This submission has been prepared by PBB primarily to support the Milton Keynes Core Strategy in general and to re-inforce the objective assessments of alternative sites undertaken in the Strategic Site Selection Report (SSSR), in particular as it relates to this village and MKSA8.

This paper is set out to comment on the Matters 1 through 8 of the Guidance Note.

**Summary of why MKSA8 is the worst place in MK to develop housing:**

1. The villagers do not want it.
2. The village has a unique position, visible from most of MK; there are many far less obvious and less important locations in MK, including the SRA’s selected in the Core Strategy.
3. There are huge and possibly insuperable traffic problems on MKSA8. The railway might eventually contribute to non-road transport availability – but would require an uneconomic railway bridge immediately making the whole project financially not viable particularly if affordable housing were intended.
4. The land is primarily high grade agricultural land.
5. There is potential to damage the Area of Attractive Landscape, wildlife, rare species and impact the wildlife conservation area along the railway.
6. The site is not adjacent to nor integrated with the urban area/city.
7. There is a recognised need to maintain open countryside on the edge of the urban area/city.

**1. The village – re: Matters 1 and 2**

The village is largely satisfied that the Core Strategy is the best way forward if the requirement for housing is such as to demand the number of dwellings indicated up to 2026 with 30% of affordable housing.

The village is on the Southern edge of Milton Keynes where a population of some 550 inhabitants have, very largely, come to live here in the last 40 years. That is their choice. It is axiomatic that most
are happy with the village and would respond poorly to a massive development of some ten times the number of dwellings already here.

Neither Fox Strategic Land (for Bellow Hill Consortium) nor FLP (for Bow Brickhill Consortium) have any connection with Bow Brickhill and they have not talked to the Parish Council at any time. Both are owned by Gladman of Congleton, Cheshire. Neither of these consortia is more than a loose agglomeration of land owners and speculative builders. There are resident landowners who have not agreed to join them, thus rejecting the FLP opinion expressed on many occasions that this site posed fewer ownership problems than others.

Furthermore, the village is in the process of revising its Village Plan in order to meet the National Planning Policy Framework criteria for a Neighbourhood Plan. The current Village Plan includes the whole of the Parish and the new one is expected to do the same, thus leaving the two areas proposed by FSL and FLP outside the village envelope which is the currently agreed limit of development. We do not pre-judge the result of the work going on now to produce the Neighbourhood Plan but it seems likely to preclude any major extension of the village envelope.

MK Council has presented plans to redesign the centre of the village to make it more people-oriented and less traffic dominated, thus reinforcing the nature of the village rather than the urban nature of the rest of the City. The Plans have been very well received in the village.

The village is a “Selected Village” in the Core Strategy and a development of 28 new dwellings on a brown field site on the edge of the village has planning consent (thus meeting government directions on the hierarchy for use of land for building) and it is expected that this, together with in-fill will take care of village demand for housing and especially affordable housing foreseeably. There is no clear demand for more than this and if there were, at some time in the future, it would probably be best handled by extending from the village with residents’ agreement and as required.

The Core Strategy MKSA8 assessment suggests that a development would be able to support a Primary School but not a Secondary School. The village already has a Church of England school rated by OFSTED as “Good” and whose results are in the top ten per cent of Primary Schools nationally.

The village has little or no crime, except for motoring offences.

It is thus difficult to see how a large housing development might “improve sustainability for the existing community” as Fox suggests in 3.2.2 of their post-submission commentary.

2. Unique Location – Matters 3 and 4

The Core Strategy looks to the urban area/city as a focus for development. The Core Strategy expects the Urban area/city to provide 26,250 houses up to 2026 while the Rural area is expected to provide 1,750. There is thus no need to identify further housing land in the Rural Area. The
proposed development is in the Rural area and south of the railway line which also makes a suitable and defensible edge to the Urban area/city.

We are not competent to comment further on the Matters 3 and 4 to any extent except to state that we think the proposals put forward by Fox for MKSA8 are fanciful. For example, they started out including all the land adjoining Woburn Sands, but reflecting on coalescence perhaps, withdrew that area but retained the same number of projected dwellings. Presumably, to meet the wished-for numbers in any one location but having to increase the density as a result.

The Area of Attractive Landscape adjoins the MKSA8 site and would restrict development. The proposed site is an important backdrop to the AAL and an essential part of its attraction for recreation. The site itself is crossed by bridleways and footpaths which allow residents of adjoining areas of MK to access the AAL without using vehicles.

There are only two AAL in Milton Keynes and to reduce the attractiveness of either by building up to their very edge would be regretted by all succeeding generations when there are – as shown in all previous objective assessments and this one – much less damaging sites for development.

While we would take issue with some details of the Council’s SSSR commentary on MKSA8, and indeed on the process of calling for proposals for new areas to come forward after the plan had been completed, PBB does not dispute the general thrust of the Core Strategy selection of the SRA’s for development.

3. Traffic Problems – Matter 5

The unrated road between Woburn Sands and Bow Brickhill carries up to 9,000 vehicle movements per day. This is more than many A-rated roads in the area. This number is augmented in Bow Brickhill by another 400 (approx) per day, many “rat-running” down the single track roads through the AAL from Woburn and from the A5 before reaching the rush-hour traffic jams on the five-way roundabout entering Milton Keynes.

All 9,000 vehicles use the residential “Leys” or “Theydon Avenue” in Woburn Sands. This causes air pollution, road traffic danger, noise pollution and environmental damage. As the assessment notes any development of MKSA8 would require a bridge over the railway so that it did not add to an already very poor road environment.

The consortia think wishfully it would cost £6.5 m. to build such a bridge. They fail to explain whether that is to cross the existing single track branch line or the proposed fast electric mainline. The latter would be needed if the E-W railway were to be built and produce the hoped-for benefit of an alternative system of transport. They do not expose the source of their “estimate” which we believe should be about £20m. – i.e an on-cost of about £8,000 per dwelling. As the MK Tariff is approx. £22,000 per dwelling, it would seem to make the provision of “affordable housing” on this site very difficult and certainly uncompetitive with other sites.

**No other proposed site has such a cost associated with it.**
5. High Quality land - Matter 7 and Matter 8

Again the consortia wishfully suppose that the land is unexceptional but it is mostly Grade 2 and 3A, gently sloped and easily cultivated. Government has made it clear that such land was to be avoided where possible. The land currently provides excellent grazing and some arable production. Grazing in the area is important because of the glorious rides in the AAL on ancient Bridleways and Byways leading to demand for horses to be stabled in the village with a direct route into the woods.

It should be noted that MKSA8 slopes down to the North making it less efficient in utilising natural warming and reducing any Carbon Off-set (7.5).

The land is watered by the numerous springs and natural watercourses arising on the Greensand Ridge and finding their way to the Tilbrook which joins the Ousel not far away.

A recent survey of wild life on the ridge found many rare and interesting species and the wildlife conservation area follows the railway line along the border with Milton Keynes. The railway line is a strong and defensible boundary to the City and should not be breached unless it becomes absolutely necessary at some time in the distant future.

We have discussed issues relating to the exceptional problem of providing adequate road infrastructure on this site in 3. A bove, but there are many other issues, such as flood risk downstream at Caldecotte, access to the site from existing roads using level crossings at Bow Brickhill and Woburn Sands, coalescence between Bow Brickhill and Milton Keynes, secondary education provision and so on. All of these are understood by the writers of the Core Strategy but down-rated by Fox in their self-admittedly “subjective assessment” of the site – item 3.2 of their post-submission comments.

We commend the Core Strategy to the Inspector.

P.A.Lousada, Chairman, Preserve Bow Brickhill

An organisation formed by the public to preserve Bow Brickhill from inappropriate development