

Jack Pope

From: Andrew McHugh <[REDACTED]>
Sent: 18 December 2025 14:08
To: NCP Engagement
Subject: Regulation 19 Representation - MK City Plan 2050 (Milton Keynes East Extension)

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Dear Milton Keynes City Plan Team,

I am writing to submit my representation regarding the MK City Plan 2050 Regulation 19 Proposed Submission. My objection specifically concerns the proposed or implied use of Broughton Grounds Lane for construction and development traffic for the Milton Keynes East expansion.

As a tenant on Broughton Grounds Business Park, I am concerned that Broughton Grounds Lane is possibly going to be used for access and egress by construction traffic and early residents of the Milton Keynes East Extension development, causing untold safety issues, significant congestion, delays, mud on the road etc. all of which will be very harmful to our business and to other businesses at the Business Park and for the reasons further below, if construction traffic and early residents are allowed to use Broughton Grounds Lane even during an early phase of the development it would then fail the "Tests of Soundness" as it fails to provide a sustainable transport solution for the construction and early development phase.

Puts existing infrastructure at risk, because of the unknown Structural Integrity of the Lane.

It also fails on the Planning Policy Framework which requires safe and suitable access for all users and as part of Broughton Grounds Lane is Public Footpath is not safe by mixing HGV with pedestrians using the Lane to access that part which is Public footpath, in your own City Plan 2050 for MK promotes "Active Travel." Heavy construction traffic on this lane directly contradicts the council's own goals for pedestrian safety. If the Lane is used for construction traffic, the dangerous mix will likely "sever" the existing community in Broughton and Brooklands from the open countryside, creating a barrier of noise, pollution and danger.

The Plan lacks clarity and is therefore Unsound, as it fails to explicitly protect Broughton Grounds Lane from inappropriate construction traffic.

Based on public planning and consultation documents, Hallams' strategy for the Keepers Place development located east of the M1 at Broughton/Brooklands, proposes the use of Broughton Grounds Lane as an access haul route for construction vehicles as part of the construction-phase, along with access for around the first 500 to 700 new homes, all of which could take a good number of years before alternative routes open.

The lane currently only serves as the access to local agricultural land, a small number of residential properties at Far Lawrence and Broughton Grounds Business Park, resulting in low baseline traffic flows.

Broughton Grounds Lane is a narrow rural road with limited passing opportunities, no formal footways, and sections bordered by soft verges that are susceptible to edge deterioration under heavy vehicle loading.

The introduction of HGV and construction-related movements, as well as those from the new homes, along Broughton Grounds Lane would represent a material intensification of use, creating risks of serious congestion, in particular the built up area on Broughton Grounds Lane especially at the entrance where it is already congested during the times when parents are dropping off and picking up children from the school, with further congestion on Fen Street and the M1 Round About, verge damage, conflict with existing vehicle road users and other members of the public from Broughton and Brooklands, who use Broughton Grounds Lane for walks, they walk over the M1 bridge to gain access to the footpath on Broughton Grounds Lane and beyond or the residents of Far Lawrence who walk the other way if they wish to walk to the play area/park at Brooklands Meadow, use public transport or the local shops, also extreme danger to children crossing the

road from the residential houses, and further afield, that lie south of the Lane, to gain access to the play/park area and the unacceptable impacts on residential amenity and road safety. Sightlines at bends and junctions are constrained, and the carriageway width, especially over the bridge, is insufficient to reliably and safely accommodate two-way HGV movements.

The lane, along with that part which is public footpath, should not be considered suitable as a primary or secondary construction traffic route and the development should be delayed until such time as the designated major link routes from the already newly established roads to the North of the site in the MKE Development have been constructed so as to safely accommodate heavy vehicle movements and increased traffic flow to and from the Keepers Place development.

In Summary

I consider the Plan to be Unsound and Not Legally Compliant based on the following:

1. Failure to meet the "Justified" Test (Policy SD12 & Infrastructure Delivery Plan)
The plan is not the most appropriate for heavy construction traffic and is not justified when strategic alternatives routes will become available when the proposed link road from the existing MKE Development abuts the Hallam Land .
2. Failure to meet the "Effective" Test (Policy CT2 - Movement and Connectivity)
3. The evidence base fails to prove that this lane can structurally or safely handle the predicted HGV load.
4. Failure to meet the "Tests of Soundness"
5. Failure to meet the Planning Policy Framework
6. The likely severance of the existing community in Broughton and Brooklands from the open countryside, creating a barrier of noise, pollution and danger.

I request that the policy for Milton Keynes East (SD12) and/or the Milton Keynes East Extension (SD12) be modified to include a Construction Traffic Management Plan (CTMP) requirement that explicitly excludes Broughton Grounds Lane as an access route for all construction traffic.

I wish to be notified of the progress of the Plan and I would like to participate in the oral part of the examination if a hearing is held.

Full Name: Andrew McHugh
Address: Unit 21
Broughton Grounds Business Park
Broughton Grounds Lane
Newport Pagnell
MK16 0HZ

Please provide a receipt and a reference number regarding my Regulation 19 Representation - MK City Plan 2050 (Milton Keynes East Extension)

Regards,

Andrew McHugh




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