



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 22nd 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

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)

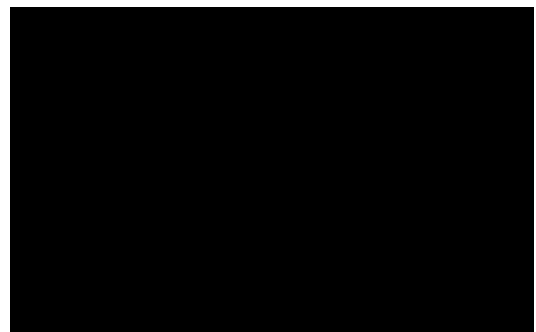
Organisation
(where relevant)

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:

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="checked" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="checked" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="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.

Policy GS15 East of Wavendon Strategic City Extension (EWSCE) makes no reference to Policy GS22 - South East Milton Keynes Strategic Urban Extension (SEMKSUE) or to this existing strategic extension more generally. It does make reference in point 14c. to movement of general traffic and secondary accesses onto Newport Road.

The EWSCE is likely to share its western boundary with the part of SEMKSUE currently referred to 'Woburn Sands North' as both sites border opposite site of Newport Road (towards Woburn Sands Station). The SEMKSUE SPD shows a 'Potential future extension of H10 corridor' towards Newport Road which crossed through our client O&H Land's site Woburn Sands North. The assumption is that the H10 will cross Newport Road and travel across to EWSCE at some point in the future and land is safeguarded on both sites for that reason.

Considering that the City Plan 2050 plans 25 years into the future, the lack of reference to both a potential H10 connection and to a strategic site bordering the allocation to the west, seems an unsound approach to strategic planning.

Whilst O&H Land appreciates there may be political reasons not to emphasise this future link due to potential negative transport impacts on Woburn Sands, the lack of policy reference risks inefficient, disjointed and confusing approaches to transport planning across EWSCE, potentially delaying and increasing costs of development.

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.

O&H Land suggest that the following revision to point 14 of policy GS15:

14. The phased introduction of a comprehensive transport network and infrastructure that prioritises active travel and public transit modes consistent with the movement hierarchy set out in Policy GS4, and specifically to include:

- a. Segregated routes for active travel and provision of interchange hubs that integrate well with **South East Milton Keynes Strategic Urban Extension**, Glebe Farm, Eagle Farm, Woburn Sands, the surrounding network of active travel routes and route(s) for the Metro and public transport;
 - b. Dedicated route and infrastructure for the Metro system, with segregated routes and/or lanes provided wherever possible, connecting from Keightley Gate and through the site, with appropriate protection and safeguarding to allow onward extension or connection to land east of the East of Wavendon Strategic City Extension beyond Milton Keynes **and land to the west including South East Milton Keynes Strategic Urban Extension**;
 - c. Routes for movement of general traffic with the primary access connecting into Keightley Gate and secondary accesses onto Newport Road and Cranfield Road, with appropriate protection and safeguarding to allow onward extension or connection to land east of the East of Wavendon Strategic City Extension beyond Milton Keynes **and land to the west including South East Milton Keynes Strategic Urban Extension**;
 - d. New and/or upgraded active travel connections to and crossings of Newport Road and Lower End Road to ensure appropriate connectivity with existing communities and community facilities **and land to the west including South East Milton Keynes Strategic Urban Extension**;
- and

(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:

The H10 extension is currently in its design phase and an outline planning application is being prepared for Woburn Sands North. O&H Land consider that it would be helpful to appear at the Examination in Public to provide an update on these matters to aid in the proper planning of strategic infrastructure in this area.

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.*

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd 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

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)

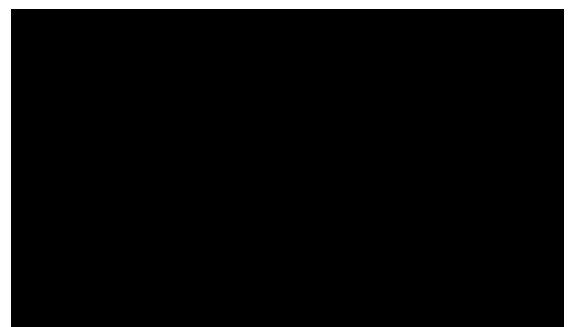
Organisation
(where relevant)

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:

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 checked="" 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.

On behalf of O&H Land, Varsity Town Planning (VTP) wishes to highlight the missed opportunities for development on brownfield land. Paragraph 124 of the NPPF explains that strategic policies should make as much use of previously developed land as possible to meet development needs. Paragraph 125 (c) states that planning policies should 'give substantial weight to the value of using suitable brownfield land within settlements'.

Paragraph 8 of the Draft Local Plan establishes that it seeks to allocate land that can deliver around 37,000 additional homes by 2050. The Council has identified 2 brownfield sites for allocation with capacity to deliver 850 homes. Therefore, the remaining 36,150 homes are to be delivered through the allocations are greenfield sites. Paragraph 14 states that there are few brownfield sites within the existing built-up area, and hence greenfield allocations are required.

Bletchley Brickworks is a large brownfield site located on the south western edge of Bletchley, and half of the site falls into the jurisdiction of Buckinghamshire Council. Draft Policy GS11

states that for proposals partly within the administrative boundary of a neighbouring authority, the authorities will work jointly to bring forward the development. With this established in the Plan, MKCC should be working with Buckinghamshire Council to ensure that this brownfield site can come forward. Given repeated reference throughout the Local Plan and Sustainability Appraisal to there being few brownfield sites available, it is unclear why this site has not been considered for allocation.

Through the Regulation 18 Consultation in 2024, we brought to the attention of the Council that the site had not been considered through the Land Availability Assessment. The site has since been assessed in the SHLAA (November 2025), which concluded the site to be undeliverable. The suitability commentary concludes that the site is unsuitable as there is no means of currently accessing the site, and the achievability commentary concludes that development at the site is unachievable because it is reliant on development in Buckinghamshire to facilitate access. It is unsound to deem a site unsuitable and unachievable on these grounds, given the requirement in the NPPF for strategic policies to make as much use as possible of brownfield land and cooperate with neighbouring authorities.

Buckinghamshire Council is not quite as advanced in their Local Plan making as Milton Keynes City Council. However, this should not mean that sites on the western side of the district should be excluded. Buckinghamshire have a housing requirement of approximately 90,000 homes to deliver across their plan period, and have established that sites on the edge of Buckinghamshire will likely need to come forward in order for them to meet this need. Whilst there is no certainty surrounding site allocations in Buckinghamshire, the site has been submitted into Buckinghamshire's 'call for sites', and it is unreasonable to discount sites along this edge of Milton Keynes because Buckinghamshire Council have only reached the Regulation 18 stage of their plan preparation.

Bletchley Brickworks is a deliverable brownfield site, albeit that the main access lies within Buckinghamshire's jurisdiction.

The SHLAA also refers to the site's environmental constraints. Whilst parts of the site surrounding the ditch are in Flood Zone 2 and 3, the majority of the site lies within Flood Zone 1. Additionally, Bletchley Landfill has been filled from the north and the working edge is now along the southern boundary. Therefore the requirement to have a buffer to the landfill has reduced. The development at Newton Leys is a testament to residential uses being able to come forward in reasonably close proximity to a landfill site. The assessment also acknowledges the site as a Biological Notification Site (BNS) and Wildlife Corridor, but it should be recognised that since the assessment, the Council has enabled EWR to use the site as a compound without reference to the BNS and without harm to the Wildlife Corridor.

Furthermore, the SHLAA concludes that for the site to come forward it must be evidenced that the site is no longer viable for employment use. Since the occupation of EWR, the site has been vacant. This demonstrates that it is not currently being used for employment.

(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.

Table 1 of Policy GS2 should be amended to include the following line:

Source of Supply: Bletchley Brickworks

No. of Homes: 150

(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:

O&H Land consider that the omission of the brownfield site at Bletchley Brickworks is a matter of legal compliance and, as such, should be heard at the Examination in Public.

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.*



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 22nd 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

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)

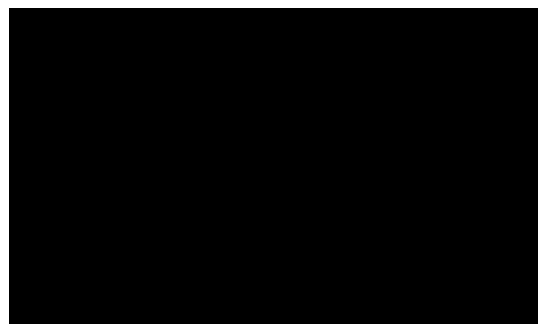
Organisation
(where relevant)

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:

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="checked" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="checked" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="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.

Policy GS22 - retains and revises the existing policy in Plan:MK (Policy SD11) in order to ensure their continued delivery (para 113) and proposes 'small changes' to the adopted policy.

The principal change is that policy cross-referencing will be removed from the new, which our clients O&H Land (who are bringing forward a significant part of the allocation), supports.

The other proposed change relates to part B of the revised policy, specifically point 4 and 5. Point 4 now sets out that surveys & assessments of built heritage should inform development which was not part of Plan:MK Policy SD11. On behalf of our clients, we query the necessity of this addition considering that heritage assets are given great weight in the NPPF and that this requirement is covered off by Policy HE1 Heritage. This is not a sound approach in that it duplicates both national policy as well as policies within the same document.

Neither do O&H Land consider the amendments at point 5 to be sound, on the basis that it is not clear, from the way it is written, what the policy requirement actually is. Point B5 states,

“In addition to the requirements set out in other policies within this plan, development of the site will be required to (point 5) - Pre-determination archaeological evaluation has been undertaken and provided in support of development proposals;”

Point B5. is poorly worded. However, we do not seek a re-draft as it is not necessary for this requirement to be embedded in a site-specific policy.

O&H Land considers that the trigger for archaeological evaluation is set out Policy HE1 Heritage - point G *Where development is proposed on a site with the potential to include heritage assets of archaeological interest, applications must be accompanied by an appropriate desk-based assessment and, where necessary, a field evaluation.*

Further, if we read between the lines, Point B5 appears to place a requirement for ‘pre-determination archaeological evaluation’ which has not been necessary for the extant applications across SEMK. It would not be sensible to impose this on the remaining applications.

The revised policy GS22 appears to be requiring all development at SEMK to undertake field/archaeological evaluation rather than allowing for Council discretion under policy HE1. To change the approach to archaeology when many of the SEMK sites have progressed to outline, is not a sound approach and risks delaying the site coming forward. Additionally, this was not required under Plan:MK policy SD11.

O&H Land request that the policy be revised and that the Council’s rely on their local validation requirements and pre-application process to fix the precise scope of future applications.

(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.

O&H Land suggest that Points B4 and B5 be removed from Policy GS22

(Continue on a separate sheet /expand box if necessary)

(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.*

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd 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

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)

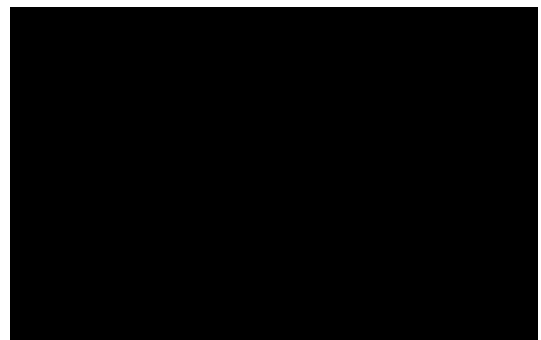
Organisation
(where relevant)

E-mail Address

Address Line 1

Line 2

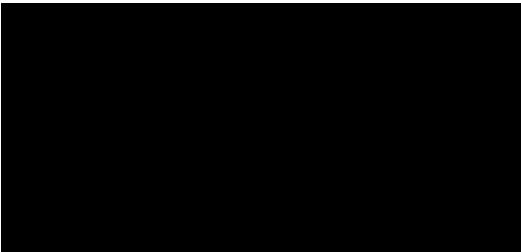
Line 3



Line 4

Post Code

Telephone Number



Part B – Please use a separate sheet for each representation

Name or Organisation:

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 checked="" 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.

On behalf of O&H Land, Varsity Town Planning (VTP) wishes to highlight the missed opportunities for development on brownfield land. Paragraph 124 of the NPPF explains that strategic policies should make as much use of previously developed land as possible to meet development needs. Paragraph 125 (c) states that planning policies should 'give substantial weight to the value of using suitable brownfield land within settlements'.

Paragraph 8 of the Draft Local Plan establishes that it seeks to allocate land that can deliver around 37,000 additional homes by 2050. The Council has identified 2 brownfield sites for allocation with capacity to deliver 850 homes. Therefore, the remaining 36,150 homes are to be delivered through the allocations are greenfield sites. Paragraph 14 states that there are few brownfield sites within the existing built-up area, and hence greenfield allocations are required.

Bletchley Brickworks is a large brownfield site located on the south western edge of Bletchley, and half of the site falls into the jurisdiction of Buckinghamshire Council. Draft Policy GS11

states that for proposals partly within the administrative boundary of a neighbouring authority, the authorities will work jointly to bring forward the development. With this established in the Plan, MKCC should be working with Buckinghamshire Council to ensure that this brownfield site can come forward. Given repeated reference throughout the Local Plan and Sustainability Appraisal to there being few brownfield sites available, it is unclear why this site has not been considered for allocation.

Through the Regulation 18 Consultation in 2024, we brought to the attention of the Council that the site had not been considered through the Land Availability Assessment. The site has since been assessed in the SHLAA (November 2025), which concluded the site to be undeliverable. The suitability commentary concludes that the site is unsuitable as there is no means of currently accessing the site, and the achievability commentary concludes that development at the site is unachievable because it is reliant on development in Buckinghamshire to facilitate access. It is unsound to deem a site unsuitable and unachievable on these grounds, given the requirement in the NPPF for strategic policies to make as much use as possible of brownfield land and cooperate with neighbouring authorities.

Buckinghamshire Council is not quite as advanced in their Local Plan making as Milton Keynes City Council. However, this should not mean that sites on the western side of the district should be excluded. Buckinghamshire have a housing requirement of approximately 90,000 homes to deliver across their plan period, and have established that sites on the edge of Buckinghamshire will likely need to come forward in order for them to meet this need. Whilst there is no certainty surrounding site allocations in Buckinghamshire, the site has been submitted into Buckinghamshire's 'call for sites', and it is unreasonable to discount sites along this edge of Milton Keynes because Buckinghamshire Council have only reached the Regulation 18 stage of their plan preparation.

Bletchley Brickworks is a deliverable brownfield site, albeit that the main access lies within Buckinghamshire's jurisdiction.

The SHLAA also refers to the site's environmental constraints. Whilst parts of the site surrounding the ditch are in Flood Zone 2 and 3, the majority of the site lies within Flood Zone 1. Additionally, Bletchley Landfill has been filled from the north and the working edge is now along the southern boundary. Therefore the requirement to have a buffer to the landfill has reduced. The development at Newton Leys is a testament to residential uses being able to come forward in reasonably close proximity to a landfill site. The assessment also acknowledges the site as a Biological Notification Site (BNS) and Wildlife Corridor, but it should be recognised that since the assessment, the Council has enabled EWR to use the site as a compound without reference to the BNS and without harm to the Wildlife Corridor.

Furthermore, the SHLAA concludes that for the site to come forward it must be evidenced that the site is no longer viable for employment use. Since the occupation of EWR, the site has been vacant. This demonstrates that it is not currently being used for employment.

(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.

Policy GSX Redevelopment of Bletchley Brickworks

Policy type: Strategic Objectives: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13

Site/sub-area: Bletchley

A. Bletchley Brickworks is allocated to provide a mixed-use residential development. It is a cross-boundary site with the majority of brownfield land falling within Buckinghamshire Council's jurisdiction. Policy GS11 will apply.

B. Development proposals in Milton Keynes will be required to meet the following criteria:

1. Delivery of around 150 homes providing a range of house size, type and tenure, through a comprehensive masterplan approach along with the following infrastructure and facilities:

a. Provision of early years, primary, secondary and SEND education contributions

appropriate to the scale and nature of the development proposal;

b. Primary and other health and social care provision as appropriate to the scale and nature of the development proposal; and

c. A mix of non-residential floorspace and community uses that complements existing uses within Bletchley Town Centre; and

2. Provision of an integrated network of low- and zero-carbon energy infrastructure from building scale to neighbourhood scale;

3. Provide or enhance active travel routes and infrastructure that integrate well with Bletchley and existing active travel and public transport networks,

(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:

O&H Land consider that the omission of the brownfield site at Bletchley Brickworks is a matter of legal compliance and, as such, should be heard at the Examination in Public.

***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.*

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd 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

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)

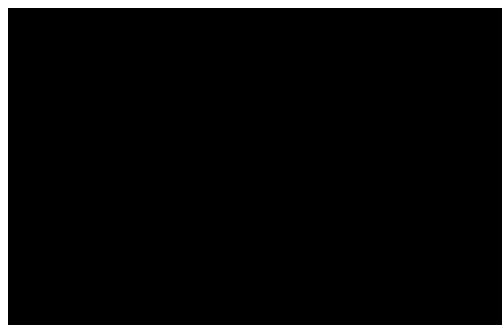
Organisation
(where relevant)

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:

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.

On behalf of O&H Land, Varsity Town Planning (VTP) wishes to highlight a missed opportunity for development on brownfield land.

Paragraph 124 of the December 2024 NPPF explains that strategic policies should make as much use of previously developed land as possible to meet development needs. Paragraph 125 (c) states that planning policies should 'give substantial weight to the value of using suitable brownfield land within settlements'. The Government intention to promote a brownfield first policy approach is proposed to be strengthened in the current consultation version of the NPPF.

Milton Keynes City Council has failed to properly consider the potential of the previously developed land at Bletchley Brickworks.

(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.

Milton Keynes City Council should recognise the development potential of a third strategic brownfield opportunity and paragraph 14 should be amended as follows:

“Given the unique way in which Milton Keynes has evolved as a city, there are few significant brownfield sites or opportunities within the existing built-up area. However, we have identified ~~two~~ **three** opportunities which do represent strategic brownfield opportunities that together could provide around ~~850~~ **1,000** new homes – **Bletchley Brickworks**, Wolverton Railway Works and Walton Hall. Wolverton Railway Works has long been established as a prime brownfield redevelopment opportunity and already has local support through the Wolverton Neighbourhood Plan. We want this opportunity to be realised to the benefit of Wolverton and the wider city. **Bletchley Brickworks is a cross-boundary site with Buckinghamshire and has most recently been used as a compound by East West Rail and is currently vacant.** The other potential opportunities for strategic brownfield redevelopment are two vacant sites within the wider Open University campus in Walton Hall.”

(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:

O&H Land consider that the omission of the brownfield site at Bletchley Brickworks is a matter of legal compliance and, as such, should be heard at the Examination in Public.

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.*



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 22nd December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at nep.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

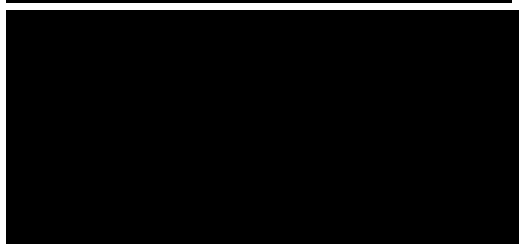
Job Title
(where relevant)

Organisation
(where relevant)

E-mail Address



Address Line 1



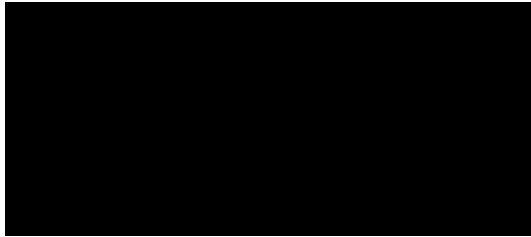
Line 2

Line 3

Line 4

Post Code

Telephone Number



Part B – Please use a separate sheet for each representation

Name or Organisation:

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.

On behalf of O&H Land, Varsity Town Planning (VTP) wishes to highlight a missed opportunity for development on brownfield land.

Paragraph 124 of the December 2024 NPPF explains that strategic policies should make as much use of previously developed land as possible to meet development needs. Paragraph 125 (c) states that planning policies should 'give substantial weight to the value of using suitable brownfield land within settlements'. The Government intention to promote a brownfield first policy approach is proposed to be strengthened in the current consultation version of the NPPF.

Milton Keynes City Council has failed to properly consider the potential of the previously developed land at Bletchley Brickworks.

(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.

Milton Keynes City Council should recognise the development potential of a third strategic brownfield opportunity and paragraph 92 should be amended to include a bullet point on Bletchley Brickworks:

- **Bletchley Brickworks Strategic Brownfield Site, mixed-use residential led development**

(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:

O&H Land consider that the omission of the brownfield site at Bletchley Brickworks is a matter of legal compliance and, as such, should be heard at the Examination in Public.

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.*

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd 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

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)

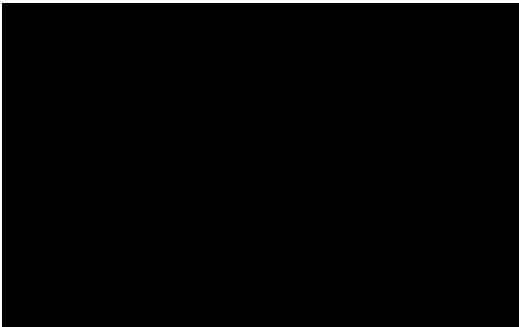
Organisation
(where relevant)

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:

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.

On behalf of O&H Land, Varsity Town Planning (VTP) wishes to highlight a missed opportunity for development on brownfield land.

Paragraph 124 of the December 2024 NPPF explains that strategic policies should make as much use of previously developed land as possible to meet development needs. Paragraph 125 (c) states that planning policies should 'give substantial weight to the value of using suitable brownfield land within settlements'. The Government intention to promote a brownfield first policy approach is proposed to be strengthened in the current consultation version of the NPPF.

Milton Keynes City Council has failed to properly consider the potential of the previously developed land at Bletchley Brickworks.

(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.

Milton Keynes City Council should recognise the development potential of a third strategic brownfield opportunity and paragraph 93 should be amended as follows:

Most vacant land in Milton Keynes, in planning terms, is not classed as brownfield as it has never been built upon. There are a limited number of options on brownfield land that have put forward for development, namely the former Wolverton Railway Works, **the former Bletchley Brickworks** and the Open University Walton Campus. The former Wolverton Railway Works has previously had planning permission to be redeveloped for residential mixed use and is suitable for redevelopment. The Open University has confirmed that parts of the Walton Campus are available for development, and we have assessed the sites as being suitable for development. **The former Bletchley Brickworks closed in 1990 and has been most recently used by East West Rail as a compound. It is a cross boundary site with Buckinghamshire and has previously had planning permission for open storage on the Buckinghamshire side.**

(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:

O&H Land consider that the omission of the brownfield site at Bletchley Brickworks is a matter of legal compliance and, as such, should be heard at the Examination in Public.

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.*