

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	Environment and Commissioning Programme Manager	Mrs
First Name		Raj
Last Name		Bains
Job Title (where relevant)		Principal Planning Consultant
Organisation (where relevant)	Environment & Waste, Milton Keynes City Council	WSP
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

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.

Snelshall West and East are currently allocated in Plan:MK (Policy ER1(A); Table 6.1) and shown as a Proposed Employment Sites on the Policies Map. Snelshall East has been allocated as an Employment site since the late 1990s.

Whilst the Snelshall West site has been carried forward into the (regulation 19) MK City Plan 2050, the Snelshall East site has not.

The de-allocation of the site would not be supported.

The Milton Keynes City Council (MKCC) as the Waste Management Authority has an approved a strategy in 2025 (Recycling and Reuse Centres – Strategic Vision / the Review and recommissioning of our Household Waste and Recycling Centre 2024 -2028) to provide new, modern Household Waste Recycling Centres (HWRCs) to the meet the growth of Milton Keynes. Part of this strategy includes the development of Snelshall East to develop a site for the South of MK. As this site is an allocated employment site in the adopted Plan: MK (2019), it is for this reason this site is being proposed as a new HWRC. Further to the allocation and approved strategy, the site has been acquired and undergone a full site appraisal. Subsequently a full planning application is being prepared for submission in early 2026.

The Planning Authority has been fully aware of the Waste Management Authority's intentions to develop Snelshall East since early 2025. Indeed, the preparation of the planning application has been subject to an Environmental Impact Assessment (EIA) Screening exercise, whereby the Planning Authority agreed that a planning application for a HWRC would be non-EIA development.

Pre-application consultations have also occurred with MKCCs ecologist, landscape, highways officers and the Lead Local Flood Authority (LLFA). In addition, subsequent environmental surveys have been undertaken between May to October 2025 and assessed to ensure significant impacts with respect to archaeology, ecology, flood risk, drainage, landscape, air quality, transport and the local amenity as a result of the proposed HWRC are unlikely.

Through our assessments it is recognised the site partially contains important grassland and the removal of this would not be supported by the extant and emerging MK Local Plan 2050. With this in mind, we would therefore recommend that the emerging Local Plan:

- a) excludes the area of important grassland (part of site in the east) from the proposed allocated employment site to safeguard the site from future development and retain the ecologically valuable asset; and
- b) continue to allocate the eastern extent of the site as a proposed employment site as this would continue to provide employment uses in an area that is well connected to the local strategic network, near to adjacent employment uses and housing developments for local people to use and access.

It is also acknowledged that part of the site falls within the flood plain. However, this did not prejudice the previous allocation of the site and indeed, the Waste Management Authority's proposals for the site seeks development outside the part of the site that is at greatest risk of flooding.

Policy GS3A Strategy for Economic Prosperity lists employment land where development will be directed. GS3 B – G provides further allowance for extensions and other forms of development such as digital communications, public transport, research and development, office and industrial warehousing.

However there appears to be no consideration for other sites to come forward e.g. waste sites.

The de-allocation of Snelshall East is not justified or supported by a review or up to date evidence, including local economic growth forecasts. The site is suitably located and deliverable to fulfil the extant policy requirement of the Plan: MK (2019) and other Council adopted strategies.

The de-allocation of this site would be contrary to Section 6 of the National Planning Policy Framework (2024) in building a strong, responsive and competitive economy and failing to provide sufficient land suitable for waste uses. For these reasons, the proposed emerging MK Local Plan 2050 is considered unsound.

(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.

To reinstate Snelshall East as an employment site suitable for B2, B8 and sui generis (waste) uses within GS3.

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

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notices/milton-keynes-city-council-corporate-privacy-notice>

Representations cannot be treated as confidential and will be published on our website alongside your name. *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*