

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 16th 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

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.

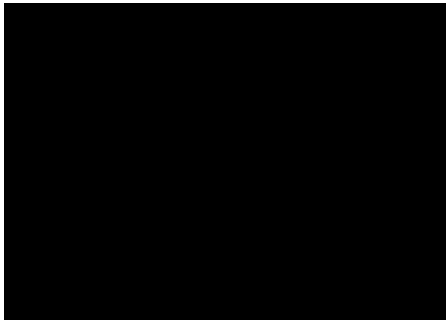
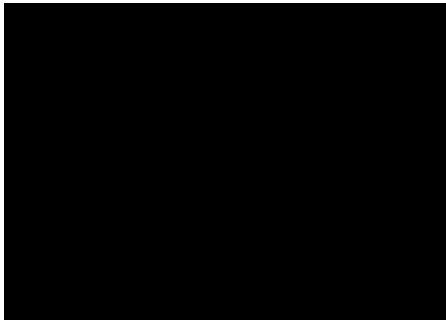
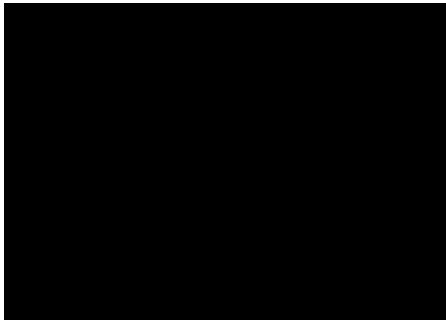
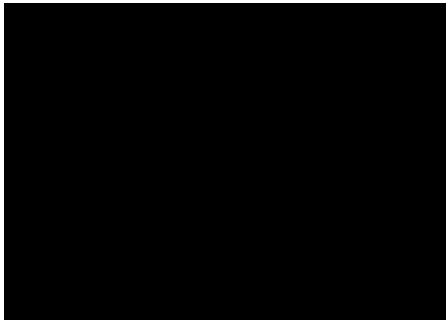
Part A

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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Peter"/>	<input type="text"/>
Last Name	<input type="text" value="Kirby"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
E-mail Address		<input type="text"/>
Address Line 1		<input type="text"/>
Line 2		<input type="text"/>
Line 3		<input type="text"/>

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

GS18,
GS17

Policies Map

Fig 4 Page 68

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

I do not consider the emerging Local Plan to be sound or legally compliant, based on the tests contained in the NPPF and consider that the Local Plan cannot be adopted in its current form. More specifically, the proposed allocation of sites at Levante Gate (GS18) and the land south of Bow Brickhill (GS17) when combined, represent development on a scale and in a location that is clearly inappropriate for this part of Milton Keynes for the following key reasons:

1. A landscape already judged unsuitable for development

This area has a long history of being recognised as environmentally sensitive and unsuitable for large-scale development. In 2017, a planning application (*Ref: 17/03233/OUT*) for around 500 homes at Levante Gate was refused by Milton Keynes Council on environmental and landscape grounds. That proposal was significantly smaller than what is now being promoted through Policy GS18.

Although planning policy has evolved since 2017 the site has always benefitted from the AAL designation and the proposed Brickhill's Special Landscape Area (SLA) designation

The refusal was based on the site's location in open countryside and its contribution to the wider landscape setting of the Greensand Ridge. The Council concluded at the time that development would have an urbanising effect, harming the rural character of the area and damaging its visual qualities.

Nothing fundamental has changed since then. If a scheme of around 500 homes was considered unacceptable in 2017 because of landscape harm, it is difficult to see how a much larger development can now be justified in exactly the same location.

2. Harm to a highly sensitive and valued landscape

The land at Levante Gate forms part of the setting of the Greensand Ridge and is valued precisely because of its openness and lack of development. This area has consistently been identified as sensitive in landscape studies and is now proposed for Special Landscape Area designation.

The key characteristic of this landscape is its open, undeveloped nature. Once built on, that quality is lost permanently. Describing the scheme as "landscape-led" does not change the reality that large-scale housing here would fundamentally alter the character of the area. Planting and buffers cannot compensate for the loss of open countryside or hide development of this scale.

3. The combined scale of GS17 and GS18 makes the impact far worse

The environmental impact of GS18 cannot be looked at in isolation. When combined with development south of Bow Brickhill (GS17), the overall scale becomes overwhelming.

Together, the two sites would:

- Spread development across a wide stretch of open countryside
- Remove the rural gap that currently defines this part of Milton Keynes
- Permanently damage the setting of the Greensand Ridge
- Create a strong sense of coalescence where separation currently exists

This would represent a major and irreversible change to the landscape, not a modest or contained extension.

4. Loss of Best and Most Versatile agricultural land (Grades 1 and 2).

The GS18 Levante gate allocation would result in the permanent loss of Best and Most Versatile agricultural land (Grades 1 and 2). Grades 1 and 2 are afforded clear policy protection under the National Planning Policy Framework (NPPF), with authorities required to prefer poorer quality land where development of agricultural land is necessary. Both these grades are

high-quality, nationally valuable resources with Grade 1 described as ‘exceptionally scarce’ so its loss must be robustly justified.

In this case, there is no clear evidence that the Council has undertaken a structured, comparative assessment of lower-grade alternatives, nor that development on BMV land is unavoidable. There is also no quantified assessment of cumulative BMV loss across the Plan period. The site’s modest size does not reduce policy protection: protection attaches to land quality, not hectares, and the loss is irreversible.

Equally, this allocation conflicts with the Plan’s own long-term sustainability rationale. The Plan is framed to 2050 around sustainability and long-term stewardship. The permanent loss of Grade 1 and 2 agricultural land:

- Undermines food-producing capacity;
- Conflicts with sustainable land use objectives;
- Represents irreversible environmental harm.

In the absence of a transparent sequential assessment demonstrating why poorer quality or non-agricultural land cannot meet the identified need, the allocation conflicts with national policy and the Plans’ own sustainability objectives so is therefore unsound.

5. Poor connectivity and an isolated location

The Levante Gate site is poorly connected to Milton Keynes and surrounding settlements. It lies beyond the established grid road system and is separated by already busy major roads such as the A5 and A4146, which act as significant barriers rather than connections.

Walking and cycling routes are limited and unattractive, and public transport options are weak. As a result, residents would be heavily reliant on cars for most journeys, which runs directly against the Plan’s sustainability and climate objectives.

6. Scale without the benefits of a sustainable community

Despite the size of the proposed developments, the site does not sit in a location that naturally supports a well-connected, walkable community. Access to jobs, services, schools and healthcare would remain difficult, meaning residents would need to travel elsewhere for everyday needs, creating a car-dependent edge-of-town development that places additional pressure on existing infrastructure rather than reducing it.

Not justified and not sound

The Plan is not consistent with the National Planning Policy Framework (NPPF) requirements to protect and enhance valued landscapes, and to allocate land with the least environmental or amenity value.

The Plan conflicts with the Council’s own landscape evidence, relies on vague future mitigation rather than demonstrable solutions, and promotes development in a poorly connected and environmentally sensitive location. As such, the allocation fails to meet the tests of soundness set out in national policy.

The Levante Gate site (and policy GS18) should be removed from the Plan and replaced with more suitable, better connected and less environmentally damaging alternatives.

(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.

I respectfully request that Policy GS 18 and Policy GS 17 and their 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)?

X

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.*