



Directorate for Planning, Growth  
&  
Sustainability

Planning and Environment  
Service Director: Richard Ambrose  
Buckinghamshire Council

Development Plans  
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19<sup>th</sup> December 2025

Sent by email to [ncp.engagement@milton-keynes.gov.uk](mailto:ncp.engagement@milton-keynes.gov.uk) and [REDACTED]

Dear [REDACTED]

**Buckinghamshire Council Comments on the Milton Keynes MK City Plan 2050 – Regulation 19 Proposed Submission consultation (November-December 2025)**

Thank you for your invitation to respond to the consultation received on 7 November 2025. These are our comments. We mentioned all these issues at our recent meeting and hope you will be open to considering Pre-Inquiry changes to address our objections in the changes requested below. We are happy to meet with you again after you have had the opportunity to consider all your Regulation 19 representations.

This is our representation as an authorised letter, but we have also completed the online portal 'Urban Intelligence' to help you.

Co-ordinating Growth and Movement – the A421 Corridor

To reiterate a matter stated in our Draft Plan stage representations and meetings with council officers this year, Buckinghamshire Council has an interest in the implications of cross-boundary growth and movement and the alignment of emerging Local Plan policies to maximise connectivity and address any potential adverse impacts.

The [A421 Corridor Study](#) report was published in March 2025. The study confirms that there are currently frequent delays especially from Buckingham to Milton Keynes at the Bottledump roundabout (A21) and H8 Standing Way. Model forecasts predict 10–48% traffic growth by 2040 along the corridor which will worsen:

- congestion (delays rising from 15 ~ 90 seconds depending on location),

- rat running through villages and
- safety/noise issues from increased HGV flows.

### **Objection – Section Movement & Access. Policy GS10. Soundness.**

1. The City Plan needs to be more explicit that cross-border coordination with Buckinghamshire Council should be required for recommended junction upgrades in the A421 study. These are the Bottledump roundabout and next 2 roundabouts closest to Milton Keynes.
2. Also, the City Plan needs explicitly mention the need for active travel investments to mitigate congestion, improve safety, and support sustainable growth in the vicinity of the Bottledump roundabout and along the A421 corridor.
3. Public Transport provision in the area is also infrequent and fragmented. The Plan needs to make a commitment that infrastructure planning linked to growth in the vicinity of the A421 will help to improve bus services and so address these deficiencies.

#### Reason:

There is a constrained road network on the Buckinghamshire / Milton Keynes boundary causing congestion on the A421, particularly at peak hours. We are aware of pinch point congestion at the Bottledump roundabout that leads to increased traffic through the villages of Whaddon and Newton Longville. The A421 corridor is a key road link providing East/West connectivity which will be impacted further by growth in Buckinghamshire and Milton Keynes. Development proposals in the MK City Plan 2050 needs to be supported by infrastructure plans that will ensure that the strategic function of the A421 corridor is enhanced and that any significant impacts from the proposed development in terms of capacity, congestion or rat running can be cost effectively mitigated to an acceptable degree.

#### Housing Provision

The Plan allocates land for c37,200 homes and with 22,700 committed/completed this provides c59,900 homes. This is a buffer of more than 16% on the housing need figure of 50,372. The council notes the MK City Plan will provides for significantly more housing than just to meet the local housing needs of Milton Keynes to 2050. The reason for providing a significant buffer to the housing need figure is made clear.

We cannot confirm yet if we will be able to full meet Buckinghamshire’s local housing needs in full. The council is currently working to identify enough sites to try to meet the local plan housing target. This is the local housing need figure for Buckinghamshire plus a 5% buffer, approximately 95,500 homes (for the local plan period 2024-2045). The latest position is despite 4 years of Call for Sites, potential capacity so far identified from the Housing and Economic Land Availability Assessment, a New and Expanded Settlement Study and Green Belt review cannot provide enough suitable achievable sites to meet the 95,000 homes. The work is still progressing, however.

The council will be engaging with the City of Milton Keynes Council officers in early 2026 on potential site options for the Local Plan for Buckinghamshire. At this stage we cannot rule out asking for help from neighbouring councils who may have capacity to accommodate our potential unmet housing needs. We do note that the City of MK Plan is providing an excess supply than needed to meet its own housing needs and there are new sites being allocated for considerable housing on the border with Buckinghamshire.

We cannot confirm if we will need help to meet Buckinghamshire’s housing needs for the Local Plan for Buckinghamshire. We are at an advanced stage on our work on capacity and constraints review with key evidence to be completed in early 2026. By the time of the City MK Local Plan examination in spring-summer 2026 we will have sufficient clarity to substantiate if we do need to ask for help from neighbours and specifically how the City of Milton Keynes could help.

#### Economic Growth and Supply

Table 3 in the Regulation 19 Local Plan sets out 430ha is the net employment land requirement. Paragraph 38/p.26 of the Plan sets out 310ha of that need is for warehousing Table 4 allocates 207.5ha of employment land. Therefore, there is a shortfall of almost 130ha of employment land which is predominantly for warehousing needs not met by allocations in the plan.

We have discussed the employment shortfall in a meeting with you and we understood that the Regulation 19 plan will address the shortfall with a positively worded policy to support new employment development on windfall sites and other measures.

The concern we have is that if the City MK Plan is not meeting its own warehousing needs, it could lead to pressure for development of warehousing sites in northeast Buckinghamshire or the A421 corridor.

On employment site allocations in the Plan, we do not have any concerns with the size of proposed Employment growth at Shenley Wood and Snelshall West sites as these have been significantly reduced since the Draft Plan stage. The Western Expansion Area employment growth is rolled forward from Plan MK and we have no concerns as this is not new.

### Housing Site Allocations

#### Shenley Dens

The site remains in the City MK Plan at Reg 19, allocated for 1000 homes and with a concept plan and policy criteria (Policy GS19). There is also now a proposed Gypsy and Traveller site (15 pitches by 2035) close to the Buckinghamshire border on Whaddon Road in the allocation landscape buffer area.

#### **Objection - Policy GS19 Shenley Dens. Soundness.**

We do not object to the principle of the new development of the Shenley Dens site but rather the allocation criteria and query the boundary chosen. The City MK Plan Policy GS19 on Shenley Dens has not incorporated the change we requested to the draft policy criteria regarding the impact on landscapes in Buckinghamshire. In 2024 we made an objection on landscape and visual impact as follows. We suggested change to Part (C) of the policy as follows to address our concerns (new text in italic underline):-

Development of the site must adopt a sensitive landscape-led approach to the layout and design of development that satisfactorily protects or mitigates impacts upon the valued characteristics of the Calverton Special Landscape Area in accordance with Policy CEA12. *Any development must also consider visibility beyond the ridgeline from Oakhill Wood running north-westerly and the impact on landscapes into northern Buckinghamshire.*

#### Reason:

The site allocation policy GS19 (C) suggests a development proposal only has regard to landscape impacts within the City of Milton Keynes council area. Given the location of the site, on the border and the slopes across the site with a ridgeline and downslopes towards Buckinghamshire, there would be a considerable landscape and visual impact expected within Buckinghamshire. The policy needs to be amended to have full regard to all the landscape character including landscapes in Buckinghamshire with the aim to make the new built development as least visually intrusive and impacting as possible on what it at present quiet open countryside.

We also query why the site allocation could not be moved to abut Tattenhoe Street – rather than having green space in council ownership between the Western Expansion Area/Tattenhoe Street and the Shenley Dens site. By moving the allocation boundary east to integrate the new development into Milton Keynes built area it would more likely take development of the 1000 new homes from spilling over the

110m/100m ridgeline and thus being visible and adding an urbanising effect on the surrounding countryside, closing the perceived gap to rural villages such as Whaddon and Beachampton.

Adding the new Gypsy and Traveller site into the Shenley Dens allocation and locating it on the lower slopes close to Whaddon Road also leaves the Gypsy and Traveller site as an urbanising effect on the countryside with a likely adverse landscape and visual impact.

Levante Gate

#### **Objection - Policy GS18 Levante Gate. Soundness.**

This site is still 1,250 homes and the same extent as in the Draft Plan. In the October 2024 Draft Plan consultation stage, we raised concern to landscape and visual impact and suggested the policy criteria have explicit regard to landscapes in Buckinghamshire (which will take a visual, character impact). This point has not been addressed. Change requested to GS18 (c) (2) as follows (new text in italic underline).

Adopt a sensitive, landscape-led approach to the distribution, layout and design of development that satisfactorily mitigates impacts upon the valued characteristics of the Brickhills Special Landscape Area *and avoids harm to other affected landscapes including into Buckinghamshire;*

Reason:

The only regard for landscape and visual impact within criteria GS18 (C) (2) as drafted is to the Brickhills Special Landscape Area designated within Milton Keynes. The site would be visible from open views into the site from landscapes in Buckinghamshire south of the A5, north of Great Brickhill and we request the criterion is amended to address impacts on all landscape affected.

#### Renewable Energy

In the 2024 draft plan we raised concerns to the solar areas suggested for designation near Shenley-Calverton but also near Great Brickhill. More significant was the wind opportunity areas near Upper Weald. Wind turbines for 3MW or more suggested in the supporting text can be typically 150 metres in height and therefore cannot be screened. We welcome the changes removing the wind opportunity areas near Calverton and the Brickhills reducing impacts on Buckinghamshire landscapes and communities.

#### **Objection - Policy GS7 Wind and solar development spatial strategy - Soundness**

The solar opportunity areas under Policy GS7 shown on the Policies Map near Calverton-Beachampton remain from the 2024 draft plan.

Requested change: Add a policy criterion to GS7 to avoiding adverse landscape and visual impacts and through mitigation and detailed design address identified harm to all landscape including those in Buckinghamshire.

Reason: Whilst development for solar farms can be mitigated to an extent by landscape mitigation – there is likelihood for some adverse landscape and visual impact from panels sited on the downward slopes visible into Buckinghamshire.

#### Bletchley Railway Station

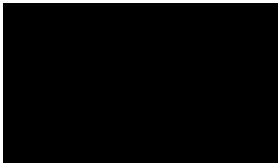
Bletchley Railway Station connects to the rural north-eastern area of Buckinghamshire, giving communities access to national public transport networks. We support the proposal for the development

of Bletchley Railway station as a regionally significant transport hub while capitalising on the East-West Rail route.

We thank the City council for the supporting Para 181 in the plan regarding the potential Aylesbury Spur line for East West Rail. This responds to a request for support in our representation in 2024. We look forward working the City council as a stakeholder on East West Rail delivery and the Spur line should it get national support.

If you have any questions on this response, please contact my officer David Broadley, Principal Planning Officer (Policy) at [REDACTED]

Yours faithfully,

A large black rectangular redaction box covering the signature of Cllr Peter Strachan.

Cllr Peter Strachan  
**Deputy Leader & Cabinet Member for Planning**