

**Name of the Local Plan to which this representation relates:**

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 16<sup>th</sup> February 2026** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at [ncp.engagement@milton-keynes.gov.uk](mailto:ncp.engagement@milton-keynes.gov.uk)

This form has two parts –

**Part A** – Personal Details: need only be completed once.

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A**

**1. Personal Details\***

**2. Agent's Details (if applicable)**

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
First Name	Paul	
Last Name	Simpson	
Job Title (where relevant)	Chair	
Organisation (where relevant)	BRAID	
E-mail Address		
Address Line 1		
Line 2		
Line 3		
Line 4		

Post Code



Telephone Number

**Part B – Please use a separate sheet for each representation**

Name or Organisation: BRAID

**3. To which part of the Local Plan does this representation relate?**

Paragraph

Policy

Policies Map

Fig 4 Page 68

**4. Do you consider the Local Plan is: (Please tick as appropriate)**

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the Duty to co-operate

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Milton Keynes City Plan 2050 – Regulation 19 Consultation

Please find below BRAID’s representation to the Regulation 19 consultation, specifically in relation to Policy GS18 – Levante Gate Strategic City Extension. Regarding the detail contained within this policy, BRAID does not consider that the emerging Local Plan is sound, based on the tests contained in the NPPF, and cannot be adopted in its current form.

BRAID does not consider that the 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. BRAID considers that Reasonable Alternatives would be better choices and result in a more sustainable Plan 2050 consistent with the Council’s own objectives, guidelines and appraisals.

We therefore consider that Policy GS18 is not sound, being inconsistent with the conclusions of the City Council's own evidence base and the aims and objectives of the NPPF.

## **Background**

### *2017 Planning Application (Ref: 17/03233/OUT)*

By way of background, the appointed Local Plan Inspector should be made aware of a previous planning application that was refused, for a more modest 500 dwelling residential scheme, on the Levante Gate site in 2017. Application Ref: 17/03233/OUT, also included the provision of open space, Local Centre and primary school and was strongly objected to by the Parish Council and residents. The planning application was refused by the City Council on the basis that the site is located outside of the settlement boundary of Milton Keynes, falling within land designated as 'Open Countryside' and in an Area of Attractive Landscape, as designated in the extant Plan:MK.

It was considered that, given the location of the proposed development and recognising the intrinsic character and beauty of the area, the proposal would represent an intrusive form of development in the open countryside, having an "urbanising" effect and detracting from the open, rural character of the locality and wider surrounding countryside, contrary to the environmental aims of the adopted Local Plan.

Although planning policy has evolved since 2017 the site has always benefitted from the AAL designation and the proposed Brickhill's Special Landscape Area (SLA) designation. Indeed, the conclusions and advice, contained within the Local Plan evidence base, is that the landscape protection should remain given the contribution of the site to the visual qualities of the wider area and ridge. The logic behind the 2017 refusal is still relevant in relation to the significantly larger site promoted through Policy GS18 and has, in many ways, been validated by the more recent evidence base relating to the Local Plan. Having carried out the detailed appraisals the City Council has then ignored its own recommendations.

It would therefore be illogical and detrimental to allow a new allocation, for a far denser form of development, in this location effectively destroying the setting of this key approach to Milton Keynes.

We consider that the combination of developing land to the South of Bow Brickhill, which also rightly falls within the SLA, together with Levante Gate, will effectively destroy the area in environmental and landscape terms. Neither of these sites represent good sustainable opportunities for development and are not sites that should be considered to meet the Council's need and vision for growth. There are better, more sustainable and less impactful alternatives.

Furthermore, the Reg 19 Local Plan's requirement for a "landscape led" approach to development at Levante Gate, fully informed and shaped by appropriate landscape surveys and impact assessments, is no more than a token gesture. It will not be possible to provide an effective landscape solution, in this location, for such a dense form of development. As

identified in many of the Council's landscape focused evidence base documents, a key feature of the area is the lack of any development and its openness. To allow any form of development in this area will destroy this key characteristic.

BRAID endorses the reasons for the refusal of Application Ref: 17/03233/OUT and considers they are still relevant but have not been given sufficient weight in the preparation of Plan 2050.

### **Landscape Impact**

The robust and compelling evidence base relating to the importance of the 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 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.

We note that in the Council's *Review of Local Landscape Designations in May 2024*, the existing landscape designations were reassessed, including the Area of Attractive Landscape designation at 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. The text supporting the evaluation 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. (our underlining)*

*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 onto 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 Parish Council 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. As documented, the Levante Gate site therefore forms part of the setting to the woodland ridge and Little Brickhill village. 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. BRAID considers that the proposed allocation GS 18, has 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 not enough to 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 Levante Gate draft allocation does not perform well against the objectives set out. We consider this to be another significant factor that contributes to the allocation of the site being unjustified and unsound. BRAID is 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 Levante Gate site falls within open countryside and is 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 with a key issue being the provision of suitable alternative transport infrastructure to enable the site to function.

BRAID considers that the cumulative effect of existing, recent and proposed developments on infrastructure have not been sufficiently considered. For example, the A4146 and existing McDonalds roundabout 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 pollution and require the development of major new infrastructure before residential development can begin. This will raise significant viability issues for any developer.

By way of evidence the planning consent for the development known as Woburn Downs, adjacent to the Levante Gate site, included community and infrastructure facilities, none of which were provided in the finished scheme as the developer considered them not to be viable.

In our 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. Levante Gate is a remote, unsustainable location, being entirely contrary to the objectives set out in the Sustainability Appraisal and national planning guidance.

BRAID's interpretation of how poorly the Levante Gate development performs against the Council's Sustainability objectives, very much mirror the City Council's own initial interpretation, which have seemingly been ignored.

It is important that the Inspector is made aware of these, which are summarised 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 site does not perform well in terms of creating improvements to physical and mental health. Although a greenfield site Levante Gate is not well connected to green infrastructure, being surrounded by arable fields. Furthermore, it is questionable whether a site the size of Levante Gate will have the critical mass to support new health facilities in what is a peripheral location.

*Objective 3: Climate and environmental action*

The Levante Gate site does not 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, 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.

*Objective 4: High quality homes and neighbourhoods; healthy places*

The Levante Gate site again performs poorly against this objective and will not provide the housing mix and affordable housing that is envisaged. The remote location and lack of alternatives means the residents will be dependent on the motor car for transport as seen and highlighted by a recent BBC report on similar developments in Milton Keynes. The aspiration of providing affordable homes, with car ownership being unaffordable and undesirable, is inconsistent with the isolation of the Levante Gate site.

*Objective 5 - Climate and environmental action; Healthy places.*

There has been an inevitable increase in noise and air pollution from the busy A5 and A4146 from recent developments. This would be exacerbated with the introduction of further development to an already stressed highway infrastructure.

### *Objective 6 - Economic and Cultural Prosperity*

The Levante Gate site has 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 Levante Gate can be 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*

Levante Gate is not close to a variety of accessible employment areas apart from the recently developed extensive B8 development, adjacent to the roundabout, which will focus on warehouse and storage provision, requiring a relatively small employment offer. The site offers 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, BRAID notes 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. We consider the City Council's approach to the consideration of Reasonable Alternatives to be significantly flawed and therefore unsound, with a lack of any sound justification for the choices made.

In terms of the Council's assessment of reasonable alternatives, it is considered that the freestanding settlement options should have been considered in more detail as being potentially suitable for development, especially in the light of the 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 Levante Gate that are isolated, constrained and benefit from important landscape designations.

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. We would therefore urge the City Council and appointed Inspector to consider potential new settlement options in more detail as being an effective strategy to deliver 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 Brickhills Greensand Ridge SLA.

BRAID considers it unreasonable to include these sites, as the City Council’s preferred option, simply 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 Levante Gate, 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.

In our 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 BRAID 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 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 may 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 early 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, BRAID considers that the Regulation 19 Local Plan, relating to Policy GS 18 - Levante Gate Strategic City Extension and the allocation of around 1,300 dwellings and associated infrastructure and community facilities, has not given due weight to the Council's own appraisals and guidelines and is not sound or adequately justified. It has not recognised nor addressed the issues raised in the Regulation 18 consultation. In this respect we 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 correct 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 5 years after adoption, by which time the political climate may have changed and major infrastructure projects, such as East West Rail, have more certainty. As the Plan currently stands, we consider it to be unjustified and consequently not sound.

We reiterate that Levante Gate does not perform well when tested against the SA framework. It does not work as part of a package of sites and won't deliver benefits in combination with

other nearby sites that 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 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 in accordance with the NPPF.

The standalone Levante Gate site therefore performs poorly against the SA framework, as acknowledged by the Council. It is an unsound and unsustainable location and a significant distance from Milton Keynes with the A4146 and A5 separating the site from the city. This standalone and peripheral option is remote from employment and amenities and will destroy a valued landscape, the loss of which will be significant.

BRAID therefore respectfully requests that Policy GS18 - Levante Gate Strategic City Expansion, be deleted from the emerging plan and that other more appropriate options be (re)considered by the Inspector.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

BRAID respectfully requests that Policy GS 18 and its explanatory text be deleted from the Local Plan to ensure it complies with the requirement to deliver sustainable development in accordance with the NPPF and The City Council's own policies.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

### Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Proposed Submission period has ended. This data will be managed by a

Programme Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by using the following link:

<https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

**Representations cannot be treated as confidential and will be published on our website alongside your name.** *If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online.*