

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

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

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

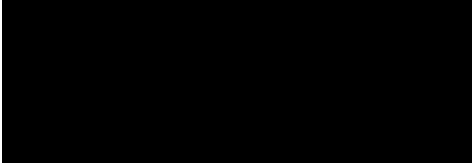
1. Personal Details*

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	Professor	
First Name	Stephen	
Last Name	Mayson	
Job Title (where relevant)		
Organisation (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?

Paragraph

Policy

GS18

Policies Map

Fig 4, page 68

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

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

No

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

Yes

No

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

Almost all of the points that I made in my response to the Regulation 18 consultation have been ignored or there has been no adequate response to the detailed objections made. It creates an impression that the fact of consultation is a tiresome, tick-box process rather than a genuine quest for democratically supported and sustainable development.

The Local Plan is unsound in relation to Policy GS18 because the development at Levante Gate fails all tests of need, appropriateness, sustainability and deliverability. The Plan appears to ignore available evidence, specifically in relation to the Sustainability Appraisal and the Council's own landscape reports. Nor has the Council credibly explored the Reasonable Alternatives, discounting those that offer more sustainable and deliverable development. In these respects, the Local Plan is not consistent with the goals of the NPPF.

The area under consideration is part of the Brickhills Special Landscape Area. The Plan explains in paragraph 339: “Where landscape has been designated as an SLA, it is recognition of the ‘special’ qualities of that landscape which make it of higher sensitivity and value. This policy requires new developments to *conserve* and, where possible, *enhance* the special character and key landscape qualities of the SLAs in addition to conserving and enhancing landscape character in wider areas” (emphasis added).

In addition, the *LUC Review of Local Landscape Designations* recommends (page 78) the conservation of the rural separation between Milton Keynes city and the “outlying village” of Little Brickhill. The Council does not propose anything in the Local Plan to preserve the rural separation of the village of Little Brickhill, or to protect its historic and cultural identity and aesthetic value (as recommended in the LUC Review). In fact, Levante Gate would fall within the parish boundaries of Little Brickhill, and the Local Plan does not acknowledge this. In fact, it makes no explicit reference at all in GS18 to Little Brickhill in its own right, or to the consequences for the existing village and its community being overwhelmed by a more than six-fold increase in homes and residents within the parish.

The Levante Gate proposal of its very nature cannot conserve the special character and key landscape qualities of the Brickhills SLA let alone enhance it; and it would reduce to a meaningless margin the “rural separation” and “outlying” nature of Little Brickhill. And yet, having once rejected the site as unsuitable for development of a much less dense proposition (17/03233/OUT), the Council in the Local Plan now refers to it not in terms of conservation (which by definition would imply no development) but in terms of development that needs to be “landscape-led” and “sensitively responded to”. These are contradictory propositions, both of which cannot simultaneously be held and fulfilled.

Further, the Council cannot promote, through the designation of the Brickhills Special Landscape Area, the value of “the shallower slopes of the [greensand] ridge due to their importance as a rural setting”, and then bring forward plans to develop a significant proportion of it in such obviously non-rural ways. The proposal does not therefore conserve or enhance the unique cultural and environmental heritage of Little Brickhill or the character of its surrounding landscape.

More specifically, the Levante Gate site is:

(a) part of the wider landscape setting of the Greensand Ridge: as part of an area of attractive landscape and within the Brickhills Special Landscape Area, the site does not naturally meet local and national criteria for residential development consistent with the existing landscape and natural environment (as the admitted need for ‘mitigation’ explicitly recognises); further, it would amount to occupying “space for nature” rather than creating it; it is disingenuous to describe the development as ‘bringing in green space’ when the essence of the proposal is to cover acres of existing green space with concrete and bricks;

(b) on the periphery of the City boundary, and is not well-served by existing infrastructure or facilities (especially public transport, GP surgeries and schools): it will be an isolated development by being beyond both the A5 and the A4146 from Central Milton Keynes, exacerbating any requirements for transport, employment opportunities, infrastructural support and ongoing maintenance; also, for these reasons, the site would not be of a sufficient scale to justify the mitigation costs (even more so if a ‘landscape-led’ approach would lead to a reduction in the developable area of the site); the case for cost-effective delivery of Levante

Gate is not made out, and the adverse consequences of the inability of the site to provide the intended outcomes would most likely be felt disproportionately by those destined to live in 'affordable housing'; further, the statement in the Local Plan that the "development of community facilities at Levante Gate will also be of benefit to the new community at Eaton Leys" amounts to a rather shocking admission either that development at Eaton Leys was itself approved without adequate local infrastructure or that facilities promised as part of that development were in fact not completed (it was originally reported as including a local centre, a community centre, a health centre and a primary school);

(c) hampered by poor connections to the already exceptionally busy A4146 and A5 roads, and to all forms of public transport: this could only result in a greater proportion of cars (in a City that already has higher than national average vehicle ownership) and then an increased carbon footprint per person, causing environmental pollution and road safety concerns as well as cutting across the Council's claims to prioritise public transport and reduce carbon emissions;

(d) too far from shopping centres, public transport, and the recreational and other amenities of Central Milton Keynes for walking to be a feasible option (and the evidence of the Council's persistent failure in the regular upkeep of other maintained roads and footpaths at the periphery of the City gives no reason for confidence that walking would be a safe choice in any event); the counter-assertion that the development would itself make provision for some such amenities and footpaths can be made, but a recent public statement by local councillors that the Council needs to be chased to force developers to complete similar facilities (see also the comment in relation to Eaton Leys in (b) above), and that councils need stronger powers to tackle such non-compliance with planning conditions, gives scant hope for the delivery of what might be promised in any planning application;

(e) located at a point where cycling and walking (the physical activities that the Plan would seek to encourage) suffer the double disadvantage of requiring crossing either or both of the A4146 and the A5 to reach Central Milton Keynes in the face of heavy and fast-moving traffic on both roads, as well as breathing in the consequential emissions of inevitably heavier traffic: neither of these outcomes is consistent with the Council's claims to encourage greater physical activity and healthier lifestyles, prioritise walking, cycling and wheeling, or to promote walkable neighbourhoods and good physical health; and

(f) within an area in respect of which permission for residential development has already been refused (Application 17/03233/OUT): the reasons for the refusal remain valid and, indeed, are more relevant in the context of the Council's proposal to increase the development from 500 to 1,250 (and an even higher number in a parallel scoping application); this 250% increase significantly magnifies the scale and density of the development, its inevitable effect on the landscape, the urbanising effect on what is currently open countryside, the visual intrusion (which the Council claims it wishes to minimise), and the consequential impact on the nature and cost of infrastructural demand and delivery.

Conclusion

The Local Plan is based too much on ambition and aspiration with important (but foreseeable) consequences that are only to be thought through once a decision to develop has been accepted; there is far too little focus on explicit plans or requirements for there to be any assurance or confidence that the nebulous and undefined requirements of 'landscape-led', 'sensitive response' or 'mitigation' will be effective in preventing irreversible or inappropriate development.

There is no explicit protection for the historical and rural settlement of Little Brickhill; there is no requirement for a flood risk assessment (and as the owner of a home adjacent to the Levante Gate site at the south-eastern point, I am aware of the unwanted and increasing effects of ground saturation and surface water running downhill from the agricultural land to the south of the site); there is no air quality or noise assessment linked to the A5 trunk road; there are no assured biodiversity outcomes; and there is no assessment of the management and funding of the assumed infrastructure.

The failure to respond effectively to the findings of the Sustainability Appraisal is not consistent with the NPPF. In a development that would have a profound and irremediable impact on an SLA, the foreseen and unforeseen risks of it far outweigh any pursuit of a higher-risk and less sustainable site that is unnecessary in meeting the stated ambition for growth (as Reasonable Alternative 2 of the Sustainability Appraisal clearly establishes).

Finally, in support of Reasonable Alternative 2, I would draw the inspector's attention to a stark inconsistency in the nature of the Council's growth projections. In June 2024, (in round numbers) a population of around 300,000 lived in about 125,000 houses, that is, 2.4 people per house. On that basis, a future population of 410,000 (to use the Council's own most ambitious population target from the Reg 18 draft plan) would need no more than 170,000 homes, namely growth in housing stock of 45,000. This is considerably fewer than even the *lowest* end of the Council's Reg 19 plan range (50,234), and the difference is not explained. The adoption of other alternatives in order to pursue growth in housing stock at a higher level is simply not supported by the available evidence and assessments of sustainability.

For all these reasons, Policy GS18 represents a poor choice of site for development, is internally inconsistent, is not justified by the available evidence, and is not consistent with the NPPF. Accordingly, it is not sound.

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 Local Plan should be modified by adopting Reasonable Alternative 2 of the Sustainability Appraisal and Policy GS18 should be removed from the Plan. As the Appraisal states, Levante Gate performs poorly against the appraisal framework, and its inclusion with other nearby sites does not change that. Removing all sites within the Brickhills SLA from the Local Plan would still deliver just 700 fewer new homes than the *upper* end of the 'buffered' target of 59,779. The risks of proceeding in such a sensitive and important SLA cannot be justified by such a slim margin of gain within an admitted range of 'ambitious' but not required growth.

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

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

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

No

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

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

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

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

Sharing your personal details

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

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

For more information on how we use your data – please see our privacy notice by using the following link: <https://www.milton-keynes.gov.uk/milton-keynes-council/privacy-notice/milton-keynes-city-council-corporate-privacy-notice>

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