

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*

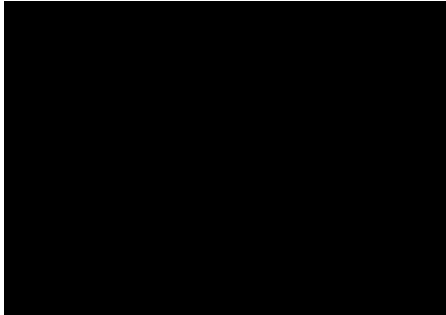
2. Agent's Details (if applicable)

**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	Mrs	
First Name	Sarah	
Last Name	Hearn	
Job Title (where relevant)	Biodiversity and Planning Manager	
Organisation (where relevant)	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)	
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:

BBOWT

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

Paragraph

Policy

GS9;
GS4;
CEA10

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.

The Plan does not consistently or explicitly treat Green and Blue Infrastructure as essential infrastructure equivalent to transport, utilities, education and health. While the relevant policies reference infrastructure and green space, they do not require green and blue infrastructure to be planned, funded, delivered early in the development process, or managed in perpetuity. This is inconsistent with the December 2024 National Planning Policy Framework and results in a Plan that is not Positively Prepared or Effective.

(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.

Amend GS9 and GS4 to explicitly state that green and blue infrastructure is essential infrastructure. Require:

- early delivery alongside development phases;
- planning, funding and delivery in accordance with the Natural England Green Infrastructure Framework;
- long-term management and maintenance secured in perpetuity.

These changes are necessary to make the Plan effective and consistent with national policy.

(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.

Part B – Please use a separate sheet for each representation

Name or Organisation:
BBOWT

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="" type="checkbox"/>	No	<input 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 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 CEA9 relies on the statutory minimum 10% Biodiversity Net Gain, with higher gains only encouraged. Evidence shows that 10% often delivers little more than no net loss in practice. This approach is not Justified by evidence and not Effective in delivering the Plan's stated ambition for nature recovery.

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

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Amend Policy CEA9 to require:

- a minimum 20% Biodiversity Net Gain for all applicable development;
- biodiversity enhancements to be secured and managed in perpetuity (minimum 125 years);
- off-site BNG to align with Local Nature Recovery Strategy priorities.

These changes are necessary to ensure effective and justified delivery of biodiversity enhancement.

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Part B – Please use a separate sheet for each representation

Name or Organisation:

BBOWT

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

Paragraph

Policy

CEA9(A);
CEA10;
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

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The Plan does not consistently require biodiversity, mitigation and green infrastructure to be secured for the lifetime of development. Time-limited management (e.g. 30 years) is ineffective given permanent development impacts. The Plan is therefore not Effective.

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Insert a clear requirement across all relevant policies that habitats biodiversity features and green infrastructure are secured and managed in perpetuity.

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Part B – Please use a separate sheet for each representation

Name or Organisation:

BBOWT

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

Paragraph

Policy

CEA13;
CEA14;
CEA15

Policies Map

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Nature-based solutions are largely encouraged rather than required, and buffer distances to watercourses are insufficient. This undermines climate resilience, biodiversity and water quality outcomes and is not Justified or Effective.

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- Require nature-based solutions as the default approach to SuDS and flood management.
- Require minimum 20m buffers along rivers and watercourses.

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

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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	<input type="text"/>	Policy	GS10; GS4; CEA11	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

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The Plan does not require streets, road verges and movement corridors to be designed and managed for biodiversity. This represents a missed opportunity for urban nature recovery and is not Effective.

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

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Require streets, road verges and grid road corridors to be designed and managed for biodiversity, with long-term funding secured and reference to best practice such as the [Wilder Road Verges Toolkit](#) produced by the Bucks and MK Natural Environment Partnership.

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

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Part B – Please use a separate sheet for each representation

Name or Organisation:

BBOWT

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Paragraph

Policy

CEA9;
CEA10

Policies Map

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The Plan does not clearly require development proposals to contribute positively to the Local Nature Recovery Strategy, reducing effectiveness and consistency with national policy.

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Insert explicit policy wording requiring development to have regard to and contribute to the Buckinghamshire and Milton Keynes LNRS.

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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.*