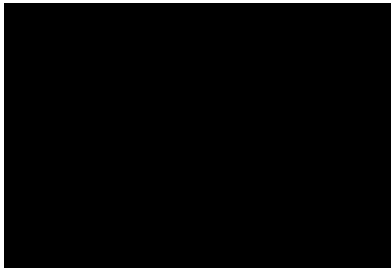


John Mitchell



15/02/2025

To: Planning Policy Team, Milton Keynes City Council

Sent via: ncp.engagement@milton-keynes.gov.uk

RE: Regulation 19 Publication Stage Representation – Milton Keynes City Plan 2050

Site: Extension to East Milton Keynes / Keepers Place Development

Subject: Formal Objection to the use of Broughton Grounds Lane for Construction Traffic

Dear Planning Policy Team,

I am writing to formally submit my representation regarding the Regulation 19 consultation and the Extension to East Milton Keynes / Keepers Place Development.

While I am commenting on the plan as a whole, my specific objection relates to the proposed use of Broughton Grounds Lane as a primary or secondary access route for construction and heavy goods vehicle (HGV) traffic.

I believe the plan in its current form is unsound based on the following ground.

1. Lack of Justification (Suitability of Infrastructure) and Inappropriate Road for Construction Use

Broughton Grounds Lane is a narrow, semi-rural roadway that was never designed to sustain the lorries and construction plant machinery that would arise. Its use for site access would introduce large volumes of HGV traffic onto a lane that lacks the necessary width, is structurally unsuitable, without safety features to support such movements from a development of this scale.

Congestion on Fen Street, Fen street was originally designed to be dual carriageway but has been downgraded due to a shortfall in the Design Code with regard to parking, extra parking had to be added which took up one lane at each side of the carriageway and with the added construction traffic will become heavily congested and somewhat

dangerous due to fact that children use it to access the schools. It currently has a weight limit on it for good reason.

Construction traffic must not be permitted to use an inappropriate minor roadway through a built-up area or rural lanes that are clearly unsuitable for this type of use, when there are alternatives available either now or in the near future.

The Plan is unsound as there is no legal enforcement process in place to ensure the link road, as shown on the plan, and which will provide the "Suitable Infrastructure" necessary, for joining the MK East Expansion/Keepers Place to the M1 J14 to Newport Pagnell development site, so as to provide the long term, appropriate access for residents and businesses.

A "justified" Regulation 19 plan for the Extension of Milton Keynes East/Keepers Place should prioritize the safety of residents, road users and existing businesses and to that end ensure the use of purpose-built roads are constructed to join with the existing recently built roads on the current development between M1 J14 to Newport Pagnell, as the only realistically safe access route for the development of the site. Broughton Grounds Lane used for site access would introduce large volumes of HGV traffic onto a lane that lacks the necessary width, structure, and safety features to support such movements. Will cause damage to road verges, hedgerows, and have a significant detrimental effect on the businesses, which should be protected, at Broughton Grounds Business Park.

2. Safety and Sustainability

The introduction of construction traffic would pose significant risks:

The lane is frequently used by Agricultural and equestrian users, pedestrians, local residents and those accessing Broughton Grounds Industrial Park. Introducing heavy construction traffic creates a significant "highway safety" risk. The Plan 2050 should emphasize the protection of existing businesses, quiet lanes, cycleways and footpaths without proper pedestrian segregation; routing HGVs along this specific route contradicts the Council's own policies on sustainable and safe transport.

Broughton Grounds Lane also includes a children's play area located directly adjacent to the road. This area is used regularly by local families and young children.

The introduction of heavy construction vehicles along this lane would create a significant and serious unacceptable Risk to Child Safety and the physical distance between the road and the play area is insufficient to mitigate the risks of "pedestrian-vehicle conflict."

The presence of large HGVs passing close to a children's play area significantly increases the danger of accidents, reduces visibility, and creates an intimidating and unsafe environment for children and parents.

Under the National Planning Policy Framework (NPPF) and MK City Council's own commitment to healthy communities, developments should promote safe environments. Routing construction traffic past a primary community asset like a playground is a failure of

Broughton Grounds Lane also includes about 1 mile of Single-Track Road, see attached photo, this is also a public footpath and brings HGV and other construction into direct conflict with pedestrians, dog walkers along with the traffic from Broughton Grounds Business Park, which has no other alternative route to access the Park, causing significant safety risk.

Congestion on Fen Street, Fen street was originally designed to be dual carriageway but has been downgraded due to a shortfall in the Design Code with regard to parking, extra parking had to be added which took up one lane at each side of the carriageway and with construction traffic will become heavily congested and somewhat dangerous due to fact that children use it to access the schools, it has currently got a weight limit on it for good reason.

The lack of Effective planning to avoid such safety risks illustrates the Section 19 plan is Unsound. Unless the Plan includes a clear and enforceable restriction preventing the use of Broughton Grounds Lane for construction traffic, it will place a temporary industrial requirement above the safety of the resident population on the Lane and Fen Street, Children crossing the road to access the play area, Children and mothers using the lane to walk to the Schools at the end of the lane, Pedestrians and dog walkers, Traffic from the Business Park and even Horses and riders where the Bridleway crosses the Lane.

3. Impact on the Environmental, Amenity and Local Businesses

The residents of Broughton Grounds Lane, the surrounding Broughton vicinity and in particular the residents East of the M1 will be subject to disproportionate levels of noise, vibration, and air pollution and suffer from delays and mud on the road This is particularly concerning given the duration of a development of this scale. The plan fails to demonstrate that all alternative access route, specifically those that could be connected directly to the purpose-built roads from the current development between M1 J14 to Newport Pagnell have been fully exhausted.

It would also have a direct and unacceptable impact on the businesses at Broughton Grounds Business Park during the many years they are likely to be using Broughton Grounds Lane as access, also Keepers place current development plan shows the

eventual route of access to the Business Park passing through the area designated as a Local Centre and a New School which will also constitute a serious safety concern after they have been developed.

To allow construction to be delivered each side of Broughton Grounds Lane, only a single manned crossing must be allowed,

4. Proposed Modification to The Regulation 19 Plan

To make the plan sound, I propose the following modification:

The plan must include the ability for the planning authority to legally enforce any proposed development to comply with the authority's own design requirements for the development of any larger site plan, to include link roads, utilities and other infrastructure. *As an example, with Keepers Place Development, I believe if such provisions are not enforced now, it could be that the proposed link road on the plan joining the M1 J14 to Newport Pagnell development site to the Keepers Place Site, which provides the long term appropriate access for residents and businesses, might never be built due to conflict of interest between the two developers and Broughton Grounds Lane then becomes the inappropriate permanent access.*

The Plan must prohibit construction traffic using in any way Public Footpaths and Bridleways, whether they have a tarmac surface or not. *As an example "with the development site of Keepers Place, **strict prohibition of construction traffic along that part of Broughton Grounds Lane that is single track road and also Public Footpath**"*

The Plan must prohibit construction traffic using unsuitable country lanes that has been the transport route for farms, rural residents and businesses for many years. So that the safety issues mentioned above are eliminated and also for the protection of the rural residents and local businesses. *As an example, with the development site of Keepers Place, **the strict prohibition of construction traffic on Broughton Grounds Lane**, allowing only one single maned crossing if necessary to meet the terms of the Authorities overall plan, and so that the safety issues mentioned above are eliminated and also for the protection of the rural residents and local businesses.*

The plan must ensure that any planning permission prevents schools, play areas and local centres being built near any transportation route that carries Heavy Goods Vehicles.

The Plan must ensure that any planning permission require the developers to produce a detailed and enforceable Construction Traffic Management Plan, part of which must require all construction traffic to only use an approved primary access route and to install wheel washing equipment wherever appropriate, to prevent mud on road crossings etc, which must be in place before any works commence.

Conclusion

For the reasons outlined above the plan is Unsound, I strongly object to the Regulation 19 proposals unless the Plan includes a clear and enforceable restriction preventing the use of Broughton Grounds Lane for construction traffic associated for the Milton Keynes East expansion and Keppers Place development, other than allowing one maned road crossing to allow development each side and the implementation of the other points in number 4

I request that this representation is taken into full consideration and that the Plan is amended accordingly.

A petition that has gained 1000 or so signatures objecting to the use of Broughton Ground Lane for access to the development Keepers Place showing significant Community Strength and feeling.

I request to be notified of the progress of the Local Plan and would like to be kept informed of any public examinations regarding this allocation.

Yours faithfully,

John S Mitchell