickhill villages**

These modifications are necessary to ensure the Plan is justified by robust evidence, consistent with national planning policy, and capable of being delivered without unacceptable harm to landscape character, sustainability objectives, or local communities.

