



9 February 2026

Regulation 19 Response Team
Development Plans,
Milton Keynes City Council,
Civic Offices,
1 Saxon Gate East,
Milton Keynes MK9 3EJ

Dear Sirs

Regulation 19 Response

I write as ward member for Danesborouh and Walton which includes the parishes of Bow Brickhill and Little Brickhill in response to the Regulation 19 consultation.

I have serious concerns reading the inclusion of land south od Brickhill and Levante Gare in Little Brickhill which I think can be strongly questioned and opposed at this stage where ethe evidence base and the processes followed by MK City Council can be called into question.

I trust these responses will be forwarded to the Planning Inspector and would hope to get be granted the time and opportunity to present these observations and concerns when the Plan MK2050 is *Examined in Public* later in 2026.

Yours sincerely



Cllr. David Hopkins
Mayor of Woburn Sands and ...
Representing Wavendon including Eagle Farm South and Glebe
Farm, Woburn Sands, Bow Brickhill and Little Brickhill at MK
City Council

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Response to MK City Council MK2050 Local Plan Regulation 19 Consultation

I wish to respond to the city council proposals for development proposal policy GS17 South of Bow Brickhill and GS18 Levante Gate impacting our local community. In addition, impacts of MK City Council policy GS23, the further expansion of the Caldecotte South warehouse employment site. I sit as a city council ward member for Danesborough & Walton, the area includes Little Brickhill and Bow Brickhill.

Overall

This relates to my representation to the Regulation 19 consultation, specifically in relation to Policies GS17, GS18 and GS 23 – land South of Bow Brickhill and Levante Gate Strategic City Extensions plus policy GD23 South Caldecotte Employment site. Regarding the detail contained within this policy, I do not consider the emerging Local Plan to be sound, based on the tests contained in the NPPF. In this regard I consider that the Local Plan cannot be adopted in its current form.

More specifically, I do not consider that the South of Bow Brickhill and Levante Gate allocation has been properly justified with the Council seemingly ignoring or giving undue weight to much of the relevant evidence contained in the Sustainability Appraisal and related documents, particularly the Council commissioned landscape focused reports.

Cllr David Hopkins further considers that the City Council has not properly explored Reasonable Alternatives, with the choices made resulting in unsustainable forms of development that simply won't be deliverable within the timeframe of the Local Plan. Furthermore, Cllr Hopkins has serious concerns relating to the effectiveness of the draft Local Plan in bringing forward sustainable development.

Local Parish Councils submitted detailed representations in respect of the 2024 Regulation 18 consultation, addressing the above points, but appear not to have received acknowledgment or responses to the objections made at that time. I therefore consider that Policies GS17, GS18 and GS23 are not sound being inconsistent with the conclusions of the City Council's own evidence base, which has largely been ignored, and the aims and objectives of the NPPF.

Landscape Impact

The robust and compelling evidence base relating to the importance of the site and wider area, in landscape terms, has been well documented albeit ignored by the Council. The former Area of Attractive Landscape Value, within the Milton Keynes border, included land between Station Road, Bow Brickhill and the A5 as well as land south of the A5, to the east of the A4146, sensibly incorporating the area covered by the draft allocation.

As part of the City Council's evidence base, the Central Bedfordshire Landscape Character Assessment 2016 provides an important overview of this character type, which the Character Assessment confirms as spreading across the Central Bedfordshire and Milton Keynes borders. The document correctly states that the settlement character is closely linked to that of the Greensand Ridge, with the strong agricultural feel, evident in surviving historic field boundaries, farmsteads and agricultural buildings, further linking this area to the character of the Greensand Ridge. The assessment goes on to state that this effectively acts as a clear buffer zone between the ridge and more suburban development beyond. The Greensand Ridge and the lower field patterns therefore form a key part of its overall landscape character and value.

The 2016 Landscape Character Assessment further identifies the Special Landscape Area as a priority for areas in which landscape character is at risk of erosion, with the following threats being identified:

- Development pressure from urban areas creating a spread of suburbanisation at the foot of the scarp and potential coalescence of distinct village settlements; (our underlining)
- Loss of tranquillity through increased noise and pollution
- Loss of views to distinctive local landmarks through increased tree cover, which will attempt to buffer new development, in historically open areas.

It is hoped that the Inspector will recognise that development at Levante Gate and land South of Bow Brickhill will destroy the above established landscape qualities that have historically led to the previous Area of Attractive Landscape designation (AAL) as well as the proposed Special Landscape Area (SLA) designation.

I note that in the MK City Council's Review of Local Landscape Designations in May 2024, the existing landscape designations were reassessed, including the Area of Attractive Landscape designation at Land south of Bow Brickhill and Levante Gate, falling within the Brickhill Greensand Ridge which is described in the review as a distinctive feature, creating a strong sense of place, as follows:

"A highly distinctive landscape which forms part of a wider ridge extending beyond Milton Keynes. The steep escarpment which rises to a woodland plateau is distinctive in its geology, topography and its strong visual character as a wooded backdrop to Milton Keynes city. The patchwork of pastoral and arable fields on the lower slopes also creates a strong sense of place".

In terms of the report's Evaluation, the area is proposed for designation as an SLA in the emerging Development Plan, with the supporting text stating:

"The land south of the A5 is recommended to be retained in the candidate SLA. Although the A5 cuts through the ridge and is a modern influence on the landscape, the village of Little Brickhill, which is located immediately south of the trunk road, provides some depth and scenic quality to the landscape.

The proposed boundaries of the candidate SLA follow Bow Brickhill Road, Brickhill Road and the A4146 to include the shallower slopes of the ridge due to their importance as a rural setting to the wider ridgeline".

The report goes on to describe important characteristics of the area that should be retained:

- A relatively remote elevated area, with long distance views from the edge over MK City and the rest of the Borough. The wooded ridge forms a distinctive backdrop for views across the Borough and provides a unique setting to MK City.
- Open agricultural fields on the shallower slopes are an important factor.
- Limited development on the ridge and lower slopes is a key feature.

The report observes that the proximity to warehousing on Brickhill Road and residential development at Eaton Leys, and the associated A4146 and A5, reduces tranquillity and a sense of remoteness in parts. Further development at Levante Gate and Bow Brickhill would further exacerbate this.

The report further identifies future development pressures that will result in the encroachment of development into views across the valley. The advice to the City Council, in terms of their future development management regime, is fully endorsed by the two Parish Council's as follows:

- to maintain the general absence of development in the area, retaining the primary uses for agriculture and forestry; (our underlining)
- ensure that the long-term panoramic views across the valleys are retained and promoted.

These special landscape qualities are therefore important and numerous and should not be eroded at the expense of meeting aspirational housing numbers that can better be accommodated elsewhere. As documented, the Levante Gate site therefore forms part of the setting to the woodland ridge and Little Brickhill village. Likewise, the land south of Bow Brickhill. Once destroyed the substantial damage caused will be irreversible.

The City Council's approach is contrary to policy contained within the National Planning Policy Framework which, at paragraph 180, states that planning policies and decisions should contribute to and enhance the natural local environment by protecting and enhancing valued landscapes. Little Brickhill Parish Council and Bow Brickhill Parish Council considers that the proposed allocations of GS 18 and GS 17 have not therefore been properly justified in landscape terms and that the above landscape issues should be considered in more detail and the evidence base revisited. It is never enough to simply state that a landscape led scheme will properly address the significant environmental harm that will inevitably occur from new development.

Sustainability Appraisal

As documented in the City Council's Sustainability Appraisal, the South of Bow Brickhill and Levante Gate draft allocations do not perform well against the objectives set out. I consider this to be another significant factor that contributes to the allocation of the site being unjustified and unsound. Little Brickhill Parish Council, Bow Brickhill Parish Council and local residents are at a loss to understand why this key evidence has been ignored by the Council when there are more suitable alternatives available.

As the City Council have observed themselves, throughout the Local Plan review process, the Land south of Bow Brickhill and Levante Gate sites fall within open countryside and are isolated, being situated away from Milton Keynes and the established grid system and Redway network. Furthermore, there is poor connectivity across the A5 and the already busy A4146, with walking and cycling routes being limited. The proposed Mass Rapid Transport system won't reach Levante Gate nor land South of Bow Brickhill with a key issue being the provision of suitable alternative transport infrastructure to enable the site to function.

The Parish Council consider that addressing the provision and maintenance burden of existing infrastructure, before new development proposals are even considered, will cause a significant barrier to growth and deliverability impacting on the effectiveness of the plan. For example, the A4146 and existing McDonalds roundabout (known as the Kelly's Kitchen Roundabout locally) and associated junctions are currently difficult to navigate and are operating at a stressed capacity resulting in congestion at certain times of the day. Allowing more large-scale development will significantly impact on highway safety and require the development of major new infrastructure before residential development can begin. This will cause delay and raise significant viability issues for any developer.

In my view the proposed scale of development does not have a sufficient critical mass to support the proposed local services and facilities endorsed in the draft Local Plan, resulting in an inevitable reliance on facilities elsewhere. I reiterate that both land South of Bow Brickhill and Levante Gate are remote, unsustainable locations, being entirely contrary to the objectives set out in the Sustainability Appraisal and national planning guidance.

Both Bow Brickhill and Little Brickhill Parish Council's interpretation of how poorly the Levante Gate development performs against the Council's Sustainability objectives, very much mirror the City Council's own interpretation, which has seemingly been ignored.

It is important that the Inspector is made aware of these as follows:

Objective 1: High quality homes and neighbourhoods; healthy places. Climate and environmental action

The site performs poorly being isolated and remote from existing facilities and is unsustainable. Furthermore, the site is not large enough to provide new facilities to encourage walkability, with poor connectivity to existing adjacent areas.

Objective 2: Healthy Places

The sites do not perform well in terms of creating improvements to physical and mental health. Both are greenfield sites which are not well connected to green infrastructure, being surrounded by arable fields. Furthermore, it is questionable whether sites the size of Levante Gate and land south of Bow Brickhill will have the critical mass to support new health facilities in what are peripheral locations.

Objective 3: Climate and environmental action

Neither the land south of Bow Brickhill nor the Levante Gate sites have good connectivity to existing public transport with residents relying on the car as the key mode of travel, leading to unsustainable travel patterns that will create further pressure on the existing highway infrastructure. The proposed Mass Rapid Transport system (MRT) is not intended to serve peripheral locations such as Levante Gate and the Land south of Bow Brickhill, creating the need for better public transport connections that currently don't exist and would be difficult to implement. Bow Brickhill, Fenny Stratford and Bletchley train stations, although relatively close to the Levante Gate site, are characterised by their absence of public transport links and both Fenny Stratford and Bow Brickhill stations are scheduled for closure by the plans put forward for East West Rail.

Objective 4: High quality homes and neighbourhoods; healthy places

Both the land south of Bow Brickhill and the Levante Gate sites again performs poorly against this objective and will not provide the housing mix and affordable housing that is envisaged. Given the location and quantum of development being proposed it is difficult to envisage how quickly the site will come forward. The site does not lend itself to providing 40% affordable housing given its relatively small size, its isolated nature and peripheral location away from community facilities. This would make the provision of affordable housing unviable for most developers with larger sites or sites in more (sub)urban locations, close to existing facilities, being preferable in offering an appropriate mix of dwellings.

Objective 5 - Climate and environmental action; Healthy places.

There will be inevitable noise and air pollution from the busy A5 and A4146 which would be exacerbated with the introduction of new development to an already stressed highway

infrastructure. An example of poor planning which did not take account of road noise being Eagle Farm South, built adjacent to the A421 and M1 in Wavendon Parish and for which a campaign for noise abatement has gained momentum since residents started to move into that area of Milton Keynes.

Objective 6 - Economic and Cultural Prosperity

The land south of Bow Brickhill and the Levante Gate sites have historically been located within the Brickhill SLA, which should rule out any form of strategic development due to landscape impact and loss of views. The Council's observation that housing numbers could potentially be reduced for the site and a "landscape led" approach to development specified, will not mitigate against the substantial landscape impact of development on this area which is characterised by its openness and general absence of development. Furthermore, the site is characterised by the presence of Grade 3 and 4 Agricultural Land across the site, with Grade 3 being protected. Clearly any reduction in the developable area, resulting from a landscape led approach, will also have a significant impact on the delivery of infrastructure and further erode viability.

Objective 7 and 8 - Climate and environmental action

As detailed in the Council's Sustainability Appraisal, developments such as the land south of Bow Brickhill and Levante Gate are required to be delivered in line with water efficiency measures as well as supporting the creation of a zero-waste economy.

Objective 9 - Economic and cultural prosperity

The land south of Bow Brickhill and the Levante Gate sites are not close to a variety of accessible employment areas apart from the recently developed extensive B8 (GS23) development, close or adjacent to the roundabout, which will focus on warehouse and storage provision, requiring a relatively small employment offer. The sites offer poor connectivity to Bletchley and the surrounding area, as well as poor connections to other employment nodes, District Centres and CMK, which in the absence of strong links would typically be reached by car.

Reasonable Alternatives

Sustainability Appraisal Growth Scenarios

Having regard to the evidence base, both Bow Brickhill and Little Brickhill Parish Councils note that the City Council have sought to consider Reasonable Alternatives, in line with the NPPF, to identify a package of sites to meet the growth target contained in the Plan. The Reasonable Alternatives have been tested against the Sustainability Appraisal objectives as a package to meet growth targets and sustainability objectives. I consider the City Council's approach to the consideration of Reasonable Alternatives to be significantly flawed and therefore unsound, with the absence of any sound justification for the choices made.

In terms of the Council's assessment of reasonable alternatives, it is considered that freestanding settlement options should have been considered in more detail as being potentially suitable for development, especially in the light of the current Labour Government's pledge to significantly increase the rate of housebuilding by developing new freestanding settlements, some of which are likely to be concentrated on the M1 corridor. This approach would avoid the need to consider sites such as the land south of Bow Brickhill and the Levante Gate sites that are isolated, constrained and benefit from important landscape designations.

I understand that an authoritative industry research report "Start to Finish", produced by Lichfields in 2020, highlights the benefits of new settlements in terms of their ability to rapidly assemble infrastructure and deliver development quickly in appropriate locations, without the need to focus on overly constrained land or impact on valued landscapes.

The Lichfield research concludes that large sites of over 2,000 units can deliver more homes per year over a longer period, with this seeming to ramp up beyond year five of the development trajectory. I would therefore urge the City Council and the appointed Inspector to consider potential new settlement options in more detail as being an effective strategy to delivering new development on existing brown field sites and transport nodes.

The Council's Reasonable Alternative 1 (RA1), which includes Levante Gate and Bow Brickhill Strategic City Extensions, is expected to deliver 62,825 dwellings by 2050. However, as addressed, the options listed do not perform well when assessed against the Sustainability Appraisal objectives, with the inclusion of Levante Gate and land south of Bow Brickhill having a detrimental impact on the Brickhill's Greensand Ridge SLA.

Both the Bow Brickhill and the Little Brickhill Parish Councils consider it unreasonable to include these sites, as the City Council's preferred option, simply, or so it appears, to enable them to meet the high end of their housing target.

Notwithstanding the need to consider new settlement options, some of the remaining reasonable alternatives listed would deliver an appropriate quantum of development by 2050 without the need to destroy key landscapes or to use sites where there will clearly be land assembly and deliverability issues.

Reasonable Alternative 2 (RA2) removes sites affected by the Special Landscape Area (SLA), including both the Bow Brickhill and Levante Gate sites, with the Council's expected delivery quantum being 59,075 dwellings by 2050. As documented in the Sustainability Appraisal, RA2 scores more positively against the SA framework and is a far more logical alternative, preserving the SLA designation and delivering the appropriate quantum of housing.

Reasonable Alternative 3 (RA3) also removes the sites affected by the SLA, and includes land West of Olney, with the expected delivery of 60,075 dwellings in the plan period. The allocation of strategic development at Olney should result in much needed bypass improvement works to solve the existing congestion problems within the town.

Reasonable Alternative 4 (RA4) is the same as RA1 but removes East of Wavendon and adds West of Olney, with an expected delivery of 60,825 dwellings by 2050. Again, the focus on a more dispersed approach, with development concentrated on Olney, is supported and should be considered by the City Council and appointed Inspector.

It is also noted that the governments list of 12 new town sites (New Towns Commission Report) includes Milton Keynes which would bring into doubt the need to develop the Brickhill sites given likelihood of 60,000 or more new dwellings being constructed in north and east Milton Keynes possibly under a Development Corporation.

In my opinion the City Council's decision to select RA1 as the preferred option is not sound, with the Council's evidence base having been largely ignored in their decision-making process. The other alternatives, that exclude Levante Gate and South of Bow Brickhill, offer more sustainable options that are deliverable, being well connected to existing facilities. These options support walking and

are self-contained, providing mixed use communities that will enable the delivery of new community facilities with good connections to public transport, health facilities and green space.

The City Council's overall aim to concentrate development in the urban area, which has been largely ignored in the detail of the plan, is supported by both Bow Brickhill and Little Brickhill Parish Councils and aligns with Government policy to provide sustainable opportunities for renewal and regeneration, supporting walkable, people friendly, healthy places with less carbon emissions.

Conversely, allowing piecemeal development in rural areas such as south of Bow Brickhill and Levante Gate, will result in further congestion, higher cumulative carbon emissions, the need for significant infrastructure to overcome site constraints, resulting in viability issues and slow delivery. The approach adopted in the Regulation 19 plan is therefore not adequately justified or sound, is contrary to national planning guidance and should be reconsidered before the adoption of the Local Plan.

East -West Rail

The planning powers enjoyed by the East West Rail company will, in effect, trump any planning powers resulting from the adopted Local Plan with the exact alignment of the route, east of Bletchley, currently not fixed. Development of the final route are very likely to result in new roads, bypass routes, bridges and the creation of nearby transport interchange hubs. Whilst the western section is operational, or near operational, the full link from Milton Keynes to Cambridge is not expected until the mid to late 2030's.

This uncertainty throws considerable doubt on any plans MK City Council produce and provides a logical reason to delay the Local Plan process until there is more certainty regarding the future of East West Rail to the east of Bletchley. This major infrastructure project could have significant implications on the allocation of certain sites and their deliverability

Conclusion

For the reasons detailed above, Cllr David Hopkins considers that the Regulation 19 Local Plan, relating to Policies GS17, GS 18 and GS23 – South of Bow Brickhill and Levante Gate Strategic City Extensions and employment extension with the allocation of around 2,800 dwellings and associated infrastructure and community facilities, has not been positively prepared and is not sound or adequately justified. In this respect I would ask the Inspector not to support the adoption of the Local Plan in its current state.

Whilst it is good practice to plan above the OAN figure, to create a buffer, it is vitally important to choose the best sites. Choosing appropriate, unconstrained and deliverable sites is the most important consideration in relation to the current plan, with the opportunity to review the development trajectory within five years after adoption, by which time the political climate may have changed and major infrastructure projects, such as East West Rail, have more certainty.

Cllr Hopkins reiterates that the land South of Bow Brickhill and Levante Gate do not perform well when tested against the SA framework. They do not work as part of a package of sites and won't deliver benefits in combination with other nearby sites that will suffer the same constraints to development in terms of deliverability and viability.

Notwithstanding the many negative aspects of developing on the SLA, smaller sites such as land south of Bow Brickhill and Levante Gate will not bring sufficient growth benefits to overcome the

many landscape concerns, or make landscape led development viable. It will not enable the delivery of sustainable development being contrary to the key aims of the NPPF.

The standalone South of Bow Brickhill and Levante Gate sites therefore both perform poorly against the SA framework, as acknowledged by the City Council. They are both unsound and unsustainable locations and a significant distance from Milton Keynes with Brickhill Street and the A4146 separating the sites from the city, with the closest points of connection being South Caldecotte and Eaton Leys, which are still undeveloped. This standalone and peripheral option won't support significant new services and will destroy a valued landscape, the loss of which will be significant.

With regards to GS23 I also make the case that no further warehousing sites be allocated in MK given the city councils total refusal to allocate land for a lorry (HGV) park with the associated welfare facilities for drivers.

Cllr David Hopkins therefore respectfully requests that Policies GS17, GS18 and GS23 – South of Bow Brickhill and the Levante Gate Strategic City Expansions plus the expansion of the South Caldecotte warehouse (employment) sites be deleted from the emerging plan and that other more sensible options be (re)considered by the Inspector.

Cllr David Hopkins

9 February 2026

