

**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

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

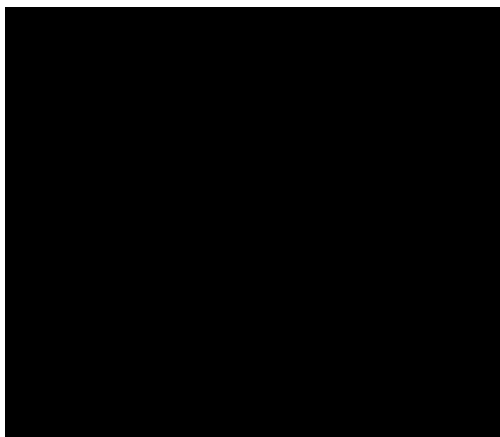
E-mail Address

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: Milton Keynes Parks Trust

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

Paragraph

136-178

Policy

CMK1;  
CMK2;  
CMK3;  
CEA8

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.

**Representation 1:**

**Concern that the draft City Plan is unsound because it does not contain sufficient measures to appropriately manage and mitigate the impacts the quantum of development proposed for Central Milton Keynes will have on Campbell Park and other existing green spaces in the catchment zone surrounding the city centre.**

1. Our concern relates to some deficiencies in the draft plan relating to the impacts that the proposed quantum and types of development in Central Milton Keynes (CMK) will have on Campbell Park and other nearby accessible green spaces (i.e. within 1 to 2 km of the city centre). The draft plan lacks the necessary policy measures to ensure these impacts will be suitably and adequately managed and mitigated.

2. These deficiencies make the draft plan unsound because there is inconsistency between the strategy for growth and densification of development in CMK and the objectives of the plan, especially objectives 1; 2; 7; 11; 13; 15; and 18. A specific deficiency in this context is that the draft plan and supporting technical evidence documents (including the Open Space Assessment; the Green & Blue Infrastructure Strategy and the Infrastructure Delivery Plan) fail to sufficiently and adequately recognise the special characteristics of Campbell Park (meaning the park, not the city centre neighbourhood by that name) and the park's position and role in the cultural and civic life of Milton Keynes, where it serves a unique 'city park' function.
3. To make it clear, our concern is not about the growth and development strategy for CMK and the proposed quantum of development and projected dwelling numbers for the city centre per se. It should be possible for the city centre to develop broadly as proposed in the strategy and for Campbell Park to be conserved and continue to fulfil its cultural and civic event space function *provided* the development of CMK accounts for and accommodates the full role and functions of the Park and manages the development around and relating to the Park appropriately.
4. We also acknowledge that the draft plan recognises the position of Campbell Park in the city centre. However, it does not recognise the role of the park to the full extent necessary. As a consequence, there is a risk that the development strategy's focus on growth and increasing the density of development in CMK could inadvertently create the situation where Campbell Park will become increasingly hemmed-in by surrounding development and constrained its ability to fulfil its 'city park' function, diminishing its ability to host larger-scale cultural and civic events that add an vital dimension to life in and the vibrancy of Milton Keynes, not only for those residing within the city centre but for the city as a whole and visitors to it.
5. Furthermore, the plan requires some additional policy measures to ensure the proposed quantum of residential development in CMK does not result in unsustainable access pressure on existing green spaces in the open space access catchment zones around the city centre (as defined in Annex C of the draft plan). Some of these green spaces, for example Linford Wood, are of high environmental value and risk being degraded by increased levels of public access pressure on them if appropriate mitigation measures are not required to be in place as residential development and densification in the city centre occurs.
6. Fundamentally, there is insufficient land available within CMK to provide accessible green space at least to the minimum quantum required under Policy CEA8 in the draft plan. Inevitably, the significantly increased resident population in CMK will seek access to green space in the surrounding zones of the city. Therefore, the plan requires some additional policy measures to avoid these green spaces becoming potentially degraded by unmanaged or unmitigated increased public access pressure.
7. The following section provides further explanation of our concerns.

**The impacts of the development strategy for CMK on Campbell Park and why the plan needs additional measures to manage these impacts to ensure Campbell Park can continue to function in its role as the 'city park' in the cultural and civic life of Milton Keynes.**

8. The special character and status of Campbell Park are formally recognised through its inclusion in the Register of Historic Parks and Gardens. The Park also has a unique position in Milton Keynes, not only within the city centre but for the city as a whole in the role it plays in the city's cultural and civic life. For example, the Park has a 5,000-capacity amphitheatre and adjacent 'Events Plateau' which host major events that have become a tradition in the cultural life of the city, including Milton Keynes International Festival , music acts, performing arts and other cultural festivals, and international celebrations like India Day MK and African Diaspora Day. The Park also contains the MK Rose, which plays a leading role in the ceremonial life of the city, where official commemorations are held such as on Armistice Day or held to mark events such as International Women's Day, Disability Awareness Day, etc.
9. Campbell Park is a relatively large green space and it was designed and has always been intended to serve as the city centre park surrounded by residential and other forms of development. The Park does have space and capacity, if managed appropriately and sustainably, to fulfil these 'city park' functions whilst also serving local green space needs for the surrounding residential population. However, this will only be the case if surrounding development adequately considers and accounts for the park and the full role it plays in Milton Keynes.
10. There are aspects in the CMK strategy that will improve the accessibility and position of Campbell Park. We support these aspects of the strategy. Most notably this includes the improvement of the access link/bridge from Midsummer Boulevard in the city centre across Marlborough Street (refer to our separate representation about the form this connection could take). In response to the plans for future development in CMK, the Parks Trust as owner and custodian of Campbell Park, is being proactive by working on a comprehensive masterplan for the park, to identify how the park can be managed and conserved and the type of facilities and features that the park will need so it can fulfil its purpose and potential in future.
11. However, the quantum and density of residential development in CMK and around Campbell Park proposed in the draft plan is substantial and is in excess of the quantum and type that was envisaged when Campbell Park and its surrounding access and transport infrastructure (including car parking) was originally laid out. In response to this increase in the quantum of development proposed for CMK, the draft plan does not include a sufficiently strong and clear set of policies to ensure the cultural, environmental and heritage value of Campbell Park is does not become constrained and/or diminished.
12. A specific concern in this regard is that the draft City Plan and the supporting Infrastructure Delivery Plan (IDP) do not sufficiently recognise the unique status and special value of Campbell Park. Rather, the draft plan and the IDP treat the park in a more generic way, failing to fully recognise its status and classifying it in the open space typology only as a "district park." This significantly underrepresents Campbell Park and its role and function in

the city. Whilst the Park does serve as the 'district park' for CMK and the Campbell Park neighbourhood, it also serves the wider 'city park' role, as described above.

13. In not sufficiently recognising and accommodating for the full role Campbell Park plays in the city of Milton Keynes, the strategy and policies in the draft City Plan present the following risks:

- The density and height of surrounding development risk creating a situation where the Park becomes unsuitable and untenable as a venue for large-scale cultural and ceremonial events and activities. One challenge to events continuing would be if residents of the surrounding development were subject to noise from these events, a conflict that could be avoided if the policies for CMK recognise the cultural role of Campbell Park and are designed to avoid or mitigate the potential of such conflicts.
- The development around the park risks spatially and physically hemming the park in, thereby constraining the ability and suitability for it to continue to as a venue for larger scale cultural and civic events.

14. These risks can be avoided if the policies for CMK are revised and strengthened to ensure the wider role and cultural value of Campbell Park is adequately taken into account as development within the city centre and around Campbell Park occurs.

**The demand for access to green space the increased number of residents living in the 'densified' area of CMK will place on Campbell Park and other open/green spaces within the catchment zone around the city centre.**

15. An increased population residing in CMK will inevitably seek regular and frequent access to green space within short distance of the city centre. One of the most a significant nearby accessible natural green spaces is Linford Wood (1.2 km from the centre of CMK), an ancient semi-natural woodland of high ecological value and sensitivity which is already subject to high footfall. Public access to Linford Wood is facilitated and managed by the Parks Trust, and in this we endeavour to provide clear access routes and limit the level of anti-social or other detrimental activities (e.g. trampling on ground flora by visitors straying from designated paths) that occur in the wood and would damage its ecology. A significantly increased urban population within a kilometre or so of the wood as proposed in the draft city plan, will risk placing an unsustainable level of access demand on the wood if sufficient mitigation measures are not put in place as nearby development occurs.

16. In expressing this concern, we acknowledge and strongly support that the draft City Plan includes an Infrastructure First policy (INF1), which includes provision of green and blue infrastructure as essential to support growth, and the Policy CEA8 for the provision and protection of accessible open space. However, the growth proposals for CMK in the draft Plan create uncertainty over where the full level of provision of different types of open space/green infrastructure necessary (defined in Policy CEA8) to serve the quantum of residential development in CMK will be provided.

17. The supporting Infrastructure Delivery Plan lists the green and blue infrastructure provision requirement for the projected residential developments in CMK as being: 55ha of natural/semi-natural greenspace; 21.4 ha of amenity greenspace; 7.6 ha of LEAP; 18.3 ha of NEAP and 9.2 ha of other outdoor play provision. This is additional to the space required for other forms of green infrastructure (36.3ha of playing fields and 7.6ha of food growing space). Whereas these minimum area requirements have been identified, there is no clear strategy or plan for where this provision will be fully met, which according to Policy CEA8 must be made within the minimum catchment distances of the increased CMK population, as defined in Annex C.

18. There will be space for some of the necessary new green infrastructure within the CMK area, for example within the 'Midsummer Boulevard Greenway'. However, this would meet only part of what will be necessary to meet the requirements of Policy CEA8 would require. Therefore, in the absence of a full strategy for this, the City Plan needs to include explicit policy measures to ensure existing spaces within the CMK catchment zone can be upgraded and made more robust to accommodate the additional demand that will be placed upon them.

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.

### **Recommended revisions to policies**

(Deleted text ~~struck through~~, new text in **bold**.)

#### Revisions to Policy CMK1 Central Milton Keynes Development Framework Area

- Amend sentence A.2 to say: "Community facilities and infrastructure to support a growing city centre population, including primary health care, education facilities, community space, library space and arts/cultural space **including outdoor event space and associated facilities;**"
- Amend sentence A.7 to say: "A new cultural attraction in Campbell Park **and associated infrastructure to ensure the Park continues to fulfil its purpose as a major cultural and civic event space for the city of Milton Keynes**".
- Add a new sentence (number 6) to Paragraph E, to read: "**6. Enable the continued use of Campbell Park as a major cultural and ceremonial event space for Milton Keynes.**"

#### Revisions to Policy CMK2 Central Milton Keynes placemaking principles

- Amend the opening statement of paragraph E to say: “Development proposals should enhance the green character of Central Milton Keynes and encourage ~~greater~~ **enhanced sustainable access** to open space **within the city centre and to green spaces in surrounding areas of the city** through:”
- Amend sentence E.1 to say: “Providing new and/or enhanced publicly accessible open space, in accordance with guidance published by the Council for open space provision within Central Milton Keynes **and where necessary, enhanced green spaces in surrounding areas of the city;**”
- Add a new sentence (E.3.d) to say: “**3.d. Conserving and enhancing the special qualities and value of Campbell Park, ensuring the Park can sustainably meet the increased demands upon it and so it can continue to fulfil its function and purpose as a major cultural and civic event space for the city of Milton Keynes.**”
- Add a new sentence to paragraph F (F.5) to say: “**F.5. Can demonstrate they do not create a conflict with the use of Campbell Park as a major cultural and civic event space for the city of Milton Keynes.**”

#### Revisions to Policy CMK3 Central Milton Keynes Skyline and Tall Buildings Strategy

- Add a new sentence to Paragraph C (C.10) to say “**C.10. Should not create an avoidable or unmitigated conflict between occupied residential buildings and the use of Campbell Park as a major cultural and civic event space, including consideration of the effect of noise when events are in progress.**”

#### Revisions to Policy CEA8 Provision and protection of accessible open space

- Add a new paragraph to this policy – paragraph ‘G’, as follows:

**“G. Development proposals that would create in increased access demand on existing open spaces within the catchment zones of the development (open space types and catchments as are set out in Annex B and Annex C) will only be permitted where provision is made, as may be necessary, to upgrade or enhance the other open spaces so they are able to sustainably accommodate the increased access demand arising from the development.”**

***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:

We have previously made comments to the same effect as presented here in response to the Regulation 18 draft version of the Plan and in other responses to drafts of the relevant supporting technical. Our concern is that the Council has not fully taken these comments on board and the without the changes we have proposed and for the reasons given we are concerned about the detrimental impacts the growth strategy for CMK will have on Campbell Park and other green spaces as has been described in this representation.

**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.

**Note: Second representation presented overleaf in a separate 'Part B'.**

**Part B – Please use a separate sheet for each representation**

Name or Organisation: Milton Keynes Parks 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 type="checkbox"/>	No	<input checked="" 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 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.

**Representation 2:**  
**Concern that, in Policy CMK2, describing the proposed connection between Campbell Park and Midsummer Boulevard as a ‘green bridge’ is too prescriptive and would unnecessarily confine otherwise appropriate forms of this connection that may not qualify as being ‘green’.**

The Parks Trust strongly supports the proposals in the draft plan to improve the physical connection between Campbell Park and Midsummer Boulevard (i.e. bridging across the Marlborough Street road cutting). We agree with the reasoning and justification presented in the plan behind this proposal.

However, setting it in planning policy that this must be *in the form of ‘green bridge’* is too prescriptive, even if the phrase ‘green bridge’ is set within inverted commas/quotation marks. Whilst the use of inverted commas suggests there would be some flexibility in what a final approved design may be, there is nevertheless a clear intended prescription that the bridge will be green. We feel this level of prescription is not only unnecessary but also that it would not be legally compliant for a local plan to be so prescription without supporting evidence to prove such a bridge must or can only be ‘green’, and also that it would be unsound for the plan to say so because it would rule out the potential of other ‘non-green’ options that may, after the necessary integrated design process, prove to be more appropriate for this location.

In making this comment, this does not mean the Parks Trust is opposed to the principle of a green bridge, which may well be appropriate for this connection. However, we feel other options should not be ruled out at this stage.

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.

Recommended revision to Policy CMK2

Change A.4. to say:

“A.4. Supporting the creation of more inclusive and safe pedestrian links and routes to Campbell Park, including through the provision of a more legible connection ~~to~~ **between** Campbell Park ~~in the form of a ‘green bridge’ from~~ **and** Midsummer Boulevard.

**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:

The above box is ticked to demonstrate we would be willing to participate in a hearing session to discuss this representation if necessary, not that we specifically want this representation to be discussed at a session.

**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.*