

**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

Mrs

First Name

Suzanne

Last Name

Pidgeon

Job Title  
(where relevant)

Technical Director

Organisation  
(where relevant)

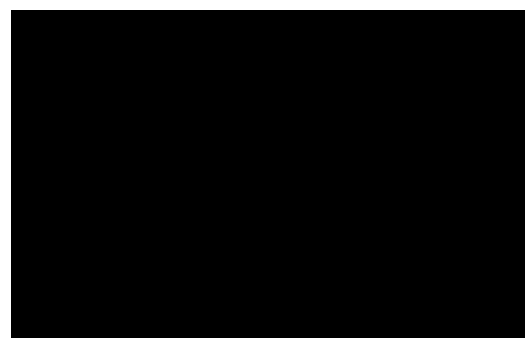
Adams Hendry

E-mail Address

Address Line 1

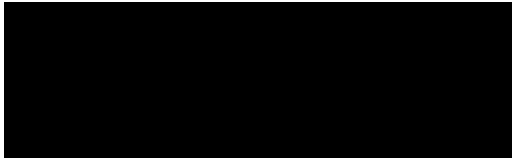
Line 2

Line 3



Line 4

Post Code



Telephone Number

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

Name or Organisation: Suzanne Pidgeon

**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 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.

Within the Proposed Polices Map for Consultation the land identified for Policy GS9 – Supporting transit-orientated development and estate regeneration is drawn such that it extends into the administrative boundary of Buckinghamshire Council.

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.

We would ask that the policy area for Policy GS9 is amended to not include any land that is outside the administrative boundary of Milton Keynes.

***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:

n/a

**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.

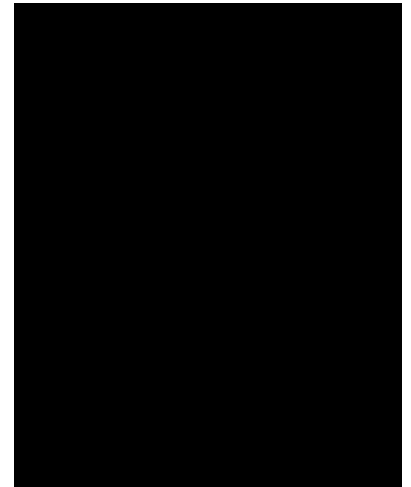
### **Sharing your personal details**

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.*

MK City Plan 2050 Regulation 19 Consultation  
Planning Policy  
Milton Keynes City Council  
Civic  
1 Saxon Gate East  
Central Milton Keynes  
MK9 3EJ



19<sup>th</sup> December 2025

Dear Sir/Madam

**Re: Milton Keynes City Plan 2050 Regulation 19 Consultation – Grand Union Canal Transfer Project**

We are writing on behalf of Affinity Water, Severn Trent and the Canal & River Trust charity (in their capacity as the Project Partners) in respect of the Grand Union Canal Transfer Project (the Project). The Project Partners are jointly responding to the MK City Plan 2050 regulation 19 consultation and, wish to advise Milton Keynes City Council of the Grand Union Canal Transfer Project and the land that will be required temporarily to construct and permanently to implement the Project.

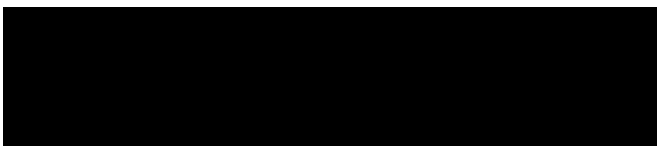
For the avoidance of doubt, this response is provided on behalf of the Project specifically and is separate to any representations which the Project Partners may wish to submit individually to the consultation in respect of their other activities and interests.

**Project Overview**

The Project is a central component of both the Water Resources in the South East (WRSE) Regional Plan and Affinity Water's statutory Water Resources Management Plan 2024 (WRMP24) in supplying water resilience for Affinity Water customers in Hertfordshire and North West London. It is also part of the Regulators' Alliance for Progressing Infrastructure Development's (RAPID) programme of Strategic Resource Options (SROs) to help meet the water needs set out in the Environment Agency's National Framework, that will benefit customers and wider society and help to protect and enhance the environment.

On 1<sup>st</sup> October 2024 the Secretary of State for Environment, Food and Rural Affairs gave a direction under section 35 of the Planning Act 2008 that the Project is to be treated as a development for which development consent is required because it is of national importance. The Project has been registered with the Planning Inspectorate and is listed on the National Infrastructure Project web pages here - <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/WA0210001>

The scheme starts at the Minworth Wastewater Recycling Centre (WwRC) near Birmingham, where water is planned to be transferred via a new pipeline to Atherstone in Warwickshire. It will then begin its journey along the Coventry, Oxford and then the Grand Union canals. The water from Minworth's WwRC is treated recycled water, which would usually be discharged into the River Tame. Under the scheme, some of this recycled water will be diverted to a new Advanced Water Treatment Plant (AWTP) to bring it to the required quality for transfer through the canal and ensure the safeguarding of fish and wildlife is maintained.

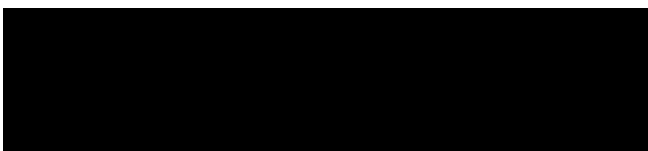


Once it's been transferred through the canal network, the water will be piped from the canal, stored and treated again at a proposed new water treatment works south of Milton Keynes, before being transferred via a new buried pipeline as clean drinking water into Affinity Water's supply network for customers from an existing covered reservoir near Luton.

The Project held its First Phase Public Consultation in September/October 2024 where a number of sites were considered for the treatment and storage of water abstracted from the Grand Union Canal and therefore multiple pipeline routes to Chaul End were also considered in order to supply to Affinity Water customers. The pipeline options included routes through Milton Keynes and Buckinghamshire and Central Bedfordshire are set out in the [Site and Route Evaluation Report September 2024](#). The outcomes from this consultation have been considered alongside further assessment work, which will be presented at the Second Public Consultation, currently planned for February 2026.

Through this ongoing work and analysis, the Project Partners the route of the project have now identified a specific site to abstract water from the Grand Union Canal and on which to locate the water treatment works and water storage elements of the project. This site is located outside of Milton Keynes, within Buckinghamshire, but this decision has allowed the project to confirm where works are potentially needed on the canal and removed optionality in terms of pipeline options, which are relevant to Milton Keynes City Council. The draft Preliminary Development Consent Order limits have been prepared for the purposes of the Second Phase Public Consultation and show the land within Milton Keynes that will be required for the project.

The land needed for the project within Milton Keynes includes the Grand Union Canal, where canal interventions and the associated work areas are needed, and approximately 3km of the proposed pipeline that will connect the new water treatment works to the underground reservoir at Chaul End. For awareness, the current draft preliminary development consent order limits are shown in Figure 1. Currently the draft preliminary development consent order limits include all possible work and non-work areas that will be needed for the delivery of the Project, including some areas where options remain.



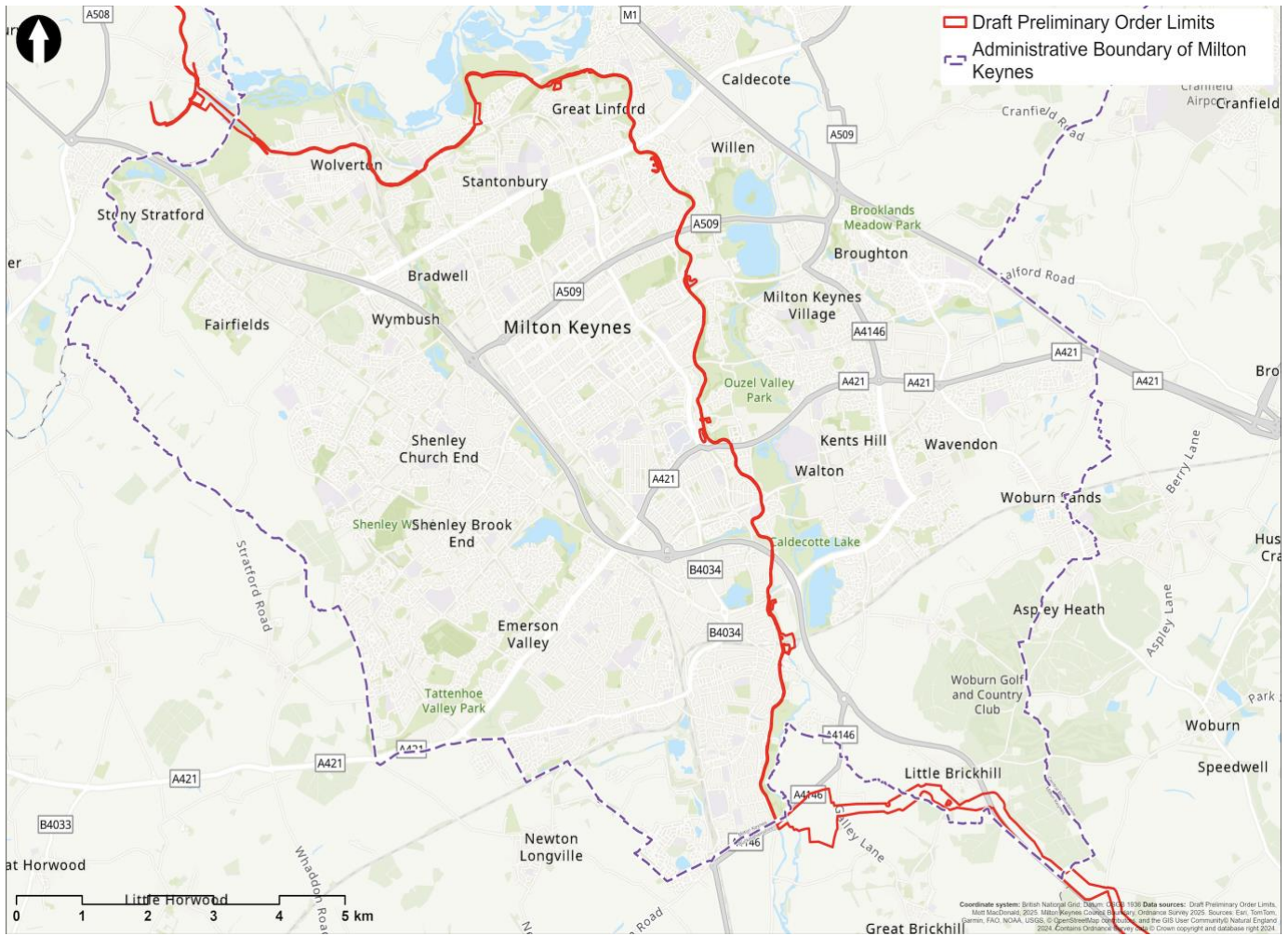


Figure 1 – A map of GUCT Preliminary Development Consent Order limits within Milton Keynes

## Details of the Project within Milton Keynes

### Canal Interventions

In relevant part to Milton Keynes, the project is proposing a ‘works area’ from the River Great Ouse to Marsh Drive, shown in Figure 2. Within this area, there are currently multiple canal interventions considered however, not all will be needed to deliver the Project. The optionality of these interventions will be presented for the phase two public consultation as they will be subject to further assessment work after the consultation is completed.

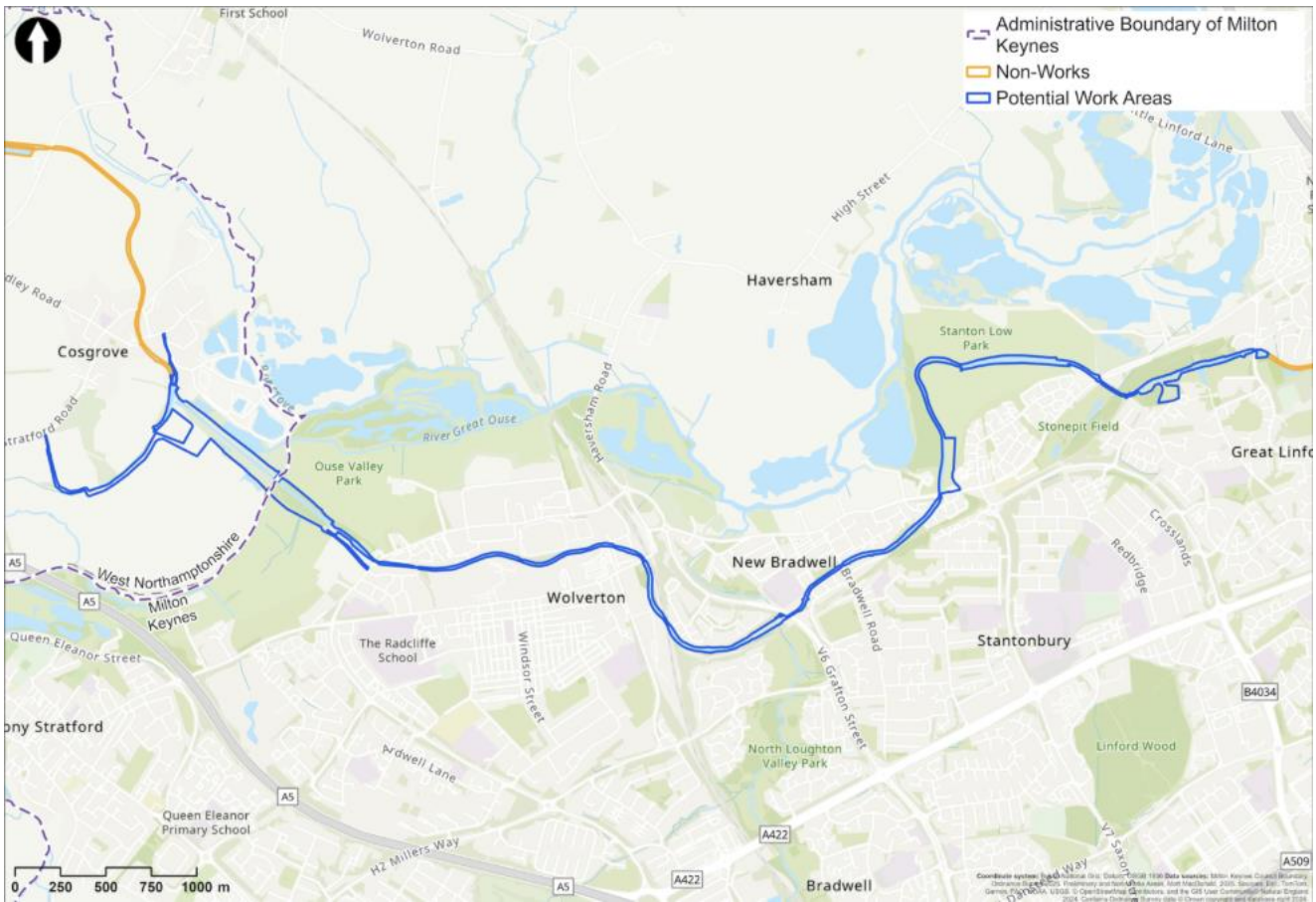
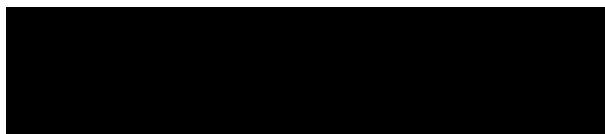


Figure 2: A map showing indicative working area from the Iron Trunk Aqueduct to Marsh Drive

There are other working areas proposed along the canal including at Fenny Stratford Lock (Lock 22), shown in Figure 3, where a pumped bypass is proposed and is required to assist the movement of transferred water around this lock. This canal interventions and others within Milton Keynes still need further assessment work to be conducted and will be consulted upon before the Development Consent Order Limits are confirmed, meaning these working areas are still subject to change and are not final at the time of writing this response.



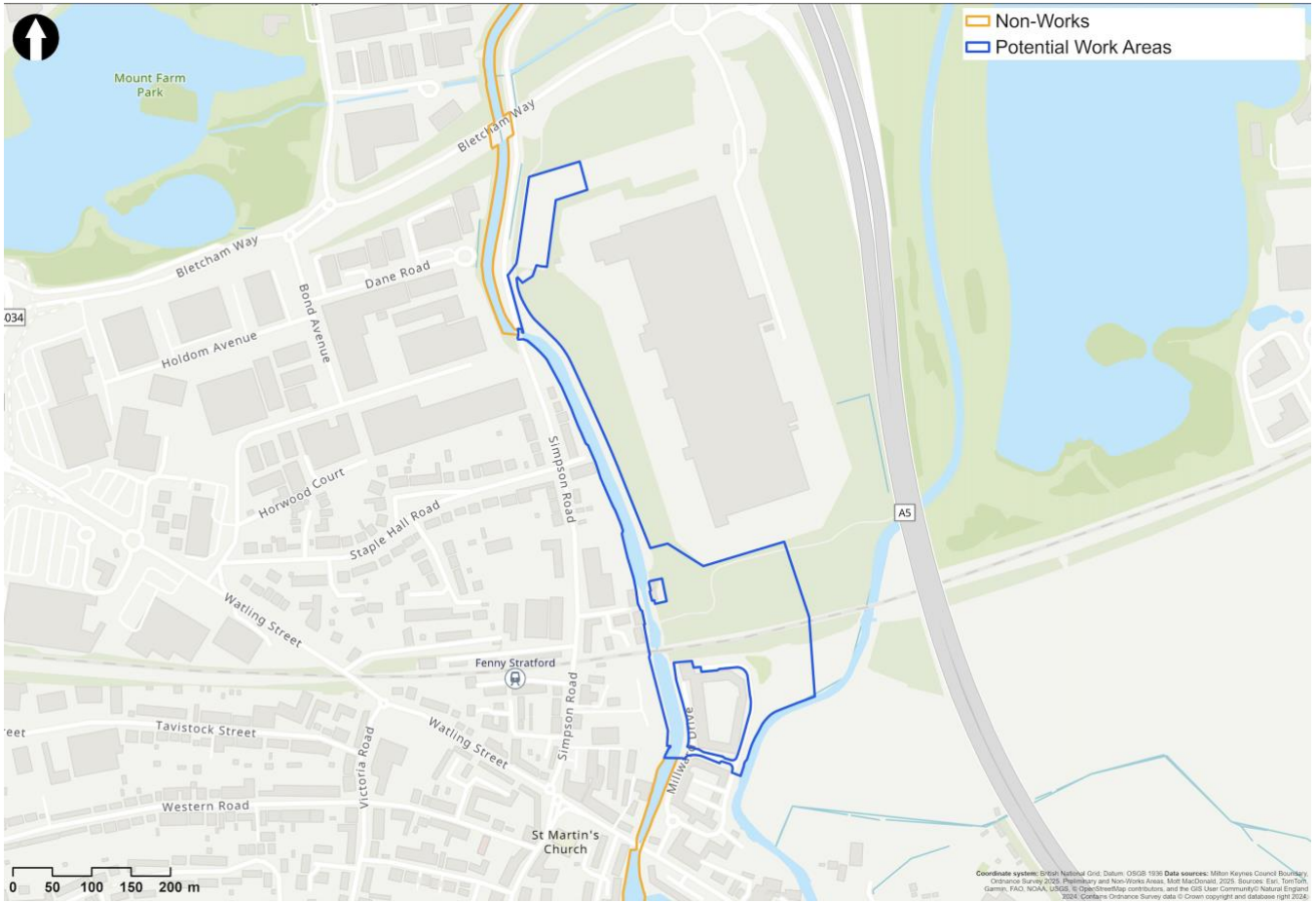


Figure 3 – A map to show the potential work areas near Fenny Stratford, Milton Keynes

***Underground pipeline between the proposed Water Treatment Works and underground storage site at Chaul End***

A 3km section of the proposed pipeline is within Milton Keynes, as shown on Figure 4. The Preliminary Development Consent Order Limits comprise the pipeline corridor which includes the temporary pipeline working area needed to construct the pipeline.

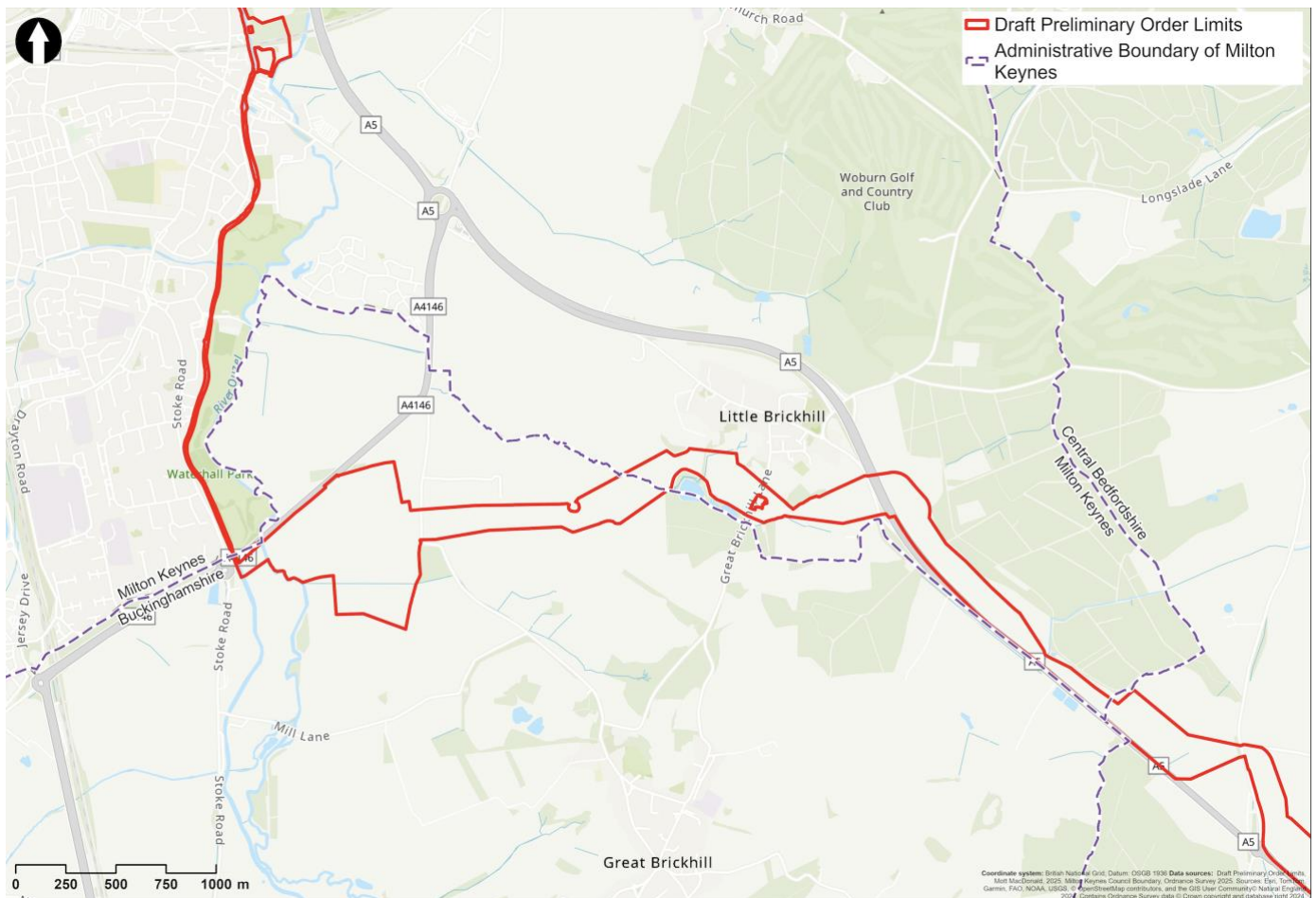


Figure 4 Figure Preliminary Development Consent Order Limits of the southern pipeline route within Milton Keynes

As currently drafted, the land needed to implement the Project does not appear to conflict with any proposed allocations within the Regulation 19 Milton Keynes City Plan 2025. However, it is noted that on the Proposed Policies Maps for Consultation that the land identified in respect of Policy GS9 – Supporting transit-orientated development and estate regeneration is drawn such that it extends into the administrative area of Buckinghamshire Council and overlaps the Preliminary Order limits where it is intended to provide the Water Treatment Works. For the avoidance of doubt, we would ask that this policy area is removed from land outside of the administrative boundary of Milton Keynes City. We have completed a Regulation 19 Consultation Response Form in this regard.

We would welcome a continued dialogue with the Council as the plan progresses towards adoption and we would be happy to provide supporting information, as necessary, to assist the Council.

Yours faithfully



Suzanne Pidgeon  
Technical Director

