



Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

Ref:
(For official use only)

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm on Monday 22nd December 2025** 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

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

Mrs

First Name

Rebecca

Last Name

Doull

Job Title
(where relevant)

Associate

Organisation

Smith Jenkins Planning & Heritage

(where relevant)
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:

3. To which part of the Local Plan does this representation relate? – General comments

Paragraph Policy Policies Map

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

| | | | | |
|--|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 4.(2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4.(3) Complies with the Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

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.

The Spatial Strategy is overly reliant on large strategic sites and does not identify opportunities for villages to grow and thrive. This is not consistent with National Policy, which requires planning policies to identify opportunities for villages to grow and thrive

Please refer to accompanying Statement for full details.

(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.

Draft Policy GS1 should be amended so that it does not exclude sites that are well related to (but outside) the settlement boundaries of existing settlements. The exclusion of these sites is not justified and the Policy is not consistent with national policy (which requires planning policies to identify opportunities for villages to grow and thrive).

Please refer to accompanying Statement for full details.

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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:

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First Name

Rebecca

Last Name

Doull

Job Title
(where relevant)

Associate

Organisation

Smith Jenkins Planning & Heritage

(where relevant)
E-mail Address

Address Line 1

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Telephone Number

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? – General comments

Paragraph

Policy

Policies Map

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

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The allocation of the South of Bow Brickhill Strategic City Extension (and exclusion of the site) does not represent an appropriate strategy and does not take into account reasonable alternative sites that are considered to have less of an impact on the Special Landscape Area. Without the consideration of reasonable alternatives, the Plan is unsound.

Please refer to accompanying Statement for full details.

(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.

The South of Bow Brickhill Strategic City Extension (draft Policy GS17) should be extended to include the promoted site. Without consideration of this 'reasonable alternative', which is considered to have less of an impact on the Special Landscape Area, the Plan is not justified.

Please refer to accompanying Statement for full details.

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Stockgrove Homes

Smith Jenkins Planning & Heritage

E-mail Address

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Paragraph

Policy

GS2

Policies Map

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Yes

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Yes

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Draft Policy GS2 places an excessive reliance on larger strategic site and does not adequately consider (or respond to) housing needs arising from neighbouring local authorities. Without consideration of 'reasonable alternatives' (such as allocating smaller-sized deliverables sites in sustainable locations that can start contributing towards housing need within a shorter time period) or confirmation as to how unmet housing needs from neighbouring authorities have been taken into account, the Policy is not 'justified' or 'positively prepared'.

Please refer to accompanying Statement for full details.

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

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Draft Policy GS2 should allocate smaller-sized deliverable sites in sustainable locations which can start contributing towards housing needs within a shorter time period (and not rely to such an extent on larger strategic sites). Without consideration of these 'reasonable alternatives', and confirmation as to how unmet housing needs from neighbouring authorities have been taken into account, the Policy is not 'justified' or 'positively prepared'.

Please refer to accompanying Statement for full details.

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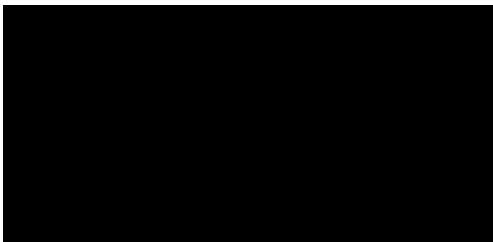
First Name

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Policy GS6 is overly restrictive and is not consistent with national policy. The acceptability of redeveloping previously developed land or buildings in the Green Belt is not dependent on whether they are redundant or disused. By restricting redevelopment to redundant or disused buildings, draft Policy GS6 is overly restrictive and does not accord with the NPPF (which seeks to make as much use as possible of brownfield land – irrespective of whether it is redundant or disused).

National policy recognises that even parts of the Green Belt land (which the government attaches ‘great importance to’) do not contribute to the purposes of the Green Belt. However, Policy GS6 adopts a blanket approach to the development of new homes in the open countryside (which is not afforded the same level of protection in national policy as Green

Belt), allowing no opportunity to assess the actual contribution of a site to the open countryside. This is not consistent with the approach taken in national policy.

Please refer to accompanying Statement for full details.

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

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To ensure consistency with national Policy (and to ensure that the Plan is sound), draft Policy GS6 should be updated to allow the assessment of a site's actual contribution to the open countryside.

Please refer to accompanying Statement for full details.

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

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**Representations to the
MK City Plan 2050
Regulation 19 Draft**

Land off Bow Brickhill Road, Woburn Sands, Milton Keynes

On behalf of Stockgrove Homes

December 2025

Ref: 740

Smith Jenkins Ltd



1 Introduction

- 1.1 This Statement has been prepared by Smith Jenkins Planning & Heritage on behalf of Stockgrove Homes to support a submission to the Regulation 19 consultation for the MK City Plan 2050 with respect to Land off Bow Brickhill Road, Woburn Sands (hereinafter referred to as ‘the site’).
- 1.2 This Statement should be read alongside the representations Stockgrove Homes previously submitted to Milton Keynes City Council’s (MKCC) Regulation 18 Local Plan consultation in December 2024, promoting the site for an allocation for residential development (likely to comprise approximately 161 dwellings). Stockgrove Homes’ representations to the Regulation 18 Local Plan accompany this Statement (see Appendix 1).
- 1.3 Following the publication of the Regulation 19 Local Plan, the site remains unallocated for development and continues to be designated as a ‘Special Landscape Area’ (see Figure 1 below).



Figure 1: Extract from MK City Plan draft Policies Map with promoted site indicated in red. The South East Milton Keynes Strategic Site Allocation is shown in green diagonal stripes (to the north) and the Special Landscape Area is washed over in green.

1.4 Given the site’s location, immediately adjacent to the South East Milton Keynes Strategic Urban Extension, Stockgrove Homes believe the site is an ideal candidate for inclusion in the emerging MK City Plan as an allocation for residential development.

Purpose of these representations

1.1 One of the key purposes of the Regulation 19 stage is to assess whether the draft Local Plan is sound, as defined by Paragraph 36 of the National Planning Policy Framework (2024). NPPF Paragraph 36 confirms that Local Plans are ‘sound’ if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other local authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence.
- c) **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.2 These representations:

- Identify whether the Regulation 19 draft addresses the matters raised at Regulation 18;
- Assess whether the Plan is sound against the tests in Paragraph 36 of the NPPF; and
- Set out the modifications needed to make the Policy sound where deficiencies remain.

1.3 We trust that these representations will assist the Council in finalising the Plan and ensuring that it proceeds to examination in a sound form. We would welcome continued dialogue with officers on any of the matters raised.

2 Representations

Policy GS 1 – Our Spatial Strategy

The Plan is not ‘justified’ or ‘consistent with national policy’

2.1 Draft Policy GS1 states:

“The development of land for new homes and employment within Milton Keynes up to 2050 will be directed toward locations in accordance with the following settlement hierarchy.

- *Tier 1 – the designated urban area of Milton Keynes City, as shown on the Policies Map, will be where the considerable majority of development that meets our identified need for homes and jobs over the plan period will be provided.*
- *Tier 2 – development in Olney and rural settlements should focus on meeting local needs and be located within defined settlement boundaries, including locations identified in relevant made neighbourhood plans”*

2.2 The broad justification for the spatial strategy is summarised in paragraph 23 of the Regulation 19 Local Plan:

“This strategy seeks to protect the character of our villages and rural communities, which are principally located to the north of the city, and direct development to the City of Milton Keynes, both within and adjoining it, as a highly sustainable location for growth. In rural locations the MK City Plan 2050 does not allocate standalone sites or extensions to rural settlements to provide strategic development. As noted above, we expect relevant Town and Parish Councils to identify opportunities to deliver the growth their communities need through a locally prepared Neighbourhood Plan”.

2.3 As drafted, the Policy establishes a two-tiered approach – where the majority of development is to be focused within the designated urban area of Milton Keynes (Tier 1) and there will be limited development elsewhere, i.e., in rural areas, villages with defined settlement boundaries and locations identified via Neighbourhood Plans (Tier 2). This approach is overly reliant on large strategic sites and does not identify opportunities for villages to grow and thrive.

2.4 Although the approach correctly seeks to protect the ‘character’ of villages and rural communities, the implication is that any new housing in (and adjacent to) these villages would be harmful to the character of the villages and the communities that live within them. This is simply not the case and plainly at odds with national planning policy. Paragraph 83 of the NPPF states:

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. **Planning policies should identify opportunities for villages to grow and thrive**, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby”.*

2.5 Whilst the Sustainability Appraisal, which underpins the Spatial Strategy, did consider ‘Expansion of Villages’ as a ‘reasonable alternative’ to the spatial strategy, the option was discounted for a number

of reasons (such as poor public transport links and sensitivity to change). However, the evidence (in the *Sustainability Appraisal*) also states that ‘there are some opportunities to make use of the greenfield sites adjacent to existing villages with a view to increasing walkability and people-friendly places’. Based on the evidence, a two-tiered approach to the spatial strategy, which is silent on the sites that are well-related to (but may not be within) existing villages is therefore not justified or consistent with national policy (which requires policies to identify opportunities for villages to grow and thrive, especially where this will support local services).

- 2.6 Villages must be able to grow, and the level of growth should be subject to assessment. However, the exclusion of all sites that are well-related to existing villages (but may be outside of the defined settlement boundary) is not justified. The site promoted by Stockgrove Homes could serve as a sustainable extension to the Bow Brickhill village, supporting its vitality and boosting the supply of homes in a sustainable location.
- 2.7 Including sites that are adjacent (and well-related) to settlement boundaries in the settlement hierarchy will help to boost the supply of homes in sustainable locations and enable existing villages to thrive. Furthermore, because these sites are likely to be smaller in scale than the larger strategic city extensions (and are often independently accessible without the complexities surrounding landownership), they are able to make a meaningful contribution to the five year housing land supply early on in the plan period. The inclusion of sites like these in the settlement hierarchy is imperative, especially taking into account the pace of housing delivery on larger strategic sites previously allocated in Plan:MK (such as the outline application for 1,920 houses in the South East Milton Keynes allocation, which is still not permitted despite having been validated in March 2022 (planning application reference 22/00524/OUTEIS)).

Modifications

- 2.8 Draft Policy GS1 should be amended so that it does not exclude sites that are well related to (but outside) the settlement boundaries of existing settlements. Including these sites will help to boost the supply of homes in sustainable locations and enable existing villages to thrive.

Policy GS2 – Strategy for homes

The Plan is not positively prepared

- 2.9 Draft Policy GS2 is not positively prepared because it assumes that MKCC’s identified housing requirement can largely be met through a number of large strategic allocations, without sufficient contingency should these sites fail to deliver at the anticipated rates.
- 2.10 Whilst it is acknowledged that strategic sites are important for the diversity in sources of supply, there is a need to ensure that ‘deliverability’ has been thoroughly assessed. A large proportion of the capacity for the sites expected to be delivered in the Plan period may not meet the NPPF definition of ‘deliverable’ and there is a risk that supply will not be maintained consistently should the larger strategic sites not come forward as expected.

- 1.4 The pace of housing delivery on sites previously allocated in Plan:MK (2019) further suggests that the reliance on larger strategic sites is not a ‘sound’ approach to meet MKCC’s objectively assessed needs. For example, an outline application for 1,920 houses in the South East Milton Keynes allocation (which was validated in March 2022) is still not permitted (planning application reference 22/00524/OUTEIS). According to the Council’s Housing Trajectory (Appendix 1 of the Assessment of Five Year Housing Land Supply 2024-2029 report), there were expected to be 655 ‘start commissions’ in the South East Milton Keynes allocation in 2025/26 (and 38 completions) and 620 ‘start commissions’ in 2026/27 (and 90 completions). As the outline planning permission has not yet been approved, and reserved matters applications cannot be submitted, it is extremely unlikely that there will be 655 ‘start commissions’ in the South East Milton Keynes allocation in 2025/26. The Safeguarding Directions issued on 19th November 2025 by the Secretary of State for Transport¹ (which include land identified as part of application 22/00524/OUTEIS²) lends further uncertainty as to when planning permission 22/00524/OUTEIS can be granted, and when the South East Milton Keynes allocation can begin to deliver housing.
- 2.11 The delay in the delivery of housing in the South East Milton Keynes allocation could not have been foreseen at the time Plan:MK was adopted (in 2019). However, in light of the delays to the delivery of housing in other allocations, and due to the scale and complexity of development on large strategic city extensions, a more prudent approach to meeting objectively assessed needs and ensuring a robust housing land supply position across the Plan period would be to include smaller, deliverable sites.
- 2.12 Land south of Bow Brickhill Road provides an opportunity to allocate a smaller site which will complement the existing and new strategic allocations and provide flexibility in the event that allocated sites do not deliver at the rates expected or do not come forward during the Plan period.
- 2.13 In addition, the draft Policy fails to demonstrate how unmet housing needs from neighbouring authorities have been taken into account. In this regard, since the Regulation 18 stage, Bedford Borough Council has withdrawn its emerging Local Plan following the identification of land for the Universal Studios development. Housing growth that had previously been identified on, or associated with, this land can no longer be assumed to come forward as planned. This creates uncertainty regarding how Bedford Borough’s housing needs will be met and increases the likelihood that unmet need will need to be addressed elsewhere within the wider housing market area.
- 2.14 Buckinghamshire also continues to experience significant and sustained housing pressures. The Buckinghamshire Local Plan is emerging but the absence of an up-to-date, comprehensive spatial strategy covering the whole of Buckinghamshire has increased uncertainty around how housing needs are to be distributed and met in a co-ordinated manner. Where Local Plans are emerging or being reviewed, there is a heightened risk that housing delivery will fall behind identified needs, particularly in the early years of Plan periods. This places greater importance on neighbouring

¹ <https://assets.eastwestrail.co.uk/public/Lists/BlockMedia/a727ebe23d/Guidance-for-LPAs-and-developers-on-safeguarding-1.pdf>

² [EWR-Safeguarding-Maps-v2.pdf](#) (please see pages 42-44 for the relevant safeguarding maps).

authorities ensuring that their own Local Plans are sufficiently robust, flexible, and responsive to wider housing market pressures.

- 2.15 Milton Keynes, with its ambitions for long-term growth, is an ideal location to accommodate unmet need from its neighbouring authorities. Despite the significant and material change in circumstances identified above, draft Policy GS2 does not demonstrate how MKCC has responded to, or allowed flexibility for, potential redistribution of housing requirements arising from neighbouring authorities.
- 2.16 There is no clear evidence that cross-boundary housing pressures have been fully considered or that the Plan provides flexibility to respond to such needs. This results in a strategy that does not adequately address the full scale of housing requirements affecting the area.

The Plan is not justified

- 2.17 Draft Policy GS2 is not justified because it is not supported by robust evidence demonstrating that reliance on large strategic sites represents the most appropriate strategy when considered against reasonable alternatives. Large sites are inherently complex, often constrained by infrastructure requirements, land assembly issues, viability challenges and long lead-in times.
- 2.18 Furthermore, the housing supply in Table 1 is vague and overly reliant on longer-term ‘broad locations’ for growth – such as ‘Central Milton Keynes and Campbell Park’ and ‘Metro Corridors’, which are expected (by draft Policy GS2) to deliver 16,000 and 2,500 homes respectively. The failure of the Plan to allocate specific sites in these broad locations, and the broad-brush assumptions regarding delivery, does not represent an ‘appropriate’ (justified) strategy and therefore renders the Plan unsound.
- 2.19 With reference to the South Bow Brickhill Strategic City Extension in particular, this is a strategic growth option that lies within an area identified to provide views of the Greensands Ridge with the wooded ridgeline as the background to the agricultural land that occupies the lower slopes (see **Appendix 1**). An important landscape characteristic of this area is the wooded Greensands Ridge which is a landscape character type in the MK Landscape Character Assessment (2022). The location of the Bow Brickhill Strategic City Extension is sensitive to development but is still considered suitable for development under draft Policy GS17. By comparison, the Stockgrove Homes site is on lower ground and is considered a less sensitive area to development. The exclusion of the Stockgrove Homes site from the Strategic City Extension, and the rejection of the opportunity to boost housing supply in a sustainable (less sensitive area) suggests that reasonable alternatives have not been considered.

The Plan is not effective

- 2.20 Draft Policy GS2 is not effective because it relies on delivery assumptions that are highly optimistic and lack resilience. Large strategic sites typically deliver housing slowly, particularly in the early years of a Plan period. Any delay in infrastructure funding or market delivery would have a significant and disproportionate impact on overall housing supply.

- 2.21 The draft Policy also lacks flexibility to respond to delivery shortfalls or changes in housing need, including those arising from neighbouring authorities. Without a diversified portfolio of sites and a clear mechanism for addressing cross-boundary needs, the strategy is vulnerable to under-delivery and fails to provide a realistic prospect of meeting housing requirements over the Plan period.

The Plan is not consistent with national policy

- 2.22 Draft Policy GS2 is not consistent with national policy. The NPPF clearly requires Local Plans to significantly boost the supply of homes in an appropriate mix (Paragraph 61) and address unmet development needs from neighbouring areas (Paragraph 27), including through effective cross-boundary cooperation (Paragraph 24). Paragraph 69 requires strategic policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The NPPF also recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes and are often built-out relatively quickly (Paragraph 73).
- 2.23 A strategy that relies predominantly on a number of large strategic sites does not align with this objective and increases the risk of stalled or delayed delivery. In addition, the failure to clearly demonstrate how neighbouring authority housing needs have been taken into account is inconsistent with the requirement for effective strategic planning and cooperation on cross-boundary matters.
- 2.24 Whilst strategic sites are important for the diversity in sources of supply, there is a need to ensure that 'deliverability' has been thoroughly assessed. A large proportion of the capacity for the sites expected to be delivered in the Plan period may not meet the definition of deliverable and there is a risk that supply will not be maintained consistently over the Plan period. A more balanced supply is required, and this could be achieved by the inclusion of deliverable sites in the short term.

Modifications

- 2.25 Draft Policy GS2 is unsound because it places excessive reliance on large strategic housing sites and fails to adequately consider or respond to housing needs arising from neighbouring authorities. The Policy should be amended to include a more balanced and flexible housing strategy, incorporating a wider range of site sizes and locations and clearly demonstrating how cross-boundary housing needs have been addressed. The Plan should allocate smaller sized deliverable sites in sustainable locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility.

Policy GS6 – Open Countryside

The Plan is not consistent with national policy

- 2.26 Draft Policy GS6 (Open Countryside) is overly restrictive (seeking to prevent any new housing development in rural areas on land outside of settlement boundaries). The approach is not consistent with national policy for the following reasons:

- NPPF Paragraph 142 confirms that the Government attaches ‘great importance’ to Green Belts. Although the open countryside is not afforded the same level of protection in national policy as the Green Belt, draft Policy GS6 is more restrictive of development in the open countryside than national policy is of development in the Green Belt. NPPF Paragraph 154 states that the construction of new buildings in the Green Belt is inappropriate, but (subject to the impact on the openness of the Green Belt) exceptions to this are ‘limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use...’ The acceptability of redeveloping previously developed land or buildings in the Green Belt is not dependent on whether they are redundant or disused. By restricting redevelopment to redundant or disused buildings, draft Policy GS6 is overly restrictive and does not accord with the NPPF (which seeks to make as much use as possible of brownfield land – irrespective of whether it is redundant or disused).
- NPPF Paragraph 155 confirms that the development of homes in the Green Belt is not inappropriate if the development would utilise ‘Grey Belt’ land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the Plan (as well as satisfying other criteria). This approach recognises that even parts of the Green Belt (which the Government attaches ‘great importance’ to) do not contribute to the purposes of the Green Belt. Draft Policy GS6, although dealing with ‘open countryside’ (which is not afforded the same level of protection in national policy as Green Belt), adopts a blanket approach to the development of new homes in the open countryside, allowing no opportunity to assess the actual contribution of a site to the open countryside.
- Paragraph B introduces the concept of the impact of a proposal on the surrounding landscape. However, protection to the surrounding landscape is already addressed in draft Local Plan Policy PFHP7(8), which requires that ‘*important views and vistas are protected, and the design of the proposal makes a positive contribution to the wider townscape, skyline and landscape*’. It is therefore unnecessary for draft Policy GS6 to restrict proposals on the basis of their impact on the landscape.

Modifications

- 2.27 Draft Policy GS6 is unsound because it is overly restrictive and is not consistent with national policy, which allows the opportunity to assess a site’s contribution to the purposes of the Green Belt (which is afforded a higher level of protection in national policy than open countryside).
- 2.28 Stockgrove Homes request that Draft Policy GS6 is updated to allow the assessment of a site’s actual contribution to the open countryside.
- 2.29 In the case of the Land South of Bow Brickhill Road, there is an opportunity to improve the relationship between the current South East MK boundary and the Open Countryside by enhancing the character of this location. Allocating the promoted site will enable the landowners to develop a scheme that offers a more natural buffer to the open countryside rather than being defined by a road. However, under the current drafting of Policy G6, it would not be possible to take these important material planning considerations into account.

Policy GS17 – South of Bow Brickhill Strategic City Extension

The Plan is not justified

- 2.30 Although the South of Bow Brickhill Strategic City Extension is located in the Brickhills Special Landscape Area (draft Policy CEA12), it is still allocated for residential development under draft Policy GS17. However, despite the location of Stockgrove Homes' site – on lower ground and well contained within the landscape (and a less sensitive area within the proposed Special Landscape Area) – it has not been included within the South of Bow Brickhill Strategic City Extension.
- 2.31 Whilst it is acknowledged that the designation of an area as a Special Landscape Area does not preclude its allocation for housing, the allocation of the South of Bow Brickhill Strategic City Extension (and exclusion of the site) does not represent an appropriate strategy and does not take into account reasonable alternative sites that are considered to have less of an impact on the Special Landscape Area.
- 2.32 Stockgrove Homes' representations to the Regulation 18 Local Plan (attached at **Appendix 1**), explain that through the implementation of a comprehensive landscaping scheme and improved public access to the woodland, the promoted site represents an opportunity for development within the Special Landscape Area that would be suitable and enable the opportunity to enhance public access to these areas. It is a 'reasonable alternative' that the Local Plan has not sufficiently considered. Without this, the Plan is unsound.

Modifications

- 2.33 Based on the evidence presented in Stockgrove Homes' Regulation 18 representations (**Appendix 1**), which set out why the site is a less sensitive area within the Special Landscape Area, we request that the South of Bow Brickhill Strategic Extension is extended to include the promoted site.

3 Conclusion

- 3.1 This representation has been prepared by Smith Jenkins Planning & Heritage to the current MK New City Plan 2050 Regulation 19 Plan on behalf of Stockgrove Homes in respect of land off Bow Brickhill Road, Woburn Sands, Milton Keynes.
- 3.2 In order for the Local Plan to meet the tests of ‘soundness’, in accordance with NPPF Paragraph 36, Stockgrove Homes request that changes are made to the following draft policies:
- **Draft Policy GS1** should be amended so that it does not exclude sites that are well related to (but outside) the settlement boundaries of existing settlements. The exclusion of these sites is not justified and the Policy is not consistent with national policy (which requires planning policies to identify opportunities for villages to grow and thrive).
 - **Draft Policy GS2** should allocate smaller-sized deliverable sites in sustainable locations which can start contributing towards housing need within a shorter time period (and not rely to such an extent on larger strategic sites). Without consideration of these ‘reasonable alternatives’, and confirmation as to how unmet housing needs from neighbouring authorities have been taken into account, the Policy is not ‘justified’ or ‘positively prepared’.
 - **Draft Policy GS6** should allow the assessment of a site’s actual contribution to the open countryside. Without this, the Policy is inconsistent with national policy, which allows the opportunity to assess a site’s contribution to the purposes of the Green Belt (which is afforded a higher level of protection in national policy than open countryside).
 - **Draft Policy GS17** should extend the South of Bow Brickhill Strategic City Extension to include the promoted site. Without consideration of this ‘reasonable alternative’, which is considered to have less of an impact on the Special Landscape Area, the Plan is not justified.
- 3.3 We would welcome the opportunity to discuss the site with officers as the preparation of the new Local Plan progresses as well as the option to take part in the forthcoming hearings for the Local Plan.

Appendix 1

**Representations to the
MK City Plan 2050
Regulation 18 Draft**

Land off Bow Brickhill Road, Woburn Sands, Milton Keynes

On behalf of Stockgrove Homes

October 2024

Ref: 740

Smith Jenkins Ltd



1 Introduction

- 1.1 This representation has been prepared by Smith Jenkins Planning & Heritage in response to the MK City Plan 2050 Regulation 18 Consultation.
- 1.2 This representation is made on behalf of Stockgrove Homes in respect to land off Bow Brickhill Road, Woburn Sands, Milton Keynes.
- 1.3 This representation should be read alongside the following documents:
 - Briefing Note, prepared by IDP Landscape (**Appendix 1**);
 - Constraints Plan (drawing ref. SK01);
 - Opportunities Plan (drawing ref. SK02);
 - Overall Sketch Masterplan (drawing ref. SK03);
 - Sketch Masterplan (drawing ref. SK04);
 - Contextual Analysis (drawing ref. SK05);
 - Viewpoints A-H and 1-4 (all plans are contained in **Appendix 2**).
- 1.4 We trust that this representation will be duly considered and we welcome the opportunity to discuss the site with officers further as the preparation of the new Local Plan continues.

2 Executive Summary

- 2.1 The site is promoted to be allocated for residential development in the emerging Plan. The promoted site could potentially deliver 325 units (at 35 dwellings per hectare) across two parcels, one promoted by Stockgrove Homes (161 units) in addition to the neighbouring land (164 units).
- 2.2 Given the site's location, immediately adjacent to the South East Milton Keynes Strategic Urban Extension (via Policy SD11 of Plan:MK), Stockgrove Homes believe the site is an ideal candidate for inclusion in the emerging MK City Plan as an allocation for residential development.
- 2.3 This Statement demonstrates that the sites represent available, suitable, achievable and therefore entirely deliverable for residential development. The site has no physical, legal or environmental constraints which would prevent it being delivered early in the new Local Plan.

3 The Emerging Planning Context

Overview

- 3.1 The Regulation 18 version of MKCC's draft City Plan was published for consultation on 17 July 2024.
- 3.2 On 30 July 2024, the Government published a new draft National Planning Policy Framework (NPPF) for consultation until 24 September 2024, alongside a Written Ministerial Statement (WMS) 'Building the Homes We Need', setting out the objective of delivering more housing over the life of the current parliament.
- 3.3 The publication of these documents has implications on the Plan, following the publication of the draft NPPF and WMS, the planning policy context is likely to change significantly prior to the Plan's adoption.
- 3.4 The City Plan must be consistent with national policy. On publication, a new NPPF is likely to have fundamental implications on the policies contained in the Plan. MKCC's City Plan must be reviewed and prepared in light of the emerging NPPF and the WMS, which is a material consideration in planning decisions, as these documents represent significant change in national planning policy.

Housing Need and Delivery

- 3.5 There are important points raised in both the revised NPPF and WMS which demonstrate the Government's intention to increase the emphasis on the benefits of housing delivery in plan and decision making. The WMS states:

"We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home. That is why today I have set out reforms to fix the foundations of our housing and planning system – taking the tough choices needed to improve affordability, turbocharge growth and build the 1.5 million homes we have committed to deliver over the next five years."

- 3.6 The consultation website for the draft NPPF changes states:

"We are clear that local planning authorities should identify opportunities for maximising the efficient use of land, especially in areas well served by transport and other infrastructure. By restricting density, the existing policy is likely to have longer term negative impacts on achieving sustainable patterns of development and on meeting expectations on future housing supply. Alongside this reversal, we propose strengthening expectations that plans should promote an uplift in density in urban areas."

- 3.7 To support the Government's ambition to boost housing delivery to 1.5 million new homes over the next five years, one of the proposed changes is the introduction of a new mandatory Standard Method of calculating housing need. This will set a baseline at a percentage (0.8%) of existing housing

stocks, apply stronger affordability multipliers to relieve price pressures and remove certain caps / additions.

- 3.8 Notably, the revised draft NPPF also restores, at Paragraph 76, the requirements for LPAs to demonstrate a five year housing land supply (5YHLS), even when the adopted Plan is less than five years old. This reflects the need for LPAs to adapt and respond to changes in delivery (or lack thereof) after the adoption of a Plan, to ensure that housing needs are met.

Cross-Boundary Working

- 3.9 The Government has also confirmed its intention to introduce a universal system of strategic planning across England in this Parliament with the objective ‘to promote a more strategic approach to planning, by strengthening cross-boundary collaboration, ahead of legislation to introduce mandatory mechanisms for strategic planning.’
- 3.10 There are also new strategic powers proposed in the draft revised NPPF (Paragraph 24) which states that: ‘Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed.’
- 3.11 Once matters requiring ‘collaboration’ have been identified, Paragraph 27 sets out certain requirements for policy-making authorities to ensure their policies are consistent, unless there is a clear justification to the contrary. The paragraph encourages strategic policy-making on matters such as delivery of major infrastructure, unmet development needs from neighbouring areas and any allocation or designation which cuts across the boundary of plan areas.

Summary

- 3.12 The above demonstrates the clear recognition from Central Government that increasing the supply of housing, including by increasing densities on sites, will be essential to addressing the housing crisis. The core message throughout the WMS and consultation NPPF is that the Government will take a pro-development approach to ensure the delivery of housing and will be updating policy to achieve this aim.
- 3.13 These representations refer throughout to the implications of the above emerging changes on the draft MK City Plan 2050 in support of the allocation of Land off Bow Brickhill Road.

4 The Promoted Site

- 4.1 The site comprises approximately 8.7 hectares of greenfield land and is bound by a substantial extent of mature trees that buffer the site from the main road and neighbouring sites. The site within the red line boundary comprises three parcels, labelled Plot 3, 4 and 5 in **Figure 1 and 2** below.
- 4.2 Plot 4 comprises 8 acres of field, directly adjacent to the recently completed Stockgrove Homes residential development. The parcel is enclosed by hedgerows and trees with woodland to the southern boundary.
- 4.3 Plot 5 comprises 12 acres of field, enclosed by hedgerow and trees with woodland to the southern boundary.
- 4.4 A third parcel (Plot 3) comprising 4 acres of field is also under the control of Stockgrove Homes but is detached from Parcel 4 and 5.
- 4.5 The site is promoted for residential development across Plots 4 and 5, with the third plot (Plot 3) reserved for the provision of biodiversity net gain if necessary. Plots 4 and 5 comprise a gross area of 8.68 hectares and is indicated to have a net developable area of 4.6 hectares (53%) and 4.08 hectares of open space (47%). The land has capacity to deliver 161 units at 35 dwellings per hectare.
- 4.6 Beyond the boundaries of the site as a whole are:
- To the north-west is Woburn Sands Road, with greenfield agricultural land located within the South East MK Strategic Site Allocation beyond.
 - To the north-east is Woburn Sands Road which becomes Bow Brickhill Road. Beyond the main road is a mix of agricultural and commercial activities in amongst greenfield land which is entirely within the South East MK Strategic Site Allocation.
 - To the south-west is a mix of commercial uses that form the edge of the Bow Brickhill settlement. Beyond these uses comprises largely of residential land. Bordering the site is a completed Stockgrove Homes residential development.
 - To the south-east is the edge of woodland known as Aspley Heath Woods.
- 4.7 An indicative red line boundary is shown in **Figure 1** below:



Figure 1: Sketch Masterplan (drawing ref. SK04)

- 4.8 The landowners also identify neighbouring land to the north-east for its potential to provide a collaborative scheme that would further the provision of housing in this location. The neighbouring land totals 7.43 hectares and has capacity to deliver 164 units at 35 dwellings per hectare. If both the promoted site and the neighbouring site were to come forward, the land would have the capacity to deliver 325 homes.



Figure 2: Opportunities Plan (drawing ref. SK02)

- 4.9 Proposals to the north of the site extends Bow Brickhill Road and seeks to provide a new roundabout and combined pedestrian and cycle route (see **Figure 1 and 2**), as part of the wider South East MK strategic site (Plan:MK (2019) Policy SD11).
- 4.10 The promoted site puts forward a scheme that would provide a 40m buffer to the woodland, forming an accessible linear public open space connecting the bridleway to the east with the Public Right of Way to the south-west. The promoted site will enable a better relationship with public amenity and recreational use of this ridge.
- 4.11 The site is located outside settlement confines and is therefore situated within the open countryside. The site is adjacently south to the boundary of South East MK strategic site allocation under Policy SD11 of Plan:MK. Some areas along the southern boundary of the site is designated as a Biodiversity Opportunity Area.

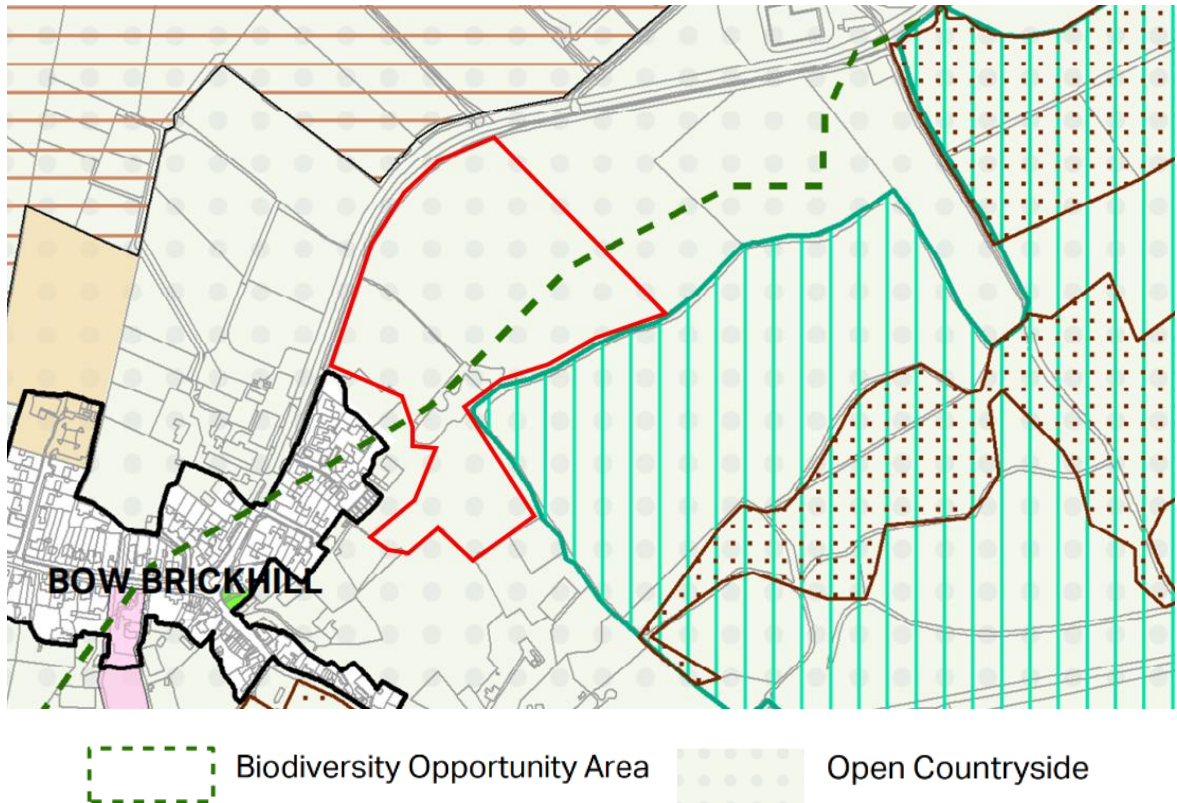


Figure 3: Plan:MK Policies Map, with site identified by red line

4.12 The draft New City Plan Policies Map designates the site within the proposed Special Landscape Area, as show in green at **Figure 4** below. The South East MK Allocation is identified also in green to the north of the site.



Figure 4: Draft City Plan Policies Map, with site identified by red line

- 4.13 The site comprises Grade 3 agricultural land to the north of the site, and Grade 4 agricultural land to the south of the site, as shown at **Figure 5** below.



Figure 5: Agricultural Land Classification, as per Plan:MK Interactive Policies Map, site identified by red line

- 4.14 The site is in Flood Zone 1 (low probability of flooding).
- 4.15 There are no listed buildings on site or within proximity.
- 4.16 The site will be accessed from Bow Brickhill Road via numerous access points that will provide a through-road through the site.

5 Representations

Overview

- 5.1 The MK City Plan 2050 Regulation 18 Plan sets out the ambition, objectives and overall policy framework for delivering growth. The Plan is aligned with the Council’s vision contained within the Strategy for 2050.
- 5.2 The 28 year plan period (2022-2050) is ambitious and well exceeds the minimum 15 year requirement to anticipate and respond to longer-term opportunities. The plan period is aligned with the 30 year requirement to allow for long-term strategic planning in accordance with Paragraph 22 of the current NPPF which remains unchanged in the revised draft NPPF.
- 5.3 Having reviewed the draft Plan however, there are several elements which Stockgrove Homes feel should be reconsidered. Given that this is a Regulation 18 draft, we are confident that they can be addressed, building on the work undertaken to date, to provide a positive plan for the area.
- 5.4 The responses are set out in relation to the various policies are set out under the various topic areas below.

Question 1(a) – our ambition and objectives for growth

Do you agree with our ambition and objectives for growth?

- 5.5 Partly agree.

Question 1(b) – our ambition and objectives for growth

Please say why you gave the answer to 1(a) above.

- 5.6 Stockgrove Homes fully supports the Council’s ambitions and objectives for growth. However, in order for the City Plan to deliver the ambition, it must encourage development across the borough, optimising all potential sources of supply.
- 5.7 The policies in the Local Plan which support the delivery of housing are almost entirely focused on the urban area of Milton Keynes, little-to-no development is encouraged in the areas outside of the urban area of Milton Keynes. If no development is supported in other areas, those areas cannot deliver sustainable development and cannot realise the Plan’s ambitions and objectives for growth. The ambition for Milton Keynes should be achieved universally across the authority area, not just in the urban area of Milton Keynes.
- 5.8 Stockgrove Homes support the objective to provide high quality homes. The Plan needs to make provision for a choice and range of homes that meets the needs of the community as a whole. Sites need to be made available for a range of developers, not just through the provision of strategic sites. Large strategic sites only favour the volume housebuilders. Small sites should also be identified. Such sites enable SME developers and housebuilders to deliver housing. SME housebuilders are equipped to deliver high-quality and bespoke housing, adding much needed variety to the new homes mix.

- 5.9 Smaller sites are also imperative to enable housing needs to be met in the shorter time frame. If small deliverable sites are not identified or included in the overall housing picture, then the Council may struggle to demonstrate a 5YHLS, as required by the NPPF.

Question 1(c) – our ambition and objectives for growth

Do you have any other comments or suggestions for this topic?

- 5.10 No.

Question 2(a) – Policy GS1 Our Spatial Strategy

Do you agree with the draft policy?

- 5.11 No.

Question 2(b) – Policy GS1 Our Spatial Strategy

Please say why you gave the answer to 2(a) above.

- 5.12 Policy GS1 – Our Spatial Strategy – set out the strategic growth options in Milton Keynes over the proposed plan period. The draft policy is given in full below:

“The development of land for new homes and employment within Milton Keynes up to 2050 will be directed toward locations in accordance with the following settlement hierarchy.

- *Tier 1 – the designated urban area of Milton Keynes City, as shown on the Policies Map, will be where the considerable majority of development that meets our identified need for homes and jobs over the plan period will be provided.*
- *Tier 2 – development in Olney and rural settlements should focus on meeting local needs and be located within defined settlement boundaries, including locations identified in relevant made neighbourhood plans”*

- 5.13 Stockgrove Homes do not support the spatial strategy. The spatial strategy sets out a two-tiered settlement hierarchy. This approach sees the majority of development focused within the designated urban area of Milton Keynes (Tier 1) and limited development elsewhere, i.e., in rural areas, villages with settlement boundaries and locations identified via Neighbourhood Plans (Tier 2).
- 5.14 The spatial strategy should also include city extensions which are outside of the urban area of Milton Keynes. For example, sites such as the East of Wavendon City Extension do not fall within Tier 1 or Tier 2.
- 5.15 Whilst we agree most development should be focussed in the urban area of Milton Keynes (Tier 1), we do not agree that this should be the only place which accommodates growth. A multi-tiered hierarchy should be established apportioning growth to the respective tiers based on their capacity to accommodate it.

- 5.16 A significant amount of growth can come from urban extensions, these should be included in Tier 1 or as a separate tier in the spatial strategy. Land at Bow Brickhill could be delivered as a strategic extension to Milton Keynes. This provides significant advantages in terms of the size of the site, and potential faster rate of delivery; and access to existing infrastructure, including road/public transport networks.

South East MK Strategic Site Allocation

- 5.17 **Figure 6** below is an extract from the draft MK City Plan Policies Map. The site's indicative boundary is outlined in red. The Plan:MK Strategic Site Allocation (South East Milton Keynes) is shown in green and the proposed 'City Boundary' is shown by black-dashed line. The site is designated Open Countryside.

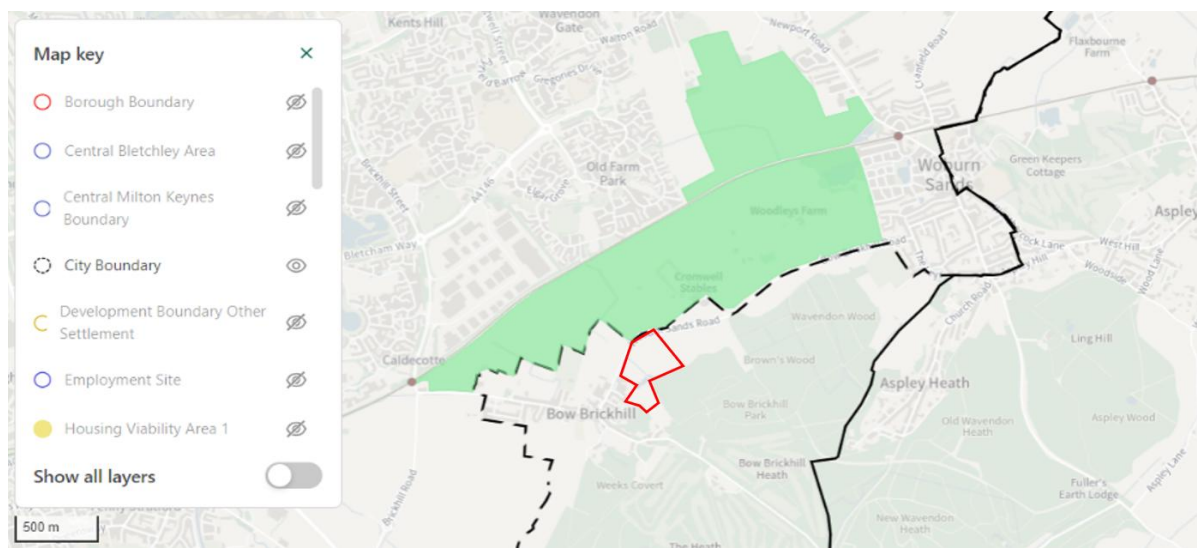


Figure 6: MK New City Plan draft Policies Map

- 5.18 The South East MK strategic site was allocated within Plan:MK under Policy SD11. The strategic site is currently subject to a live planning application (ref. 22/00524/OUTIES) for outline permission for a mixed-use urban extension comprising up to 1920 units of residential development, secondary school and primary schools, local centre (including retail, commercial, and community uses), landscaped green infrastructure and public open space, access roads and associated highways improvements, surface water drainage and associated infrastructure works. The application was validated on 4th May 2023 and remains 'pending determination'.
- 5.19 It is generally agreed that it takes beyond three years to deliver an implementable planning permission, particularly on a strategic site with various landowners. To get to the stage of implementation, the strategic site would need to achieve outline approval, reserved matters approval, discharge of planning conditions, Section 106 Agreements, and so on. The preparation of surveys and reports will further add to the time of the preparation of the various applications. It is therefore unrealistic to anticipate that the strategic site will deliver housing in the immediate future.

5.20 The above point is effectively validated by the Council’s own assessment of housing supply, as given in the Assessment of Five-Year Housing Land Supply 2022/23 (October 2023). The site profile for the South East MK allocation¹ indicates that 0 units will be delivered on the wider site until 2026/27. As discussed above, the site was submitted in May 2023 and is yet to be determined. It is also noted that the pre-application discussion began in 2019 and the Planning Performance Agreement indicated that the application would go to Committee in September 2022. As of October 2024, the application has not been determined. On this basis, no homes from this allocation were included in the Council’s Five-Year Housing Land Supply.

5.21 It is imperative that the New City Plan identifies sites for housing across a range of site sizes, and in a variety of locations. This can include extensions to existing strategic allocations especially those that can be delivered independently, quickly, and would make a meaningful contribution to the 5 year housing land supply.

Justified

5.22 The spatial strategy must be justified. The strategy must be based on proportionate evidence. In its current form, the spatial strategy is not justified.

5.23 The broad justification for the spatial strategy is summarised in paragraph 26 of the Plan:

“This strategy seeks to protect the character of our villages and communities, which are principally located to the north of the city. In these locations the MK City Plan does not propose to allocate sites for strategic new developments. As noted above, we would expect the relevant Town and Parish Councils to identify opportunities to deliver the growth their communities need through a locally prepared Neighbourhood Plan”

5.24 The approach seeks to protect the ‘character’ of villages and communities. It follows that any new housing in (and adjacent to) these villages would be harmful to the character of the villages and the communities that live within them. This is simply not the case and plainly at odds with national planning policy. Paragraph 83 of the NPPF states:

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. **Planning policies should identify opportunities for villages to grow and thrive**, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby”.*

5.25 The *Sustainability Appraisal*, which underpins the Spatial Strategy, considered ‘Expansion of Villages’ as a development option. It was considered that this was not a ‘Reasonable Alternative’ within the growth strategy due to number of reasons such poor public transport links and sensitivity to change.

¹ Assessment of Five-Year Housing Land Supply: 2022/23 - 2026/27 (October 2023) - <https://www.milton-keynes.gov.uk/sites/default/files/2022-10/MKCC%20Annual%205-Year%20Housing%20Land%20Supply%20Assessment%202022.pdf>

- 5.26 Villages must be able to grow, the level of growth is subject to assessment, however, a blanket ‘no growth’ to all villages is not sustainable or justified. Whether the site promoted by Stockgrove Homes is an extension to Bow Brickhill village or an extension to the SD11 Land Allocation, it serves the purpose of both enabling development adjacent to the village to support its vitality, while boosting the supply of homes in a sustainable location.

Question 3(a) – Policy GS2 Strategy for homes

Do you agree with the draft policy?

- 5.27 No.

Question 3(b) – Policy GS2 Strategy for homes

Please say why you have the answer to 3(a) above.

- 5.28 The housing crisis is well documented. To support the Government’s objective of ‘significantly boosting’ the supply of homes, NPPF Paragraph 60 highlights the importance of a sufficient amount and variety of land coming forward where it is needed. As set out in Section 2, the new Government’s latest consultation proposes reforms to the NPPF and other aspects of the planning system to further boost housing supply.
- 5.29 Draft Local Plan Policy GS2 Strategy for Homes seeks to ensure the housing requirement is met by delivering between 53,245 and 63,000 new homes over the Plan period (2022 – 2050) or (1,902 – 2,250 homes per annum) through a range of urban and brownfield sites and new Strategic City Extensions.
- 5.30 The identified lower range will meet both the identified local housing need of 53,245 dwellings (1,902 per annum) using the Government’s Standard Method and the emerging figure of 1,759 per annum as set out in the revised Standard Methodology. Providing only the ‘minimum’ housing requirement of 53,245 dwellings over the Plan period will not deliver the Government’s clear objective of significantly boosting the supply of homes.
- 5.31 The distribution of the homes is set out in Table 1. The total housing supply as per Table 1 is 62,825. The identified supply of 62,825 provides a substantial 18% buffer over the Local Housing Need of 53,245.
- 5.32 Whilst this approach of exceeding the identified need is commendable, the components of the supply must be achievable. Indeed, 63,000 homes will only be delivered if every component of the supply is forthcoming over the Plan period.

Achievable Supply

- 5.33 The housing supply in Table 1 is considered vague and overly reliant on longer-term ‘broad locations’ for growth. For example, the assertion that 2,500 units will come from Transport Hubs is not evidenced in the Plan and no land is allocated. These units are currently based on an assumption (as

stated in Paragraph 13 of the Plan). This cannot be a component of the housing supply if the figure is assumed and there are no allocations in the Plan.

- 5.34 Additionally, provision is made for 11,000 homes in Central Milton Keynes (CMK), however, this is based on broad assumptions and no specific sites are allocated. This figure is taken from a Land Availability Assessment (LAA) for CMK which is included in the Strategic Housing Land Availability Assessment (SHLAA). The LAA is a broadbrush assessment of capacity for residential development based on various assumptions. It is not based on a capacity resulting from available and developable sites submitted to the Council.
- 5.35 The South Bow Brickhill Strategic City Extension is a strategic growth option that lies within an area identified to provide views of the Greensands Ridge with the wooded ridgeline as the background to the agricultural land that occupies the lower slopes (see **Appendix 1**). An important landscape characteristic of this area is the wooded Greensands Ridge which is a landscape character type in the MK Landscape Character Assessment (2022). The location of the Bow Brickhill Strategic Site is sensitive to development but is still considered suitable for development under draft policy GS17. By comparison, the Stockgrove Homes site is on lower ground and is considered a less sensitive area to development. However, this site has not been included within the strategic city extension, as discussed in more detail later in this representation. These allocations should be reviewed together. There is nothing to prevent both sites coming forward for development together, and this would boost housing supply in this location.

Maintaining Supply

- 5.36 Local planning authorities are required to maintain a deliverable housing supply. As per Paragraph 69 of the NPPF, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Policies should identify a supply of (a) specific deliverable sites for five years from adoption, and (b), developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining Plan period. As defined in the NPPF Glossary, to be considered 'deliverable', sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 5.37 The Plan does not comply with the above requirements. It does not identify a short-term supply (five years from adoption). Most of the supply is from much longer-term strategic allocations and 'broad locations.'
- 5.38 Whilst strategic sites are important for the diversity in sources of supply, there is a need to ensure that 'deliverability' has been thoroughly assessed. A large proportion of the capacity for the sites expected to be delivered in the Plan period may not meet the definition of deliverable and there is a risk that supply will not be maintained consistently over the Plan period. A more balanced supply is required, and this could be achieved by the inclusion of deliverable sites in the short term.
- 5.39 This has been demonstrated by the existing allocations in Plan:MK, for example Land East of the M1 which is allocated for delivery of around 5,000 new homes and is expected to deliver 295 dwellings by 2026/2027 in the current Plan's trajectory. However, to date no reserved matters applications

have come forward for residential development on the site and as such there is likely to be a delay in the expected delivery of homes against the trajectory. In addition, the Milton Keynes South East Strategic Urban Extension (Policy SD11) is allocated for the delivery of around 3,000 homes and was expected to deliver 50 dwellings in the monitoring year 2023/24, 250 dwellings in 2024/25, 350 dwellings in 2025/26 and 450 dwellings in 2026/27. As the site does not yet have planning permission, there is very likely to be a delay in the expected delivery of homes at this site against the trajectory.

- 5.40 Stockgrove Homes supports the principle of existing allocations being carried forward into the new plan and the provision of new allocations. Strategic sites are important for the diversity in sources of supply. These sites often appeal to a different market to town centre and other urban sites providing flexibility and a range of housing products. However, with the number of sites and the important contribution they make towards the sources of supply, there is a need to ensure that ‘deliverability’ has been thoroughly assessed.
- 5.41 As defined in the NPPF Glossary, to be considered ‘deliverable’, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. A large proportion of the remaining capacity for the sites expected to be delivered in the plan period may not meet this definition. This is particularly pertinent to large outline sites where permission could expire prior to the submission of reserved matters. A thorough assessment of the deliverability of sites should be undertaken to provide an update to the housing trajectory.
- 5.42 Understanding the contribution of different sized sites is important. Land south of Bow Brickhill Road provides an opportunity to allocate a smaller site which will complement the existing and new strategic allocations and provide flexibility in the event that allocated sites do not deliver at the rates expected or do not come forward during the Plan period. It is not of itself a strategic site (falling below the Plan:MK definition of a strategic site, and therefore has the ability to be large enough to stand alone, with the ability to deliver homes more quickly).

Meeting the Needs of Neighbouring Areas

- 5.43 NPPF Paragraph 11 requires that, as a minimum, strategic policies provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas unless:
- The application of policies protecting areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
- 5.44 Similarly, NPPF Paragraph 61 requires that any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing to be planned for. As identified in Section 2, in revising the NPPF, the Government will require all areas to take a “cross-boundary strategic planning approach” in a bid to boost delivery of new homes.

- 5.45 Delivering the lower-range target of 53,245 dwellings over the Plan period, as set out in draft Local Plan Policy GS2, will not address needs that cannot be met within neighbouring areas, such as Buckinghamshire and Bedford Borough, which are discussed in more detail below.
- 5.46 Whilst it is acknowledged that there are circumstances under which the needs of neighbouring areas do not need to be provided for, it is not considered that any of these apply to the site the subject of this representation (or to Milton Keynes as a whole). Part of the site is currently designated within a Biodiversity Opportunity Area which will continue to protect sites under draft Plan Policy CEA10. However, the promoted site's indicative masterplan highlights how the site will accommodate enhancements to biodiversity in this area, mitigating any adverse impacts. It is noted that a Special Landscape Area designation is proposed to cover the entire site, however, the designation covers a large part of the Borough and does not preclude development. As such, the promoted site is not considered to comprise an asset of particular importance in its current form and no adverse impacts (that would demonstrably outweigh the benefits) are anticipated.
- 5.47 In terms of Bedford Borough, although the examination of the Local Plan has been paused, the draft Policies Map allocates the land upon which Universal Studios is understood to be seeking to deliver a theme park for at least 4,000 homes (Policy HOU14 Kempston Hardwick New Settlement). If a proposal for a theme park is approved, it will be necessary for Bedford Borough to provide this housing to meet its needs elsewhere within its administrative area or if this is not possible, it will be required to look to neighbouring authorities to help meet this need. Milton Keynes, with its ambitions for long-term growth, is an ideal location to accommodate unmet need from Bedford Borough.
- 5.48 In terms of the other neighbouring authority, Buckinghamshire, it is noted that the revisions to the Standard Method would significantly increase Buckinghamshire's housing need figure from 2,912 homes per year to 4,122 homes per year (an increase of 41.6%). Paragraph 2.11 of the NPPF Update report to Buckinghamshire Council's Growth, Infrastructure and Housing Select Committee on 26th September 2024 confirms that over the time horizon of the Buckinghamshire Local Plan (2024-2045), this produces a total housing need of 86,562 dwellings. Taking into account the 25,650 homes which are already in the pipeline as a result of unimplemented planning permissions and existing local and neighbourhood plan site allocations, 60,912 homes will still need to be allocated through the new Buckinghamshire Local Plan.
- 5.49 Although Buckinghamshire Council's most recently published Annual Monitoring Report shows that in the annual monitoring year 2022 – 2023, 3,751 dwellings were delivered, the table published alongside the Government's consultation on revisions to the Standard Method shows that the average annual net additions in Buckinghamshire between 2020/21 and 2022/23 comprised only 2,789 dwellings. Clearly it will not be possible to deliver the 4,122 homes per year that the Government's revised Standard Method, if adopted, will require.
- 5.50 As previously mentioned, Milton Keynes, with its ambitions for long-term growth, is an ideal location to accommodate unmet need from Buckinghamshire. Delivering the 'minimum' housing requirement over the Plan period, 53,245 dwellings, will not address needs that cannot be met within neighbouring areas.

- 5.51 There is no evidence to confirm that the needs of neighbouring authorities have been considered in the preparation of the Plan. It is considered that the 'minimum' housing requirement must be reviewed to take into account the unmet need of neighbouring areas and that the New City Plan should seek to allocate additional housing sites which can assist in meeting these needs.

Question 3(c) – Policy GS2 Strategy for homes

Do you have any other comments or suggestions for this topic?

- 5.52 In summary, the Plan will need to maintain a deliverable supply of housing over the Plan period. At this stage, the Plan does not demonstrate that the housing supply is achievable and does not include allowance for meeting the needs of neighbouring authorities. A very large component of the existing supply is based on broad assumptions and strategic sites, both of which will be delivered in the longer-term. It appears that there is an over-reliance on the delivery of sites which are expected to come forward, rather than those which are deliverable now.
- 5.53 For this reason, Stockgrove Homes maintains that the Plan should allocate smaller sized deliverable sites in sustainable locations which can start contributing towards housing needs within a shorter time period compared to larger strategic sites to diversify supply and increase flexibility.

Question 7(a) – Policy GS6 Open countryside

Do you agree with the draft policy?

- 5.54 No.

Please say why you gave the answer to 7 (a) above.

- 5.55 Stockgrove Homes does not agree with the policy. The approach to the open countryside is overly restrictive. The policy would restrict any housing development in rural areas (on land outside of settlement boundaries).
- 5.56 Draft Policy GS6 (Open Countryside) states that “*within the Open Countryside planning permission will only be granted for development proposals that conserve and enhance the character of the surrounding landscape*” along with satisfying a number of criteria. The South East MK Strategic Site Allocation comprises of land within the Open Countryside whereby the principle for development in this area has been established by Policy SD11 of Plan:MK, the first phase of which is being delivered under Planning application reference 22/00524/OUTIES.
- 5.57 As the strategic site comes forward and develops southbound towards the site, development will not extend beyond Woburn Sands Road and Bow Brickhill Road. Significantly, the draft New City Plan highlights this southern boundary to form the 'City Boundary' whereby the road forms an abrupt edge of settlement.
- 5.58 The promoted site offers an opportunity to improve the relationship between the current South East MK boundary and the Open Countryside by enhancing the character of this location. Allocating the

promoted site will enable the landowners to develop a scheme that offers a more natural buffer to the Open Countryside rather than being defined by a road.

5.59 Notwithstanding the fact that the site is not serving the purposes of open countryside, draft Local Plan Policy GS6 (Open Countryside) is considered overly restrictive for the following reasons:

- Criterion 'd' is unnecessarily restricted to the redevelopment or reuse of *non-residential* brownfield land. In order to promote 'an effective use of land in meeting the needs of homes and other uses', NPPF Paragraph 123 requires strategic policies to set out a clear strategy for accommodating objectively assessed needs 'in a way that makes as much use as possible of previously developed "brownfield" land'. Since draft Policy GS6 seeks to restrict the redevelopment of brownfield land to *non-residential* brownfield land, it is overly restrictive and does not accord with the NPPF (which seeks to make as much use as possible of *all* brownfield land – irrespective of its use class).
- NPPF Paragraph 142 confirms that the Government attaches 'great importance' to Green Belts. Although the open countryside is not afforded the same level of protection in national policy as the Green Belt, draft Policy GS6 is more restrictive of development in the open countryside than national policy is of development in the Green Belt. NPPF Paragraph 154 states that the construction of new buildings in the Green Belt is inappropriate, but (subject to the impact on the openness of the Green Belt) exceptions to this are 'limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use...' The acceptability of redeveloping previously developed land or buildings in the Green Belt is not dependent on whether they are redundant or disused. By restricting redevelopment to redundant or disused buildings, draft Policy GS6 is overly restrictive and does not accord with the NPPF (which seeks to make as much use as possible of brownfield land – irrespective of whether it is redundant or disused).
- Paragraph 2 introduces the concept of the impact of a proposal on the surrounding landscape. However, protection to the surrounding landscape is already addressed in draft Local Plan Policy PFHP7(h), which requires that '*important views and vistas from within the immediate area and wider surrounding area are protected, and the design of the proposal makes a positive contribution to the wider townscape, skyline and landscape*'. It is therefore unnecessary for draft Policy GS6 to restrict proposals on the basis of their impact on the landscape.
- Although it is assumed that not all the criteria listed under paragraph 2 of the draft policy (a-g) must be satisfied for a development proposal to be acceptable, for clarity, it would be helpful to state that 'at least one' of the criteria must be satisfied and delete 'and' after criterion f.

Question 18(a) – Policy GS17 South of Bow Brickhill Strategic City Extension

Do you agree with the draft policy?

5.60 Partly.

Question 18(b) – Policy GS17 South of Bow Brickhill Strategic City Extension

Please say why you gave your answer to 18(a) above?

- 5.61 Land to the south of Bow Brickhill lies adjacent to the broadly triangular site at Crossroads Farm which is currently in construction as a logistics park. From here the views are open to the Greensands Ridge with the wooded ridgeline as the backdrop to the agricultural land that occupies the lower slopes. An important landscape characteristic of this area is the wooded Greensands Ridge which is a landscape character type in the MK Landscape Character Assessment (MKLCA 2022). More recently the Council commissioned a review of the landscapes within the Borough to identify landscapes of the highest quality and most value, that could potentially merit local landscape designation in line with current best practice. This document ‘Review of Local Landscape Designations’ (May 2024) has been prepared by LUC and is informed by the MKLCA 2022.
- 5.62 SEMK lies in 5b ‘Upper Ouzel Clay Vale’ and adjacent to 6a ‘Brickhill Wooded Greensand Ridge’. In the assessment, 5b with 39% previously within the former AAL largely does not meet the criterion set for a valued landscape and therefore is not taken forward for further evaluation. 6a with 98% formerly in the AAL is taken forward. It is worth noting that the boundary for the original AAL in the Brickhills area does not follow the boundary of LCA 6a and therefore includes the Site, and this is the area that is taken forward as a Candidate Special Landscape Area.
- 5.63 The document in Chapter 4 describes the AAL as *“a distinct landform with wooded scarp slopes and interspersed agricultural areas and heathland, that fall down to the enclosed valley of the River Ouzel and Grand Union Canal”*. In terms of its extent, they state that *“the distinctive landform of the ridgeline has extensive woodland coverage and heathland, while agricultural fields at the foot of the ridge provide an important rural setting”* (pg69). The proposed boundary extends to Bow Brickhill Road to *“include the shallower slopes of the ridge due to their importance as a rural setting to the wider ridgeline”*. The full evaluation (pg73-75) is peppered with references to the pastoral fields on lower slopes and their role in providing a *“visual contrast between the open lower slopes and the striking escarpment cloaked in woodland”*. Therefore the review concludes that the area covered be included as a Special Landscape Area (SLA) in the forthcoming MK City Plan.
- 5.64 In light of the above, the location of the Bow Brickhill Strategic Site is sensitive to development but is still considered under draft policy GS17. The promoted site is on lower ground, is well contained within the landscape, and is considered a less sensitive area within the proposed Special Landscape Area. However, this site has not been included within the strategic city extension and would offer a more suitable alternative site. The promoted site should therefore be included as an allocated site with the draft Plan.

Question 54(a) – Policy CEA12 Conserving and Enhancing Landscape Character/Special Landscape Areas

Do you agree with the draft policy?

- 5.65 No.

Question 54(b) – Policy CEA12 Conserving and Enhancing Landscape Character/Special Landscape Areas

Please say why you gave your answer to 54(a) above?

- 5.66 The site is not currently located in a Special Landscape Area (SLA), but the draft Policies Map proposes to designate large parts of the borough as three distinct Special Landscape Areas, the site of which is located within the proposed Brickhill Special Landscape Area, shown at **Figure 7** below.

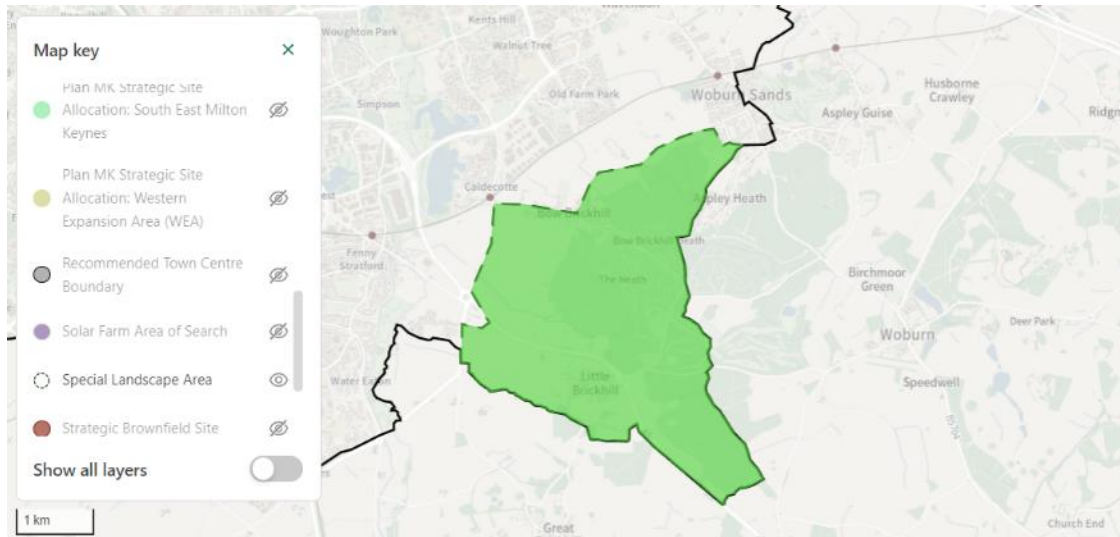


Figure 7: MK New City Plan 2050 Policies Map (showing Special Landscape Area covering part of the site)

- 5.67 The findings of the Landscape Character Assessment (2022) are understood to inform the designation of the SLAs. According to the Landscape Character Assessment, the site is located in the Upper Ouzel Clay Vale whereby the Landscape Character Area (LCA) wraps around the Brickhill Greensand Ridge which rises to the south-east. The eastern and south-western boundaries are formed by the borough boundaries with Bedfordshire and Buckinghamshire respectively.
- 5.68 Whilst the Landscape Character Assessment seeks to conserve and enhance the landscape character, it does not suggest that there should be no development in or adjacent to the villages, or existing SLAs. Draft Local Plan Policy CEA12 also lists circumstances where development affecting SLAs will be permitted. To this end, the designation of an area as a Special Landscape Area does not preclude its allocation for housing. Indeed, it is noted that two of the Strategic City Extensions are also located in the proposed Special Landscape Areas.
- 5.69 Of note, Paragraph 5.192 of the Landscape Character Assessment highlights the benefit of residential expansion of Milton Keynes north of Lower End Road (i.e. Eagle Farm and Glebe Farm) by virtue of its role in screening views of the warehouses at Kingston from the LCA.
- 5.70 Through the implementation of a comprehensive landscaping scheme and improved public access to the woodland, the promoted site presents an example that development within the proposed

Landscape Character Area would be suitable and enable the opportunity to enhance public access to these areas.

6 Conclusion

- 6.1 This representation has been prepared by Smith Jenkins Planning & Heritage to the current MK New City Plan 2050 Regulation 18 Plan on behalf of Stockgrove Homes in respect to land off Bow Brickhill Road, Woburn Sands, Milton Keynes.
- 6.2 In order to deliver the Council's ambitions and objectives for growth and the Government's aim of significantly boosting the supply of homes, the Plan needs to provide credible evidence that sites are deliverable over the plan period, particularly in the short term.
- 6.3 At present the Plan is overly reliant on long-term strategic sites and broad locations for growth. The Plan does not consider smaller sites, especially those in rural areas, which can deliver housing in the short-term. The Plan's spatial strategy should be modified so that these sites are deliverable. Allocating sites which can deliver housing in the short-term will ensure compliance with the NPPF and the requirement to identify specific, deliverable sites for five years following adoption.
- 6.4 Land off Bow Brickhill Road represents an immediately available, suitable and achievable and therefore entirely deliverable option for residential development with no physical, legal or environmental constraints. It is in a sustainable location on the edge of existing residential development, immediately adjacent to the South East Milton Keynes Strategic Urban Extension (Policy SD11), such that it could benefit from existing and forthcoming infrastructure and thus be delivered early on in the New City Local Plan period.
- 6.5 We trust that these comments will be duly considered as the preparation of the Plan progresses.

Appendix 1



PROJECT NOTE – NEWPORT ROAD, WAVENDON

1.0 INTRODUCTION

- 1.1. IDP Landscape Ltd are appointed by the clients Stockgrove Homes to provide professional advice on landscape and visual matters regarding the promotion of land for proposed residential development off Bow Brickhill Road adjacent to the village. The site is located to the east of the village in fields that lie between the main road and the woodland associated with Greensands Ridge. To the north there is committed development associated with the South East Milton Keynes (SEMK) strategic urban extension which allocates a significant amount of housing (around 3000 homes) along with a new roundabout junction on Bow Brickhill Road just to the north of the site (refer to SK05 Wider Context Plan).
- 1.2. An assessment of the landscape and visual characteristics of the area has been carried out to inform the opportunities and constraints and development opportunities for the promotion of this site. This assessment has been carried out by Kevin Charsley, managing director of IDP Landscape Ltd, a chartered landscape professional with experience of providing impartial judgements as part of LVIA and Appeals.
- 1.3. A site visit has been carried out following instruction and informed by a desktop study to establish the wider implications of developing the land within the control of the client and a composite appraisal of land to the east.

2.0 SITE DESCRIPTION

- 2.1. The site lies immediately to the east of Bow Brickhill on land currently a series of fields defined by Bow Brickhill Road to the north, the village to the west, woodland to the south, and a public bridleway BW 12 to the east. The site in the control of the client is two fields, the first of 8 acres directly adjacent to a Stockgrove Homes development recently



completed, and enclosed by tree belts and an existing pond to the south. The second larger field of 12 acres is also enclosed by hedgerows and trees with the woodland to the southern boundary. A third plot of 4 acres is also in the owner's control but is detached from the rest of the ownership but could be utilised for biodiversity benefits so has been included in the proposals. The combined gross site area within the redline boundary is 21.5 acres (8.68 hectares) including the existing pond. SK01 Constraints Plan illustrates the site and setting, showing that the site slopes in a northwest direction to Bow Brickhill Road at approximately 1 in 30, and a strong landscape structure of hedgerows dividing the series of fields with the woodland associated with the Greensands Ridge to the south.

- 2.2. The adjacent fields to the east are outside of the clients ownership, however, they share similar characteristics to the main site. The land slopes away from the Greensands Ridge, and the strong landscape boundaries are present which enclosed the site physically and visually and wider views of this land are not readily available.

- 2.3. The proposed development to the north of the site extends to Bow Brickhill Road and provides a new roundabout and combined pedestrian and cycle route which will change the character of the road and have an urbanising effect on the local area. Other large urban extensions are proposed to the west of Bow Brickhill, with a number of Local Growth Options as part of the emerging Local Plan (draft MK City Plan 2050).

- 2.4. The existing village to the west is centred around Station Road and originated as a ribbon settlement with housing fronting the main street and the junction with Church Road (see viewpoint A). The village is slightly unusual with the church outside the village and isolated to the edge of the village on the hillside and enclosed by woodland. Further north along Bow Brickhill Road is the village sign now located inside the urban area adjacent to Brickhill Sands housing development (viewpoint B). The recently completed Stockgrove site is a further extension to the village (viewpoints C and D) and consists of large,



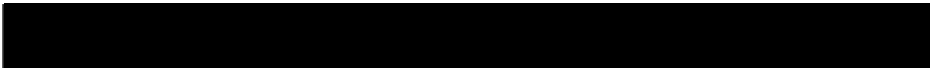
detached dwellings and a gated driveway. Viewpoints E and F illustrate the character of the road adjacent to the proposed site where an evergreen tree screen prevents views into the site except for the field gate which provides a glimpse across the site to the Greensands Ridge (viewpoint G).

- 2.5. Viewpoint H is taken to the north of the site and illustrates the proposed roundabout location to be delivered by the SEMK extension, and the approved housing scheme by L&Q which will occupy land to the north. The site and the neighbouring development site lies beyond the hedgerow to the road frontage.

3.0 CONTEXTUAL ANALYSIS

- 3.1. The wider contextual analysis of the site is shown on Plan SK05. There is a significant amount of committed development around Bow Brickhill in the eastern extent of the City. This will change the complexity and characteristics of the landscape and form a mosaic of urban areas and landscape structure. The site is located to the edge of SEMK and directly adjacent to Bow Brickhill and was considered for development as part of the Local Growth Options by the council. Due to the landscape structure and topography there are very few locations from where the site or the ridge can be experienced. An evergreen tree screen flanks the northern boundary of the site and obscures views from Bow Brickhill Road. There is a single public right of way to the north (viewpoint 3) from where the site and the ridge are viewed together but the northern boundary trees form a visual screen. In the future this view will be located within an urban extension and the character of the view will completely change. Viewpoints 1 and 2 illustrate views from local footpaths of the site and the grassland and hedgerows that form the landscape elements, with views out to the north towards the city centre.

- 3.2. Land to the south of Bow Brickhill is a strategic growth option and lies adjacent to the broadly triangular site at Crossroads Farm which is currently in construction as a logistics park. From here the views are open to the Greensands Ridge (see viewpoint 4) with the



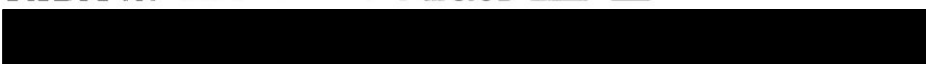


wooded ridgeline as the backdrop to the agricultural land that occupies the lower slopes. An important landscape characteristic of this area is the wooded Greensands Ridge which is a landscape character type in the MK Landscape Character Assessment (MKLCA 2022). More recently MKCC commissioned a review of the landscapes within the Borough to identify landscapes of the highest quality and most value that could potentially merit local landscape designation in line with current best practice. This document ‘Review of Local Landscape Designations’ (May 2024) has been prepared by LUC and is informed by the MKLCA 2022

MKCC ‘Review of Local Landscape Designations’ (May 2024)

- 3.3. SEMK lies in 5b ‘Upper Ouzel Clay Vale’ and adjacent to 6a ‘Brickhill Wooded Greensand Ridge’. In the assessment, 5b with 39% previously within the former AAL largely does not meet the criterion set for a valued landscape and therefore is not taken forward for further evaluation. 6a with 98% formerly in the AAL is taken forward. It is worth noting that the boundary for the original AAL in the Brickhills area does not follow the boundary of LCA 6a and therefore includes the Site, and this is the area that is taken forward as a Candidate Special Landscape Area.

- 3.4. The document in Chapter 4 describes the AAL as “a distinct landform with wooded scarp slopes and interspersed agricultural areas and heathland, that fall down to the enclosed valley of the River Ouzel and Grand Union Canal”. In terms of its extent, they state that “the distinctive landform of the ridgeline has extensive woodland coverage and heathland, while agricultural fields at the foot of the ridge provide an important rural setting” (pg69). The proposed boundary extends to Bow Brickhill Road to “include the shallower slopes of the ridge due to their importance as a rural setting to the wider ridgeline”. The full evaluation (pg 73-75) is peppered with references to the pastoral fields on lower slopes and their role in providing a “visual contrast between the open lower slopes and the striking escarpment cloaked in woodland”. Therefore the review concludes that the area covered be included as a Special Landscape Area (SLA) in the forthcoming



MK City Plan.

4.0 DEVELOPMENT OPPORTUNITIES

- 4.1. The site provides a genuine development opportunity for new housing on a site where there are no constraints that would compromise its delivery and is unlikely to have significant adverse effects from a landscape and visual perspective. Plan SK02 Opportunities Plan sets out the parameters by which the site could provide 161 units across plots 4 and 5, with the addition of over 4 hectares of public open space and biodiversity measures. Neighbouring land adjacent to this could also deliver 164 units across 4.7 hectares with 2.73 hectares of open space. Each parcel would be separately accessed from Bow Brickhill Road and could be interlinked through either road connections or pedestrian/cycle routes.
- 4.2. In response to the wooded Greensands Ridge to the south, a substantial landscape buffer of a minimum of 40m can be provided which would form a publicly accessible linear POS which connects the Bridleway to the east with the PRoW to the southwest. Development would therefore sit below the 100m contour and would be unlikely to obscure views of the wooded ridge from the wider area. In response to the ‘candidate’ Special Landscape Area, the extent to which the site and the adjacent fields provide an important setting to the wooded ridgeline could be challenged if there were to be an appropriate buffer retained to the edge of the existing woodland, and that views to and from the ridge would maintain the separation that the draft designation is trying to protect.
- 4.3. The development opportunities put forward in the scheme provide a 40m buffer to the woodland which is conducive with ancient woodland offsets and could provide new public amenity space which would enhance the recreational value of the ridge.
- 4.4. Two sketch masterplans have been produced to illustrate the potential for a housing development of medium density (35 dph) and appropriate levels of POS for the site (Plan



SK04) and the wider comprehensive site including the neighbouring land (Plan SK03). As demonstrated, there is the potential for the site to be developed in such a way that retains the existing landscape structure, respects the character and setting of the village, and the important attributes of the Greensands Ridge.

KEVIN CHARLESLEY
BA (Hons) Dip LA CMLI

-  ARCHITECTURE
-  LANDSCAPE & ENVIRONMENT
-  URBAN DESIGN & MASTERPLANNING



APPENDICES

SK01: Constraints Plan

SK02: Opportunities Plan

SK03: Overall Sketch Masterplan

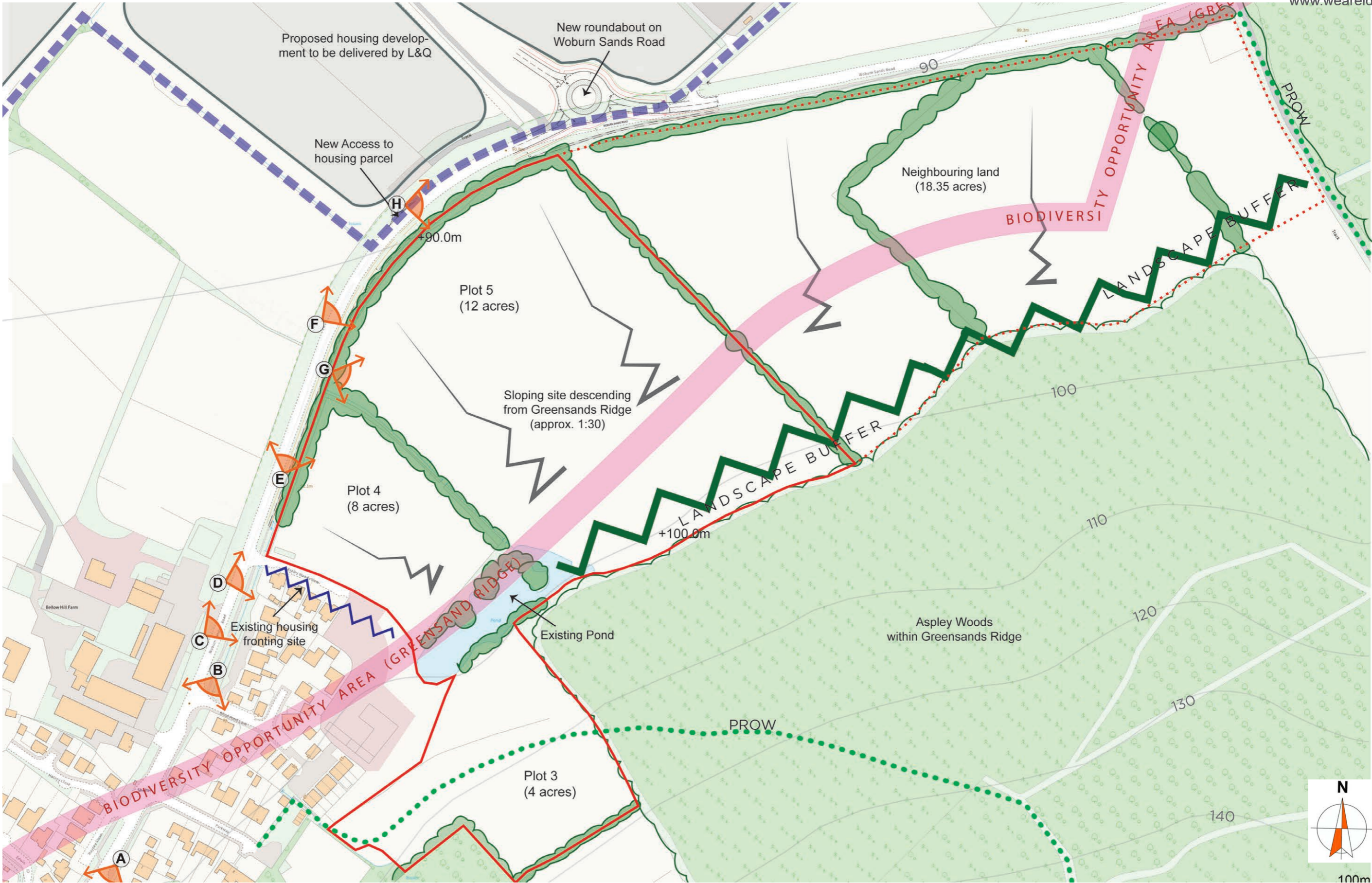
SK04: Sketch Masterplan (the Site)

SK05: Contextual Analysis

Site Photographs VP A-H

Wider Landscape Photographs VP 1-4

Appendix 2



LA5957 Land at Bow Brickhill, Milton Keynes
 SK01: CONSTRAINTS PLAN



ARCHITECTURE
 URBAN DESIGN &
 MASTERPLANNING
 LANDSCAPE &
 ENVIRONMENT



LA5957 Land at Bow Brickhill, Milton Keynes
SK02: OPPORTUNITIES PLAN



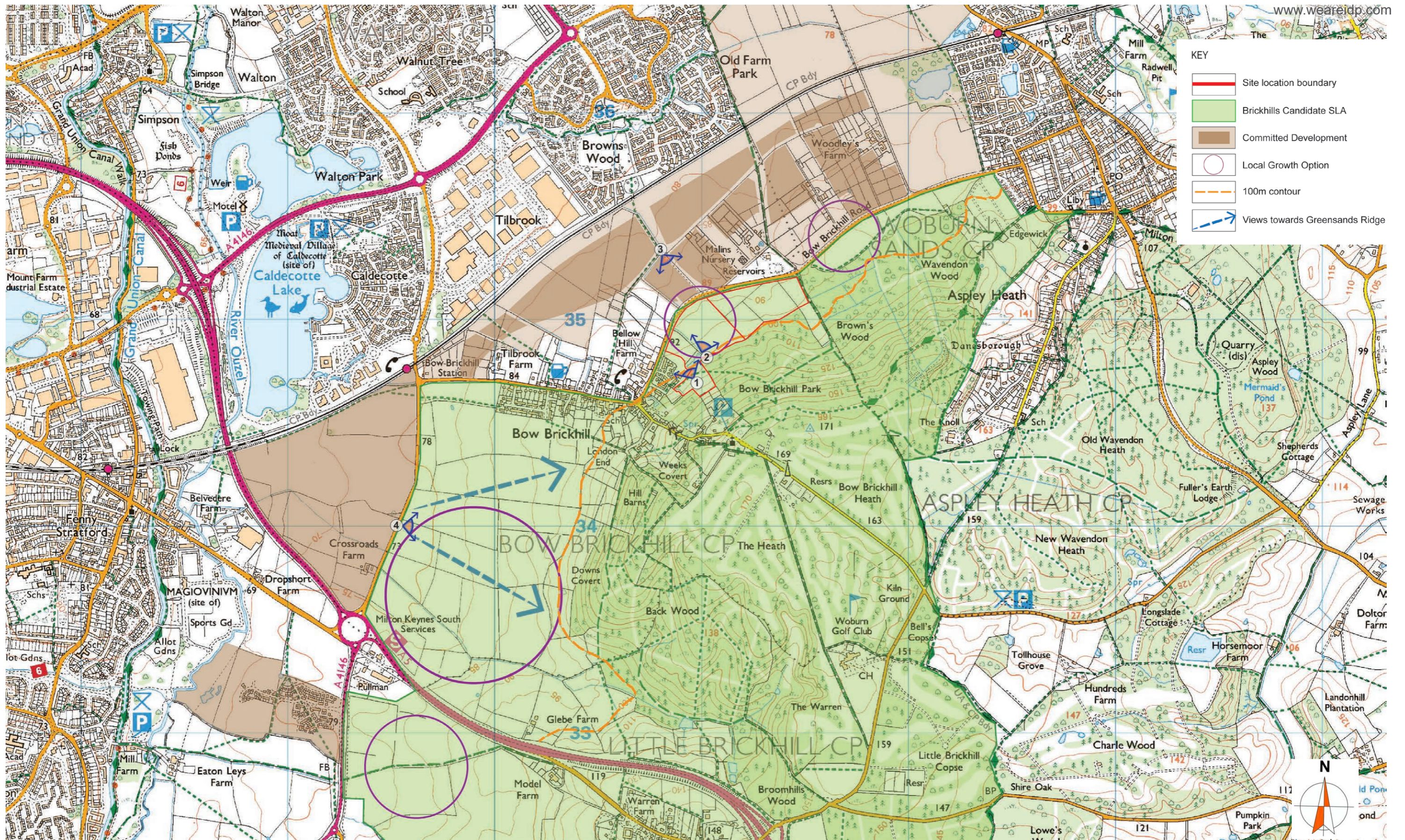
LA5957 Land at Bow Brickhill, Milton Keynes
SK03: OVERALL SKETCH MASTERPLAN



LA5957 Land at Bow Brickhill, Milton Keynes
SK04: SKETCH MASTERPLAN



ARCHITECTURE
URBAN DESIGN &
MASTERPLANNING
LANDSCAPE &
ENVIRONMENT



LA5957 Land at Bow Brickhill, Milton Keynes
SK05: CONTEXTUAL ANALYSIS



Junction of Church Road with Bow Brickhill Road



Bow Brickhill village sign on Woburn Sands Road



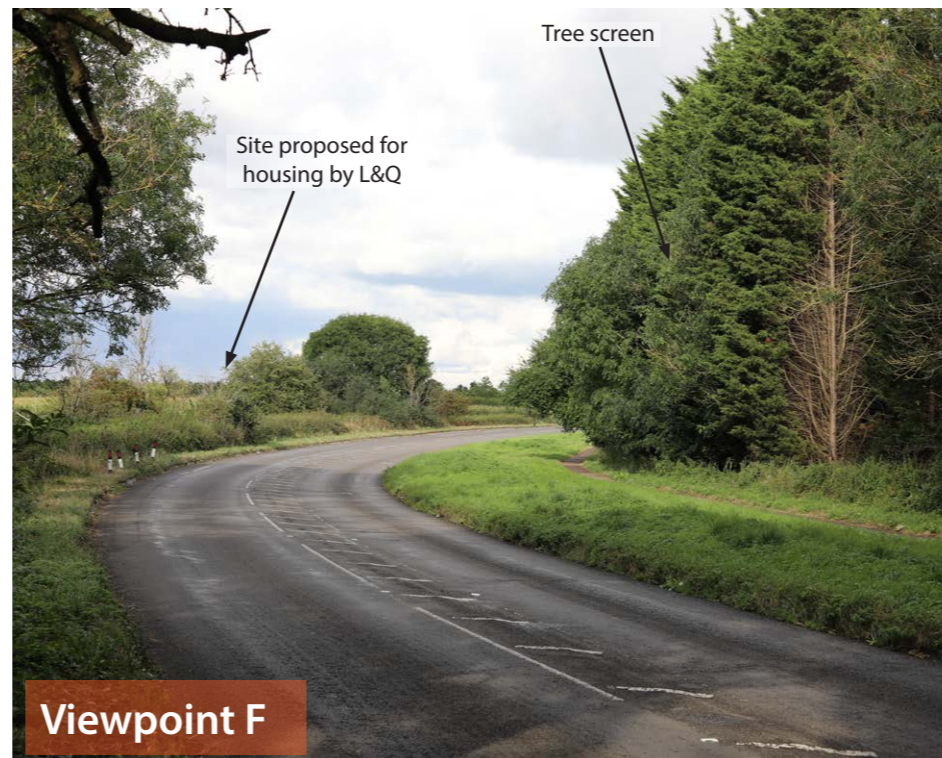
Bow Brickhill Road opposite Brickhill Sands development



View of the new gated development by Stockgrove Homes adjacent to the proposed Site



Bow Brickhill Road opposite the Site



Bow Brickhill Road opposite the Site



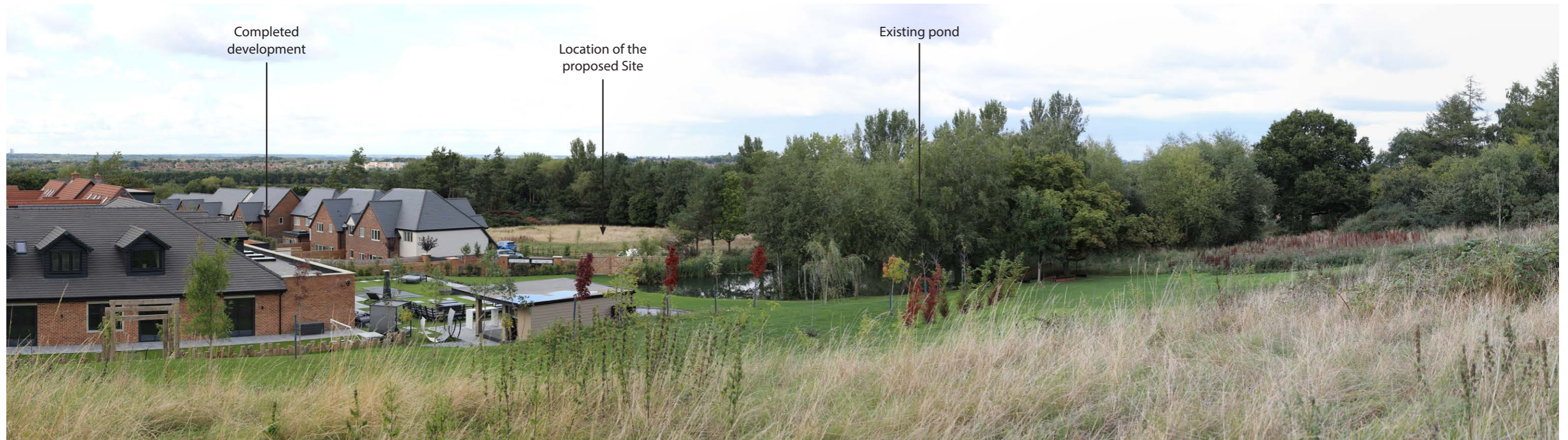
View through existing field access to the Site



View looking along Bow Brickhill Road looking east, located between the approved development to the north and the proposed Site to the south.

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Viewpoints E-H



Viewpoint 1

| | |
|--------------------------|---|
| Location of view: | Public Right of Way to the south on open land looking across towards the proposed site |
| Notes: | Cloudy with sunny spells, very good visibility; view experienced by footpath users only |



Viewpoint 2

| | |
|--------------------------|---|
| Location of view: | View from within the site looking north across plot 5 to the north-eastern boundary |
| Notes: | Cloudy with sunny spells, very good visibility; located in private property |

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Viewpoints 1-2



Viewpoint 3

| | |
|--------------------------|---|
| Location of view: | View from Public Right of Way looking south across the urban expansion site |
| Notes: | Cloudy with sunny spells, very good visibility; view experienced by footpath users only |



Viewpoint 4

| | |
|--------------------------|---|
| Location of view: | View from Brickhill Road near Crossroads Farm across growth option site to the Greensands |
| Notes: | Cloudy with sunny spells, very good visibility |

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Viewpoints 3-4