

Jack Pope

From: Martin Lawless [REDACTED]
Sent: 14 February 2026 21:32
To: NCP Engagement
Subject: Milton Keynes City Council Proposed Submission (Regulation 19) - MK City Plan 2050 - Levante Gate Allocation

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I write in response to the Regulation 19 consultation on the MK City Plan 2050 Proposed Submission version. This representation relates specifically to whether the Plan is legally compliant, satisfies the Duty to Cooperate, and is sound in respect of the proposed Levante Gate allocation.

Having reviewed the Plan and its supporting evidence, I consider that the Levante Gate allocation is not sound and is not legally compliant for the reasons set out below.

Soundness - Not Justified Against Reasonable Alternatives

The Plan is not justified in respect of the Levante Gate allocation because it has not demonstrated, through proportionate and transparent evidence, that the site has been selected against a robust and comparative assessment of reasonable alternatives, as required by national policy and plan-making regulations.

In particular, there appears to be insufficient assessment of reasonable alternative spatial growth options to the east of Milton Keynes beyond the M1 corridor, where there is a potentially workable and deliverable expansion area. National policy requires that plan preparation includes proper consideration and appraisal of reasonable alternatives. The evidence presented does not demonstrate that such alternatives have been evaluated on a like-for-like basis in terms of environmental constraints, infrastructure deliverability, landscape impact, and long-term growth strategy.

Without a clear comparative alternatives assessment, the selection of Levante Gate cannot be demonstrated to be justified.

Soundness - Not Consistent with National Policy

The allocation is not consistent with national policy requirements to direct development toward land of least environmental and amenity value and to avoid or minimise significant adverse environmental effects where reasonable alternatives exist.

Available evidence indicates that the Levante Gate location raises substantial environmental and amenity sensitivity issues, including landscape, ecological network, and cumulative growth pressures in this sector. The Plan does not clearly demonstrate that less sensitive or lower-impact alternatives have been ruled out through proportionate evidence.

National policy also requires that allocations are supported by clear and deliverable infrastructure and mitigation mechanisms. The current Plan documentation does not provide sufficiently specific or secured delivery mechanisms, infrastructure triggers, or mitigation frameworks to demonstrate that development at Levante Gate would be effective and deliverable within the plan period without unacceptable impacts.

Soundness - Not Effective

For an allocation to be sound it must be effective, deliverable, and based on effective joint working and infrastructure planning. The Levante Gate allocation is not supported by sufficiently detailed, secured, and phased infrastructure delivery mechanisms. There is insufficient clarity regarding transport mitigation, environmental safeguards, and delivery dependencies. As presented, the allocation relies too heavily on future resolution rather than demonstrated delivery pathways.

Legal Compliance - Reasonable Alternatives and Evidence Base

Legal compliance requires that the Plan is prepared with a proportionate evidence base and includes proper consideration of reasonable alternatives through the sustainability appraisal and site selection process. The documentation does not demonstrate that reasonable alternative strategic growth locations - including expansion east of the city beyond the M1 - have been adequately assessed and compared using consistent criteria.

As such, the legal requirement to assess reasonable alternatives is not satisfactorily evidenced in respect of this allocation.

Duty to Cooperate

Given the cross-boundary implications of strategic growth locations around the eastern and south-eastern edge of Milton Keynes, including transport, environmental networks, and cumulative development pressures affecting neighbouring authority areas, it is not clear that the Duty to Cooperate has been adequately and transparently

demonstrated in relation to this allocation. The Plan does not clearly show how strategic alternatives involving cross-boundary growth options have been jointly explored and assessed.

Conclusion

For the reasons set out above, I consider that the Levante Gate allocation is:

- not justified against reasonable alternatives
- not consistent with national policy requirements
- not supported by proportionate comparative evidence
- not demonstrated to be effective and deliverable
- not legally compliant in respect of alternatives assessment
- not clearly supported by demonstrated Duty to Cooperate engagement

Accordingly, I request that the allocation is reconsidered and removed or subject to further alternatives testing and evidence before submission.

Thank you for considering these representations.

Yours faithfully,

Martin Lawless