

Representations to MK City Plan 2050 Regulation 19 Consultation

Policy GS18 – ‘Land at Levante Gate’

**Response on behalf of Gallagher
Developments**

December 2025

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Appendix 1: Site Location Plan

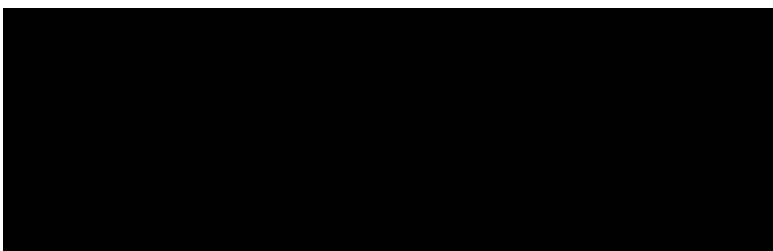
Appendix 2: Indicative Masterplan

Appendix 3: Strategic Framework Document for Land at Levante Gate

Appendix 4: TN6 Transport Note prepared by WSP

Peter Davis

Tim Burden



1. Introduction and Background

- 1.1 This representation has been prepared by Turley on behalf of Gallagher Developments in response to the Council's consultation on the MK City Plan 2050 (Regulation 19).
- 1.2 Gallagher Developments control land within the City Plan area at Levante Gate (hereby referred to as 'the Site') (please see Location Plan at **Appendix 1**) and are working alongside stakeholders to promote the Site for development (please see Masterplan in **Appendix 2**). The Site in its entirety is included within the MK City Plan 2050 as a proposed residential led mixed-use allocation under **Policy GS18 'Levante Gate Strategic City Extension'**.
- 1.3 It should be noted that there is ongoing engagement with Milton Keynes City Council in relation to the Strategic Framework Masterplan Document and there is an expectation that this will be refined in the coming months to take onboard comments from the Council and other consultees. This representation supports the emerging allocation of the Site specifically, as well as focusing on matters within the Regulation 19 consultation documentation that particularly affect the Site.
- 1.4 These representations are informed and supported by a draft Strategic Framework Masterplan Document prepared by Edge to demonstrate the suitability and deliverability of the site in accordance with the emerging principles set out within the MK City Plan 2050 (**Appendix 3**). In addition, please see enclosed a Transport Technical Note (**Appendix 4**) that provides a Vision and Movement Strategy to accommodate a residential led mixed use development proposed through Policy GS18.
- 1.5 Detailed evidence in support of this emerging allocation has been provided to date through the Regulation 18 Consultation Representations, and again as part of this current representation through the indicative Masterplan (Edge) and Highways Technical Note (WSP), in order to demonstrate that no significant environmental or technical constraints exist to impact on the delivery of the proposed scheme in a sustainable manner. The inclusion of the Site in the City Plan will provide a significant contribution to the supply of housing in the plan period through the delivery of a minimum of 1,250 new homes along with education, community, and recreational facilities.
- 1.6 Gallagher Developments have undertaken successful and collaborative engagement with Milton Keynes City Council during their preparation of the MK City Plan 2050 to date, and are keen to continue working with the authority to support the allocation and delivery of the Levante Gate Strategic City Extension early within the City Plan period.
- 1.7 Gallagher Developments are a master developer who have a proven track record of delivering sustainable development in Milton Keynes. Gallagher Developments obtain both deliverable planning consents and deliver strategic infrastructure on sites, such as swathes of public open space, schools, enhanced local centres, distributor roads and sustainable urban drainage systems (SuDs). Gallagher Developments ability to act as a master developer promotes accelerated delivery as it enables a range of house builders to build and sell new homes simultaneously.

2. Levante Gate – Site and Proposals

- 2.1 This section of our representations summarises the Site details, context and proposed development opportunity.
- 2.2 The Site, known as ‘Levante Gate’, is located to the southeast of Milton Keynes and covers an area of approximately 66.14ha. The Site comprises five arable fields that are defined by mature tree and hedgerow vegetation.
- 2.3 The adopted Plan:MK Policies Map shows that the Site is currently located within an area identified as Open Countryside and within a Minerals Primary Focus Area. It is adjacent to the current Milton Keynes City Development Boundary; a Strategic Site Allocation (which includes housing, shopping/leisure and community facilities); and a Scheduled Ancient Monument to the west.
- 2.4 The northern boundary of the Site runs parallel to the A5. The A5 is identified as a wildlife corridor, with an existing employment allocation located to the northeast, off the northern arm of Kelly’s Kitchen Roundabout. To the east is a Biodiversity Opportunity Area, beyond which lies the settlement of Little Brickhill approximately 400m east of the Site boundary.
- 2.5 The western boundary is shaped by its relationship with the Eaton Leys development, situated across the A4146. The southern boundary runs in alignment to the authority boundary of Milton Keynes and Buckinghamshire. To the south lies additional agricultural land parcels within Buckinghamshire.

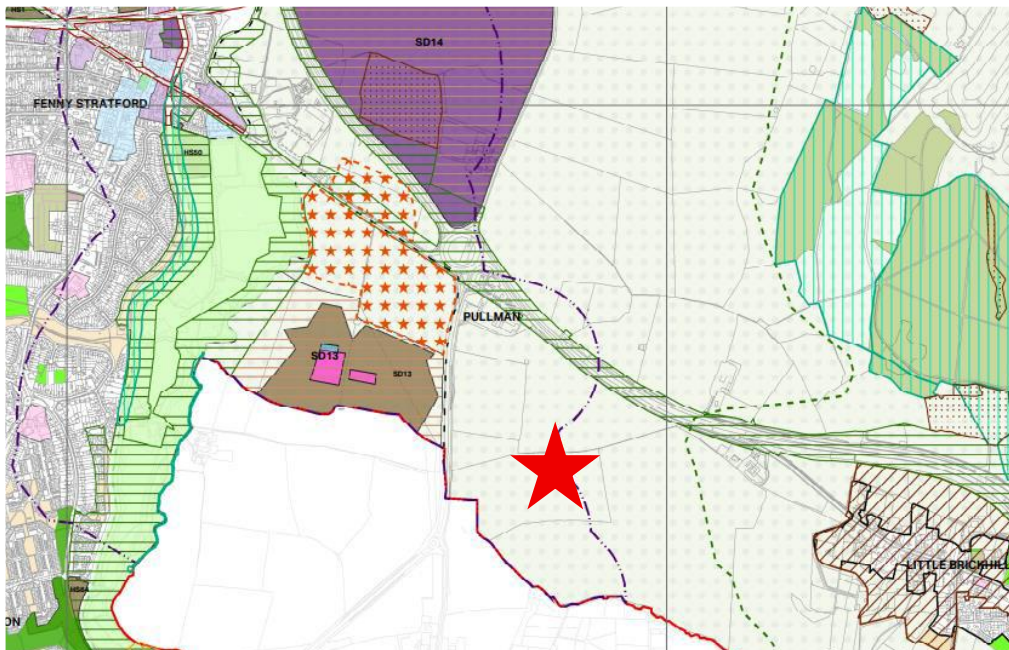


Figure 1 - Plan:MK Policies Map Extract (Site location indicated by star)¹

¹[https://miltonkeynes.statmap.co.uk/map/map.html?map=\Maps\Public%20Maps\External_Maps\My%20Milton%20Keynes%20-%20Open%20Portal.Map\\$&login=ExternalELP](https://miltonkeynes.statmap.co.uk/map/map.html?map=\Maps\Public%20Maps\External_Maps\My%20Milton%20Keynes%20-%20Open%20Portal.Map$&login=ExternalELP)

2.6 The Site is limited in constraints both on-site and in the neighbouring context.

2.7 A summary of the considerations relating to the Site are set out below:

- *No statutory ecological designations covering the Site, although the most easterly portion of the Site is within the current Plan:MK Biodiversity Opportunity Area;*
- *Trees and hedgerows are limited to the field boundaries;*
- *The Site slopes east-west towards the A4146 with levels AOD ranging from 75m in the west to 110m in the east;*
- *An existing Public Right of Way (Bridleway) crosses the Site in an east west direction (Little Brickhill BW 15);*
- *The Site is situated within the Greensand Ridge National Character Area;*
- *The Site is within Flood Zone 1, with small areas to the west of the Site adjacent to the A4146 being at low to high risk of surface water flooding;*
- *Within the Site there are no designated heritage assets. To the north west of the Site is a Scheduled Monument (the Roman town of Magiovinium and fort (listing ref. 1006943) and less than 1km to the east is Little Brickhill conservation area and a number of listed buildings;*
- *Overhead 11kV pole mounted powerlines run along the boundary on the eastern side which then cut across to the western side in diagonal line. The lines travel south along the A4146, north-west of the Site;*
- *There is an existing High-Pressure gas main located along the western boundary of the Site;*
- *An existing foul water sewer with associated 3m easements runs through the north east of the Site;*
- *The Site is not within an existing Air Quality Management Area; and*
- *The noise environment on Site is impacted by road traffic noise the A5 and from the A4146.*

2.8 The emerging Policies Map published under the Regulation 19 consultation essentially identifies the same considerations, alongside the allocation area itself. Further comments on this map are provided later in these representations, but a summary is noted below:

- *On the emerging MK City Plan 2050 Policies Map, the Site is within the proposed Brickhills Special Landscape Area (SLA) designation (albeit acknowledged that this is not yet adopted).*

2.9 The existing designations are 'carried over' from Plan:MK to the City Plan 2050.



Figure 2 - Emerging MK City Plan 2050 Regulation 19 Policies Map² (site marked by red star)

2.10 It is noted that there is recent development to the north of the Site at 'Hunters Farm Shop', fronting the A5 to the north and A4146 to west, and the employment allocation to the north, and Eaton Leys to the west.

2.11 The Site itself has also been subject to the following applications for development:

- *17/02705/EIASCRC - Screening opinion in respect of proposed development for up to 625 dwellings together with associated amenity and open space, landscaping and access – EIA not required – 2 November 2017.*
- *17/03233/OUT - An outline proposal with all matters reserved for development of land to the south of the A5 and east of the A4146, Milton Keynes for up to 500 homes, including 40% affordable homes; a 1 Form Entry Primary School; a local Centre, open space and associated works – Refused – 13 September 2018.*

2.12 It is highlighted that application ref. 17/03233/OUT was recommended for approval by Officers, however, was refused at Planning Committee for a single reason relating to the Site location being within the open countryside, reflective of the Council's position at that time.

² https://www.milton-keynes.gov.uk/sites/default/files/2025-11/PoliciesMap_Reg19_A0.pdf

Site Context

- 2.13 The Site is situated wholly within the administrative boundary of Milton Keynes City Council, with the entirety of the southern boundary, and part of the western boundary, adjacent to the Buckinghamshire Council border (former Aylesbury Vale area).
- 2.14 Milton Keynes is a highly sustainable settlement with a range of diverse services, facilities and employment opportunities, as well as being located on a main trainline into London. Luton Airport is also located just 30 minutes south along the M1 providing flights to international destinations.
- 2.15 The nearest current facilities to the Site itself are located at the service station and commercial area that borders the Site to the northwest. This includes a petrol station (incl. convenience retail), McDonalds and an established farm shop complex providing locally sourced convenience products.
- 2.16 The Site is within a 5 minute cycle, 20 minute walk, (along the A5 Redway) and easily accessible by public transport to the suburban area of Fenny Stratford. Fenny Stratford remains highly accessible and hosts a range of facilities and amenities on the main route into Milton Keynes city centre, including but not limited to a primary school, leisure centre, playing pitches, medical centre and a range of town centre uses including restaurants, public houses, barbershop.
- 2.17 The Site is located south of the A5 which connects Milton Keynes to the hubs of Dunstable and Luton to the south and the social and economic employment opportunities available with strategic connections to the M1. The A4146 that runs to the west of the Site provides direct links to Leighton Buzzard that shares a similarly strategic setting with employment and commercial floorspace.
- 2.18 To the east, 400m from the edge of the Site, is the village of Little Brickhill. The western boundary of the Site is heavily influenced by the relationship with the Eaton Leys development on the opposite side of the A4146, which now constitutes the urban edge of Milton Keynes. A number of small hedgerows and small watercourses enclose the southern edges of the Site, beyond which are further agricultural fields sited within the administrative area of Buckingham (former Aylesbury Vale).
- 2.19 The area in the surrounding context of the Site has been subject to recent developments and will likely be subject to further development moving forward, demonstrating that this area forms a clear direction of growth for Milton Keynes. In summary:
- In 2017, a cross boundary outline planning permission was granted on land to the west of the Site at Eaton Leys for mixed use development including 1,800 dwellings (ref. 15/01533/OUTEIS). This development is under construction as part of a subsequent reserved matters for 450 homes (ref. 19/01412/REM);
 - In 2020, an appeal was allowed for employment development on Land at Brickhill Street, which is to the north of the Site (ref. 19/01818/OUT). This was also a Strategic Allocation in the adopted Plan:MK. This development is now under construction;

- Under the MK City Plan 2050 a Strategic City Extension South of Bow Brickhill is also an emerging allocation under Policy GS17 for mixed use development including 1,300 new homes, secondary school, healthcare facilities, local centre and open spaces; and
- We are aware that land over the boundary in Buckinghamshire is also available for development and is being actively promoted to their emerging Local Plan.

Proposed Development Opportunity

- 2.20 The overarching Vision for the Site is to deliver a distinguishable, high-quality and landscape-led development, providing a minimum of 1,250 new homes well-connected by low carbon modes of travel into the existing communities of the City with the Site forming the Levante East Strategic Extension allocated under Policy GS18.
- 2.21 At the heart of the development sits a new three-form entry primary school, local centre, mobility hub and a series of sports pitches, forming a social and activity hub for the neighbourhood. These social land uses have been collectively located centrally within the development to encourage shared use and easy access from residential areas and transport nodes within the Site, acting as a key focal point to bring to the community together.
- 2.22 To support an inclusive and self-sustaining neighbourhood, the Site can accommodate, a local centre to meet daily convenience needs. This is proposed with a central mobility hub and positioned along the main green corridor. This could accommodate a café, small shop or community space, encouraging social interaction and enabling active, walkable lifestyles. Its location along the existing PRow reinforces the wider movement framework, with strong walking and cycling links connecting homes to facilities.
- 2.23 Residential parcels are carefully distributed throughout the Site to protect and enhance existing landscape features, topography and proposed and existing access routes. Homes can be positioned to front onto green spaces, key streets and public routes, helping to create a safe, attractive and characterful environment. A mix of housing types and tenures will support a diverse and inclusive community in line with the overarching vision of the MK City Plan 2050.
- 2.24 The allocation of the Site presents a strategic opportunity to deliver a sustainable, healthy, landscape-led development with high-quality homes, a mixed-use neighbourhood hub, and primary school, supported by extensive open spaces green active travel, red route corridors and additional woodland blocks to help screen the development and assimilate built form with the urban edge of Milton Keynes.
- 2.25 To demonstrate how the development of the Site would align with the principles of the MK City Plan 2050, and assimilate with the wider strategic growth at southeast Milton Keynes, the accompanying Strategic Framework Masterplan Document provides comprehensive consideration of the Site's inherent constraints and opportunities that will continue to develop through engagement with Officer's and in tandem with the progression of the MK City Plan.

- 2.26 In doing so, the Framework Plan ensures that new development responds sensitively to the existing landscape features and topography, integrating retained habitats, hedgerows and watercourses into a connected green infrastructure network. The Strategic Framework Masterplan Document effectively translates the strategic vision and principles proposed through the allocation into a tangible, deliverable design framework that will guide detailed design and planning decisions in support of a sustainable, well connected and resilient community that contributes to the future growth of Milton Keynes.
- 2.27 Coupled with infrastructure within the Site to prioritise active and sustainable travel, this will maximise opportunities for journeys to be undertaken by active modes and reduce the demand for people to travel away from the site, but acknowledge the need to travel by private car.
- 2.28 In summary, the proposed development opportunity for the Site comprises the following:
- ***Minimum 1,250 new high quality family homes with 40% (circa. 500) affordable homes with a mix of sizes and tenures.***
 - ***A mobility hub to provide varied modes of sustainable transport to local amenities that could include e-bikes, electric car share and RTPI (real time passenger information) boards for buses and trains.***
- 2.29 A new primary school.
- ***Amenities and services ready for the Zero-Carbon future, including provisions for electric vehicle charging points.***
 - ***New children's play areas and natural play trails, promoting outdoor activity.***
 - ***New footpaths and cycle routes connecting into the existing Public Rights of Way network.***
 - ***New multi-functional open spaces, areas for food production and enhanced woodland and boundary planting to provide a biodiversity net gain of at least 10%.***
 - ***New landscape buffers and sustainable surface water management including swales and attenuation basins with wildlife friendly features.***
 - ***Commitment to carbon reduction with the implementation of a zero-gas communal heat facility and all new homes meeting The Future Homes Standards.***
- 2.30 To align with the requirements of Policy GS18, the emerging masterplan for the site is extracted below and in **Appendix 2** for ease.

2.31 Gallagher Developments will continue to work with Milton Keynes and its stakeholders to prepare a spatial framework masterplan for the development, its characteristics, how constraints and opportunities have influenced the emerging masterplan and how the allocation is anticipated to accommodate the scale of growth proposed. As such, the proposals for this portion of the allocation have been developed in the context of this wider framework.

3. Levante Gate Strategic City Extensions – Site Assessment and Response to the Evidence Base

- 3.1 This section provides an assessment of the key considerations of the Site, taking into account the documentation within the Council’s evidence base, along with the separate environmental and technical assessments relating to the site instructed by Gallagher Developments, and submitted with these and previous Regulation 18 representations.

Principle of the proposed development

- 3.2 The National Planning Policy Framework (NPPF) is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as extensions to existing towns and cities (Paragraph 77) that help support strong, vibrant and healthy communities and by fostering well-designed places.
- 3.3 The allocation of the Site therefore conforms with this, as does the Council’s chosen strategy for growth, but it is important that the phased release of this site allows for multiple outlets in order to ensure consistent delivery over the plan period.

Strategic Housing Land Availability Assessment (November 2025)

- 3.4 Under the Regulation 18 consultation, comments were provided by Gallagher on the July 2024 version of the Strategic Housing Land Availability Assessment (SHLAA). The Council have now published an updated version under the Regulation 19 consultation, date November 2025.
- 3.5 Within the Council’s Strategic Housing Land Availability Assessment (July 2024) the portion of the Site proposed for allocation was assessed under ref. 110511 Land at Levante Gate (north-westernmost half of the Site at 30.7ha and capacity for 600 units) and ref. 111934 Levante Gate Extension (south-easternmost half of the Site at 39.02ha and capacity for 650 units).
- 3.6 It is noted that the SHLAA Assessment of site ref. 111934 ‘Levante Gate Extension’ includes an area within Buckinghamshire Council, south of the administrative boundary line within Figure 4 below. This area does not form part of the proposed allocation of the Site within the MK City Plan 2050, and we suggest should be removed from the SHLAA. Indeed, it would be helpful if the study area of the SHLAA reflected the area of the proposed allocation in a single assessment.

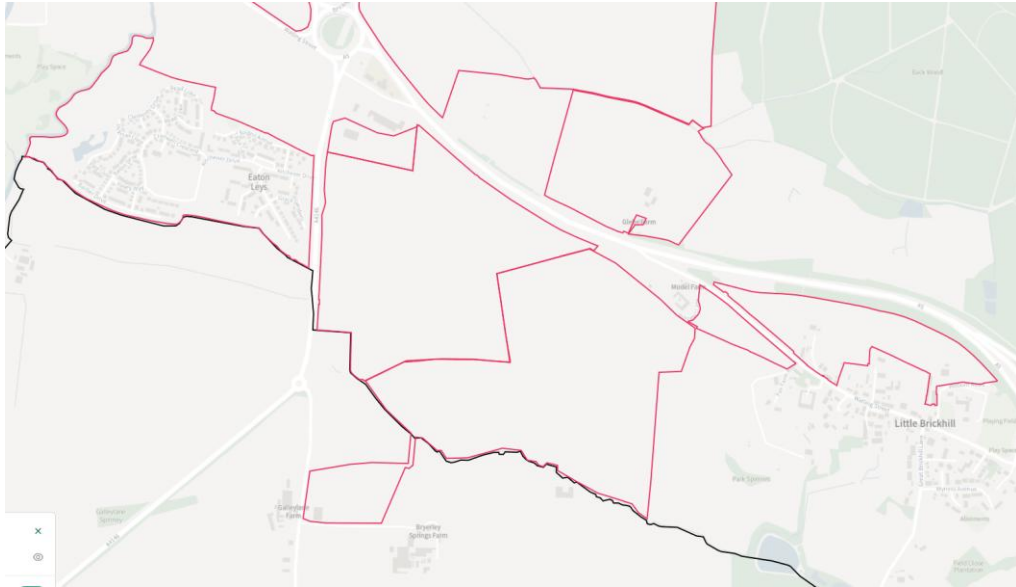


Figure 4 – Extract of MKCC SHLAA Mapping Extract

- 3.7 In respect of the **Site ref. 110511**, the Council has considered that the Site was suitable, available and achievable as a strategic scale greenfield extension to Milton Keynes. It states that the Site is currently designated as open countryside and falls within the proposed Brickhills Special Landscape Area. It is noted that it falls within a Minerals Primary Focus Area and has some minimal surface water flooding which would need consideration in design. Access does not represent an issue but, the site would need to provide substantial suitable connections for walking and cycling to Eaton Leys and Bletchley.
- 3.8 In terms of overcoming constraints, it states that a positive allocation of the site would be required through the new Local Plan or a Neighbourhood Plan to overcome the existing open countryside designation. Further consideration would be required as to the impact upon the Special Landscape Area within which the site sits and as to whether this constrains the suitability of the site. Any proposed development should also consider potential impact upon the Little Brickhill Conservation Area and would need to ensure to avoid coalescence with Little Brickhill, especially if the site is brought forward with neighbouring land as part of a wider strategic extension to Milton Keynes (note that the assessment refers to Bow Brickhill, but it is gathered this is an error and should state Little Brickhill).
- 3.9 The SHLAA summarises that there are no unsurmountable constraints identified, and the principle of development is acceptable through formal allocation of the Site.
- 3.10 For **Site ref. 111934**, the Council considered the Site was suitable, available and achievable. In summarising its constraints, the Council considered that the Site deliverable alongside adjacent land to the west forming a larger strategic extension to Milton Keynes. A small part of the site falls within a Minerals Primary Focus Area and has some minimal surface water flooding which would need consideration in design.
- 3.11 Access does not represent an issue but, the site, alongside the adjacent land to the west, would need to provide substantial suitable connections for walking and cycling to Eaton

Leys and Bletchley. It notes that the site is close to the Little Brickhill Conservation Area, so design and layout would need to consider mitigating any impact.

- 3.12 In overcoming constraints, it states that a positive allocation of the site would be required through the new Local Plan to overcome the existing open countryside designation. Further consideration would be required as to the impact upon the Special Landscape Area within which the site sits and as to whether this constrains the suitability of the site. Any proposed development should also consider potential impact upon the Little Brickhill Conservation Area and would need to ensure to avoid coalescence with Little Brickhill (again, note that the assessment refers to Bow Brickhill but it is gathered this is an error and should state Little Brickhill).
- 3.13 Again, there are no unsurmountable constraints identified here and the principle of development is acceptable through allocation. Further commentary is provided within this report to address the considerations raised.

MK City Plan 2050: Sustainability Appraisal (November 2025)

- 3.14 The Sustainability Appraisal of the MK City Plan 2050 (November 2025) has been prepared to supersede the previously published MK City Plan 2050: Sustainability Appraisal Regulation 18 Consultation Version (July 2024).
- 3.15 The Non-Technical Summary identifies Levante Gate “*of considerable importance*” noting that the Site can deliver early “*which is a key consideration, given the need to demonstrate a five year housing land supply at the point of adoption and then maintain this over the early years of the plan period ahead of a local plan review*”.
- 3.16 The Sustainable Appraisal (SA) considers Reasonable Alternative growth scenarios at Table 5.1 within the SA.

Table 5.1: The RA growth scenarios (with constants greyed-out)

Source of supply	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Completions/commitments	22,705	22,705	22,705	22,705	22,705	22,705
Windfall	2,990	2,990	2,990	2,990	2,990	2,990
Urban supply inc. CMK	20,534	20,534	20,534	20,534	20,534	20,534
ESCE	7,750	7,750	7,750	7,750	7,750	7,750
East of Wavendon	2,250	-	2,250	-	2,250	2,250
South of Bow Brickhill	-	1,300	-	1,300	1,300	1,300
Levante Gate	-	1,250	-	1,250	1,250	1,250
Shenley Dens	-	1,000	-	1,000	1,000	1,000
West of Olney	-	-	1,000	1,000	-	1,000
Total supply 2022-2050	56,229	57,529	57,229	58,529	59,779	60,779
% over LHN (50,372)	12%	14%	14%	16%	19%	21%

- 3.17 In all but two scenarios, Levante Gate is shown at being able to deliver 1,250 homes between 2022-2025. The reasonable alternative growth scenarios 1 and 3 consider the preferred approach of the MK City Plan 2050, but does not count the delivery of number of allocations, including Levante Gate.
- 3.18 It is noted that the Council's preferred option (Scenario 5) includes the delivery Levante Gate. Gallagher Developments are supportive of the preferred option and the Council's position that the Levante Gate has the capacity to deliver at least 1,250 dwellings in each growth scenario and reiterates its availability early within the Plan Period to assist in securing housing land supply in line with the Framework (Dec. 2024).
- 3.19 Rather than the Site Assessment Matrix which was included in the 2024 version of the report, a series of narrative discussions are included in the 2025 document. For clarity, the representations made to the Regulation 18 consultation provide a full response to the Site Assessment Matrix of the Site, and therefore the Council are directed to these for further detail.
- 3.20 A summary of the assessment made with respect the Site is therefore set out below with commentary.
- 3.21 With respect to **Accessibility (to community infrastructure)** the narrative states that:
- “Levante Gate and South of Bow Brickhill can be planned in combination including to complement the adjacent Eaton Leys site under construction and mindful of possible further growth south in Buckinghamshire; delivering a secondary school is an important option to explore ...*
- preferred approach (Scenario 5) is considered to be highly proactive and is well considered in terms of addressing locational issues and opportunities. It is also*
- recognised that a large amount of work has been undertaken regarding infrastructure strategy and planning ... [Levante Gate] has the potential to deliver a primary school”*
- 3.22 It is noted that there is the potential to deliver two secondary schools across other strategic allocations, with two sites (including Levante Gate) located in close proximity to existing secondary schools.
- 3.23 Gallagher Developments recognise the strategic location of Levante Gate, adjacent to existing strategic infrastructure within Fenny Stratford, adjoining allocations, and the ability of the Site to accommodate its own community infrastructure. This includes, but not limited to the provision of a primary school within the development parcel, local centre and mobility hub to further the accessibility of new communities of this area. Alongside, the strategic allocation of the Site can further the provision of formal open space and playing pitches within the Gallagher Developments land control.
- 3.24 Further improvements and connectivity with active travel and mass rapid transport and red routes from the Site into the heart of Milton Keynes demonstrate how development on the edge of Milton Keynes can positively contribute to the accessibility of community infrastructure and daily convenience serves critical to sustainable and social communities for the vitality of this area of Milton Keynes.

3.25 Evidence prepared by EFM that accompanied the Reg. 18 Representations pertaining to Policy GS18 demonstrates how there is existing capacity for secondary school places within surrounding areas, including those proposed within adjoining allocations (namely Policy GS17 Land South of Bow Brickhill) that a secondary school is not necessary within Levante Gate. Gallagher Developments note that Policy GS18 cross-refers to the provision of necessary financial to the provision of this infrastructure in adjoining developments.

3.26 With respect to **Air and wider environmental quality** the narrative states that:

“The appraisal reflects a view that expansion of Milton Keynes is supported from an air quality perspective, given good potential for growth to be ‘vision-led’ in transport terms and, in this regard ... Expansion of Milton Keynes can be compared to expansion of most other towns in the sub-region, where there is typically at least one AQMA (e.g. there is an extensive AQMA affecting the centre of Bedford).

In conclusion, there is support for the higher growth scenarios”

3.27 Gallagher Developments note that the Site at Levante Gate is not sited within an AQMA. Gallagher Developments technical evidence submitted with the Reg. 18 Representations demonstrating how the proposed development of the Site would not give rise to unacceptable impacts on air and environmental quality receptors either directly or indirectly. In this regard, Gallagher Developments support the view of the Council in accommodating higher growth scenarios and continue to promote sustainable and active travel modes through new developments.

3.28 With respect to **Biodiversity** the narrative states that:

“All of the variable growth locations are subject to a degree of onsite, adjacent or nearby constraint ... however each case biodiversity concerns are of limited significance, with no clear concerns regarding locally designated Local Wildlife Sites (LWSs) let alone nationally designated Sites of Special Scientific Interest (SSSIs).

Broadly speaking, expansion of Milton Keynes does give rise to biodiversity concerns relative to potential strategic growth locations elsewhere in the sub-region, e.g. the north of Buckinghamshire is less sensitive.

It is recognised that there will be much potential for the proposed greenfield strategic growth locations to deliver targeted green / blue infrastructure”.

3.29 The Site, on the southeastern edge of Milton Keynes, in the area immediately north of Buckinghamshire is less sensitive. Gallagher Developments recognise that the Site is not constrained by LWS or SSSI within or in close proximity to the strategic allocation. The careful design and masterplan of the Site will seek to preserve assets of biodiversity value, whilst also being able to accommodate additional and supplemental planting to secure on-site gains in biodiversity in accordance with national legislation.

3.30 Gallagher Developments therefore support the approach to a higher growth scenario within the MK City Plan in recognition that targeted and well-planned development can allow for appropriate mitigation and gains in biodiversity.

3.31 With respect to **Climate change adaptation** the narrative states:

“None of the variable growth locations intersect fluvial flood risk zones but most are associated with surface water flood risk (SWFR) channels/zones. The Environment Agency’s consultation response in 2024 concluded “no major concerns” because risk could be “avoided through site design” but stated a residual concern ahead of concept masterplanning.

Levante Gate [is] associated with notable SWFR channels and areas of SWFR pooling adjacent to roads infrastructure, such that there could be a challenge for masterplanning, and downstream flood risk is a consideration, but it is not clear there are major concerns

3.32 Gallagher Developments note the identification that the Site is located within Flood Zone 1, the lowest category of flood risk, but recognises pockets of surface are present, notably along the western boundary along the A4146 where run-off drains and hedgerows are present. It is accepted that surface water flooding is a matter that can be suitably addressed through detailed masterplan and concept planning.

3.33 As identified through technical evidence submitted with the Reg. 18 representations, the development of the Site should not be precluded on flood risk grounds and that any forthcoming development will incorporate SuDS attenuation basins and swales that will account and mitigate the risk of flooding on-site and downstream in line with, or an improvement on existing greenfield run-off rates.

3.34 Gallagher Developments therefore support the conclusions of the Sustainability Appraisal in that development can be accommodated through efficient masterplanning process, such as that shown in the accompanying SFMD / Masterplan, and informed by technical evidence.

3.35 With respect to **Climate change mitigation** the narrative states:

“there is support for strategic growth locations, which can be masterplanned to deliver on decarbonisation objectives. Masterplanning for renewable heat and power generation and storage can enable new communities that are not a net draw from the national grid over the course of a year (and minimise net peaks of demand on the grid during winter), and perhaps even generate a net surplus.”

3.36 Gallagher Developments note there are competing master planning and wider policy priorities with major cost implications, for example transport infrastructure and affordable housing. This can and likely will limit the potential to masterplan for energy infrastructure” as recognised at Paragraph 6.6.2 of the Sustainable Communities.

3.37 The emerging Masterplan demonstrates how the Site has the potential to provide on-site communal heat hub in support of the overarching objective of the MK City Plan 20250. Further, Gallagher Developments note that the strategic delivery of new homes can enable new units being designed to Future Homes Standard (or equivalent) that reduces the carbon footprint of individual units on a strategic scale, including through car clubs associated with mobility hubs, and private and public EV charging where appropriate.

3.38 Gallagher Developments support the ability of strategic allocations to provide on-renewable provision where feasible and deliverable.

3.39 With respect to **communities** mitigation the narrative states:

“It is important to recognise that whilst there are no nationally designated landscapes, and relatively little in the way of wider national designations, landscapes around the edge of MK are highly diverse and sensitive at least in the sub-regional context.

This varying sensitivity has factored strongly into spatial strategy / site selection, but concerns do remain across the variable options for MK expansion.

This is perhaps least the case for Levante Gate and South of Bow Brickhill because: A) these locations are strongly on the periphery of MK, separated from the current urban edge by industry and major infrastructure; B) there are limited concerns regarding impacts to nearby historic villages, assuming avoiding impacts factors in as a masterplanning priority; and C) there is a low density of public rights of way through / adjacent to these two sites. However, the effect of developing these two sites will be to dramatically change the relationship between the MK edge and the Greensand Ridge, which is a key feature and asset within the Oxford to Cambridge growth corridor.”
Emphasis added.

3.40 Gallagher Developments re-iterate the objectives of the National Planning Policy Framework in advocacy of high growth scenarios in ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. In this context, Levante Gate should be considered in all growth scenarios given its pre-existing connectivity, both socially and through strategic infrastructure with the existing edge of Milton Keynes. As identified earlier and throughout these representations, the Site benefits from strong connections to Eaton Leys development immediately west of the Site, and the range and proximity of facilities and services within Fenny Stratford, as well as having the ability to provide its own community infrastructure.

3.41 As identified within earlier representations to the MK City Plan 2050, including the Council’s strategic assessment of the Site through its evidence base, Levante Gate presents a significant opportunity to provide a sustainable and self-contained neighbourhood area that relates strongly to the existing edge of Milton Keynes, with an active landowner who has engaged the Council and other stakeholders with a view to deliver the Site early within the Plan period in recognition of the limited constraints and contribute the need to demonstrate a five year housing land supply at the point of adoption and then maintain this over the early years of the plan period.

3.42 With respect to **economy and employment** the narrative states:

“the key point to note is that none of the variable growth locations would be likely to deliver significant new employment land”

3.43 Gallagher Developments note that the allocation at Levante Gate would be a residential led mixed-use development, but that the Site sits in close proximity to existing and proposed industrial and business estates such as Caldecotte Lake Business Park and

other employment areas within commuting distance, as well as emerging development of south Caldecotte, and north of the A5.

3.44 In this context Gallagher have no further comment on the assessment of the Site on this criteria.

3.45 With respect to **historic environment** the narrative states

“Historic England did not raise any specific concerns with any of the variable growth locations through consultation in 2024.

Levante Gate [is] quite unconstrained in historic environment terms”.

3.46 Gallagher Developments note that there are no designated heritage assets on the Site, but recognise that Little Brickhill Conservation Area and associated listed buildings are located c. 400m east of the Site. It is strongly considered that the Site can suitably provide residential development (alongside complementary uses) that assimilates with the built form and context of the edge of Milton Keynes.

3.47 The supporting masterplan and SFMD retains an approximate 90m buffer to the edge of the site and 400m to the eastern edge of Little Brickhill, that can be supported by supplemental planting to assist in screening the site. Gallagher Developments support the conclusions of the Sustainability Appraisal insofar as there are no overarching constraints that cannot readily be mitigated through sensitive design and masterplanning.

3.48 With respect to **homes** the narrative states:

“Under all scenarios total plan period supply comfortably exceeds Local Housing Need (LHN), but there is still support for higher growth scenarios because: A) delivery risks suggest a possible need for a large supply buffer; B) there is a need to consider the requirement/supply balance not only across the plan period but also year on year across the plan period (avoiding the need for a stepped requirement); and C) higher growth scenarios could possibly enable some flexibility to set the housing requirement modestly above LHN to account for affordable housing needs and/or unmet need from elsewhere.

Levante Gate is considered to be an important site from a housing perspective because it is expected to see its first completions in the 2028/29 monitoring year, such that it will contribute to ‘five year housing land supply’ at the point of plan adoption ... Levante Gate benefits from strong development viability and therefore good potential to deliver affordable housing”. Emphasis added.

3.49 Gallagher Developments support the conclusions of the Sustainability Appraisal in identifying the delivery of Levante Gate as key in establishing a five year housing supply at the point of adoption in accordance with Paragraph 72 of the NPPF.

3.50 Gallagher Developments are actively engaging the Council and other stakeholders in advancing the masterplan and SFMD to deliver a minimum of 1,250 new homes at the Site, with a view to deliver these early in the Plan period. As identified throughout these representations and the supporting technical information that accompanied the Reg. 18

submission, there are no environmental or viability constraints that would otherwise restrict the ability of this Site to be delivered.

3.51 With respect to **Landscape** the narrative states:

“It is fair to flag a preference for the lowest growth scenario under this topic and to conclude a ‘moderate or uncertain’ negative effect under those scenarios that would see significant growth directed to an SLA. However, it is recognised that the lowest growth scenario could mean that the plan struggles to progress to adoption without additional allocations and any other allocation options could well be associated with landscape constraint”.

3.52 In the context of Levante Gate:

“Levante Gate - There is a need to carefully consider the southern / southeastern boundary, with a view to minimising concerns around further encroachment on the Greensand Ridge and/or sprawl to the south along the river corridor”.

3.53 Gallagher Developments note that the landscape constraints were similarly recognised in 2024, with the Sustainability Appraisal acknowledging *“landscape-led development in these locations could still occur without fundamentally undermining the landscape qualities that have led to their proposed designation as [Strategic Landscape Areas].*

3.54 Gallagher Developments would continue to propose that higher growth scenarios can still be accommodated in tandem with protecting the landscape qualities of Strategic Landscape Areas and would reiterate that Milton Keynes is largely unconstrained by the presence of Green Belts or National Landscapes that play a significant role in the capacity of neighbouring authorities to accommodate higher levels of growth.

3.55 The development of Levante Gate can create a landscape-led place that integrates with the existing landscape characters and features, protecting and enhancing existing trees, hedgerows and habitats, to create an attractive and vibrant place where people will aspire to live.

3.56 With respect to **Resources** the narrative states:

“The plan area is not particularly constrained in the sub-regional context, with Central Bedfordshire associated with a higher concentration of BMV land (including significant grade 1). Focusing on the edge of MK, agricultural land quality is higher to the north and east than it is to the south and west, whilst Olney is potentially associated with agricultural land quality that is similar to north/east MK (the available dataset is low resolution and low accuracy).”

3.57 Gallagher Developments note the location of Levante Gate to the southeastern edge of Milton Keynes. Notwithstanding this, it is clear that Milton Keynes Council require the development of greenfield sites in order to meet its housing requirements, inevitable leading to the loss of agricultural land across the Plan area.

3.58 Gallagher Developments support the findings that there are no significant concerns in advocating higher growth scenarios in regard to resources. It is noted that the undue sterilisation of minerals is not known to be a key issue for the current plan.

3.59 With respect to Transport the narrative states:

“Nationally there has been a recent shift to ‘vision-led’ transport planning that involves directing growth in order to minimise the need to travel and support modal shift away from the private car, and it is clear that this is a priority locally.”

3.60 Gallagher Developments support the approach undertaken by the Council and aligning with a “vision-led” approach and reducing the need to travel where possible and encourage residents to undertake active and sustainable travel modes in lieu of the private car. This will not only reduce the impact on the highway network of additional residential development but will also reduce the impact on the environment through a low carbon approach to travel.

3.61 The supporting **TN6 Transport Technical Note** prepared by WSP (**Appendix 4**) outlines how the Site at Levante Gate is supported by a Vision and Movement Strategy for the Site, focus on ‘placemaking’ to maximise the opportunity to maximise internalised trips and influence travel behaviours at the outset through careful layout design. The Site can actively reduce external trips providing a range of on-Site community facilities, a new primary school, formal and informal open spaces throughout the development. Off-site measures can also assist in directly connecting the site with existing development at Eaton Leys to the west through controlled pedestrian crossings. This connectivity is furthered by linkages to the existing Redway network for easy, attractive, and safe active travel by residents across the Site and beyond towards central Milton Keynes, including Fenny Stratford, Bow Brickhill Station, and surrounding employment areas and adjoining strategic allocations.

3.62 With respect to **Water** the narrative states:

“Strategic growth locations are well placed to achieve high water efficiency, although this is another policy objective with cost implications that must be balanced with competing priorities.”

3.63 Gallagher Developments acknowledge these conclusions and the ability and viability of Levante Gate Strategic City Extension to accord with adopted building regulations in this regard. However, significant concerns and objections are raised in respect of Policy CEAS in that the proposed provision of water efficiency over and above building regulations, including the Future Homes Standard in that the current approach of water efficiency to be achieved through development plan policies do not align with national guidance. Further commentary on CEAS is provided below.

3.64 The **Overall** conclusion of the Growth Scenarios states

“The SA confirms that Scenario 5 is shown to broadly perform well through the appraisal, striking a balance between boosting housing supply and responding to constraints and delivery risks.

The landscape and/or historic environment case for lower growth scenarios is also acknowledged, but all of the sites in question (South of Bow Brickhill, Levante Gate, Shenley Dens, East of Wavendon) have considerable merit when viewed in isolation and as part of an overall strategy. The following statement from the Interim SA Report (2024) still holds true: “Taken with the positive effects of these options, and on balance with other considerations, they represent sustainable options for growth...

With regards to specific strategic allocations, the site specific policies are considered strong in terms of setting out clear requirements, and the approach of including concept masterplans within the plan is strongly supported. This all serves to generate confidence that the sites can deliver in line with policy aspirations.”

3.65 Gallagher Developments support the overall findings of the appraisal of Growth Scenarios, in particularly advocating for higher growth scenarios where it has been identified that Levante Gate can be developed without significant negative impact against the sustainability objectives of the MK City Plan, both in isolation with a capacity to deliver early within the Plan period, but in combination with adjoining strategic sites insofar as it relates well through strategic infrastructure and accessibility to community resources.

Milton Keynes City Council: Housing and Economic Development Needs Assessment Update (October 2025)

3.66 The Site will clearly deliver a significant number of homes, including affordable. In the Milton Keynes City Council: Housing and Economic Development Needs Assessment Update (October 2025) the document is clear in recognising a backlog in affordable housing and the need for more homes in the immediate future. It states that that an estimated 5,704 households in Milton Keynes are currently living in unsuitable housing and are unable to afford their own housing (an increase from 3,927 in the 2024 version of the same report following the 2021 census).

3.67 Of these households, 2,148 currently occupy affordable housing that does not meet the households’ current needs, mainly due to the number of bedrooms (an increase from 1,413 in the 2024 version of the same report). Providing suitable housing for these households will enable them to vacate their existing affordable housing, which can subsequently be allocated to another household in need of affordable housing.

3.68 Paragraph 44 confirms that the total need identified by the HEDNA Update analysis for the period 2022 – 2050 equates to 15,576 households (556 per year). This figure is 30% higher than the original HEDNA (11,964 households, 427 per year) due to increases in the estimates of current need.

- 3.69 Paragraph 47 reiterates that there is a net and immediate need of 3,556 households at the start of the Plan period in 2022. To address this, it is necessary to maximise affordable housing delivery in the early years of the Plan.
- 3.70 In relation to draft Policy HQH2 Affordable Homes, we note that approach to 40% housing on sites in Housing Viability Area 1 (where Levante Gate is located) it is over and above the requirement identified in the Housing and Economic Development Needs Assessment (HEDNA, Figure 16, Page 70: October 2025).
- 3.71 It is therefore considered that the development of the Levante Gate Strategic City Extension will provide a significant supply of affordable housing to help address this backlog early within the Plan period.

Milton Keynes Infrastructure Study Further Assessment Report (October 2025) & Milton Keynes Infrastructure Delivery Plan (November 2025)

- 3.72 The Milton Keynes Infrastructure Study Further Assessment Report (October 2025) aims to ensure that adequate infrastructure is provided to make the MK City Plan 2050's growth ambitions for Milton Keynes developable, sustainable and equitable, setting out projected infrastructure requirements.
- 3.73 The accompanying Milton Keynes Infrastructure Delivery Plan (November 2025) sets out that with respect of the South East Sub Area and Levante Gate Strategic Expansion, there are a number of related infrastructure types across transport, education, health and social care, emergency services, Community Facilities, Green and Blue Infrastructure, Flood Risk and Water Management, Energy, Waste Management and Digital Infrastructure.
- 3.74 The Site is categorised as part of the 'South East' study sub area 4, which is expected to see growth of 6,384 homes between 2022 and 2050, with an increase in population of 14,942 people. Planning applications for housing developments on the strategic allocation sites within each sub area will need to address the specific infrastructure requirements and needs through a mixture of provisions and / or contributions through MK Tarriff and Section 106 Agreements.
- 3.75 As identified within the accompanying SFMD / Masterplan, the Site can be designed to accommodate a number of these matters on-site to foster healthy and sustainable communities, with financial contributions where necessary through S106 to support the delivery of the Site and identified infrastructure improvements. Highway connections, onsite highways and existing highway capacity upgrades associated with new developments can be assessed on a case-by-case basis in more detail.

Milton Keynes Multi Modal Transport Model

- 3.76 These representations are informed by a **Transport Technical Note** prepared by WSP. The MK MMTM forms part of the Regulation 19 evidence base for Milton Keynes City Plan 2050. It supports the modelling and forecasting work underpinning transport and infrastructure planning for the City's growth strategy, to ensure that there is an established transport strategy aligned with housing and economic growth which complies with the national decarbonisation and sustainability policies.

- 3.77 The MK MMTM includes a base year of 2019 (adjusted in 2023 for covid travel patterns), and a reference case and forecast year of 2050. Planned highway improvements are included in the 2031 reference case model along with all Plan:MK 2031 development allocations that are reasonably likely to be permitted and implemented. The forecasting scenario for 2050 includes all of the draft allocations from the City Plan 2050 along with other committed infrastructure schemes.
- 3.78 Growth in traffic in the reference case scenario in 2050 to reflect the increase in housing and jobs is forecast to increase most on the SRN including A5 and the grid road network more than on the local road network such as A4146. This is in part because of the unique nature of the road system in Milton Keynes which offers multiple different route choice alternatives. The largest increases in traffic in the reference case scenario also included on V10 Brickhill Road, southbound, presumably in relation to the Plan:MK 2031 allocation at South East Milton Keynes and associated highway connection amendments/Bow Brickhill bypass.
- 3.79 The forecasting scenario for 2050 includes all of the draft allocations from the City Plan 2050 along with other committed infrastructure schemes including the MRT. The forecast model convergence is good with all time periods meeting the Transport Analysis Guidance (TAG) criteria, i.e. the MK MMTM City Plan 2050 model is TAG compliant.
- 3.80 Compared to the 2050 reference case scenario, the greatest traffic increases related to the City Plan 2050 are forecast to be on the A5 link with modest flow increases at A5 Kelly's Kitchen roundabout but additional vehicle delays of potentially 90 seconds or more due to the congested nature of the junction.
- 3.81 A4146 is expected to see a reduction in traffic northbound in the AM peak as a result of planned growth combined with the implementation of the MRT scheme.
- 3.82 As discussed and agreed with MKCC, NH and BC, a VISSIM microsimulation model has been built to test the impact of the Levante Gate development on A5 Kelly's Kitchen roundabout in the forecast year of 2037 (full occupation) and NH are currently progressing a study to consider the mitigation that could be required. Further detail will be forthcoming from National Highways in early 2026.
- 3.83 Overall, the impact of the City Plan 2050, including development at Levante Gate, does not appear to have a significant adverse impact on the operation of the highway network in the vicinity of the Site in terms of volume of traffic, link and junction capacity, or delay. Whilst some impacts are shown, the introduction of MRT is considered to be sufficient mitigation when considered at a high level using the MK MMTM.

4. Representations to Policy GS18 Levante Gate Strategic City Extension

- 4.1 The MK City Plan 2050 includes draft wording of Policy GS18 which allocates the Site for development. As referenced, Gallagher Developments are in support of the proposed allocation as well as the extension to the City Boundary on the Policies Map to incorporate the Site.
- 4.2 Gallagher Developments note that the Council have made some revisions to the policy since the Regulation 18 consultation.
- 4.3 In the wording under B. has been amended to now remove the requirement for a Supplementary Planning Document which is supported. Gallagher Developments were concerned that such a document could cause delay to the delivery of the Site due to the associated timescales, and are therefore pleased to see this has been removed.
- 4.4 Gallagher Developments previously set out a preference for a concept Framework Masterplan being produced and a Design Code to be provided and submitted as part of the planning application. Gallagher Developments note that is no clear mechanism or timescales for facilitating the approval of this document in advance of planning permission being granted. Gallagher Developments have concerns that such ambiguity can create unnecessary delay in determining and approving any forthcoming applications for development. The policy should clarify the approach and timing of the submission and approval of such documents. Indeed, it should be considered whether they are actually required as a pre-determination activity given at Levante Gate the allocation is under a single party's control and an application relation to the whole site will be submitted. There appears no need to pre-empt or duplicate that process.
- 4.5 Further, Policy GS18 makes new reference to an "*approved Strategic Green and Blue Infrastructure and Open Space Strategy for the Strategic City Extension in accordance with the Infrastructure Delivery Plan*". Gallagher's object to the inclusion of this text and reserves further comment until the details of a site specific strategy is published for consultation.
- 4.6 It is recognised that it remains important for the Council to remain in control and in agreement with end-developers of each of the strategic city extensions, but consider that the approval of Framework Masterplan and Design Code can be readily addressed through the planning application process.
- 4.7 Gallagher Developments continue to have a number of comments and suggestions on the policy wording itself. These are set out below with a subsequent tracked change version of the policy provided for ease. Gallagher Developments would be very happy to engage with the Council as well as the other stakeholders involved in the allocation moving forward.

Policy GS18 Levante Gate Strategic City Extension

A. The Levante Gate Strategic City Extension is allocated for a new, mixed use, residential-led, strategic development to the south of the A5 and east of the A4146, **as shown on the Proposals / Policies Map.**

B. Development proposals within the Levante Gate Strategic City Extension should be in accordance with a **site based area** Framework Masterplan and ~~site-based area~~ Design Code **(to be agreed as part of the planning applications for the site)** that are consistent with the criteria below and wider plan policies and approved by the Council prior to planning permission being granted. **It is likely that the delivery of Levante Gate Strategic Extension will be phased.**

B. Development proposals within the Levante Gate Strategic City Extension will be required to meet the following criteria:

1. Delivery of ~~around~~ **a minimum of** 1,250 new homes through a comprehensive masterplan approach providing a range of house size, type and tenure, including affordable, older persons and specific needs housing;

2. Adopt a sensitive, landscape-led approach to the distribution, layout and design of development that satisfactorily mitigates impacts upon the valued characteristics of the Brickhills Special Landscape Area **in line with Policy CEA12;**

3. Provision of early years and primary education facilities **on site**, and **support** SEND provision appropriate to the scale and nature of the development proposal, and make necessary **and proportionate financial** contributions to the provision of secondary education facilities located within the South of Bow Brickhill Strategic City Extension;

4. ~~Contributions~~ **Proportionate financial contributions** toward the provision of primary healthcare facilities within the South of Bow Brickhill Strategic City Extension, together with contributions to wider health and social care infrastructure, appropriate to the scale and nature of the development proposal;

5. Provision of **a local centres**, as appropriate to the scale and nature of the development proposals;

6. The location, scale and phased delivery of social infrastructure, services and community facilities is planned to ensure they are in place to support new communities from the early phases of development in line with Policies GS4 and PFHP1;

7. Provision of green and blue infrastructure and open space, ~~in line with an approved Strategic Green and Blue Infrastructure and Open Space Strategy for the Strategic City Extension~~ in accordance with the Infrastructure Delivery Plan, ~~the Council's Nature, Green and Blue Infrastructure Strategy~~, and open space standards **to meet strategic and local requirements;**

8. An integrated network of low- and zero-carbon energy infrastructure from building scale to neighbourhood or district scale;

9. The phased introduction of a comprehensive transport network and infrastructure that follows the movement hierarchy set out in Policy GS4, and to **specifically** include:

a. **Active travel routes segregated from traffic Segregated routes for active travel** and provision of mobility hubs that integrate well with Eaton Leys, South of Bow Brickhill Strategic City Extension and the surrounding area and network of active travel routes and routes for public transport;

b. Routes for movement of public transport and general traffic through the site, with **primary and secondary** access taken from the A4146;

c. **Proportionate** infrastructure and traffic management measures to mitigate impacts upon the wider highway network **the extent of which, should be defined during scoping discussions leading to the preparation of a comprehensive Transport Assessment that should also accord with national policies and planning guidance.**

~~10. Be informed by appropriate surveys and assessments of built heritage and ecology with appropriate mitigation of impact; and~~

~~11. Pre-determination archaeological evaluation has been undertaken and provided in support of development proposals.~~

5. Representations to Reg. 19 MK City Plan 2050 Policies

- 5.1 Within this section, comments are provided by Gallagher Developments to other policies within the MK City Plan 2050.
- 5.2 For the avoidance of doubt, some policies within the MK City Plan 2050 are not referenced in this statement as Gallagher Developments do not wish to make any representations on them at this time. Although some general comments are made with the intention of assisting the authority, the majority are made in the interests of the Site, with input provided from specialist consultants in the project team.
- 5.3 To highlight, Gallagher Developments are supportive of the ambition and objectives of the MK City Plan 2050, particularly the drive towards ambitious growth to support prosperity, quality of life and wellbeing.

Our spatial strategy

Policy GS1 Our spatial strategy

- 5.4 Gallagher Developments support the spatial strategy for growth but suggest that the policy wording itself could be amended to better reflect the chosen growth strategy which includes greenfield development, which would not appear to evidently fall into either of the tiers stated under the policy.
- 5.5 It is suggested this could be captured by reference within Tier 1, for example, ‘...*the city of Milton Keynes Strategic Site Allocations and the Strategic City Extensions, as shown on the Policies Map...*’.

Policy GS2 Strategy for homes

- 5.6 Gallagher Developments support the chosen growth strategy set out within Policy GS2 and the application of the standard methodology for identifying and providing local housing needs of an authority area.
- 5.7 It is noted that the start date for the proposed Plan-period is from April 2022 – four years prior to the submission of the plan for examination. It is not clear why this base date has been chosen, noting that the Council’s latest Local Development Scheme fails to determine a date of adoption for the MK City Plan, rather extending the Examination In Public from April 2026 – December 2026.
- 5.8 Accordingly, should the timetable for the examination of the MK City Plan be delayed by just one month from its forecast programme, it is reasonable to conclude that the ‘start date’ of the MK City Plan will be presented five years sooner than its actual date of adoption.
- 5.9 This will have subsequent implications on the delivery of housing at the point of adoption of the MK City Plan.

- 5.10 Gallagher Developments propose that the plan period should start from 2025/26 and not 2022/23 to align with its current assessment of local housing needs and application of the standard methodology and most recent data on dwelling stock and the affordability ratios published in 2025 and forms the basis for housing need within the MK City Plan

Policy GS3 Strategy for economic prosperity

- 5.11 Gallagher Developments support the ambitions of this policy to support economic prosperity in Milton Keynes and the range of sectors that provide jobs within the city, ensuring a highly sustainable settlement with ready access between jobs and homes.

Policy GS4 Strategy for People Friendly and Healthy Places

- 5.12 Gallagher Developments support the inclusion of this policy to promote good physical and mental health and would highlight that the proposals for the Levante Gate Site will include a Local Centre which will provide easily accessible services for all homes on the Site, in addition to the provision of a Mobility Hub and Primary School.
- 5.13 The policy is supported as it aligns with national policy regarding the movement hierarchy to prioritise active and sustainable modes ahead of the car.

Policy GS5 Our Retail Hierarchy

- 5.14 Gallagher Developments support the in-principle favour towards Local Centres to provide convenience shopping to allow ready access by non-car modes, and this provision will be delivered on the Levante Gate Site.

Policy GS10 Movement and Access

- 5.15 In principle, Gallagher Developments support this policy and refer to the Strategic Framework Masterplan Document and WSP Transport Note which includes redways and other Active Travel Routes in line with the policy requirements.
- 5.16 Minor suggestions are made including to point A. which should reference vision-led scenario testing relating to mitigation as per NPPF paragraph 115 D.

*"A. Development proposals that would cause a severe **residual cumulative** impact on the operation of the highway in terms of capacity and congestion, or an unacceptable impact on highway safety, will be refused unless such impacts can be effectively mitigated, **taking into account all reasonable future scenarios**".*

- 5.17 With respect to B.8. it is suggested that the wording should explicitly reference flexibility in applying parking standards e.g. proposals for car-free or low-car housing may also be acceptable where high-quality public transport and active travel connections are provided.

Infrastructure first

INF1 Infrastructure first principles

- 5.18 It is suggested under point B. of this policy additional wording could be added for clarity to state that where appropriate infrastructure may also be secured by planning condition.
- 5.19 There is also a typographical error in this policy with the duplication on D. so the second should be updated to state E.

INF2 Infrastructure planning and delivery principles for strategic allocations

- 5.20 Gallagher Developments support the addition of this policy under the Regulation 19 plan in providing a mechanism to coordinate infrastructure delivery across multiple sites in a fair way. Gallagher Developments would however be interested to learn more about the framework and how this is being compiled.

People friendly and healthy places

Policy PFHP1 Delivering Healthier Places

- 5.21 Gallagher Developments support the Council approach to delivering healthier places but would suggest that the Council ensure that clear justification is provided to demonstrate how the thresholds for a Health Impact Assessment have been determined e.g. why has 50 homes been chosen as appropriate. In addition, other uses included within the policy just reference the use e.g. provision of education, but it is unclear if this relates to all scales of education use.

Policy PFHP3 New Local Centres

- 5.22 Gallagher Developments support this policy approach and in line with A. 2. the Site intends to deliver a Local Centre as part of this strategic allocation and will cater for the needs of the new development.
- 5.23 Gallagher Developments would suggest that the wording in D. is amended to state '*...indicated within Framework Masterplans approved by the Council, or where appropriate agreed as part of planning applications.*' which will enable greater flexibility.

Policy PFHP4 Delivering a healthier food environment

- 5.24 Gallagher Developments support the Council's approach to support a healthier food environment and highlight that the Site will include provision of allotments and would be happy to explore the other suggestions under C. of the policy, as appropriate for the Site.

- 5.25 It is suggested that wording under D should be reviewed as this is a little unclear. Currently this reads as though all major developments must provide on-site allotments, which would appear a low threshold given the NPPF definition of major as well as impracticalities in certain locations of the City. The second part of this point then references community orchards which would appear not to have any threshold.

Policy PFHP5 Designing People-Friendly Places

- 5.26 Gallagher Developments do not wish to make any comments on this policy other than to support its urban design principles and highlight that these are already being considered as part of the development of the Site proposals.

Policy PFHP6 Designing healthy streets

- 5.27 Again, Gallagher Developments support the design principles set out in the policy but suggest that there should be an element of flexibility in the requirements similar to PFHP5 so as to not be unnecessarily onerous. The wording could be amended to state 'Development proposals will be permitted where they meet the following principles **wherever possible and relevant to the development...**'

Policy PFHP7 Well-designed buildings and spaces

- 5.28 Gallagher Developments support the proposed approach to well-designed buildings and would only query the reference under 8. as to whether the Council are intimating that any important views will be formally identified as these are not presently on the Policies Map.

PFHP8 Tall buildings outside Central Milton Keynes

- 5.29 This policy sets out support for tall building in 'highly sustainable locations'. It is however queried whether this is the correct test for acceptability of tall buildings. Whilst sustainable locations are more likely to be the types of locations where a denser development will be acceptable, it is suggested that this wording could be removed with the key test being the context and appropriateness of the location in character and design terms, as set out under 1. -6. of the policy.

A new MK Design Code

- 5.30 Although not a policy provision, the document sets out that the Council intend to prepare Design Codes to help with the implantation of policies. With respect to Policy GS18, Gallagher Developments are keen to discuss this with the Council further.

High quality homes

Policy HQH1 Healthy Homes

- 5.31 It is noted that the text under E. has been updated following Gallagher Developments previous Regulation 18 comments setting out further guidance on self-build/custom homes. Whilst this guidance is helpful, it is considered that the policy wording should allow for greater flexibility. The policy states that schemes of 100 dwellings or more must provide at least 5% as serviced plots for custom builders. However, for the Strategic Extensions a 5% could be a very significant number, taking GS18 5% of 1,250 would be 63 homes (rounded up from 62.5). For such sites a more proportionate approach should be taken noting plot requirements and establishing character areas for development within the site with complementary infrastructure and landscaping.
- 5.32 This could either be addressed by adding flexibility to the requirement e.g. 'Development proposals involving 100 dwellings or more, excluding flatted units, should aim to provide at least 5% of the total dwelling plots as serviced dwelling plots for sale to custom builders' or through amendment to the following sentence 'Any provision will take account of the viability and feasibility of provision, taking into account the form of the development and characteristics of the site, particularly in the case of the Strategic Extensions.'

Policy HQH2 Affordable Homes

- 5.33 It is noted that this policy sets a requirement for 40% affordable housing to be delivered at the ESCE. Whilst the provision of affordable housing within the allocation is supported by Gallaghers, there needs to be sufficient justification for applying a specific policy, including tenure split, to strategic sites. We note that the 40% requirement is over and above the requirement identified in the Housing and Economic Development Needs Assessment (HEDNA, Figure 16, Page 70: October 2025). It is also a significant increase on the proportion sought by the current Plan:MK (31%). Therefore, setting a requirement above this need would appear not to be justified by evidence. In addition, clarification needs to be given on how this should be considered against other site-specific infrastructure requirements to ensure it does not undermine deliverability of the strategic allocation.
- 5.34 Furthermore, Policy HQH2 sets out an overly prescriptive approach to tenure split which is likely to impact delivery and is not justified by the provided evidence base. Limb 2 in particular (via the use of "must") does not allow for appropriate flexibility, particularly where planning for large scale strategic allocations with underpinning infrastructure needs.
- 5.35 The tenure requirements in HQH2 are not considered justified by the HEDNA update, with the requirements inconsistent with Figure 16 (embedded below). Whilst it is noted that these figures are rounded, they would only apply in a situation where 36% affordable housing is provided (please see earlier point on this) and is another reason why prescriptive figures are inappropriate.

Climate and environmental action

Policy CEA1 – Sustainable Buildings

- 5.36 Gallagher developments note that Part A requires all new dwellings be designed in line with the Energy Hierarchy and take a 'fabric first' approach. Net zero carbon buildings should be achieved by reducing operational carbon emissions, reducing whole lifecycle (embodied) carbon emissions, and the incorporation of net zero energy generation technologies and smart demand control measures. Further, Part C requires major residential development achieve 60% regulated carbon emissions reduction over the Target Emission Rate set out in Building Regulations Part L 2021.
- 5.37 Gallagher Developments would highlight the introduction of the Future Home Standard (2025) to building regulations – a nationally consistent approach that would allow all residential developers ensure that all new homes are equipped with the technology to meet these standards. The introduction of standards that go beyond approved building regulations and/or other methodologies, such as the consideration of achieving less than 625 kgCO₂e/ metres squared as whole lifecycle carbon requirement can create unnecessary uncertainty and delay to the provision of much needed new homes to meet local housing need. It has not been demonstrated whether such targets are realistically achievable and viable for all major development sites.

Policy CEA2 Green Roofs and Walls

- 5.38 Gallagher Developments note the positive changes that the Council have made to this policy since the Regulation 18 version. However, whilst it is appreciated that the policy wording does allow flexibility it is considered that the expectation of this policy remains unrealistic and unjustified. A more suitable wording would set out support for development that includes this provision, rather than stating that they should be required.

Policy CEAS Water Efficiency

- 5.39 It is suggested that C.1. could be deleted as this is a rainwater harvesting measure that is captured under point C.4.
- 5.40 This policy proposes a requirement of 93 litres per person per day for water efficiency. This standard is inconsistent with national guidance in the Planning Practice Guidance (PPG), which identifies an optional tighter requirement of 110 litres per person per day, compared to the current Building Regulations standard of 125 litres per person per day. It is also noted that proposed amendments to the Building Regulations are currently subject to consultation and do not align with the emerging policy position.
- 5.41 As set out in that consultation, MHCLG proposes to reduce the national standard to 105 litres per person per day, alongside an optional standard of 100 litres per person per day for water-stressed areas. Given that the proposed policy requirement is inconsistent with both the current and anticipated future Building Regulations, it is recommended that the reference to 93 litres per person per day is removed and replaced with a requirement to align with the Optional Technical Standard once adopted. This approach would not materially dilute the policy's ambition, would ensure consistency with

national policy, and would not adversely affect delivery. It is also noted that the Whole Plan Viability Assessment (paragraph 5.56a) has costed the policy on the basis of a 100 litres per person per day standard.

Policy CEA7 Mitigating wider environmental pollution

- 5.42 Point C. refers to soil managed and it is suggested that the wording should be clarified that this relates to 'topsoil' in the last sentence, to differentiate from general soil materials.
- 5.43 Point K. relates to light pollution and would appear to suggest that a Lighting Assessment is required for any proposal for external lighting. This is not considered to be a proportionate or justified requirement.
- 5.44 Point M. briefly makes reference to nutrient neutrality although the Council are not understood to be an authority where Natural England have advised that protected sites are in unfavourable condition due to excess nutrients. As such the intention behind this inclusion is queried given the potential implications of such wording.

Policy CEA9 Biodiversity and Habitats Network

- 5.45 Under A. the policy sets out support for proposals that provide a higher than 10% net gain in biodiversity. However, the Environment Act 2021 refers to 10% which is considered to include this figure itself, rather than need to exceed this figure. The policy is therefore inconsistent with national requirements by suggesting that schemes will only be supported where they exceed 10% and should be amended to state '*Development proposals that provide 10% or higher net gain in biodiversity, and those that provide for long-term management and maintenance for more than 30 years, will be strongly supported...*'
- 5.46 Although the name does not imply it, the wording of the policy relates to biodiversity net gain specifically. The name of the policy should therefore clarify that this relates to biodiversity net gain specifically.

Policy CEA10 Protection and enhancement of environmental infrastructure network, Priority Species and Priority Habitats

- 5.47 Under G. of this policy wording, it infers that development will not be permitted where there will be a negative impact on protected species and priority habitats. It is considered that in the interest of allowing some flexibility and accordance with the NPPF, additional wording should be included to add '*...unless the impacts can be adequately mitigated or as a last resort compensated for*'.

Policy CEA11 Urban greening, trees and woodland

- 5.48 Whilst in principle Gallagher Developments support the aspirations of this policy, it is felt that further clarification and guidance is necessary around the requirement under A. of green cover and under D. of a 19% tree canopy cover and as such object to the drafting in the current form. These are onerous requirements that will impact on development densities and at this time do not appear evidence based and justified. For example, the

requirements exceed those in the London Plan (2021) as a comparison and could also conflict with biodiversity net gain in terms of scoring when taking into account urban greening and woodland creation.

- 5.49 There also appears to be some inconsistency and varying triggers for requirements in the policy wording which could lead to uncertainty and confusion, as well as an overly-complicated policy to interpret. Flexibility and clarification is therefore required, particularly noting that other authorities, such as Wycombe District Council, adopted similar requirements in their local plans and they have had significant negative implications on deliverability and viability.

Policy CEA12 Conserving and Enhancing Landscape Character/Special Landscape Areas

- 5.50 This policy makes reference in B. to 'where a site-specific landscape and visual impact assessment is required' although the policy does not state a threshold. Presumably therefore the Council validation requirements will be clear on any other types and scales of development that will require such a document.
- 5.51 Part C. of the policy sets out where development affecting Special Landscape Areas will be permitted. It is considered that given allocations are proposed within these areas, Strategic City Extensions should be explicitly referenced within this policy to provide clarity along with the evidence base documentation which confirms that development can be acceptable in these areas.

Policy CEA14 Protecting and enhancing watercourses

- 5.52 Point A. under this policy reference the need for development proposals to be set back at a distance of at least 8 metres from any 'main river, at least 9 metres from all other ordinary watercourses'. The rationale for these distances does not appear to be evidenced and would appear disproportionate given the extent of works that could be defined as 'development'.

Economic and cultural prosperity

Policy ECP1 Protecting Employment Land and Buildings

- 5.53 This policy in principle resists the loss of any 'employment land and buildings' subject to criteria. It is considered that it would be appropriate to define the planning use classes that this relates to given the extent of uses that could be considered to comprise employment land and buildings. The intention behind this is presumably with a focus on Class E g) i), ii) and iii) as well as B2 and B8.

6. Summary

- 6.1 These representations have been prepared by Turley on behalf of Gallagher Developments and are provided in response to the Council's consultation on the MK City Plan 2050 (Regulation 19) in support of the proposed allocation under Policy GS18 Levante Gate City Extension as well as providing overall comments on the consultation documentation.
- 6.2 The Site is considered to provide a fantastic opportunity to support the sustainable growth southeast of Milton Keynes, complementing the direction of development and existing proposals in the locality in recognition of the sustainability of the area to accommodate strategic growth.
- 6.3 As set out in our comments to Policy GS18 in section 4 of this document, we fully understand that the city expansion site needs to be masterplanned and planned for in a comprehensive manner in order to ensure that infrastructure is delivered in a timely manner and that the sustainability of the site is maximised.
- 6.4 In order to ensure that there is early delivery of the site to contribute towards a strong housing supply early in the Plan period it is considered that it would be sensible that this forms part of the outline planning application submission, reducing duplication and delay, as it will be informed by a full Environmental Statement assessment.
- 6.5 The following benefits would result from the development of the Site:
- The delivery of circa **1250 dwellings** - a mix of **market homes** and **40% affordable** homes with a range of tenures that are well connected and integrated with the existing community;
 - A new **primary school**;
 - An enhanced **local centre** to include a mix of community and commercial opportunities.
 - Proposed new cycle **Redway** through the site to connect to the existing network;
 - A **mix of house types and sizes**, catering for varied needs and creating a sustainable community;
 - Potential for a new **mobility hub** promoting **sustainable transport** in the form of e-bikes, e-car share and more;
 - The delivery of safe, accessible and high quality landscaped open spaces including community **food production** areas, equipped children's **play areas** and **natural play trails** and other recreation opportunities for both new and existing residents;
 - An opportunity to reinforce the existing **landscape character** through enhancing landscaping and the planting of new trees and hedgerows;

- Ability to accommodate on-site community growing space through the **provision of allotments** to enable and support healthy communities and access to healthy foods;
- Provision of circa 1.2ha of formal **playing and sports pitches** for use by the community and improves access to recreation and green infrastructure;
- The potential to create **biodiversity enhancements** and a **10% biodiversity net gain** through new tree planting, SuDS features and the introduction of substantial areas of public open space; and
- Direct, indirect and induced **jobs created** through the construction of the development, stimulating the local economy.

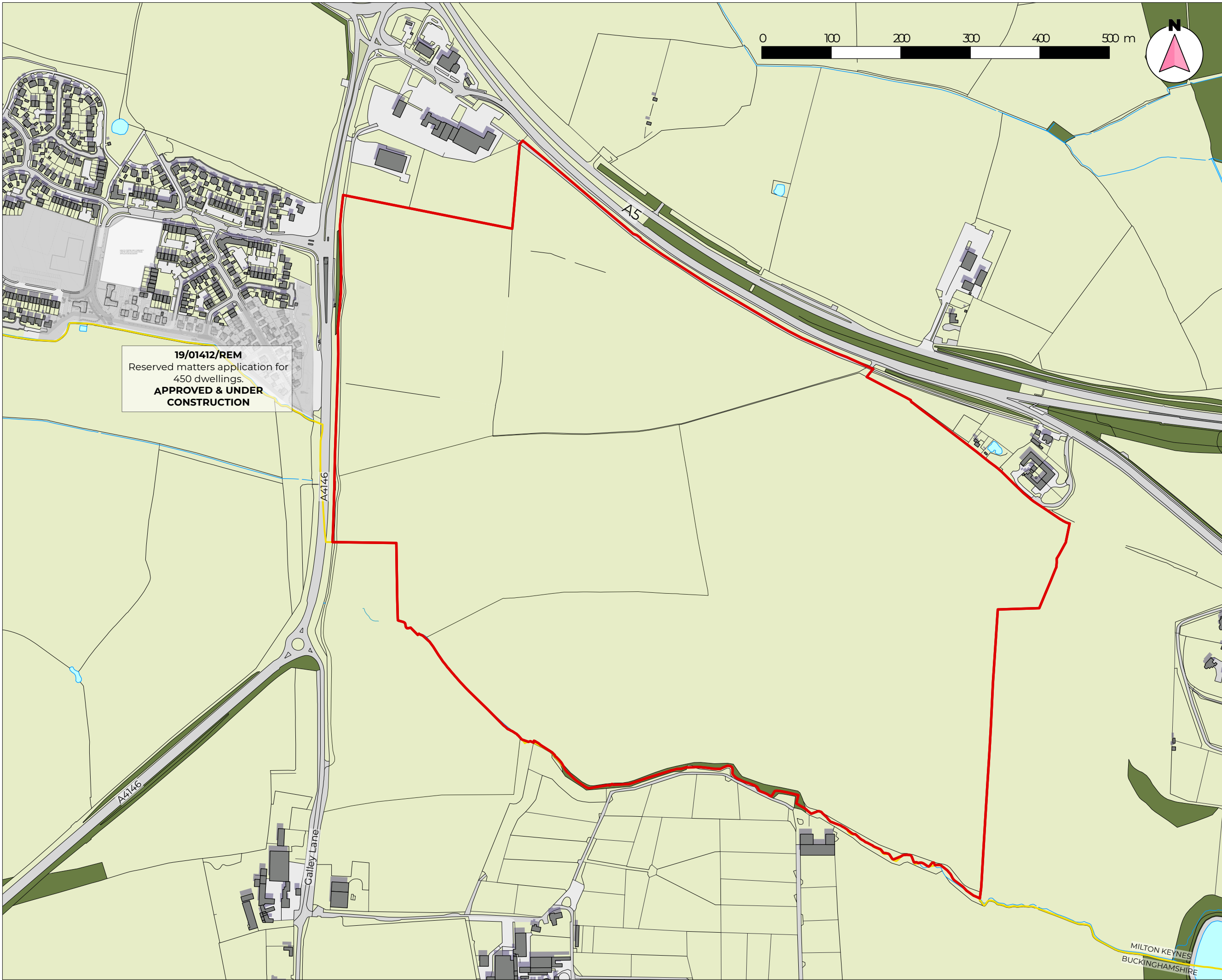
6.6 This representation confirms that in accordance with the NPPF the Site is deliverable, being suitable, available and achievable for allocation in the emerging City Plan. In summary:

- **Available** - Gallagher Developments control the Site and the land is immediately available for development, being actively promoted to the MK 2050 City Plan.
- **Suitable** - the Site is suitable for residential-led development because it:
 - Is located in a sustainable location and in close proximity to existing and committed development with capacity for additional growth;
 - Can be developed immediately;
 - Has no identified environmental constraints that, subject to appropriate mitigation, would prevent or otherwise restrict development;
 - Will deliver high-quality market housing and much need affordable housing;
 - Offers the opportunity to provide a wide range of public benefits including supporting infrastructure, public open space, and net gains in biodiversity;
 - Will improve sustainable transport links and wider pedestrian and cycle connectivity; and
 - Is in an area identified as a preferred location for the future growth of Milton Keynes in the MK 2050 City Plan.
- **Achievable** - the Site could deliver circa 1,250 dwellings, which would make a significant contribution towards meeting the housing needs of Milton Keynes, alongside supporting strategic infrastructure including a new primary school, public open spaces, community infrastructure, commercial development and supplemental planting that fosters healthy and vibrant communities.

6.7 Amendments are however required to a number of policies, and as such we have noted various objections and as appropriate, proposed amendments, to policies in these submissions.

6.8 Gallagher Developments would be very happy to discuss these representations further with the Council and provide any additional detail that may be helpful, as part of ongoing engagement.

Appendix 1: Site Location Plan



Do not scale from this drawing.
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PLANNING

- Site boundary (68.45ha)
- District Council boundaries

Rev.	Date	Description
		Levante Gate MILTON KEYNES
		Location Plan
Job ref:	Drawing number:	Revision:
740	L01	
Scale:	Date:	
1:5000 @ A3	December 2025	



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MILTON KEYNES
 BUCKINGHAMSHIRE

Appendix 2: Indicative Masterplan



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PLANNING

- Site boundary (68.45ha)
- District Council boundaries
- - - - Public Rights of Way (PRoW)
- ← Proposed primary vehicular access
- ← Proposed secondary vehicular access
- ← Pedestrian access
- Proposed tree lined primary spine road loop
- Proposed secondary and tertiary streets
- - - - Proposed redway
- Proposed leisure routes
- ✳ Proposed mobility hub
- Proposed NEAP
- Proposed community food growing
- Proposed SuDS basins & Swales
- Proposed landscape bund for A5 noise mitigation
- Proposed open space (including landscape buffers, existing and proposed trees and hedgerows, wildlife corridors and areas for play)
- Proposed sports pitches
- Proposed local centre
- Proposed 3 form entry primary school
- Proposed community greens
- Proposed residential land use
- Proposed indicative key built frontages

Rev.	Date	Description
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**Levante Gate
MILTON KEYNES**

Framework Plan

Job ref: 740	Drawing number: L02	Revision:
Scale: 1:5000 @ A3	Date: December 2025	



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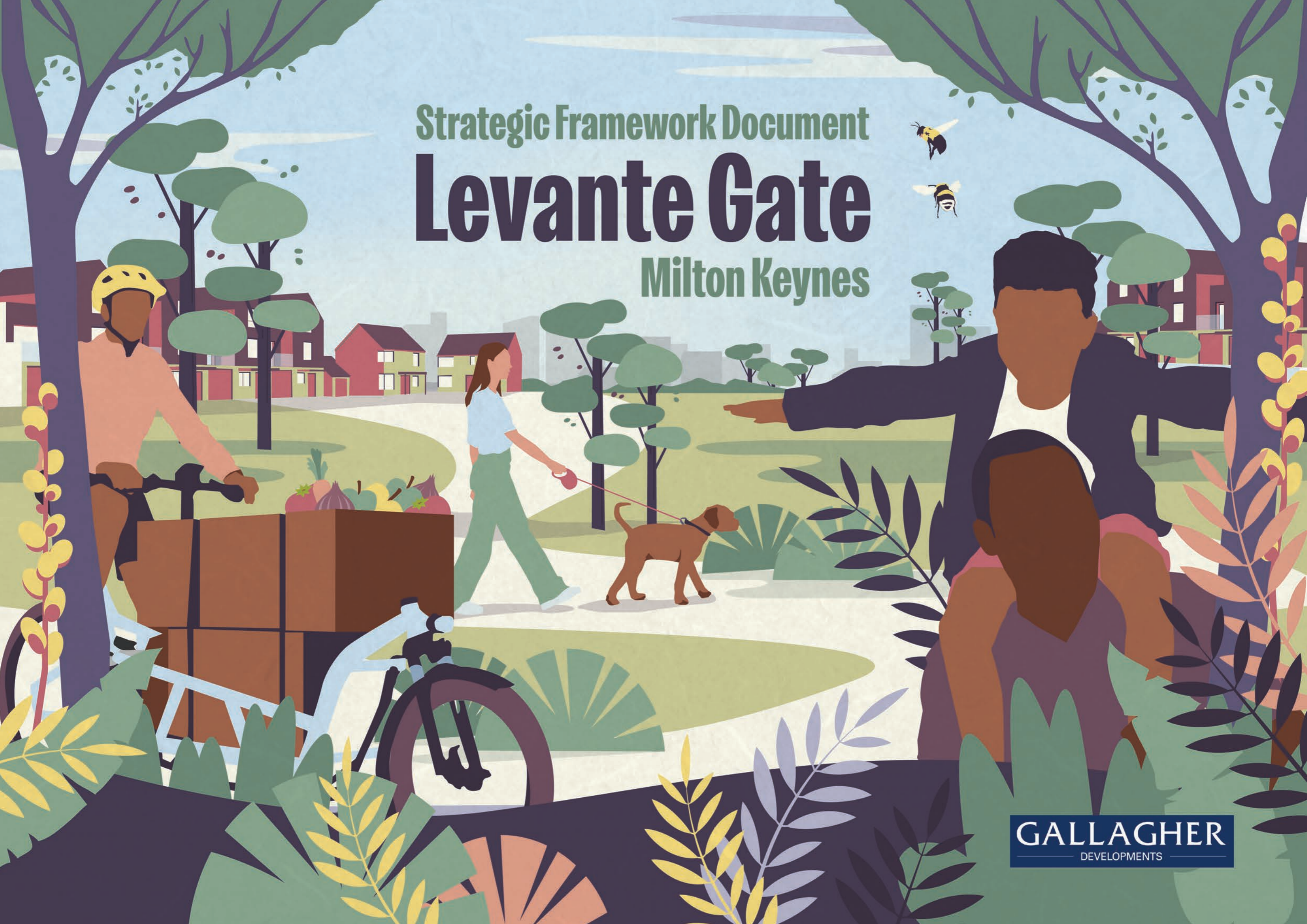
MILTON KEYNES
BUCKINGHAMSHIRE

Appendix 3: Strategic Framework Masterplan for Land at Levante Gate

Strategic Framework Document

Levante Gate

Milton Keynes



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Strategic Framework Document
 Levante Gate
 December 2025
 Revision A

Foreword & About Gallagher Developments

“ With over 50 years’ experience in the property development industry, we have been and continue to be at the forefront of delivering strategic development sites across the UK. Our cash balances, vast experience and track record enables us to deliver what developers want.

We work closely with Local Authorities and key stakeholders to deliver sustainable communities for future generations.

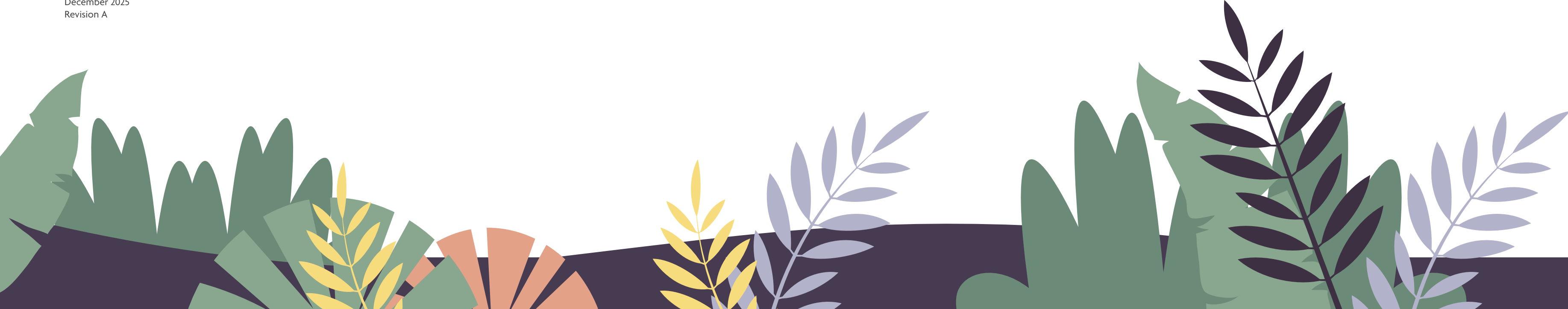
Sir Tony Gallagher, Chairman



About Gallagher Developments

Gallagher Developments prides itself in obtaining deliverable, technically robust and commercially sound planning consents, and providing physical and community infrastructure on sites, such as strategic public open space, schools, local centres, distributor roads and drainage.

We work with a range of housebuilders to deliver new homes. Our ability to act as a master developer accelerates the delivery of much-needed housing by enabling a range of housebuilders to build and sell new homes simultaneously on serviced parcels of land.



Our Overarching Vision

THE VISION

The vision for Levante Gate is to create a vibrant, forward-thinking neighbourhood on the south eastern edge of Milton Keynes, where contemporary living, sustainable mobility and green infrastructure come together to enhance everyday life and contribute to the city's long-term growth.



Moving Smarter, Living Greener

The development will prioritise active and inclusive travel. A well-connected network of footpaths, Redways and cycle routes will link homes to a central mobility hub, local centre and primary school, promoting walkable neighbourhoods and reducing car dependency. Support for electric bikes, e-scooters and cargo bikes will further encourage low-carbon travel, helping to create a cleaner, greener local environment.

Where Green Spaces Grow Connections

Rooted in sustainability and landscape-led design principles, Levante Gate will integrate existing features such as mature hedgerows and field patterns into a network of east to west green corridors. These spaces will support biodiversity, create habitat connectivity, and provide places for recreation, food growing and community gathering, including allotments and play spaces.

Resilient by Design, Vibrant by Nature

A range of architecture and placemaking will reflect the evolving character of Milton Keynes, offering a diverse range of homes set within attractive streets and public spaces. Levante Gate will be designed as a resilient and adaptable neighbourhood, supporting the city's economic ambitions while delivering a high-quality of life for future residents.



“Big” Guiding Principles

To deliver the vision for Levante Gate, a set of ten guiding principles have been established to shape the strategic direction for the development.

These principles translate the aspirations of the vision into a clear framework for placemaking, ensuring that the neighbourhood is sustainable, inclusive and distinct.

They reflect the opportunities of the Site and respond directly to the ‘big ambitions’ of the Milton Keynes Strategy for 2050, supporting a connected, green and forward-thinking city. Together, these principles will guide the design and delivery of a resilient new community that contributes positively to the long-term growth of Milton Keynes.

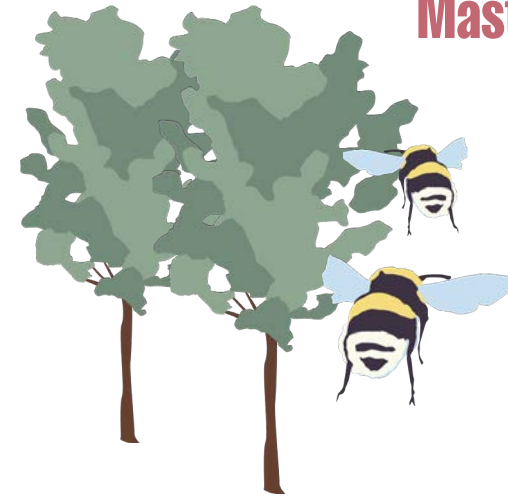
Create a Walkable, Connected Neighbourhood



Prioritise walking, cycling, and inclusive access through a clear network of streets, a central Redway, and green corridors that link homes to key destinations, including the school, local centre, and mobility hub.

Aligned with Big Ambition 1: A City of Connected Communities

Deliver a Landscape-Led Masterplan



Shape the development around existing hedgerows, watercourses, and landforms to create distinctive green spaces, enhance biodiversity, and root the new community in its landscape context.

Aligned with Big Ambition 3: A Green and Sustainable City

Deliver Local facilities & Social Infrastructure



Include a new primary school, local centre, and community facilities within walking distance of homes to ensure the neighbourhood is convenient, inclusive, and self-sustaining.

Aligned with Big Ambition 1: A City of Connected Communities

THE VISION

“Big” Guiding Principles

Culture, Identity & Sense of Place



Celebrate and strengthen the emerging identity of Levante Gate and existing identity of Milton Keynes, by drawing on local heritage, materiality and landscape to create a place that feels rooted, meaningful and memorable.

Supports MK Big Ambition 3: A City of Opportunity and Culture

Support a Vibrant Community Life



Provide a mix of homes, public spaces and social infrastructure to support diverse lifestyles and intergenerational living, encouraging neighbourliness and community activity.

Aligned with Big Ambition 1: A City of Connected Communities

Celebrate Nature & Wellbeing



Integrate dementia-friendly neighbourhoods principles with play areas, orchards, allotments, and sports pitches into a network of open spaces to support healthy lifestyles, local food growing, and access to nature for all ages.

Aligned with Big Ambition 3: A Green and Sustainable City

Design for a Sustainable Future



Incorporate low-carbon infrastructure, support green energy use, and promote sustainable travel options such as electric and cargo bikes to reduce emissions and build climate resilience. Homes will meet the Future Homes Standard, reducing operational carbon by 75-80%.

Aligned with Big Ambition 3: A Green and Sustainable City

Encourage High-Quality, Contemporary Design



Promote architecture and streetscapes that reflect the evolving identity of Milton Keynes, with varied housing types and adaptable layouts that respond to changing needs.

Aligned with Big Ambition 4: A Creative and Innovative City

Foster Identity Through Character Areas



Create distinct but connected areas across the Site using landscape features, street hierarchy, built form, and materials to generate a strong sense of place.

Aligned with Big Ambition 1: A City of Connected Communities

Plan for Long-Term Stewardship



Ensure that public spaces, landscapes, and community assets are designed to be well-managed and cared for over time, supporting pride of place and local ownership.

Aligned with Big Ambition 5: A City of Opportunity and Quality Places

Introduction

Levante Gate, Milton Keynes

Levante Gate is located to the south east of Milton Keynes, a city known for its wide range of services, amenities, and employment opportunities. Milton Keynes benefits from excellent transport connections, including a direct rail link to London Euston, with journey times of around 35-40 minutes. Luton Airport is approximately 30 kilometres to the south east, accessible via the M1, and offers direct flights to a range of international destinations.

Milton Keynes is an increasingly desirable location for local, national, and international businesses. This continued economic growth reinforces the need for new residential development to support a growing workforce and sustainable expansion.



Wider Context Plan

Site Context

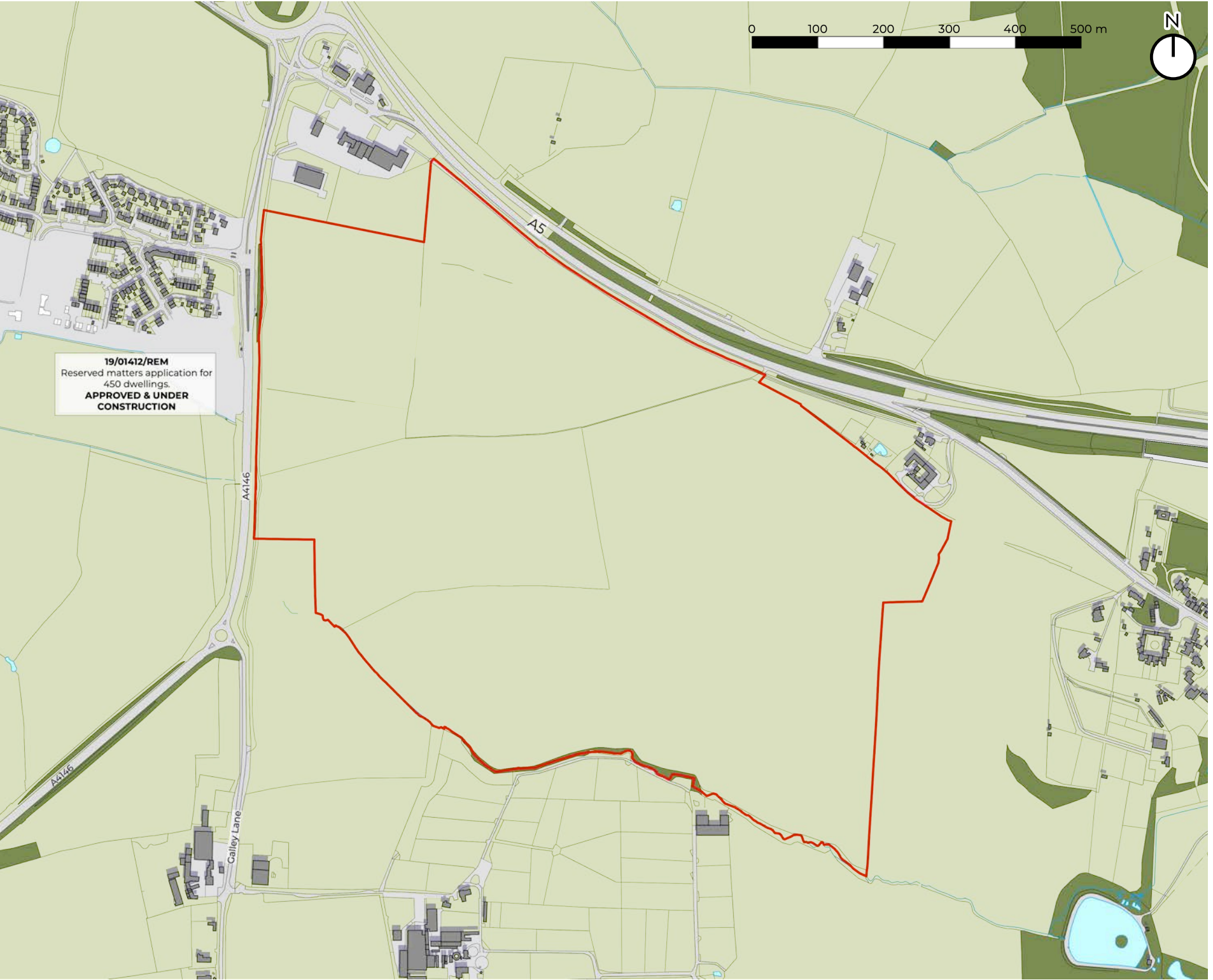
Site Description

The Site, known as Levante Gate, is located on the south eastern edge of Milton Keynes. It lies immediately east of Eaton Leys, south of the A5, and east of the A4146, approximately 400 metres to the east is the village of Little Brickhill.

Covering an area of approximately 66 hectares (as shown edged red on the Location Plan), the Site comprises five arable fields, which are enclosed and subdivided by a network of hedgerows, mature trees, and a public bridleway that crosses the Site.

The western boundary is shaped by its relationship with the Eaton Leys development, situated across the A4146. This now forms part of the urban edge of Milton Keynes. To the south, a series of hedgerows and small watercourses define the Site's edge, beyond which lie further areas of open agricultural land.

To the north east, the Site is bordered by a mature hedgerow, beyond which runs the A5, a key strategic route linking Milton Keynes with Dunstable and Luton to the south. Beyond which is land allocated for future development, known as South of Bow Brickhill. A public bridleway runs east to west through the Site, providing access to the wider Public Rights of Way (PRoW) network in the surrounding area.



Location Plan

KEY
 Site Boundary (66.14ha)

Site Photos



Key plan



1
Bridleway route across the Site



2
Boundary along the A5



3
Central small hedgerow looking west to the A4146



4
Central field looking westwards



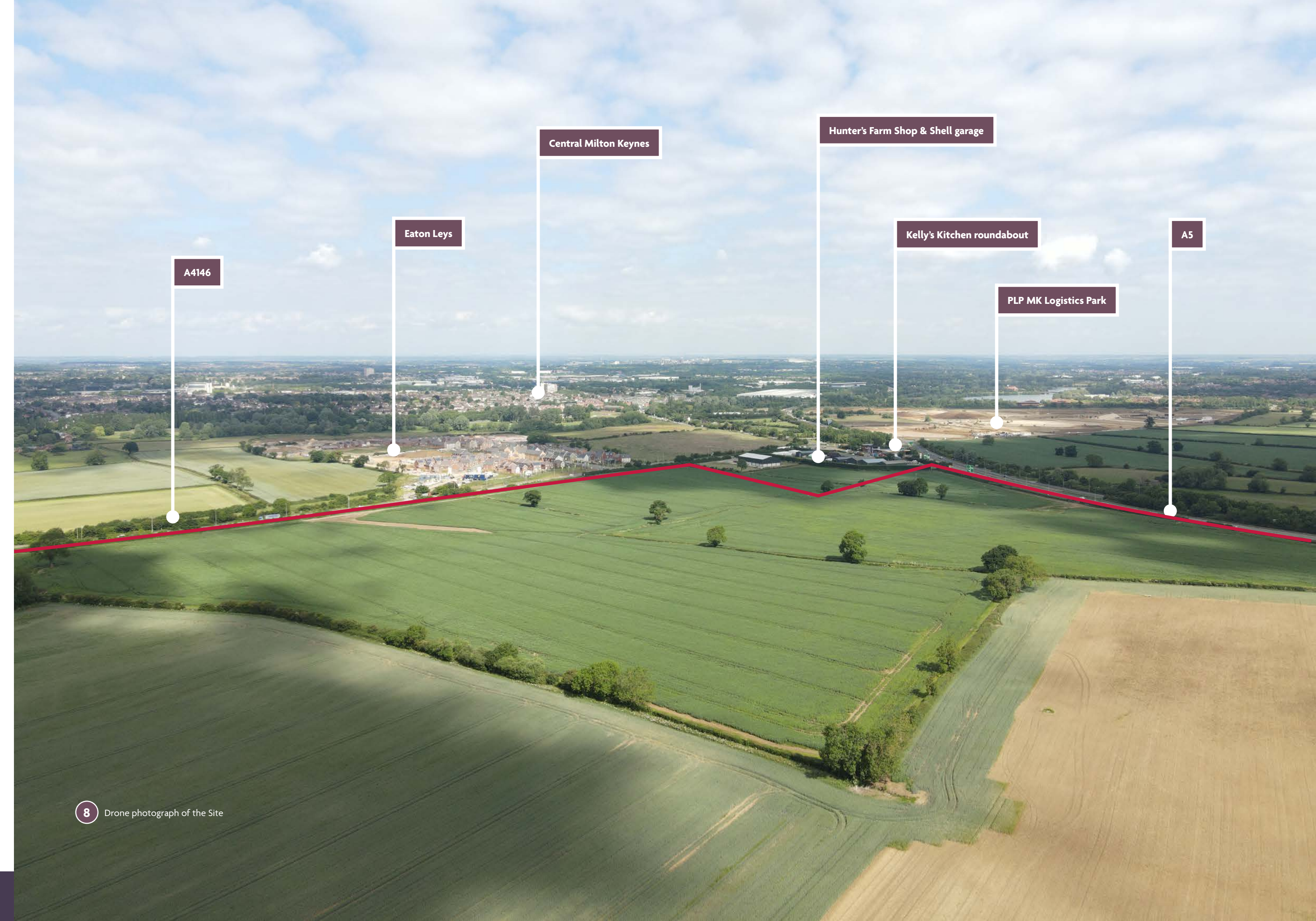
5
View from central field looking southwards



6
View from a central field north west towards the Eaton Leys development and Milton Keynes



7
View from the north east of the Site southwards



8
Drone photograph of the Site

Constraints & Opportunities

Understanding the Site

Assessments have been undertaken of the Site and its locality by various environmental and technical disciplines. The findings are summarised here to demonstrate the Site's suitability for development and to inform the proposals. The Levante Gate site presents a range of environmental and physical constraints that have shaped the structure and layout of the proposed framework plan.

The Site is largely agricultural land, with existing field boundaries defined by hedgerows, occasional mature trees, and watercourses. While the Site has limited ecological designations, veteran trees and areas of scrub and wet ditches offer important habitat value and are retained where possible to support biodiversity.

The Site's topography rises from west to east, requiring sensitive treatment in street and building layout to ensure accessibility, manage views, and optimise solar orientation. Flood risk is generally low (Flood Zone 1), though localised surface water risk near watercourses has informed the drainage strategy, with SuDS features proposed across the Site.

Noise and air quality constraints arise from the proximity of the A5 and A4146, requiring buffers and acoustic design responses, including bunding, offset, and planting. Existing infrastructure such as overhead powerlines, a high-pressure gas main, and foul water sewers present additional constraints, requiring easements that have influenced the location of roads, open spaces, and built form.

Visual and heritage sensitivities include the nearby Scheduled Monument and Little Brickhill Conservation Area, as well as the Site's location within the wider setting of the Greensand Ridge. These factors have informed a carefully considered landscape and edge treatment strategy.

Building on Strengths

Despite its constraints, the Site presents significant opportunities to create a high-quality, landscape-led neighbourhood.

The existing hedgerows, trees and watercourses provide a strong green framework for the development and have been used to define green corridors, habitat links and public open space. The Site's varied topography enables characterful development with views to the surrounding landscape and a sense of identity across different neighbourhood areas.

Opportunities for sustainable travel are embedded through the extension of Milton Keynes' Redway network, integration of existing bridleways, and provision of a central mobility hub, ensuring excellent pedestrian and cycle connectivity. The landscape strategy maximises access to nature through new parks, play spaces, orchards and allotments, enhancing wellbeing and supporting biodiversity net gain.

The absence of significant ecological or heritage designations allows for a flexible approach to placemaking, while existing infrastructure constraints have been turned into structuring elements for green space and movement corridors. The Site's location on the south-east edge of Milton Keynes makes it well positioned to support new homes, a primary school and community facilities, contributing positively to the city's planned growth.

- KEY**
- Site boundary
 - ← Proposed primary vehicular access
 - ↔ Proposed secondary vehicular access
 - ↔ Proposed pedestrian/cycle connections
 - Proposed primary spine road loop
 - Proposed secondary road links
 - Public Rights of Way (PROW)
 - Existing Redways
 - Proposed Redways
 - Proposed recreational routes
 - Local authority boundary line
 - Existing bus stops
 - 30m noise buffer
 - 11V overhead electric cables
 - Existing foul water pipe
 - Gas main and offset
 - Surface water flooding
 - Existing watercourse buffer
 - Existing vegetation
 - Scheduled ancient monument
 - Wildlife/ecology corridor
 - Strategic landscape planting
 - Proposed landscaped bund for A5 noise mitigation
 - Proposed community food growing
 - Proposed NEAP
 - Proposed communal heat hub
 - Proposed SuDS basins
 - Sports pitches
 - Primary school
 - Local centre
 - Residential opportunity
 - ✳ Mobility hub
 - ★ Foul pumping station



Framework Plan

Guiding Framework for Development

Building on a thorough understanding of the Site's key constraints and opportunities, and firmly rooted in the vision and guiding principles established for Levante Gate, the Framework Plan provides a comprehensive spatial strategy for the development for up to 1,250 homes. It defines the overall concept, including the organisation of movement networks, land uses, green infrastructure, and community facilities, creating a balanced and coherent blueprint for future growth.

The Framework Plan has been developed to ensure that a meaningful gap between future residential development and Little Brickhill is retained. This separation is reinforced through the provision of a new planted buffer and areas of open landscape, incorporating occasional trees and small copses. Together, these elements help to maintain visual amenity, soften the settlement edge and preserve the distinct identity of Little Brickhill, while contributing positively to the wider green infrastructure network and landscape character of the Site and its surroundings.

The Framework Plan ensures that new development responds sensitively to the existing landscape features and topography, integrating retained habitats, hedgerows and watercourses into a connected green infrastructure network. It prioritises sustainable mobility by embedding pedestrian, cycling and public transport routes that link residents to local services and wider Milton Keynes.

Through the allocation of key uses such as the primary school, sports pitches, allotments and local centre, the Framework Plan supports the creation of a vibrant, inclusive community where everyday needs are accessible within walking distance. It also reflects the need to mitigate environmental factors such as noise and flood risk through thoughtful layout and landscaping.

Overall, the Framework Plan translates the strategic vision and principles into a tangible, deliverable design framework that will guide detailed design and planning decisions. It sets the stage for a neighbourhood that is sustainable, well-connected and resilient, contributing positively to the future growth of Milton Keynes.



- KEY**
- Red line boundary
 - Public Rights of Way (PRoW)
 - Proposed primary vehicular access
 - Proposed secondary vehicular access
 - Pedestrian access
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 - Proposed secondary and tertiary streets
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 - Proposed SuDS basins & Swales
 - Proposed landscape bund for A5 noise mitigation
 - Proposed open space (including landscape buffers, existing and proposed trees and hedgerows, wildlife corridors and areas for play)
 - Proposed sports pitches
 - Proposed local centre
 - Proposed 3 form entry primary school
 - Proposed local greens
 - Proposed residential land use
 - Proposed indicative key built frontages



Benefits of the Proposal

A Neighbourhood with Lasting Value

Levante Gate offers a strategic opportunity to deliver a vibrant, sustainable, and inclusive new neighbourhood on the edge of Milton Keynes. Aligned with the ambitions set out in the Milton Keynes Strategy for 2050, the proposals respond directly to the city's vision for a greener, more connected, and forward-thinking future.

The development has been shaped to reflect and support the five 'Big Ambitions' identified in the strategy, including the creation of connected communities that are well-designed and balanced, alongside a strong emphasis on sustainability, innovation, and high-quality placemaking. Levante Gate contributes to this long-term vision by providing new homes, social infrastructure, and integrated green space in an environmentally responsible and socially inclusive way.

Rooted in the Site's landscape, existing movement routes, and wider context, the masterplan delivers a walkable neighbourhood where people can live, learn, work, and thrive. Through thoughtful design and careful planning, Levante Gate will bring forward a range of lasting benefits.



Extensive Green & Open Spaces
 Around half of the Site will be dedicated to landscape, including parks, sports pitches, allotments, orchards and green corridors that support biodiversity, healthy lifestyles and opportunities for play and social interaction.



A Central Mobility Hub with Seamless Connections
 A central Mobility Hub linked to smaller satellite Hubs located across the site will promote and encourage the use of low carbon, flexible travel choices.



A Local Centre with Everyday Amenities
 The neighbourhood will feature a new local centre offering the potential for a shop, cafe or community space within walking distance, of dwellings using safe and direct routes.



High-Quality, Diverse New Homes
 Around 1,250 well-designed homes will be delivered, providing a mix of tenures and types, including 40% affordable. To meet a range of needs, supporting local housing targets and economic growth.

Benefits of the Proposal



A New Primary School at the Heart of the Community
 The delivery of a new primary school will provide accessible, high-quality education for local children, supporting families and contributing to a strong, inclusive community from the outset.



Sustainable Design & Resilient Infrastructure
 From integrated SuDS to energy-efficient buildings delivered in line with the Future Homes Standard, reducing operational carbon by 75-80%, and preserved landscape features, the framework embeds sustainability and climate resilience at every level.

Land Use Strategy

Living, Learning, Connecting

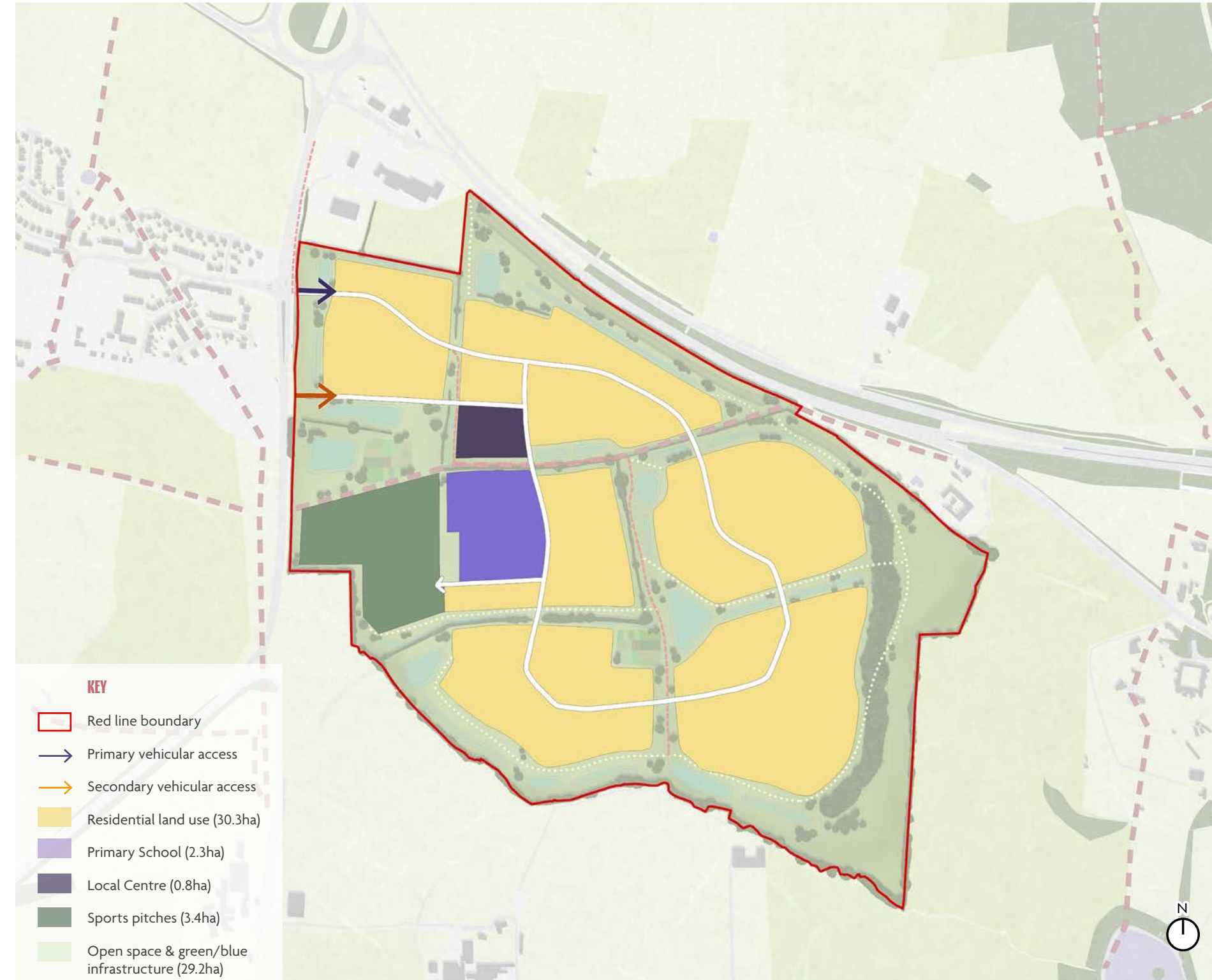
The land use strategy for Levante Gate is rooted in creating a well-balanced, inclusive and sustainable neighbourhood, where homes, amenities, green space and community infrastructure are carefully integrated to support everyday life.

At the heart of the framework sits a new three-form entry primary school and a series of sports pitches, forming a social and activity hub for the neighbourhood. Co-located to encourage shared use and easy access, this central cluster will act as a key focal point, bringing together families, young people and wider community members.

To support local daily needs, a local centre is proposed with a central mobility hub, positioned along the main green corridor. This could accommodate a café, small shop or community space, encouraging social interaction and enabling active, walkable lifestyles. Its location along the existing PRoW reinforces the wider movement framework, with strong walking and cycling links connecting homes to facilities.

Residential areas are distributed throughout the Site to make the most of existing landscape features, topography and access routes. Homes are positioned to front onto green spaces, key streets and public routes, helping to create a safe, attractive and characterful environment. A mix of housing types and tenures will support a diverse and inclusive community.

Together, these land uses form a compact, connected layout that is shaped by the Site's natural assets and focused on people. The strategy supports the delivery of a 20-minute neighbourhood, where everyday needs are met within a short walk or cycle, aligning with the principles of the Milton Keynes Strategy for 2050 and creating a strong foundation for community life.



Land Use Strategy Plan

Density Strategy

Resilient by Design, Vibrant by Nature

The density strategy for Levante Gate has been carefully designed to respond to the Site's context, support sustainable transport, and create a varied, characterful neighbourhood.

Higher-density development is focused in the northern and western parcels, where proximity to the A5, A4146, and Kelly's Kitchen Roundabout positions this area as a key gateway into the Site. With an average density of around 50 dwellings per hectare, this area lends itself to a more urban character, reflecting the efficient block structure and forward-thinking spirit of Milton Keynes. This area is also well-placed to expand on the city's movement legacy, with Redway connections and footpaths radiating outwards to promote walking and cycling.

The higher density here will help establish a vibrant heart for the neighbourhood, with homes clustered around key uses including the local centre, primary school, sports pitches, and central green (incorporating play and community growing). This concentration of activity provides the critical mass needed to support potential future public transport connections and potential for a mix of services and facilities.

From this core, density gradually steps down southwards and eastwards across the Site. Mid-density parcels of approximately 37.5 dwellings per hectare will provide a balance between activity and spaciousness, supporting a mix of housing typologies and access to key community amenities such as the primary school.

At the outer edges of the development, density will drop further to around 30 dwellings per hectare. Here, a looser, more open character will transition into the surrounding landscape, reinforcing the green edge of the Site and allowing homes to benefit from views and connections into adjacent public open space.

This tiered approach to density not only supports placemaking and transport objectives, but also fosters a vibrant, adaptable, and resilient community, one that grows from a walkable centre into a green, well-connected edge.



Density Strategy Plan

Landscape & Public Open Space Strategy

Where Green Spaces Grow Connections

The landscape and public open space strategy for Levante Gate establishes a comprehensive and connected green infrastructure network that forms the backbone of the masterplan. It is a landscape-led approach that integrates the Site's existing natural features, such as hedgerows, trees, topography and PRow, with new spaces for biodiversity, recreation, and community life.

Central to the strategy is a series of green corridors that follow the Site's existing field boundaries, creating a strong east-west structure that connects across the development. These corridors accommodate retained hedgerows and new planting, provide habitat connectivity, and form part of an integrated Sustainable Urban Drainage System (SuDS) network. Together, they support biodiversity net gain, improve climate resilience, and offer attractive, traffic-free routes for walking and cycling.

At the heart of the development, the landscape opens into a significant area of public open space in the east, providing opportunities for natural play, informal recreation and habitat creation. Elsewhere, green space is distributed throughout the Site, including a landscape-led gateway to the west. Here, the natural fall of the land allows SuDS features to be integrated into a multifunctional open space with play areas, allotments and footpath connections to the wider network, establishing an immediate sense of place on arrival.

The existing bridleway running through the Site is retained and enhanced, with new connections and routes that link residents to open spaces, the primary school, central mobility hub and the wider countryside. These connections ensure green infrastructure supports not only ecology and drainage, but everyday movement and wellbeing.

Overall, the strategy defines a connected, layered and multifunctional landscape that shapes the identity of Levante Gate, placing nature, sustainability and community at the centre of the design. It aligns with the principles of the Milton Keynes Strategy for 2050, supporting greener living and resilient placemaking.



Landscape & Public Open Space Strategy Plan

Movement & Active Travel Strategy

Moving Smarter, Living Greener

Levante Gate has been designed around a walkable framework that prioritises movement on foot, by bike and via public transport, creating a connected, accessible neighbourhood that reduces reliance on private cars.

A network of Redways, footpaths and cycle routes will form the backbone of the development framework, linking each residential parcel with key destinations such as the primary school, local centre, play areas and open spaces. These routes build on the Site's existing PRow and movement corridors, promoting healthy, active lifestyles while enhancing permeability across the neighbourhood.

A central mobility hub will provide convenient access to cycle parking, potential e-bike and shared mobility options. The central mobility hub will be linked to smaller hubs located across the Site, and will also cater for public transport and 'real time' information and weather proof shelters. This infrastructure will encourage sustainable travel choices and support low-carbon living in line with the Milton Keynes Strategy for 2050. The Site could also integrate into the MK Connect service.

By embedding sustainable and inclusive movement into the heart of the framework, Levante Gate will deliver a future-ready neighbourhood where active travel is a natural part of everyday life.



Movement & Active Travel Strategy Plan

Phasing Strategy

Indicative Phasing to Support Early Placemaking

While the detailed construction phasing of Levante Gate will be subject to further design development, infrastructure planning and delivery coordination, some early assumptions can be made about how the neighbourhood is likely to come forward over time. A strategy will be developed to ensure construction activities are carefully managed to not interfere with residents moving in to the new community in early phases.

It is anticipated that the initial phases of development will focus on the north-western edge of the Site, where strategic access points along the A4146 allow construction traffic to be separated from residential access as people begin moving into new homes. These gateway parcels, particularly the higher-density areas in the north-west, are well positioned to establish a strong presence and identity for the new neighbourhood from the outset.

Bringing forward development around the local centre, play and primary school early in the programme would help to provide a critical mass of residents and community activity, supporting the viability of early infrastructure and services. This approach would also ensure that core amenities and sustainable travel options, such as the central mobility hub and Redway connections, are in place from the start to promote low-carbon movement patterns.

Subsequent phases are likely to extend eastwards through the Site, following the alignment of the existing public right of way. Delivering open space, play areas, and green corridors in parallel with housing in these phases would ensure that future residents benefit from early access to nature and high-quality outdoor environments.

Later phases could then step southwards, completing the lower-density parcels and integrating the southernmost parts of the masterplan into the adjacent landscape and ecological corridors. This final stage would strengthen biodiversity connections and reinforce the landscape-led character of the Site's green edges.

This likely phasing sequence aims to ensure that each stage of development contributes to the early establishment of a vibrant, walkable, and well-connected neighbourhood, while also supporting the long-term resilience of infrastructure and community facilities.

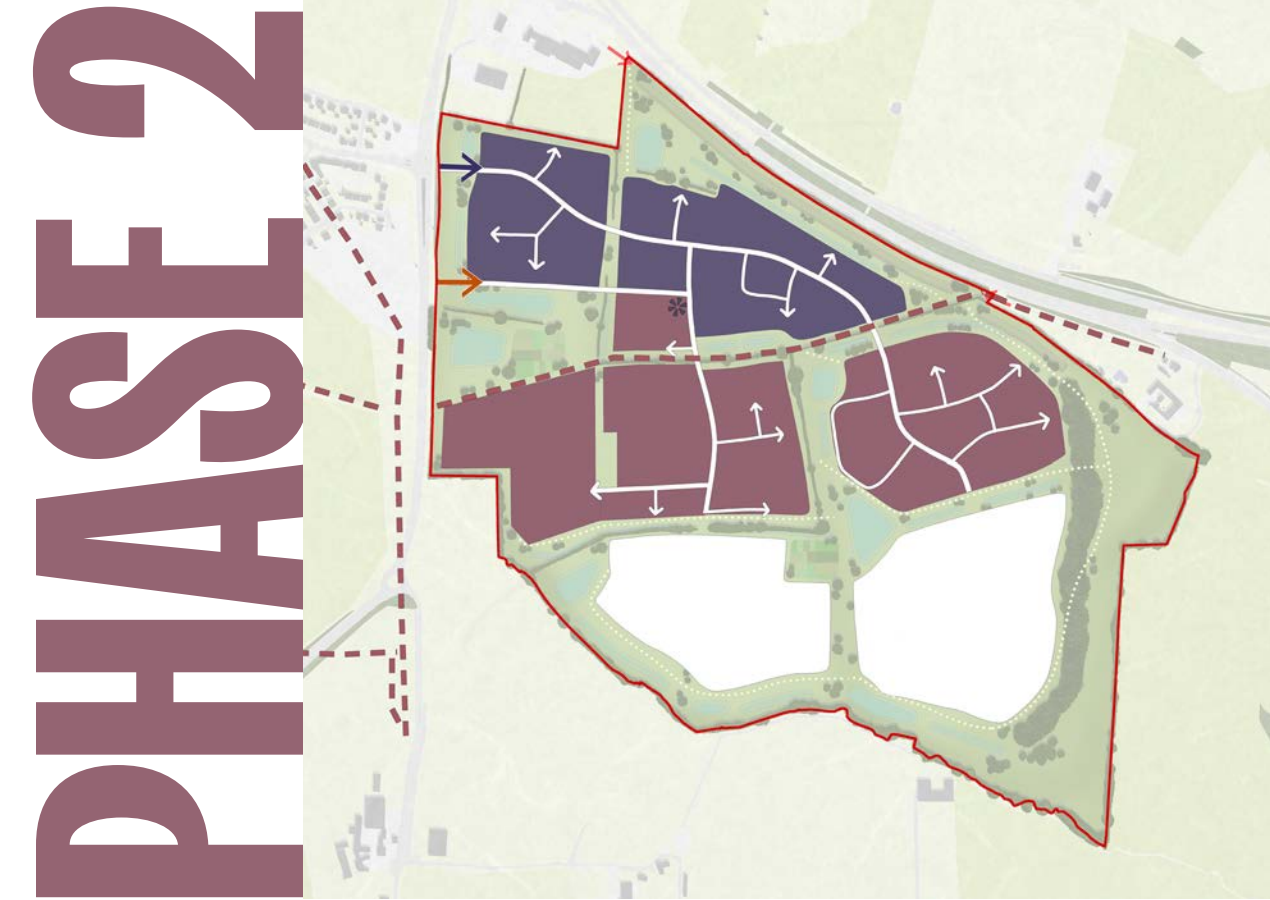


PHASE 1

Establishing the Heart of Levante Gate

The first phase of development is focused on the north west corner of the Site, where Levante Gate meets the A5 and A4146, forming a key gateway into the new neighbourhood. This phase delivers the highest density homes on the Site, averaging around 50 dwellings per hectare, helping to establish an early sense of place and a vibrant, urban character influenced by Milton Keynes' forward looking design principles. Approximately 450 homes will be delivered during this initial phase, providing a strong residential foundation for the emerging community.

A strong network of green infrastructure and public open space, including the central NEAP and key green corridors, will be delivered from the outset. These early landscape elements will encourage walking, play and recreation, and help establish an immediate sense of neighbourhood identity.

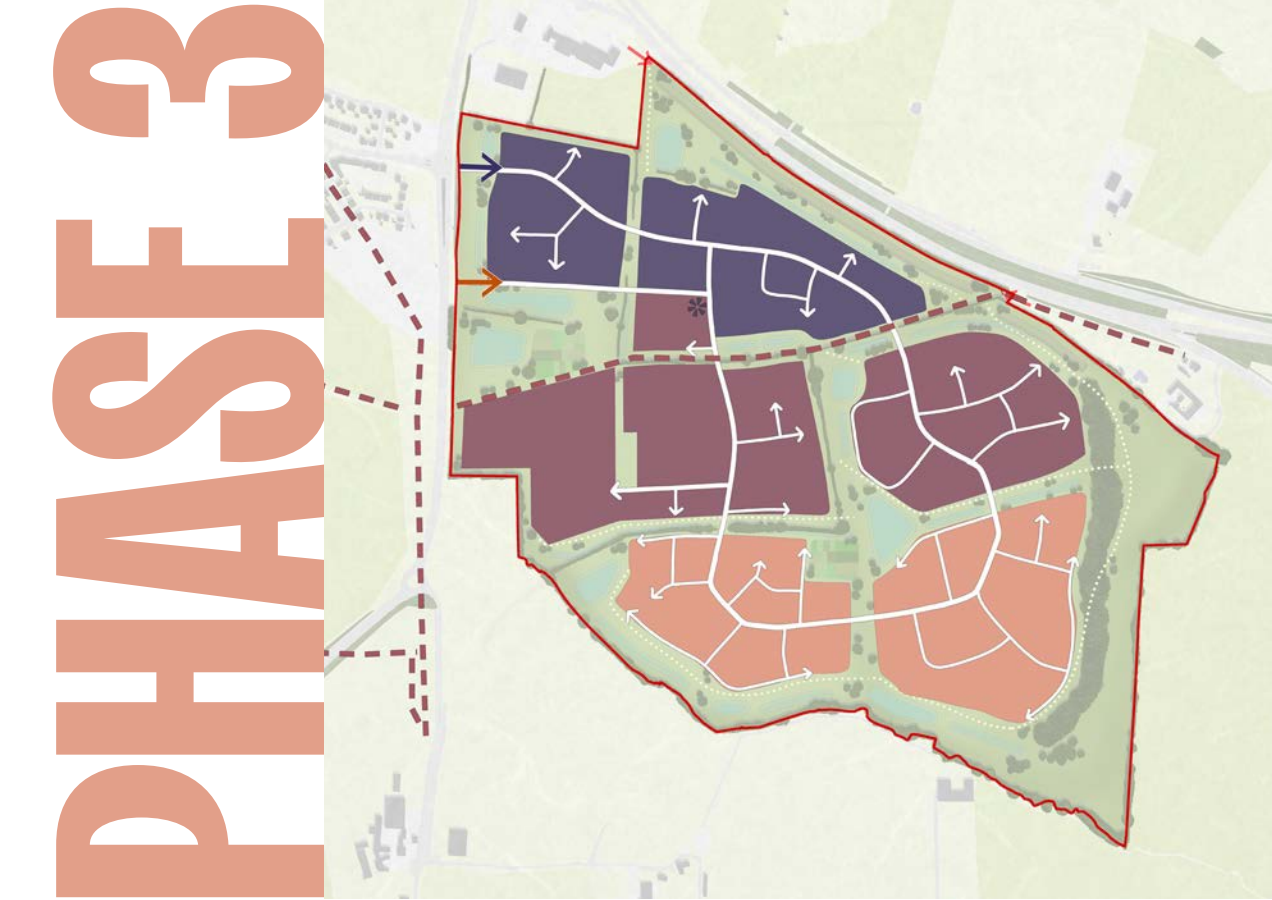


PHASE 2

Building the Core Community

Radiating out from the established heart, Phase 2 would extend development eastwards and southwards into the central parcels. These areas could adopt a mid-density approach of 30-37.5 dwellings per hectare, creating a balanced, family-friendly neighbourhood with a varied mix of homes. Approximately 440 homes could be delivered in this phase, continuing the momentum set by Phase 1. A major milestone would be the delivery of the three-form entry primary school and adjacent sports pitches, alongside the establishment of the local centre, creating a lively hub of daily activity and community life.

Development during this stage would reinforce Levante Gate's strong movement and green infrastructure by bringing forward new stretches of the Redway network, incidental play areas, and safe, direct walking and cycling connections. These new homes would benefit from immediate access to green space and key amenities, helping to foster a cohesive, walkable and well-supported community.



PHASE 3

Completing the Green Edge

The final phase of development would bring forward the remaining southern and eastern parcels, completing the vision for Levante Gate with a lower-density, landscape-led character (approximately 30-37.5 dwellings per hectare). This phase could deliver approximately 360 homes, expanding into a looser, greener layout that responds to the surrounding countryside and gently draws the development into its wider ecological and landscape setting.

This stage would complete the Redway and footpath network, linking all parts of the neighbourhood with seamless, traffic-free walking and cycling routes. Enhanced green corridors and SuDS features would be delivered alongside new play areas and informal open spaces, creating a rich ecological mosaic and reinforcing the Site's natural assets. This final chapter would bring the neighbourhood together not just in layout, but in character and function, creating a connected, resilient, and nature-rich place for people to call home.

Phasing Strategy

CONCLUSION

Rooted in Place, Designed for the Future

Levante Gate presents a strategic opportunity to deliver a well-connected, landscape-led neighbourhood that supports the long-term ambitions of Milton Keynes. Informed by a strong vision and a clear set of Big Principles, the masterplan responds sensitively to the Site's landscape character, celebrating existing green infrastructure, varied topography and opportunities for sustainable movement.

At the heart of the neighbourhood, a central mobility hub, will enable low-carbon, inclusive travel. Together with a network of footpaths, Redway extension and green corridors, these connections will link homes to the primary school, local centre and open spaces, supporting a healthy, walkable lifestyle for all residents.

From its emphasis on nature-rich green space to its support for active travel, diverse homes and community infrastructure, every aspect of Levante Gate has been shaped to create a resilient and vibrant new neighbourhood. In doing so, it aligns closely with the Big Ambitions and long-term goals set out in the Milton Keynes Strategy for 2050.



A New Primary School at the Heart of the Community
The delivery of a new primary school will provide accessible, high-quality education for local children, supporting families and contributing to a strong, inclusive community from the outset.



A Central Mobility Hub with Seamless Connections
A central mobility hub linked to smaller satellite hubs located across the site will promote and encourage the use of low carbon, flexible travel choices. Residents will benefit from safe, convenient access to Redways and shared mobility options.



Extensive Green & Open Spaces
Around half of the Site will be dedicated to landscape, including parks, sports pitches, allotments, orchards and green corridors that support biodiversity, healthy lifestyles and opportunities for play and social interaction.



A Local Centre with Everyday Amenities
The neighbourhood will feature a new local centre offering the potential for a shop, café or community space within walking distance, reducing car dependency and supporting daily convenience.



High-Quality, Diverse New Homes
Around 1,250 well-designed homes will be delivered, providing a mix of tenures and types, including 40% affordable. To meet a range of needs, supporting local housing targets and economic growth.



Sustainable Design & Resilient Infrastructure
From integrated SuDS to energy-efficient buildings and preserved landscape features, the framework embeds sustainability and climate resilience at every level.





Appendix 4: TN6 Transport Note prepared by WSP



Gallagher Developments

LAND AT LEVANTE GATE, MILTON KEYNES

TN6 Transport Technical Note for Regulation 19



Gallagher Developments

LAND AT LEVANTE GATE, MILTON KEYNES

TN6 Transport Technical Note for Regulation 19

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1 INTRODUCTION

1.1 INTRODUCTION

- 1.1.1. WSP is instructed by Gallagher Developments Ltd (GDL) in regard to the promotion and planning of land at Levante Gate (hereinafter referred to as the Site). This Technical Note (TN) provides baseline information, explains the planning history, and establishes the Vision and Movement Strategy to accommodate a mixed residential led development (hereinafter referred to as the Proposed Development).
- 1.1.2. Regular meetings have been held since November 2023 with Officers at Milton Keynes City Council (MKCC), Buckinghamshire Council (BC) and National Highways (NH) to introduce the Site and explain the emerging development masterplan and vision which is explained later in this TN as well as to discuss an appropriate modelling methodology for assessment of the highway impacts of the Proposed Development.

1.2 SITE LOCATION

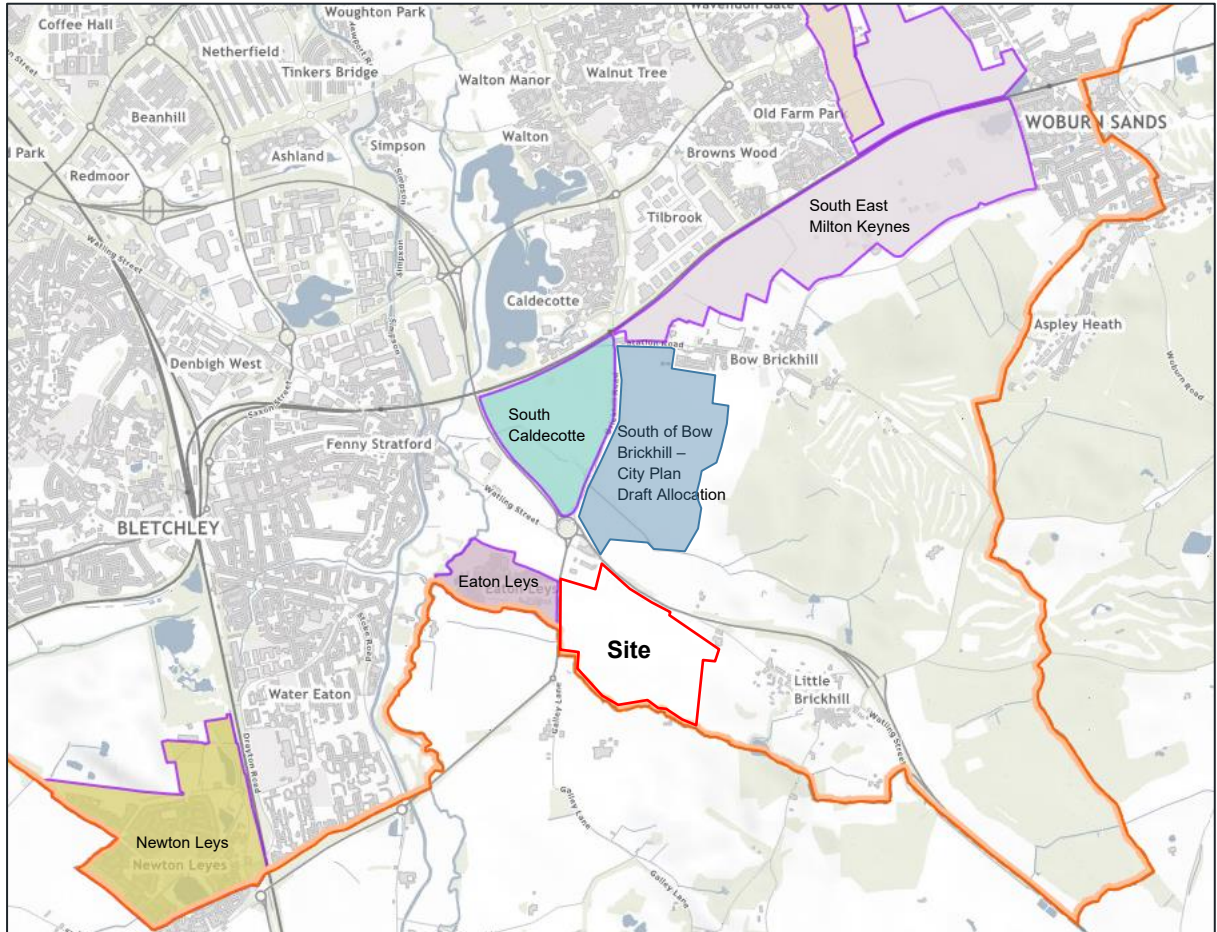
- 1.2.1. The Site is located approximately 6.5km to the south-east of the centre of Milton Keynes close to the A5/A4146 Kelly's Kitchen Roundabout and is west of the trunk road A5 and east of A4146 as shown below in Figure 1-1.

Figure 1-1 - Site Boundary



1.2.2. The Eaton Leys residential led scheme lies immediately west of A4146 opposite the Site and comprises 448 homes, a local centre and primary school and is currently being built out by Barratt David Wilson Homes. Immediately north of the A5/A4146 roundabout is the consented commercial site at South Caldecotte for c.250,000sqm of B1c, B2 and B8 uses. The Site location in context with the surrounding area is shown below in Figure 1-2.

Figure 1-2 - Site Location¹



1.3 CURRENT USE

1.3.1. The Site is currently predominantly arable fields, with field boundaries delineated by low hedgerows.

¹ Base map adapted from:
[https://miltonkeynes.statmap.co.uk/map/map.html?map=\\Maps\\Public%20Maps\\External_Maps\\My%20Milton%20Keynes%20-%20Open%20Portal.Map\\$&login=ExternalELP](https://miltonkeynes.statmap.co.uk/map/map.html?map=\\Maps\\Public%20Maps\\External_Maps\\My%20Milton%20Keynes%20-%20Open%20Portal.Map$&login=ExternalELP)

2 POLICY AND LOCAL CONTEXT

2.1 NATIONAL POLICY

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) – DECEMBER 2024

2.1.1. The latest version of the NPPF was published in December 2024 (as amended on 7 February 2025) and sets out the Government’s planning policies for England. Section 9 of the NPPF entitled ‘Promoting Sustainable Transport’ outlines the transport considerations for plan making and development proposals.

2.1.2. Paragraph 110 states that:

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

2.1.3. Paragraph 115 identifies several key considerations when assessing sites to be allocated for development in plans. These are:

“a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”

2.1.4. Paragraphs 110 and 115 of the NPPF are quite clear that site locations can be made more sustainable through the implementation of various measures to improve the accessibility of active travel and sustainable modes thereby, reducing the reliance on the private car.

2.1.5. Paragraph 116 states:

“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

2.1.6. The NPPF does not define what constitutes an unacceptable impact on highway safety or a severe residual cumulative impact is determined by the decision maker. This creates a high threshold which

is met only when extreme, serious, or significant adverse impacts persist despite mitigation efforts in respect of highway safety or congestion on the road network.

2.1.7. Paragraph 117 states that developments should:

“a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

2.1.8. As outlined in paragraph 118:

“All developments that generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impact of the proposal can be assessed and monitored.”

2.1.9. As demonstrated within this TN, there are a reasonable range of local facilities and amenities within a walkable/cyclable catchment of the Site and sustainable travel will be promoted via the enhancement of public transport services and supporting infrastructure to provide a viable alternative to private car use. Access to the Redway network also offers excellent opportunity for trips to be made by pedal cycle or e-bike, and improvements to pedestrian permeability within and around the Site, including new footpaths and Redways (and associated crossings), will offer significant benefits to both future residents and the wider community, supporting local connectivity through public transport and active travel whenever possible and in connection with existing provisions.

2.1.10. The ‘high level’ review included within this TN therefore demonstrates that the Proposed Development would be designed to satisfy the criteria within NPPF Paragraphs 110 and 115. In addition, a framework Vision and Movement Strategy is included at Section 6 of this TN which broadly follows the travel hierarchy set out in Paragraph 117 of the NPPF as indicated above. In this regard, it is acknowledged that any future outline planning application for the Proposed Development would need to be accompanied by a Site-wide Framework Travel Plan (FTP) and a comprehensive Transport Assessment (TA).

DEPARTMENT FOR TRANSPORT CIRCULAR 01/2022

- 2.1.11. The Department for Transport (DfT) Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development' sets out the way in which National Highways (NH)² will engage with communities and the development industry to deliver sustainable development and economic growth whilst safeguarding the primary function and purpose (i.e. providing a safe and reliable SRN to allow the efficient movement of people and goods).
- 2.1.12. On 23 December 2022, an update to the policy was provided through the publication of DfT Circular 01/2022 'Strategic Road Network and the Delivery of Sustainable Development' which supersedes the previous DfT Circular 02/2013.
- 2.1.13. Circular 01/2022 sets out that the purpose of the SRN remains unchanged that is to enable safe, reliable, predictable, efficient, long-distance journeys of both people and goods and to drive productivity and prosperity by unlocking growth and attracting investment.
- 2.1.14. The policy presents far greater emphasis regarding the need to embrace sustainable developments to support the government's commitments for transport decarbonisation as set out in *Decarbonising Transport: A Better, Greener Britain*. This will be achieved through reducing the need to travel and enabling the necessary behavioural change regarding active travel and public transport use, ahead of travelling by car.

Circular 01/2022 confirms NH's commitment to net zero road user emissions by 2050 and defines sustainable development as:

'encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.'

Principles of Sustainable Development

- 2.1.15. Para 12 - 'New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. In this regard, recent research on the location of development found that walking times between new homes and a range of key amenities regularly exceeded 30 minutes, reinforcing car dependency. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas.'
- 2.1.16. Para 13 - 'As set out in the Transport Decarbonisation Plan, Gear Change, Bus Back Better and the second Cycling and Walking Investment Strategy, walking, wheeling, cycling and public transport must be the natural first choice for all who can take it. However, where developments are located, how they are designed and how well delivery and public transport services are integrated has a huge impact on people's mode of travel for short journeys. The company will therefore expect strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans to only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified.'
- 2.1.17. Circular 01/2022 places great emphasis right at the start of the policy on the location of sustainable development to achieve growth through reducing the need to travel and travelling by sustainable

² Referred to as the Highways Agency in DfT Circular 02/2013

and active modes. The policy places these elements ahead of ensuring the SRN functions effectively and safely. The emphasis is considerably stronger than within Circular 02/2013 which focussed primarily on safeguarding the primary purpose of the SRN and refers to sustainable development in a secondary context in relation to development location and ensuring sufficient capacity remained available on the SRN through travel planning.

Assessment of Development Proposals

Para 48 – ‘Where a transport assessment is required, this should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision. Where such development has not been identified in an up-to-date development plan (or an emerging plan that is at an advanced stage), developers should demonstrate that the development would be located in an area of high accessibility by sustainable transport modes and would not create a significant constraint to the delivery of any planned improvements to the transport network or allocated Sites.’

2.1.18. Paragraph 48 of Circular 01/2022 expands on paragraph 15 regarding a vision-led approach to sustainable development and the assessment of it by providing a variety of scenarios to demonstrate the impacts of the Proposed Development. In this regard, at planning application stage, the TA will follow a more vision-led approach to assessment as set out in Circular 01/2022 which is anticipated to reduce the impact on the local highway network by adopting robust place making principles and the promotion of greater sustainable travel opportunities.

2.1.19. Furthermore, a ‘Monitor and Manage’ strategy for mitigation to ensure that capacity enhancements on the local highway network remain relevant and appropriate given the future demand and appropriate at the point of implementation of each phase of the Proposed Development.

Para 49 – ‘A transport assessment for consideration by the company must also consider existing and forecast levels of traffic on the SRN, alongside any additional trips from committed developments that would impact on the same sections (link or junction) as the proposed development. Assumptions underpinning projected levels of traffic should be clearly stated to avoid the default factoring up of baseline traffic. The scenario(s) to be assessed, which depending on the development and local circumstances may include sensitivity testing, should be agreed with the company; where a scenario with particularly high or low growth is proposed, this should be supported by appropriate evidence. Planned improvements to the SRN or local road network should also be considered in any assessment where there is a high degree of certainty that this will be delivered.’

Para 50 - ‘An opening year assessment to include trips generated by the proposed development, forecasted growth and committed development shall be carried out to establish the residual transport impacts of a proposed development. For multi-phase developments, additional assessments shall be provided based on the opening of each phase.’

Para 51 – ‘Where a transport assessment indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the SRN would

be severe, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary.'

Para 52 – 'The scope and phasing of necessary transport improvements will normally be defined by the company in planning conditions that seek to manage development in line with the completion of these works. In such circumstances, modifications to the SRN must have regard to the need to future-proof the network, while its delivery may require a funding agreement between the development promoter and the company.'

- 2.1.20. Paragraphs 49-52 of the Circular set out more detail in relation to the assessments to be completed, including the treatment of growth and committed developments, assessment years and phasing and timescales for the implementation of mitigation. The policies are different to those within Circular 02/2013 which considers a worst-case assessment; however, they do allow for the assessment of various scenarios as a result of the vision-led approach to trip generation.
- 2.1.21. The identification of a timescale for implementation of mitigation is consistent with a 'Monitor and Manage' approach in regard to setting a framework for the monitoring to occur against a baseline expectation of impact. Should the monitoring show that planned improvements are not necessary at that time, discussions can be held with NH to agree a further monitoring programme and later implementation date.
- 2.1.22. This approach can be secured by way of an appropriate planning condition for the implementation of a 'Monitor and Manage' strategy and process which sets out the baseline infrastructure to be provided, a programme of monitoring and reassessment to ensure it remains relevant, and a governance structure including the key stakeholders.

Assessment of Development Proposals

Para 48 – 'Where a transport assessment is required, this should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision. Where such development has not been identified in an up-to-date development plan (or an emerging plan that is at an advanced stage), developers should demonstrate that the development would be located in an area of high accessibility by sustainable transport modes and would not create a significant constraint to the delivery of any planned improvements to the transport network or allocated Sites.'

- 2.1.23. Paragraph 48 of Circular 01/2022 expands on paragraph 15 regarding a 'vision-led' approach to sustainable development and the assessment of it by providing a variety of scenarios to demonstrate the impacts of the Proposed Development. In this regard, at planning application stage, a TA should follow a more vision-led approach to assessment as set out in Circular 01/2022 which is anticipated to reduce the impact on the local highway network by adopting robust place making principles and the promotion of greater sustainable travel opportunities. In this regard, this TN adopts the approach stipulated in Circular 01/2022 and explains the vision for the Proposed Development and future movement strategy.

- 2.1.24. Furthermore, a ‘Monitor and Manage’ strategy may be appropriate to ensure that capacity enhancements on the local highway network remain relevant and appropriate (in the future years) and appropriate at the point of implementation of each phase of the Proposed Development.

Para 49 – ‘A transport assessment for consideration by the company must also consider existing and forecast levels of traffic on the SRN, alongside any additional trips from committed developments that would impact on the same sections (link or junction) as the proposed development. Assumptions underpinning projected levels of traffic should be clearly stated to avoid the default factoring up of baseline traffic. The scenario(s) to be assessed, which depending on the development and local circumstances may include sensitivity testing, should be agreed with the company; where a scenario with particularly high or low growth is proposed, this should be supported by appropriate evidence. Planned improvements to the SRN or local road network should also be considered in any assessment where there is a high degree of certainty that this will be delivered.’

Para 50 - ‘An opening year assessment to include trips generated by the proposed development, forecasted growth and committed development shall be carried out to establish the residual transport impacts of a proposed development. For multi-phase developments, additional assessments shall be provided based on the opening of each phase.’

Para 51 – ‘Where a transport assessment indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the SRN would be severe, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary.’

Para 52 – ‘The scope and phasing of necessary transport improvements will normally be defined by the company in planning conditions that seek to manage development in line with the completion of these works. In such circumstances, modifications to the SRN must have regard to the need to future-proof the network, while its delivery may require a funding agreement between the development promoter and the company.’

- 2.1.25. Paragraphs 49-52 of the Circular set out more detail in relation to the assessments to be completed, including the treatment of growth and committed developments, assessment years and phasing and timescales for the implementation of mitigation. The policies are different to those within Circular 02/2013 which considers a ‘worst case’ assessment, however they do allow for the assessment of various scenarios because of the vision-led approach to trip generation.
- 2.1.26. The identification of a timescale for implementation of mitigation is consistent with a ‘Monitor and Manage’ approach in regard to setting a framework for the monitoring to occur against a baseline expectation of impact. Should the monitoring show that planned improvements are not necessary at that time, discussions can be held with NH to agree a further monitoring programme and later implementation date.
- 2.1.27. This approach can be secured by way of an appropriate planning condition for a ‘Monitor and Manage’ strategy and process which sets out the baseline infrastructure to be provided, a

programme of monitoring and reassessment to ensure it remains relevant with a governance structure that includes key stakeholders.

ROAD INVESTMENT STRATEGY (RIS)

2.1.28. The RIS is Government's national programme for identifying and funding improvements across the network of some 7,200 km (4,500 miles) of nationally important roads which comprise motorways and trunk roads which form the SRN. The RIS sets out Government's strategic vision for the SRN, objectives of NH and the funding that would be available for the delivery of schemes in periodic Roads Periods. In this regard, RIS2 (2020-25) has informed the delivery of scheme improvements during Roads Period 2 (RP2) (2020-25); RIS3 (2026-31) would inform RP3 (2026-31).

2.1.29. RIS3 is delayed by one year due to a review by Government of priorities. The previously identified RIS3 pipeline schemes are deferred to RIS4 beyond 2030. RIS3 will however continue to build on the first two RPs and continue to unlock housing, generate employment and achieve environmental gain in conjunction with the objectives of local highway authorities.

In May 2023, NH published their initial reports on various Route Strategies.³ The Strategies are a rolling programme that sets out the NH's plan for the SRN and to inform RIS3 which was published in its draft form in June 2025⁴, and should be finalised in March 2026. Of particular relevance to the Site, is the Route Strategy Report London to Scotland East (South),⁵ which considers A5 and M1. The report refers to A5 in the vicinity of the Site and in particular:

- delays on the northbound approach to the A5 Kelly's Kitchen roundabout are observed as being over 25 seconds per vehicle per mile with low travel time reliability. The Regional Traffic Model predicts delays to remain broadly similar to current levels on A5 by 2031;
- the lack of real time information for road users during journeys along A5;
- 'low to medium' safety risk, with a 2020 iRAP⁶ star rating of 2/5 south of Milton Keynes;
- the importance of the route to the economy for the south Midlands, especially for warehousing and logistics;
- the interaction with A4146 as part of the Major Road Network (MRN); and
- expectations of significant growth in housing and population around the south-east of Milton Keynes.

2.1.30. A5 Kelly's Kitchen (A4146) roundabout is identified alongside several other at-grade junctions for further investigation both now and in future road periods in relation to improving average peak period delays and the reliability of journey times along A5.

2.1.31. The draft RIS3 has a funding envelope of c.£25bn overarching objectives relating to growth of the economy, improved safety and environmental impacts, enhanced use of technology, and improved network performance and resilience. It places greater emphasis on maintenance and renewal rather than major new construction and stresses the importance of integration with local roads around modal shift and active travel.

³ National Highways – [Route Strategies \(nationalhighways.co.uk\)](https://nationalhighways.co.uk)

⁴ DfT, June 2025, Draft Road Investment Strategy 3

⁵ National Highways, Route Strategy Initial Overview Report, London to Scotland East (South)

⁶ iRAP – International Road Assessment Programme

- 2.1.32. The A5 through Milton Keynes, as part of the SRN, is currently under pressure at key junctions (including A5 / A4146 Kelly's Kitchen Roundabout). Improvements would fall within RIS3's intention to improve operational performance through signal timing optimisation, better lane marking/signage and safety interventions rather than building major new infrastructure. The draft RIS3 does not include any specific schemes for implementation.

2.2 LOCAL POLICY

PLAN:MK 2016-2031

- 2.2.1. The Site is not allocated for development within Plan:MK to 2031. The previous refusal on the Site discussed in Section 4 of this TN was not determined under this planning policy, however Plan:MK contains similar policies regarding development in the open countryside, which the Site is designated as within Plan:MK.
- 2.2.2. Objective 12 of the strategic objectives relates to transport as follows:

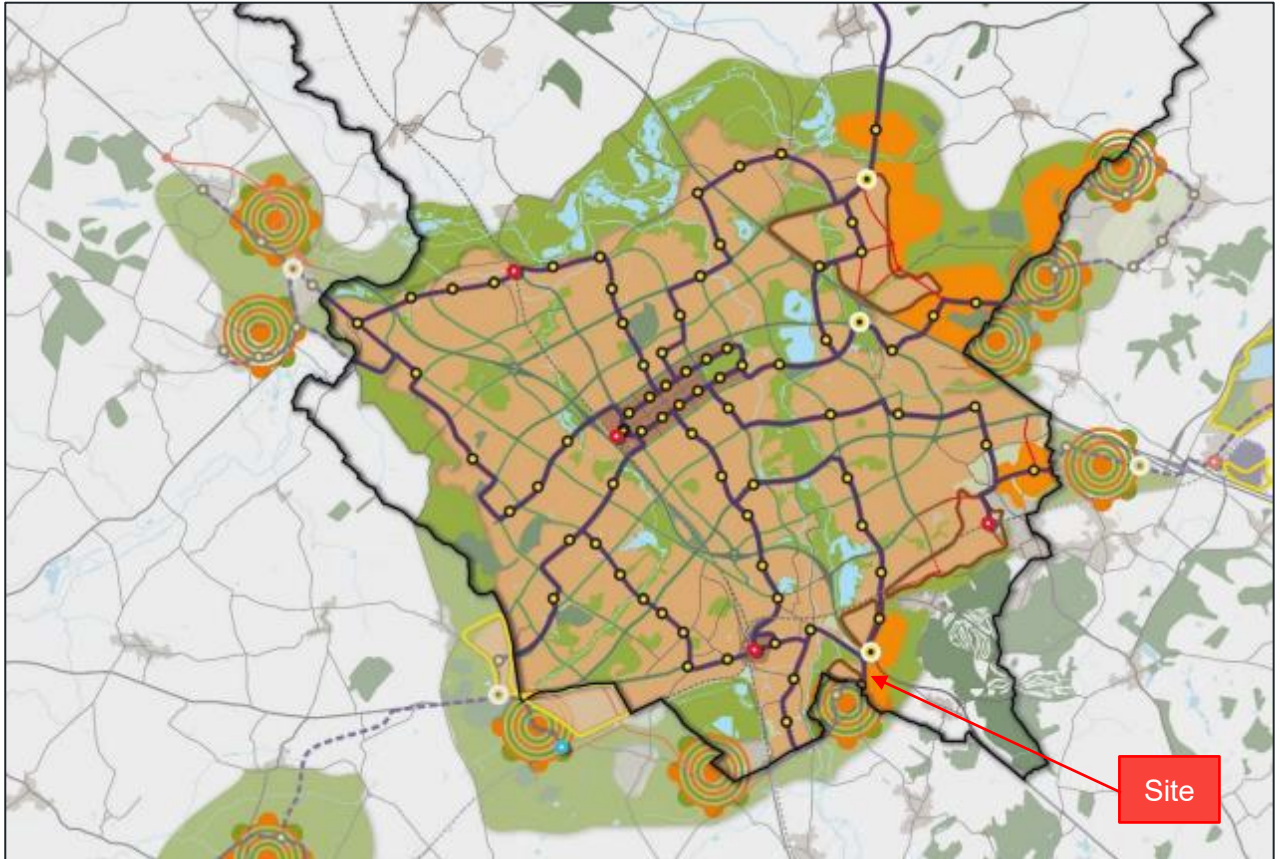
'To manage increased travel demands through: Smart, shared, sustainable mobility. Promoting improvements to public transport and supporting the development of the East – West rail link between Oxford and Cambridge, including the Aylesbury Spur. Encouraging an increased number of people to walk and cycle by developing an expanded and improved redway network. Extending the grid road pattern into any major new development areas. Utilising demand management measures to reduce the growth of road congestion, whilst upgrading key traffic routes such as the A421, A422 and the A509.'

- 2.2.3. Appendix A provides further detail on the policies within Plan:MK related to transport.

MK FUTURES GROWTH STRATEGY 2050

- 2.2.4. The MK Futures Growth Strategy 2050 set out a preferred strategy for the next stage of Milton Keynes (MK) evolution that anticipates continued growth of the city to a population of 410,000 people by 2050.
- 2.2.5. The final strategy was adopted at a Full Council meeting on 20th January 2021 and covered the whole of the administrative borough of Milton Keynes plus land in the adjacent neighbouring local authority areas of Aylesbury Vale, Central Bedfordshire and South Northamptonshire. Areas beyond the borough boundary are shown as potential growth areas denoted by orange circles. The adopted growth strategy is shown in Figure 2-1.

Figure -1 - MK Futures Growth Strategy 2050



- 2.2.6. The Site is within an area identified as a growth option for future development and adjoins a location for a potential Park and Ride site and terminus for a Mass Rapid Transit (MRT) system that would ultimately become an important transport hub for the enlarged City.

THE CITY PLAN 2050

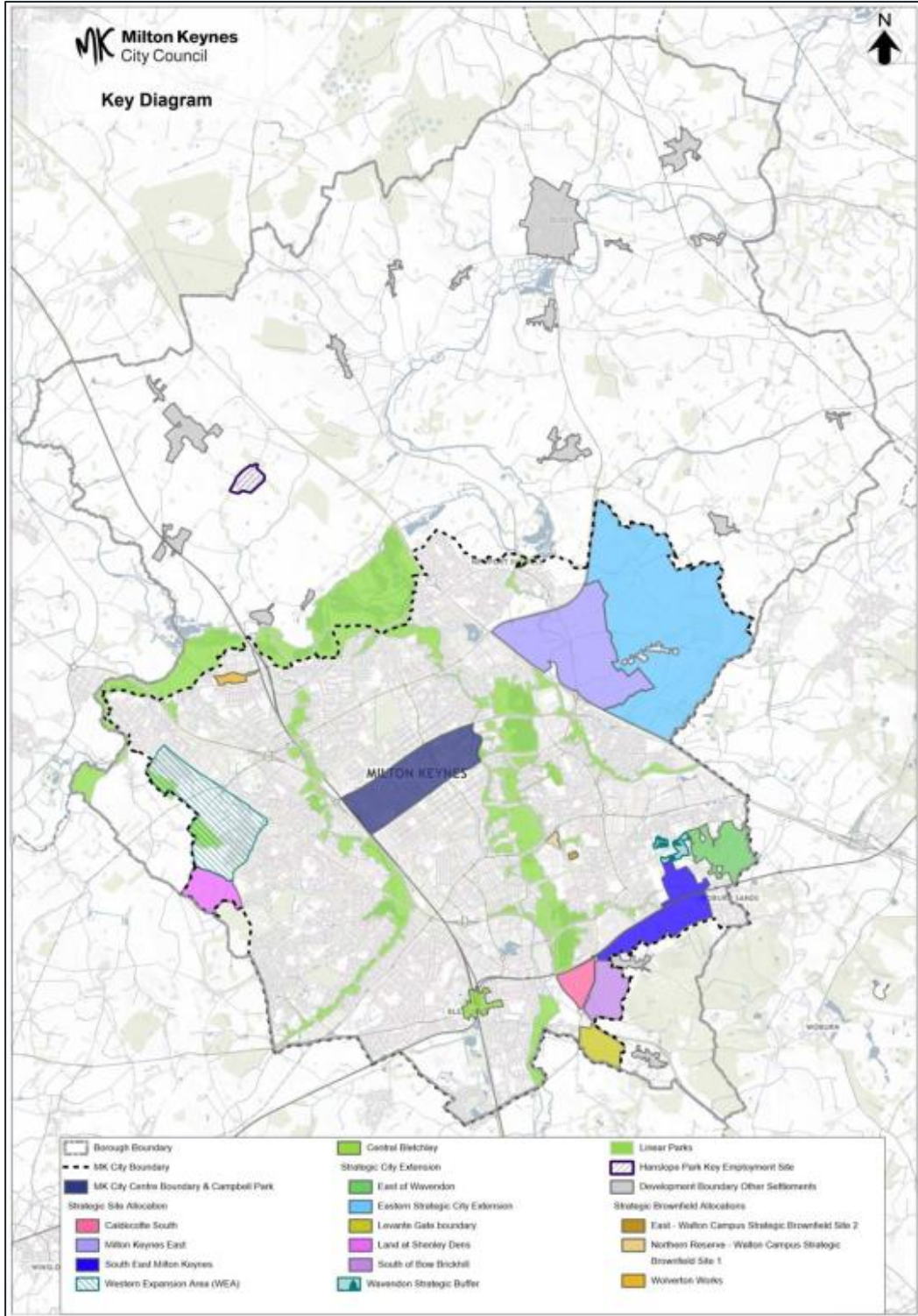
- 2.2.7. The new City Plan 2050 will take forward the MK Futures Growth Strategy for 2050 which set out a bold and ambitious vision for MK over the next 28 years, including equal opportunities for all, 'lifelong' homes that suit people at all stages of their life, and a pioneering mass rapid transit system.
- 2.2.8. The role of the City Plan 2050 is to deliver on the vision set out in the Strategy for 2050 and to do so sustainably. It will also build on the award-winning previous Plan:MK from 2019 and will plan the city's development until 2050. MKCC has indicated that the City is planning to accommodate 63,000 homes for 2050, which includes circa 33,000 homes to be allocated beyond the current supply.
- 2.2.9. A number of engagement activities have been commenced as part of the City Plan 2050, including a 'Carbon and Climate Study' public consultation; a Design Code for MK; a 'People Friendly and Healthy Places' survey; and the scoping consultation for the Plan's Ambition and Objectives and Sustainability Appraisal. The emerging evidence base includes the Land Availability Assessment Methodology and Call for Sites responses (including the Site promoted by GDL), and topic papers to accompany the Regulation 19 Consultation which runs from November to December 2025.

Proposed Submission (Regulation 19) MK City Plan 2050 – Consultation

Policy GS18 – Levante Gate

2.2.10. The Key Diagram within the Proposed Submission MK City Plan 2050 identifies a number of strategic city extensions, including the Levante Gate as draft Policy GS18.

Figure 2-2 - MK City Plan 2050 Key Diagram



- 2.2.11. Policy GS18 (Appendix B) regarding the Levante Gate Strategic City Extension requires the following active and sustainable travel measures and residual traffic management measures which will be incorporated into the masterplan layout for the Proposed Development:

“The phased introduction of a comprehensive transport network and infrastructure that follows the movement hierarchy set out in Policy GS4, and to specifically include:

a. Segregated routes for active travel and provision of interchange hubs that integrates well with Eaton Leys, South of Bow Brickhill Strategic City Extension and the surrounding area and network of active travel routes and routes for public transport;

b. Routes for movement of public transport and general traffic through the sites, with access taken from the A4146;

c. Infrastructure and traffic management measures to mitigate impacts upon the wider highway network.”

Other Policies and Considerations

- 2.2.12. Draft Policy GS4 Strategy for People-Friendly and Healthy Places considers, amongst other elements, the linkages between available transport and health and social deprivation. The policy sets catchment distances for community infrastructure to ensure walking and wheeling are viable options where travel by car is not accessible, setting the movement hierarchy principles for active modes first, followed by public transport, then finally by other modes including the car.
- 2.2.13. Draft Policy GS10 Movement and Access. The policy aims to manage the impact of continued growth in the City on the transport network, including the impact on emissions, through appropriate vision-led assessments and provision for safe and sustainable/active modes of travel. Locating development where public transit, the network of Redways and the grid roads can be utilised and expanded upon appropriately (in the context of the movement hierarchy in Policy GS4) is central to the growth of the City. Policy GS10 defines the expectations for movement corridors, prioritising active travel and public transit that is accessible to all, with the potential for reduced car parking provision where opportunities for travel by other modes is high.
- 2.2.14. Within the draft City Plan 2050, ‘Figure 1: Emerging Metro Routes’ shows a route with bus lanes between Central Milton Keynes and Bletchley, continuing on road with no bus lanes via Water Eaton to Newton Leys south west of Levante Gate. Further consideration should be given by MKCC to extending the route to serve the two strategic city extensions at Levante Gate (Policy GS18) and South of Bow Brickhill (Policy GS17).

TRANSPORT POLICY

Milton Keynes Local Cycling and Walking Infrastructure Plan (LCWIP) (2023)

- 2.2.15. The Milton Keynes LCWIP 2023 aims to deliver a borough-wide strategic plan that expands and improves active travel infrastructure by identifying, assessing, and prioritising walking, wheeling and cycling routes. The LCWIP sets out an ambitious vision to make streets safer, more accessible and more welcoming for people of all ages, including children, older residents and disabled people. To achieve this, Milton Keynes City Council reviewed around 300 proposed schemes, using bespoke appraisal criteria developed with key stakeholders, and ultimately adopted a targeted list of 25

priority schemes for further development. These schemes are designed to upgrade or create routes using the latest national guidance—such as LTN 1/20, the revised Highway Code, and the MK Redway Design Manual—with the overarching goal of ensuring high-quality, safe and attractive active-travel corridors across the city.

- 2.2.16. The LCWIP also seeks to support wider policy goals, including improving public health, reducing congestion, cutting carbon emissions and enhancing local connectivity. Its objectives include addressing missing links in the Redway network, improving priority crossings, and creating better connections between neighbourhoods and key destinations. Ultimately, the plan aims to create environments where walking and cycling are safe, convenient, and attractive options for short everyday journeys, supporting more sustainable mobility across Milton Keynes.
- 2.2.17. Within Bletchley and local to the Site, a number of missing links are identified including A4146 between Water Eaton and A5 (scheme 280), and Watling Street (scheme 7) which is also identified for Redway improvements and local schemes. Water Eaton Road (scheme 187), a key link between the Site and Bletchley station, is also identified as a missing link.
- 2.2.18. The identified schemes are appraised, with Water Eaton Road scoring highly (79%) and ranked 16th out of the long-list of all schemes, with the suggestion to upgrade the existing paths to Redways and improve the crossing of the railway. The links closer to the Site are not included in the top 100 schemes list. Scheme 7 (Long distance strategic link between Bletchley (coming in at Fenny Stratford) and Little Brickhill) scored 57% and scheme 280 (Redway along A4146 connecting Lakes Estate (South Bletchley) to Eaton Leys and A5 roundabout) scored 50%. None of these schemes is included in the MKCC LCWIP Delivery Plan for the next 10 years.

Mobility Strategy For Milton Keynes 2018-2036 (LTP4) Mobility For All (2018)

- 2.2.19. The Milton Keynes LTP4 (MK LTP4) was adopted in March 2018 and sets out Milton Keynes Council's (MKCC) policies and programme for delivering local, sub-regional and national policy objectives between 2018 and 2036. The MK LTP4 assumes growth in the population from 268,000 people to over 300,000 by the mid-2030s and to over 400,000 by around 2050, with an additional 31,000 homes.
- 2.2.20. This future mobility strategy for MK acts as the reference point for how the town wishes to maintain, improve and develop its transport system up to 2036⁷, providing the foundations upon which the Plan:MK policies are built. As such, the MK LTP4 is significant to the growth of Milton Keynes and explains to how the transport network needs to respond to accommodate that growth.
- 2.2.21. It establishes both short term and long term (up to 2050) visions and demonstrates how it will connect to new infrastructure such as East West Rail as outlined in the National Infrastructure Commission's final report 'Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes-Oxford Arc' and the council's 'First Last Mile' strategy.
- 2.2.22. The ambition for MK LTP4 is to:
 - *"Stabilise average journey times and ensure they remain competitive while promoting the development of smart shared sustainable mobility for all;*

⁷ MK Mobility Strategy 2018-2036 Section 1.1, page 2 (CD12/C)

- *Provide a fully integrated and accessible public transport system - “Mobility as a Service” (MaaS)*
- *Develop and promote a ‘First Last Mile’ culture for future technologies such as autonomous and connected vehicles and sustainable connectivity*
- *Ensure transport infrastructure is configured to enable the city’s future development and growth in travel demand to be accommodated based on the council’s ‘First Last Mile’ Strategy”*

2.2.23. MKCC’s Mobility Strategy sets out key transport objectives and outcomes⁸ to accommodate the anticipated level of growth through to 2036 and beyond leading towards 2050:

- Support growth and provide mobility for all;
- Provide an effective Network: to prioritise travel by public transport, cyclists and pedestrians;
- Maximise Travel Choice; and
- Protect Transport Users and the Environment: to improve wellbeing, reduce emissions and ensure the safety of all travellers.

Bus Service Improvement Plan (BSIP)

2.2.24. The Milton Keynes BSIP sets out the vision, goals and objectives of MKCC in relation to public transport, giving context to the challenges and opportunities and how public transport can achieve its full potential in the City to assist with accommodating the planned extensive growth and development. The BSIP will deliver the groundwork for the 2050 Strategy, mass rapid transport and the new university.

2.2.25. The vision for Milton Keynes as set out in the BSIP is to have an excellent, green and inclusive public transport system that is used by all. The main goal is to significantly increase the relevance of public transport to reduce the dominance of the car, support growth, create inclusivity and improve health and wellbeing. Success with realising the vision and goals will be through innovation to deliver a quality service with low environmental impacts.

2.2.26. The objectives include:

- A service hierarchy for a coordinated public transport network, including the potential for rapid transit services;
- Enhanced frequencies and operating times;
- Improved journey times and reliability;
- Integrated ticketing and improved passenger infrastructure especially to facilitate multi-modal interchange;
- Improved vehicle fleet to help MKCC achieve the carbon neutral by 2030 ambition.

⁸ Mobility Strategy for Milton Keynes 2018-2036 (LTP4), March 2018, MKC, Section 2, page 3 (CD12/C)

2.3 COMMITTED DEVELOPMENTS

EATON LEYS (15/01533/OUTEIS)

2.3.1. Eaton Leys is directly opposite the Site to the west of A4146. Originally the application was for 1,800 units split across the jurisdiction of Milton Keynes Council (448 units) and Buckinghamshire Council (BC) (1,200 units). Milton Keynes Council granted outline permission for the 600 units within their jurisdiction and construction is almost complete. The remaining 1,200 units were not allocated by BC in the Vale of Aylesbury Local Plan and the planning application was subsequently withdrawn.

Highways

2.3.2. Access to Eaton Leys is taken from A4146 as shown below in Figure 2-3, Figure 2-4 and Figure 2-5.

Figure 2-3 - Proposed Access into Eaton Leys (Gallagher Estates)

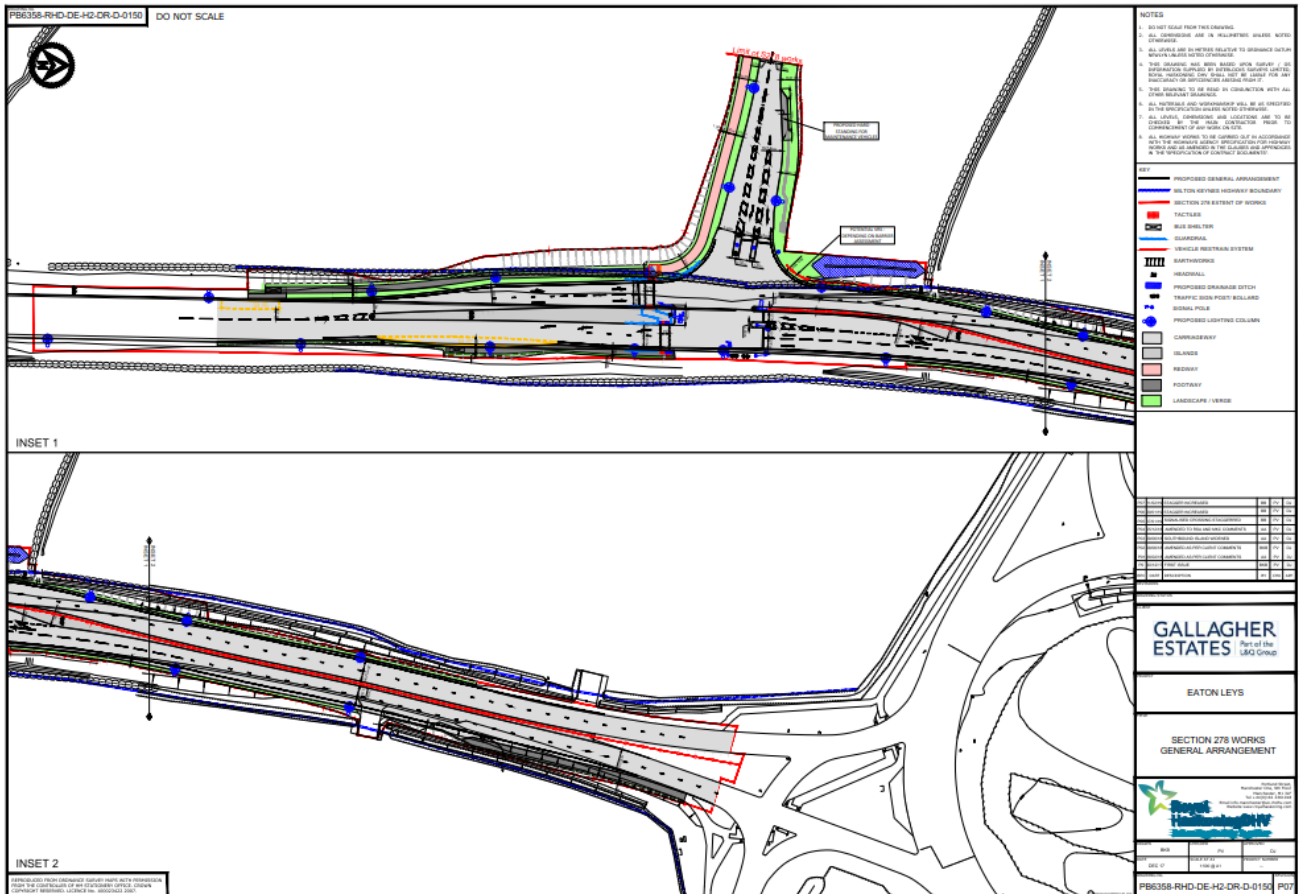


Figure 2-4 - As Built Access into Eaton Leys from A4146

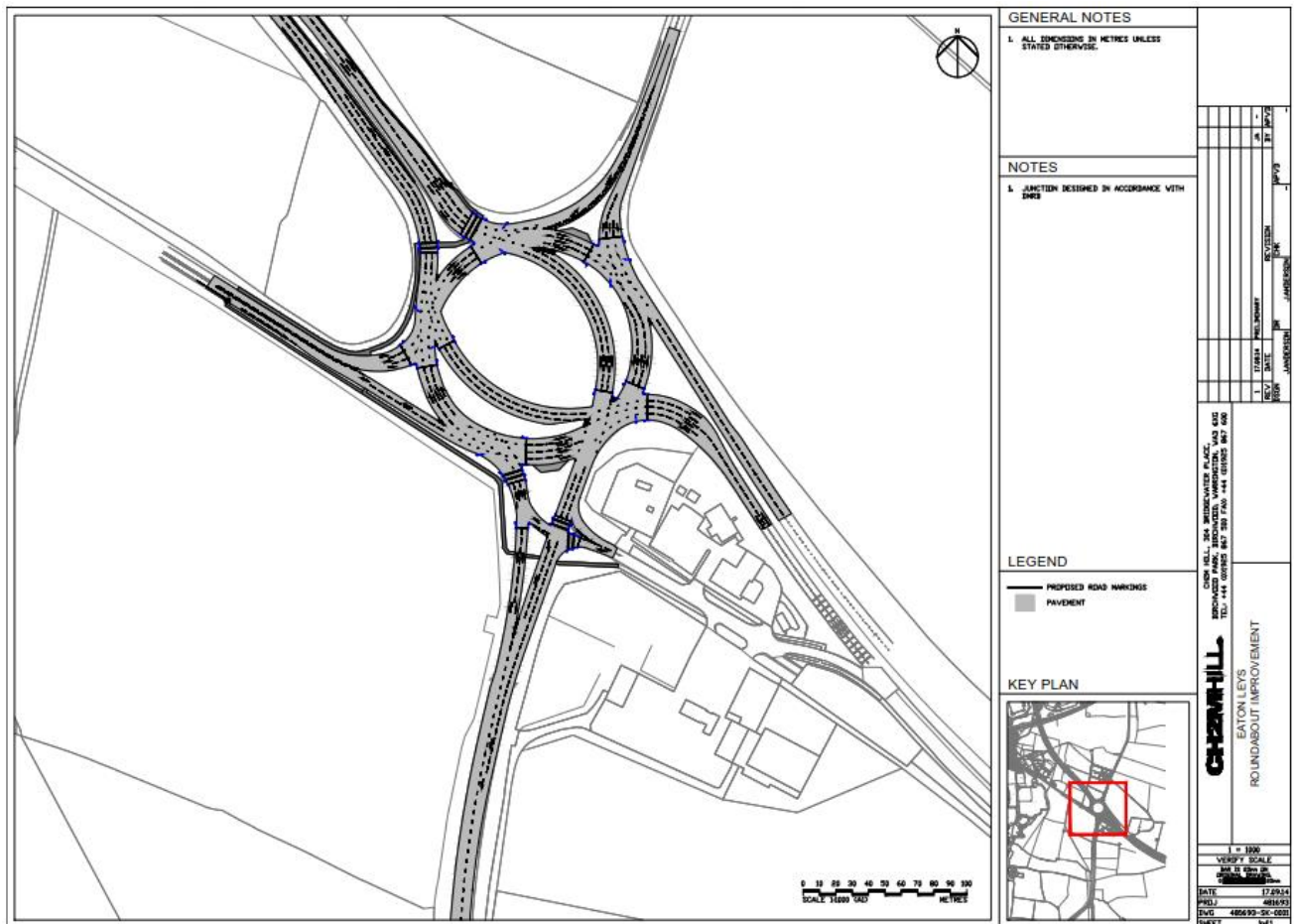


Figure 2-5 - A4146/Eaton Leys Signal Junction



2.3.3. The Eaton Leys planning permission includes a pre-occupation condition to enter a s278 agreement with Highways England (HE) (now National Highways - NH) regarding the completion of improvements to the junction of A5/A4146. The planning condition has since been discharged with the design of a scheme to significantly enhance the junction layout as shown below at Figure 2-6. This indicates an extensive improvement to create a double 'hamburger' style arrangement with links across the central space and modifications to the traffic signals and approach lanes.

Figure 2-6 - A5/A4146 Improvements – as proposed by the full Eaton Leys Development



2.3.4. HE acknowledged in their response to the Eaton Leys planning application that a trigger of 629 units was likely prior to the implementation of the full scheme improvement at A5/A4146⁹, based on a linear build rate of the development. Given the size of the approved Eaton Leys development, the full scheme improvement at the junction of A5/A4146 shown above in Figure 3-4 will not be implemented in conjunction with the extant Eaton Leys planning permission.

Sustainable and Active Modes

2.3.5. The masterplan for Eaton Leys (MK land parcel) includes pedestrian and cycle links to Watling Street, A4146 and to Waterhall Park, from where connections can be made across the River Ouzel into Water Eaton and Bletchley. The connections to A4146 have been in place for a number of years linking to the bus stops, as visible on Figure 2-4. A new footpath has been constructed from the development to Watling Street (Figure 2-7) and the new Redway between the development and Waterhall Park via a new bridge over the River Ouzel is also now open (Figure 2-8).

⁹ HE response to application 15/01533/OUTEIS dated 21-12-2015

Figure 2-7 – Footpath to A4146 from Eaton Leys

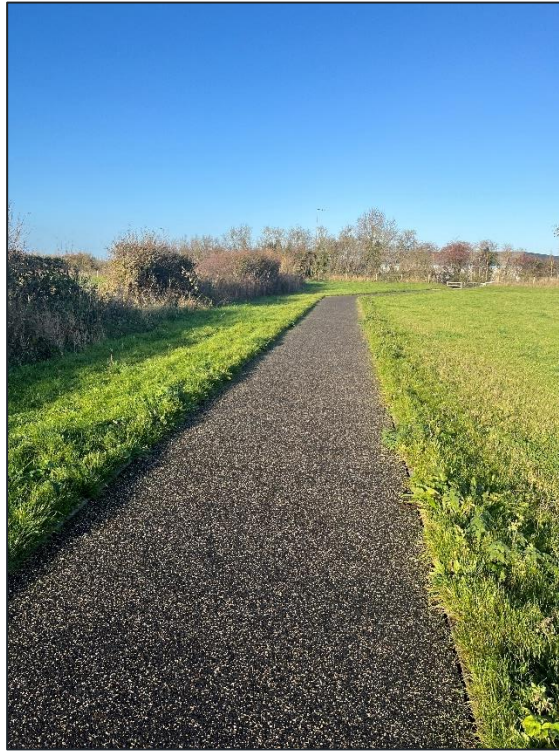


Figure 2-8 – Redway and Bridge between Eaton Leys and Waterhall Park over River Ouzel



2.3.6. The overall 1,800 unit Eaton Leys scheme included bus route extensions to routes 1 and 70, via a loop between the two proposed A4146 access points. With consent for only 600 units in MK, and only one access point, the proposals for bus improvements are presumed to be 'on-street' via the new bus stops on A4146.

SOUTH CALDECOTTE (19/01818/OUT)

- 2.3.7. Planning permission was granted in October 2020 via Appeal for a logistics park for 241,540 sqm of B1c, B2 and B8 to the northeast of the A5/A4146 roundabout. Phase 1 of the development is complete.¹⁰ Phase 2 comprising a single unit of approximately one million square feet of logistics space was granted detailed planning consent in May 2023.¹¹

Highways

- 2.3.8. Access to the South Caldecotte development is from a new roundabout connecting with the A5/A4146 Kelly's Kitchen roundabout via a new dual carriageway link upgrade to Brickhill Road.
- 2.3.9. The planning submission included a cumulative assessment for Eaton Leys (1800 units), Levante Gate (500 units) and the Proposed Development. The assessment assumed that the full scheme improvement at A5/A4146 (as approved for Eaton Leys), would be available and proved that it would suffice to accommodate all three development sites.
- 2.3.10. However, with uncertainty over the remaining 1,200 units at Eaton Leys and refusal of the previous Levante Gate scheme, the planning approval includes improvements to the A5/A4146 roundabout which can come forward independently of the Eaton Leys proposals and without accommodating traffic from Levante Gate. The proposals include an additional lane at the entry to the roundabout from A5 northbound and an extension to the flare length on the offside lane on the entry from A5 southbound, along with dualling Brickhill Road. The independent South Caldecotte development improvements are shown below in Figure 2-9.
- 2.3.11. It is understood that the s278 works to the A5 Kelly's Kitchen roundabout and the dualling along Brickhill Road to the new South Caldecotte access roundabout was completed in June 2023 as shown in Figure 2-10.

¹⁰ <https://www.plproperty.com/sites/plp-milton-keynes/>

¹¹ <https://peellandp.co.uk/news-and-views/news/plp-secures-planning-for-1-million-sq-ft-logistics-unit-at-milton-keynes/>

Figure 2-9 - A5/A4146 Improvements - South Caldecotte Development (Excluding Eaton Leys Improvements)

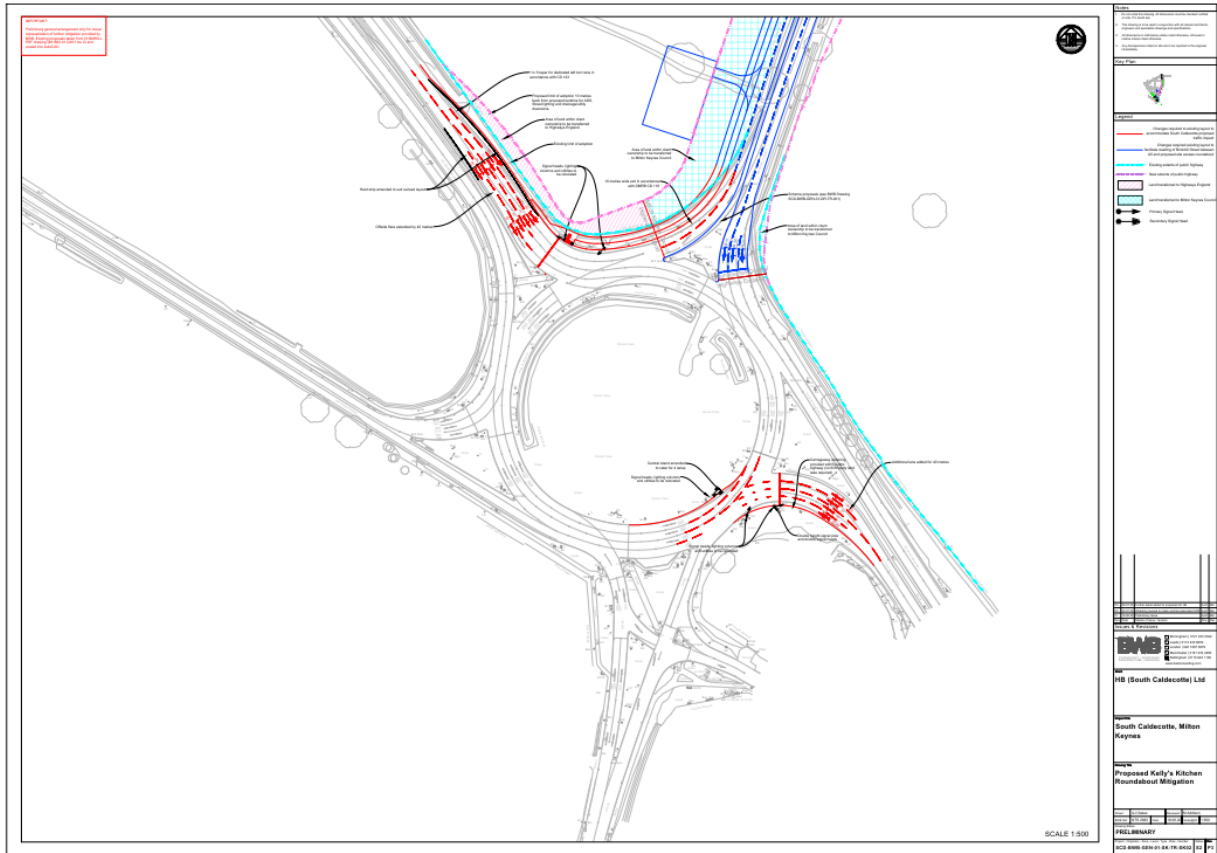
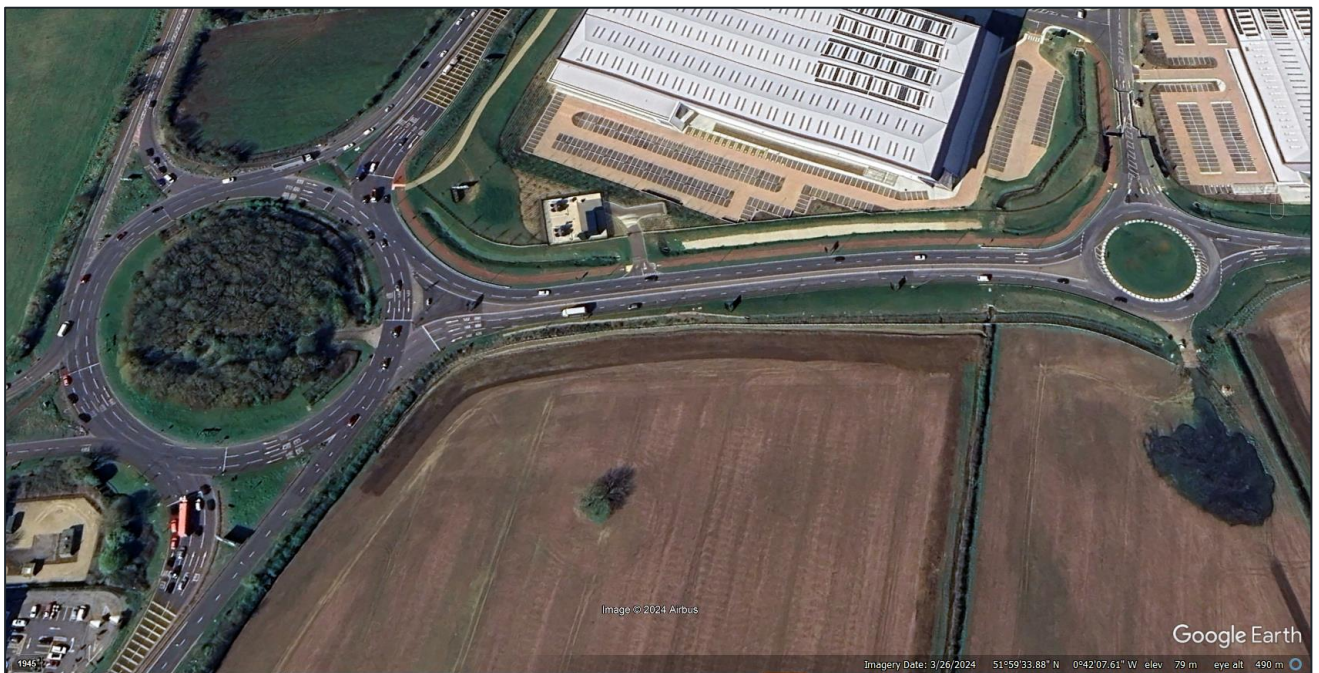


Figure 2-10 - A5/Brickhill Road layout (March 2024)



Sustainable and Active Modes

- 2.3.12. The development includes a Redway through the site to connect the existing Redways at the junction of A5/A4146 and those further north at the Bow Brickhill level crossing, as visible alongside the road on Figure 2-11. The Brickhill Road grid road reserve includes sufficient width for a Redway to come forward in the future, if required.
- 2.3.13. Bus services would be brought into the site to a new southern terminus, with additional buses and extended service times to enhance provision.

Figure 2-11 – Redway Through South Caldecotte Development



3 PREVIOUS SITE PROPOSALS (17/03233/OUT)

- 3.1.1. The previous planning application for the Site submitted by The Guinness Partnership in December 2017 was for:

“An outline proposal with all matters reserved for development of land to the south of the A5 and east of the A4146, Milton Keynes for up to 500 homes, including 40% affordable homes; a 1 Form Entry Primary School; a local Centre, open space and associated works.”

- 3.1.2. Access to the Site was considered in the supporting Transport Assessment (TA) and located directly opposite the approved junction to serve Eaton Leys off A4146 to form a signal controlled crossroads.

3.2 HIGHWAY IMPROVEMENT PROPOSALS

- 3.2.1. The previous proposals included the following highway improvements:

- Capacity improvements to the A4146 up to the A5;
- Capacity improvements to the A5/A4146 Kelly’s Kitchen roundabout (note: capacity and safety improvements to the roundabout and Brickhill Road to the north have been implemented in conjunction with the employment development at South Caldecotte);
- Redway along A4146 between the Site access and the A5/A4146 roundabout;
- Redway along Watling Street between the A5/A4146 roundabout and Fenny Stratford (note: this improvement has already been implemented);
- Contribution to Redway on Brickhill Street;
- Contribution to highway improvements at V10/H10 roundabout;
- Contribution to public transport services serving the Site;
- Extended high frequency bus routes 1 & 70 into the Site – all new homes to be within 400m walking distance of these routes;
- Pedestrian and cycle crossing facilities at the four-arm signalised crossroads access aligned with the approved access into Eaton Leys, thereby enabling direct connections into Eaton Leys and onto new planned redways;
- Commitment to a second pedestrian and cycle crossing of the A4146 (in addition to the one as the Site access);
- Bus stops along the A4146 with pedestrian links to and from Levante Gate; and
- Improved access/surfacing from the bridleway across the Site onto Watling Street towards Little Brickhill.

3.3 RESPONSE FROM MKC HIGHWAYS – NO OBJECTION

- 3.3.1. Subject to securing the highway improvement proposals listed above, and to a satisfactory response from Highways England, MKC¹² Highways had no objection to that proposed development.
- 3.3.2. The response from MKC Highways acknowledged that the impact of 500 units would be acceptable assuming the full scheme improvement at the junction of A5/A4146 that related to Eaton Leys was implemented. MKC accepted that the full scheme improvement at A5/A4146 would provide capacity for 1,800 units and as only 600 units are consented at Eaton Leys and potentially with 500 units on Levante Gate, then there would be plenty of capacity to accommodate the latter, assuming the full scheme improvement would be implemented. This was agreed prior to the signing of the Eaton Leys s278 with Highways England, which set a trigger of 629 units for the implementation of the full scheme improvement at the junction of A5/A4146.

3.4 RESPONSE FROM HIGHWAYS ENGLAND – NO OBJECTION WITH CONDITIONS

- 3.4.1. Subject to securing the improvements set out below, Highways England (i.e. now NH) raised no objection to the development proposed at that time subject to various planning conditions:

A5 / A4146 ROUNDABOUT

“The Transport Assessment supporting this planning application has not provided an assessment of the A5/A4146 roundabout. The roundabout is subject to an improvement scheme as part of the Eaton Leys development (15/01533/OUTEIS). The agreed improvement for the Eaton Leys development relate to CH2M drawing no: 481693.01.GA01 Revision 2 dated 17.07. 2015. It is therefore required that prior to commencement on site, the promoters of this development undertake a full assessment of the roundabout and a mitigation scheme is agreed with Highways England and the Local Highways Authority.

Condition: No development within the application area shall be undertaken prior to a Section 278 Agreement having been entered into between the Developer and Highways England (and the Council if necessary) which shall include an obligation on the part of the Developer (and such other parties as may be party to the agreement) to cover the costs of implementing a scheme of improvement works to the A5/A4146 roundabout that is required to mitigate the effects of the development on the Strategic Road Network. Any such approved improvement scheme shall be completed prior to first occupation of any part of the development hereby approved.”

A5/ REDMOOR JUNCTION

“The A421 / A5 Redmoor junction is a grade separated signalised roundabout with the A5 mainline running through the junction being the responsibility of HE. The proposed development may contribute to queueing on the mainline, hence HE are

¹² As they were at the time, now MKCC

conditioning that the junction is monitored prior to the commencement of the development.

Informative: The applicant is advised that prior to entering into a Section 278 Agreement with Highways England (and the Council if necessary) and prior to the commencement of the development, an assessment of the impact of the development on the slip roads which link the A5 with the A5 / A421 Redmoor Roundabout is required to be completed and submitted to Highways England to inform the parameters of any mitigations that may be necessary at this location.”

3.5 OUTCOME

- 3.5.1. The planning application was subsequently refused as it was contrary to Local Plan policies regarding development in the open countryside. The Guinness Partnership did not appeal the decision.

4 EXISTING CONDITIONS

4.1 PROW NETWORK

4.1.1. Figures 4-1 and 4-2 below show the Public Rights of Way (PRoW) network surrounding the Site. There is currently one bridleway through the Site, Little Brickhill BW015, which is approximately 1.1km long and connects Watling Street north of Little Brickhill with the edge of the Site, close to A4146 in the west. The connection between the bridleway and A4146 (Figure 4-3) is somewhat overgrown, with no footway or crossing point on A4146 to facilitate a safe passage to the bridleway opposite. With the perceived speed and mix of traffic on A4146, the existing crossing location between the two footpaths is unattractive and intimidating to pedestrians.

Figure 4-1 - PRoW network in Milton Keynes

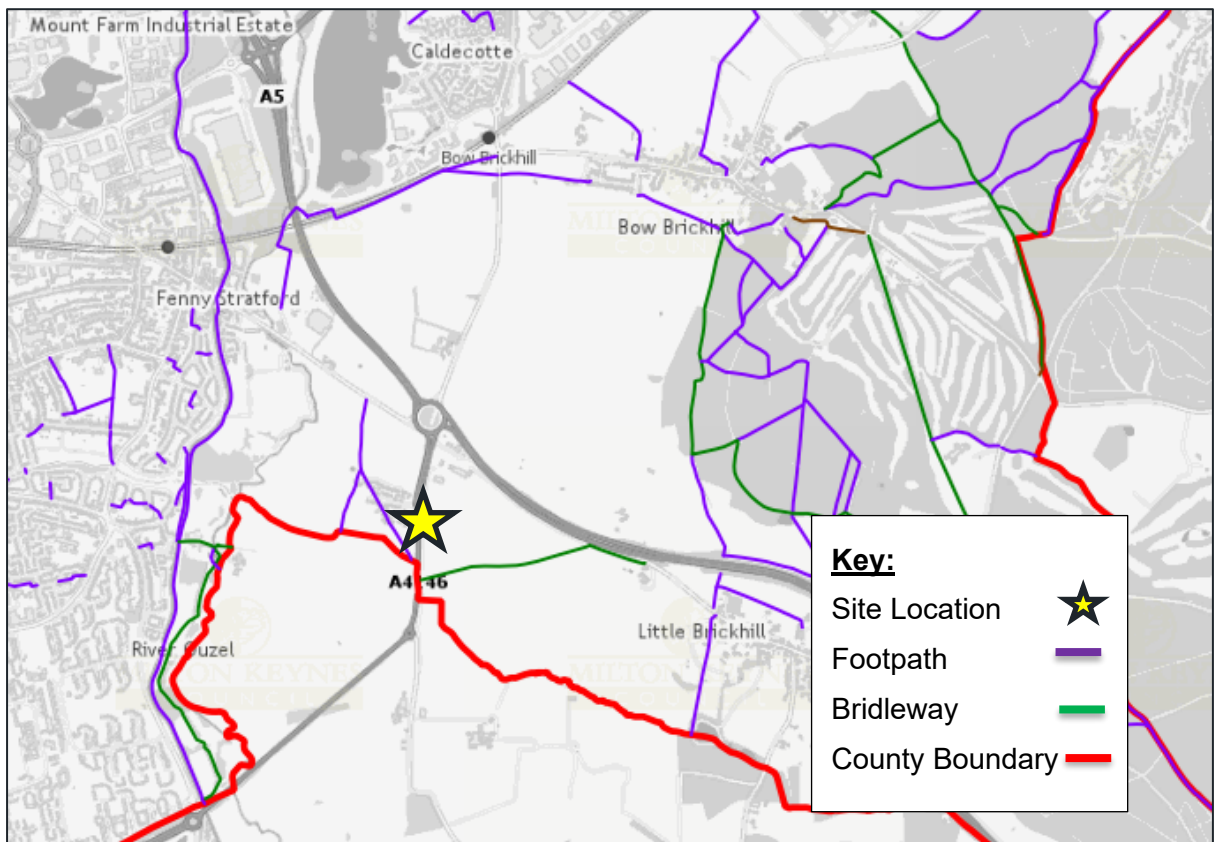


Figure 4-2 - PRoW Network in Buckinghamshire

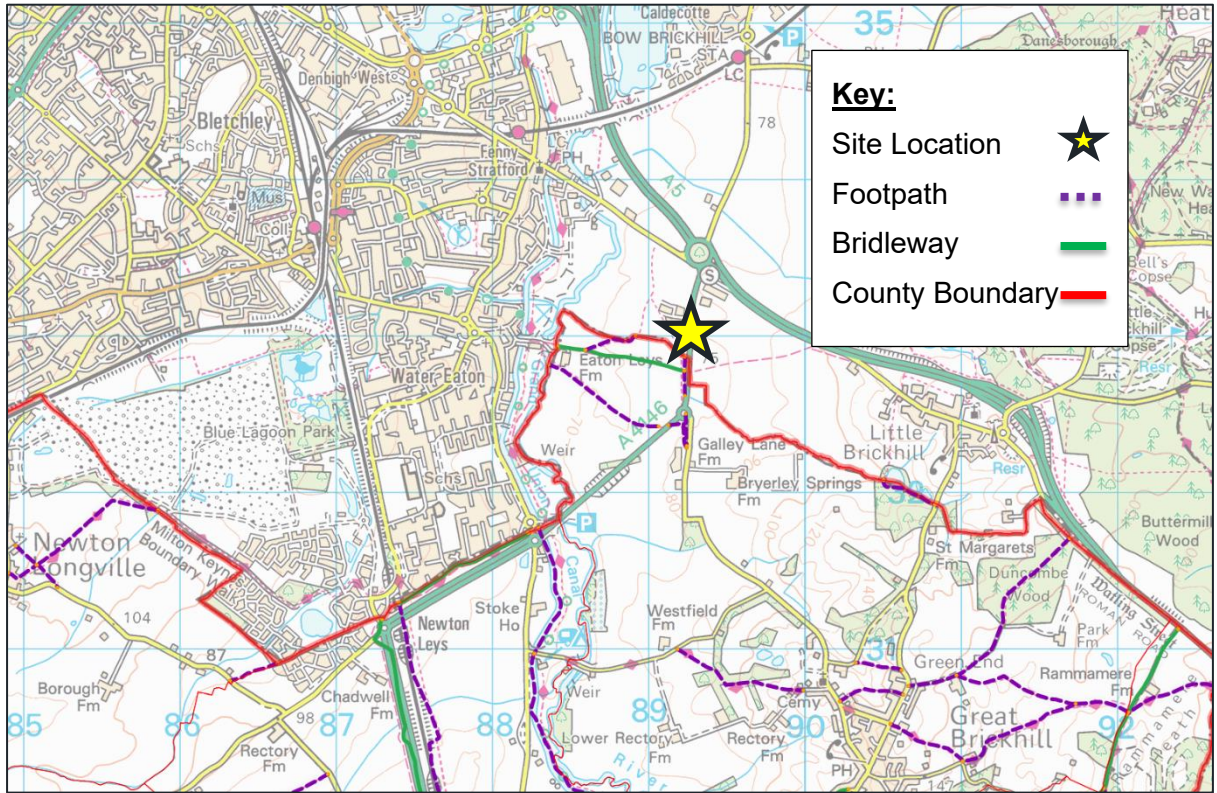


Figure 4-3 - Bridleway connection from the Site to A4146



4.2 PEDESTRIAN AND CYCLE NETWORK

- 4.2.1. There are existing opportunities for pedestrians and cyclists in the immediate vicinity of the Site brought forward through recent developments, as detailed in Section 2 of this TN. A new footpath has been created from the Eaton Leys development to the new bus stops on A4146 at the access junction, and although this is an aspiration of the MKCC LCWIP, there is currently no wider connectivity on A4146.
- 4.2.2. There is a short section of Redway network at the A5/A4146 roundabout, as shown below in Figure 4-4 below. The route connects A4146 and the Farm Shop/McDonalds southeast of Kelly's Kitchen roundabout with the Redway that extends to the northwest along Watling Street to Fenny Stratford and the recommended cycle route which runs along the A5 carriageway in both directions. The Redway around the roundabout needs maintenance in some places where vegetation has currently overgrown the route (Figure 4-5). An image of the Redway along Watling Street is provided in Figure 4-6.
- 4.2.3. There is also a Redway from A5 (north) to and through the South Caldecotte commercial development, visible on Figure 2-11. The route continues joins with the mini roundabout to the north of the railway crossing at Bow Brickhill, providing access to the Caldecotte Lake Business Park.

Figure 4-4 - A5/A4146 Redways (MK MyMaps)



Figure 4-5 – Existing Redway at Kelly’s Kitchen Roundabout



Figure 4-6 - Redway on Watling Street (looking towards Fenny Stratford)



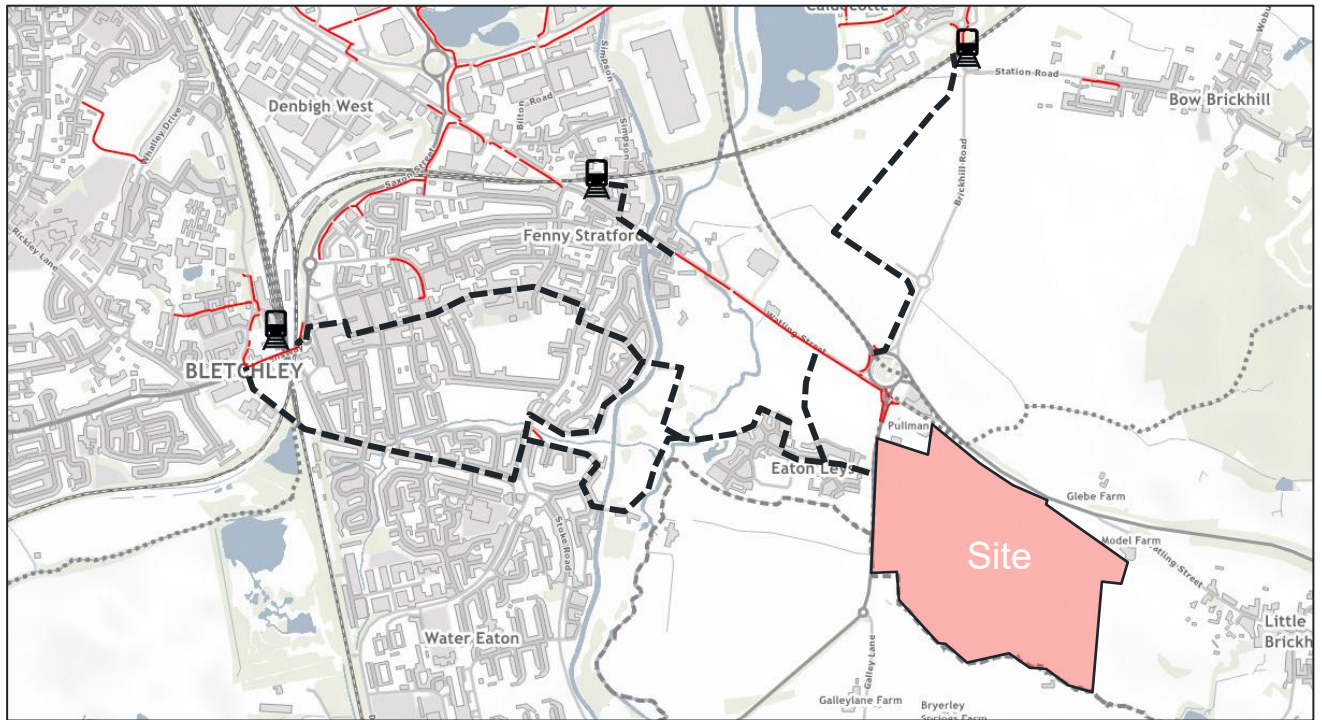
- 4.2.4. A new footpath connection has been made from the Eaton Leys development directly north to meet the Redway on A5 Watling Street (Figure 2-7) broadly along the alignment of the existing PROW footpath as shown on Figure 4-7. The footpath does not have Redway status and is unlit.

Figure 4-7 - New footpath from Eaton Leys to Watling Street



- 4.2.5. Pedestrians and cyclists from the western edge of the Site who wish to travel to Fenny Stratford for the station and local amenities would have the opportunity to exit the Proposed Development via either the proposed primary or secondary access points located along A4146 and enter Eaton Leys to access the new link onto the existing Redway along Watling Street as an alternative to connecting to the Redway network at Kelly's Kitchen roundabout.
- 4.2.6. Connections are also available between Eaton Leys and Waterhall Park to the west. There are new Redways through the development to a new bridge over the River Ouzel into Waterhall Park (Figure Figure 2-8 and Figure 4-7), from where onward connections can be made into Bletchley over the Grand Union Canal at Pinewood Drive.
- 4.2.7. With the introduction of the new bridge over the River Ouzel, it is possible to walk/cycle from the Site to Bletchley Station in 3.5km via Eaton Leys, Waterhall Park, Mill Road and Water Eaton Road (or Sycamore Avenue, Queensway) as shown in Figure 4-8. Whilst there are no cycle facilities on these roads, traffic is low on Sycamore Avenue and Mill Road, and the majority of the length of Water Eaton Road is part of a 20mph zone, meaning that the speed of traffic is suitable for on-road cycling.

Figure 4-8 – Existing Pedestrian and Cycle Connectivity to Stations



4.3 PUBLIC TRANSPORT

BUSES

- 4.3.1. There are two bus stops located on A4146 outside the Site, installed in conjunction with the Eaton Leys development, as shown below in Figure 4-9. Routes 162 and M6 currently pass the Site, although route 162 provides a limited service once a day, four days per week between Bletchley and Leighton Buzzard/Stewkley and Route M6 provides limited services to Amazon Magna Park in the very early morning and in the late evening, presumably to service employees and shift change times.
- 4.3.2. Milton Keynes has recently moved away from having numerous local bus services to the new MK Connect service, which is demand responsive anywhere across the Milton Keynes Council area. Journeys are booked via an app (or weblink) with waiting times of around 30 minutes typically. The cost of a journey is £4.00 during peaks and £3.00 off-peak, between 6am – 8pm Monday to Saturday.¹³
- 4.3.3. Popular destinations include local stations, areas of major employment and Central Milton Keynes, as shown below in Figure 4-10.

¹³ <https://www.milton-keynes.gov.uk/highways/bus-rail-and-taxis/mk-connect> and <https://city.ridewithvia.com/mk-connect>

Figure 4-9 - New Bus Stops on A4146 at Eaton Leys



Figure 4-10 - MK Connect - Popular Destinations



RAIL

4.3.4. Fenny Stratford Station and Bow Brickhill Station are both 1.8km from the Site. Fenny Stratford Station can be accessed on foot or by bicycle using the Redway along Watling Street from the A5/A4146 roundabout (or via Eaton Leys). There is no existing pedestrian/cycleway connection to Bow Brickhill Station, however there will be a connection via the South Caldecotte development once implemented.

- 4.3.5. Bletchley Station is currently approximately 5km from the Site by bicycle via the road network or 3.5km via Eaton Leys and Waterhall Park. Waterhall Park is unlit and although the routes are surfaced, it is likely to be most useable during daylight hours.
- 4.3.6. All three stations are on the Marston Vale line providing east-west services to Bedford. Bletchley Station is also on the West Coast Main Line providing connections to London and Birmingham.
- 4.3.7. Whilst further away at 8.7km from the Site, Milton Keynes Central station is accessible for those willing to cycle further by either a pedal or e-bike, or by using either MK Connect 'on-demand' buses.

East West Rail

- 4.3.8. The Bletchley to Bedford section of EWR involves refurbishing existing lines on this route and major upgrades to both Bletchley and Bedford railway stations. Connection Stage 1 between Oxford and Bletchley/Milton Keynes is complete and passenger trains are due to start imminently. Later stages of the project would extend EWR to Bedford and further east towards St Neots and Cambridge.
- 4.3.9. East-west public transport is currently limited to a coach service, which takes 1 hour 50 minutes between Oxford and Milton Keynes at peak times and the bus journey between Bedford to Cambridge takes up to one and a half hours. With EWR, these journey times could be cut to 45 minutes from Oxford to Milton Keynes and would take 35 minutes between Bedford and Cambridge.
- 4.3.10. Development of the Site will benefit from the improved rail services and access to facilities which will be delivered as part of EWR. In this regard, Government has endorsed the implementation of EWR including the confirmed route of the Central Section between Bedford and Cambridge.
- 4.3.11. Government has recently confirmed that both Bow Brickhill and Fenny Stratford stations will be closed under the EWR proposals, with a new station at Woburn Sands and a new eastern entrance for Bletchley station, making it easier for rail passengers to access that station from the Site. It is anticipated that the closure of Bow Brickhill and Fenny Stratford wouldn't happen until mid-2030s, which would be after the completion and full occupation of the Site, when travel patterns would be established, offering the opportunity for passengers using those stations to transfer to Bletchley station instead.

4.4 ACCESS TO FACILITIES

- 4.4.1. Existing facilities in the local area include primary schools, convenience retail, employment, and the local centre of Fenny Stratford; all within a 30-minute walk or less from the Site, with further opportunities for employment and education within a 20-30 minute cycle. The Eaton Leys development will include a primary school and local centre which will be within an approximate 10 minute (800m) walk of the Site once completed. In this regard, it is intended that the Proposed Development would also include a 2/3 FE primary school and local community hub as explained later in this TN.
- 4.4.2. Figure 4-11 below demonstrates the existing access to local facilities close to the Site. Approximate distances and times between the Site and local facilities are shown below in Table 4-1 and Figure 4-12.

Figure 4-11 - Access to Facilities

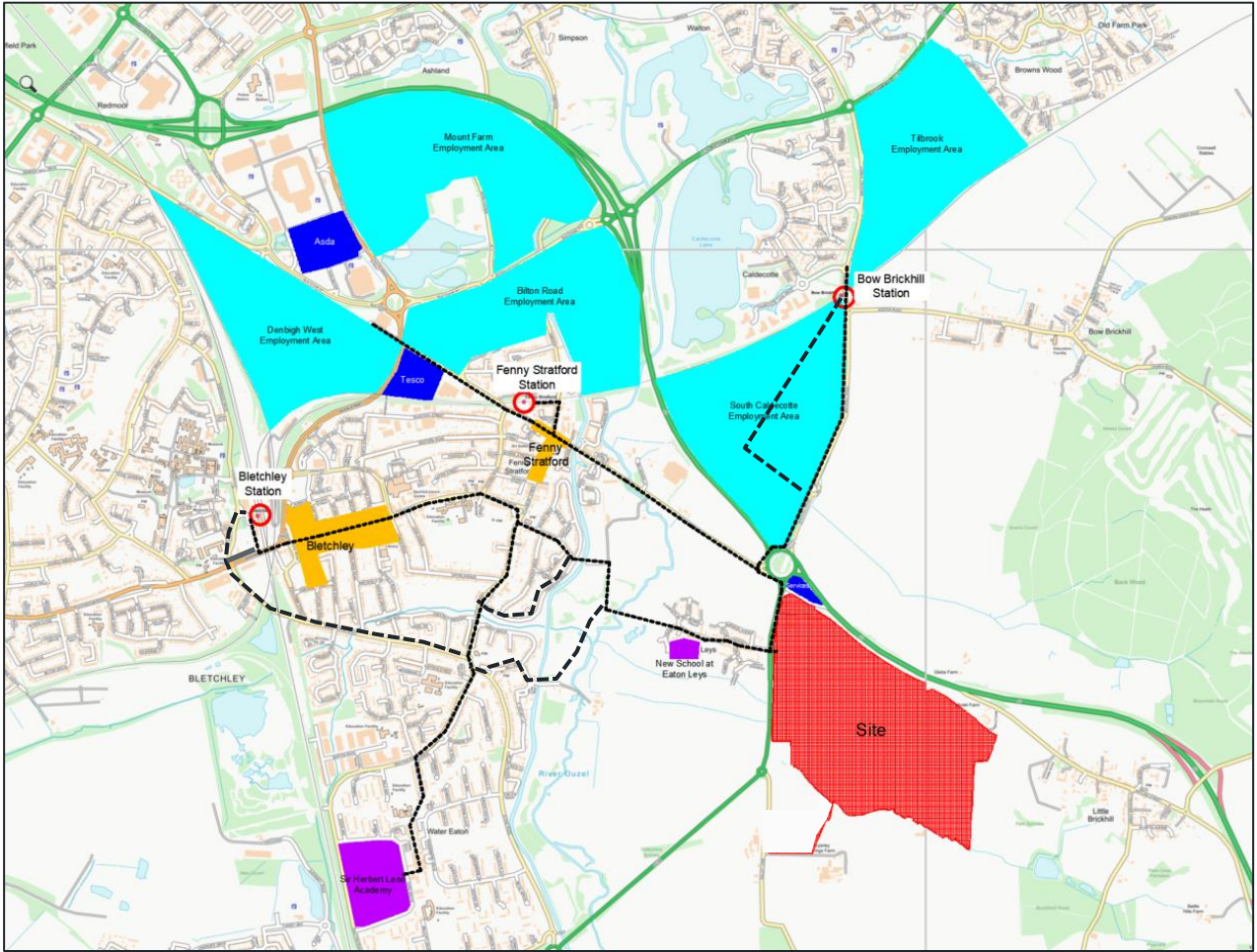


Figure 4-12 - Access to Facilities by E-bike

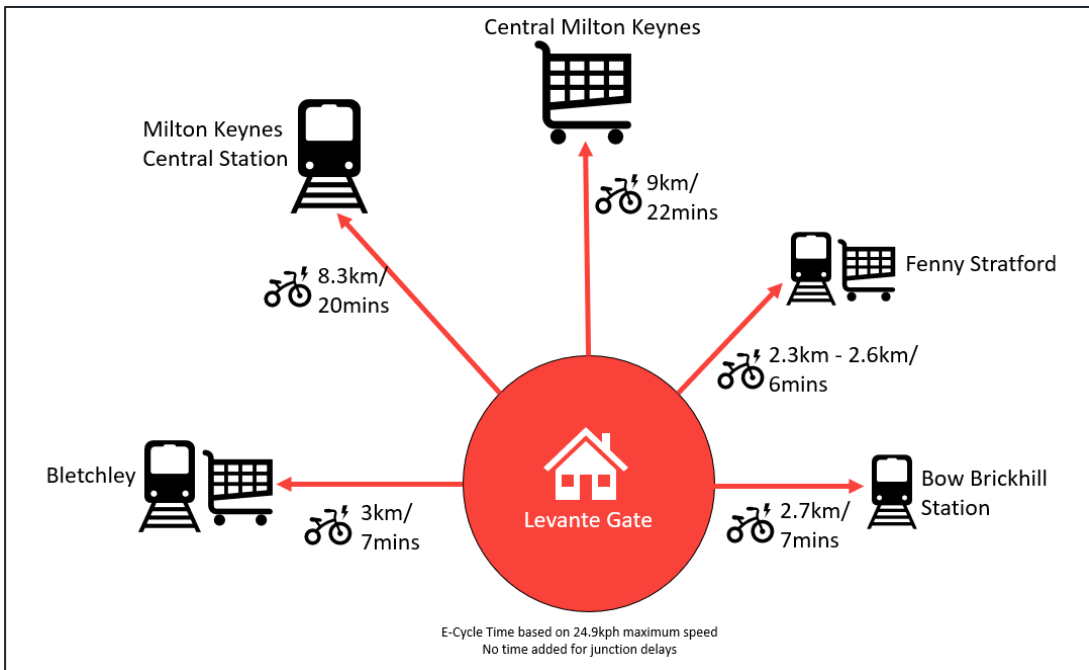


Table 4-1 - Access to Local Facilities by Walking and Cycling from the Centre of the Site

Facility	Distance	Walk Time ¹⁴ (mins)	Pedal Cycle Time ¹⁵ (mins)	E-bike Cycle Time ¹⁶ (mins)
Eaton Leys Local Centre inc. primary school (proposed)	1.1km	13	4	3
South Caldecotte Employment Area (proposed)	1.8km	21	7	4
Fenny Stratford	2.3km	27	9	6
Fenny Stratford Station	2.6km	31	10	6
Bow Brickhill Station	2.7km	-	11	7
Bilton Road Employment Area	2.9km	35	12	7
Bletchley Station	3.0km	36	12	7
Tesco Extra, Fenny Stratford	3.1km	37	12	7
Tilbrook Employment Area	3.1km	-	12	7
Denbigh West Employment Area	3.6km	43	14	9
Sir Herbert Leon Academy	4.0km	48	16	10
Milton Keynes Central Station	8.3km	1hr 38	33	20
Central Milton Keynes	9.0km	1hr 7	36	22

4.5 HIGHWAY NETWORK

LOCAL NETWORK

- 4.5.1. The local highway network is shown below in Figure 4-13 and includes A4146 which is dual carriageway between the A5/A4146 Kelly's Kitchen roundabout and the access to Eaton Leys (Kitchener Drive). South of Kitchener Drive, A4146 is a rural single carriageway (Figure 4-14) connecting to Galley Lane at a small roundabout and further west to Stoke Road at another roundabout on the urban edge. A4146 connects A5 to A505 to the south of Leighton Buzzard.
- 4.5.2. Between the A5/A4146 roundabout and the Galley Lane roundabout, A4146 has a posted 40mph speed limit. Further south on A4146 the national speed limit applies.

¹⁴ Based on Table 4.1 of The Guinness Partnership TAA, Feb 2018 (1.4m/s; 84m/minute; 5kph)

¹⁵ Based on Table 4.1 of The Guinness Partnership TAA, Feb 2018 (4.2m/s; 252m/minute; 15.1kph)

¹⁶ Assuming a cycling speed of 24.9kph/15.5mph (DfT, July 2020, *Local Transport Note 1/20: Cycle Infrastructure Design*, paragraph 5.4.3, page 43)

Figure 4-13 - Local Highway Network

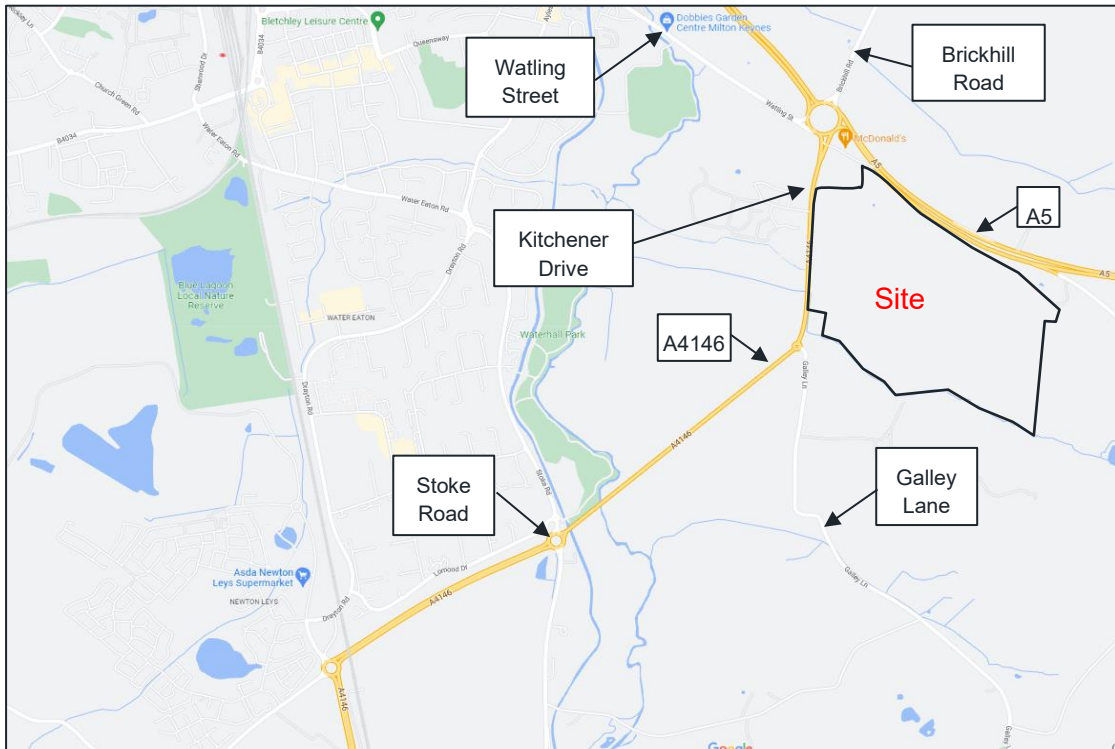


Figure 4-14 - A4146 south of Kitchener Drive (Eaton Leys)



4.5.3. Galley Lane is a rural single carriageway subject to the national speed limit which provides access to Great Brickhill. Stoke Road is 40mph local distributor road on the edge of the Lakes Estate and the River Ouzel.

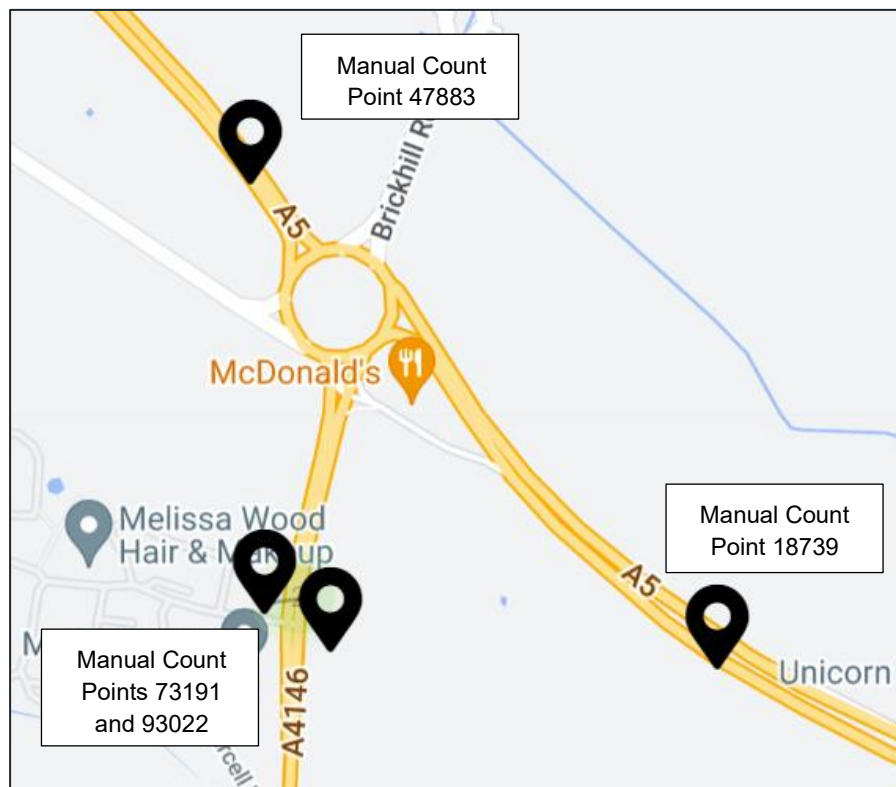
STRATEGIC ROAD NETWORK

- 4.5.4. The Strategic Road Network (SRN) in the vicinity of the Site includes A5 which is operated by National Highways (NH). A5 extends from M1 to the north of Houghton Regis in Hertfordshire to Bangor in North Wales, with most of the route included in the SRN.
- 4.5.5. A5 close to the Site is a dual carriageway subject to the national speed limit with a combination of 'at-grade' and grade-separated roundabouts forming junctions with the local highway network.
- 4.5.6. A5 includes an 'on-carriageway' cycle route between the A5/A4146 roundabout and the Stoney Stratford roundabout to the north of Milton Keynes.
- 4.5.7. Further East, M1 connects London to the north of the country and can be accessed at either junction 13 from A421 at the A5 Redmoor roundabout north of the Site, or at Houghton Regis to the South at junction 11A.

EXISTING TRAFFIC DATA

- 4.5.8. There are three DfT Manual Count Point locations near the Site as shown in Figure 4-15.¹⁷ These count points provide AADT¹⁸ data from 2000 onwards including traffic flows and vehicle types. Data for the past available five years are provided in Table 4-2, Table 4-3, and Table 4-4.

Figure 4-15 - Locations of DfT Count Data



¹⁷ Count point 73191 renumbered to 93022 but same location

¹⁸ Annual Average Daily Traffic

Table 4-2 – AADT Traffic Flows at Count Point 73191 and 93022¹⁹ (A4146)

Manual Count Point 73191							
Year	Cars and Taxis	Pedal Cycles	Two-Wheeled Motor Vehicles	Buses and Coaches	Light Goods and Vehicles	Heavy Goods and Vehicles	All Motor Vehicles
2024*	18714	0	105	100	3584	1493	23996
2023*	18492	0	106	100	3521	1502	23721
2022*	18045	0	114	101	3453	1552	23265
2021	19395	17	105	66	3880	1641	25086
2020*	13610	0	71	70	2640	1309	17700
2019*	18466	1	134	50	4036	1424	24111
2018*	18427	1	125	50	4053	1418	24074

* estimated using previous year's AADF on this link/nearby links – latest manual count 2021

Table 4-3 - AADT Traffic Flows at Count Point 18739 (A5 south)

Manual Count Point 18739							
Year	Cars and Taxis	Pedal Cycles	Two-Wheeled Motor Vehicles	Buses and Coaches	Light Goods and Vehicles	Heavy Goods and Vehicles	All Motor Vehicles
2024*	17857	17	154	29	3584	1285	22909
2023*	17727	16	151	29	3484	1276	22668
2022*	17466	19	155	29	3372	1308	22331
2021	15142	20	135	27	3079	1257	19640
2020*	14701	17	126	52	2608	921	18408
2019*	21880	17	213	85	3281	1095	26555
2018*	21697	15	211	89	3293	1099	26389

* estimated using previous year's AADF on this link – latest manual count 2021

¹⁹ Count point renumbered but same location

Table 4-4 - AADT Traffic Flows at Count Point 47883 (A5 north)

Manual Count Point 47883							
Year	Cars and Taxis	Pedal Cycles	Two-Wheeled Motor Vehicles	Buses and Coaches	Light Goods and Vehicles	Heavy Goods and Vehicles	All Motor Vehicles
2024*	32457	0	174	42	5263	1895	39831
2023	32220	0	172	42	5117	1887	39438
2022*	33007	1	172	60	6022	2076	41337
2021	28615	1	150	56	5497	2016	36335
2020	21691	1	133	38	4520	1832	28212
2019*	36127	1	205	84	4883	1768	43067
2018*	35824	1	203	88	4901	1773	42789

* estimated using previous year's AADF on this link – latest manual count 2023

- 4.5.9. The data indicate that the traffic volumes were steadily increasing at all locations year on year, with a significant reduction in 2020 largely because of the COVID-19 pandemic that restricted the movement of people and goods. Traffic volumes have increased since 2021 with flows in 2024 estimated to be broadly similar to 2019 on A4146 but remain a little lower on A5 north and south.

5 PROPOSED DEVELOPMENT

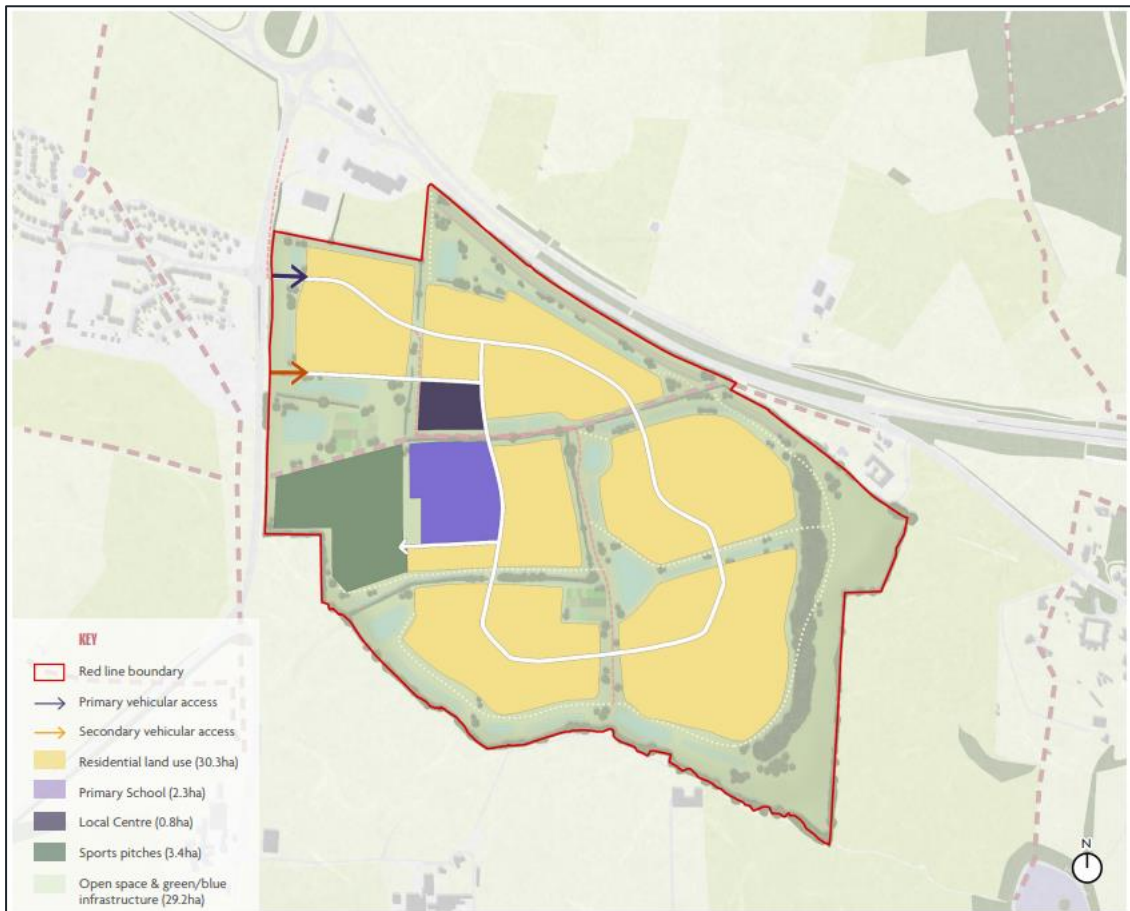
5.1 LAYOUT

5.1.1. The Proposed Development layout is still evolving and is indicated below in Figure 5-1. The proposed land uses comprise:

- Circa 1,250 residential units;
- 3 FE primary school;
- Sports pitches (1.2ha); and
- Local centre – mobility hub, possible community use building/GP/retail (approx. 0.5ha).

5.1.2. A mobility hub for travel mode interchange and ease of access to sustainable travel options will be located centrally within the Site. The existing Redway which terminates at Kelly’s Kitchen roundabout will also be extended into the Site via the existing commercial area and also the proposed primary access on A4146 and would provide wider connectivity for active travel users. The latter would facilitate permeability with the existing development at Eaton Leys and a connection to Watling Street leading to Fenny Stratford.

Figure 5-1 – Draft Land Use Plan (December 2025)



5.2 INITIAL DISCUSSIONS WITH KEY STAKEHOLDERS

5.2.1. An initial meeting was held with Officers from MKCC, BC and NH on 23 November 2023 to introduce the Site and the emerging masterplan, which at that time, included a residential led scheme for circa 620 mixed dwellings.

5.2.2. The current land use plan as indicated above, includes a more comprehensive residential led scheme of some 1,250 mixed dwellings. Officers from MKCC, BC and NH were present at the meeting in November 2023 and raised various points for discussion that are equally applicable to the current more comprehensive masterplan. The key points arising from that meeting and more regular monthly discussions since are summarised below:

- Useable active and sustainable travel connections will be key to ensuring the Proposed Development is not dominated by highways and that new residents will have a realistic choice of modes of travel to/from the Site;
- A Vision Statement setting out the Vision and Movement Strategy is required by NH to comply with DfT Circular 01/2022 and was produced and agreed in early 2024. The broad framework is explained later in this TN;
- Traffic modelling at all levels is likely to be required, with strategic modelling determining the distribution of traffic and the study area to be considered in greater detail. Microsimulation and/or junction modelling would then consider the impacts in more detail. In this regard, it was agreed with MKCC, BC and NH that a VISSIM model should be prepared to assess the impact on Kelly's Kitchen roundabout; the base model for which is complete and agreed with MKCC. The need for separate models to assess the impact at key junctions would also be determined and agreed subject to understanding the cumulative impact of the Proposed Development using an area wide strategic transport model;
- MKCC, BC and NH agree that the most appropriate strategic modelling tool to be used to assess the wider cross boundary impact of traffic would be the calibrated and validated Milton Keynes Multi Modal Model (MKMMM), with the City Plan 2050 growth to a forecast year of 2037 included; and
- An outline planning application would be prepared to support the Site allocation identified by policy GS18, 'Levante Gate Strategic City Extension' included within the draft MKCC City Plan 2050 (Regulation 19 version).

6 MOVEMENT STRATEGY FRAMEWORK

6.1 VISION

6.1.1. The Vision and Movement Strategy for the Site will be based on reducing the need to travel where possible then encouraging residents to follow the travel hierarchy of active modes²⁰ first, then sustainable modes, and finally travel by car, as shown below in Figure 6-1. This will not only reduce the impact on the highway network of additional residential development but will also reduce the impact on the environment through a low carbon approach to travel. This aligns with both national policy and the draft Policy GS4 in the MK City Plan 2050.

Figure 6-1 - Sustainable Travel Hierarchy (source: Energy Saving Trust)



6.1.2. The emerging masterplan would focus on ‘placemaking’ to maximise the opportunity for internalised trips and to influence travel behaviour. Proposals for reducing external trips, such as providing a range of on-Site community facilities, a new 3FE primary school, centralised collection / delivery points and work from home digital infrastructure will be central to the Proposed Development. The proposals will help to implement the paradigm shift in thinking about non-car modes and trip reduction to ensure the Site does not become a car-dominated development.

6.1.3. The draft Movement Strategy is shown in Figure 6-2.

²⁰ Energy Saving Trust, An Introduction to the sustainable travel hierarchy; updated 26 September 2023

Figure 6-2 – Draft Movement Strategy



6.2 ACTIVE TRAVEL

- 6.2.1. The evolving masterplan would incorporate purpose-built cycle and walking infrastructure in accordance with current Government guidance²¹ and provide high quality routes direct to centres containing a range of local facilities (e.g. located at Fenny Stratford and Bletchley), as well as connections to Eaton Leys to the west of A4146.
- 6.2.2. To enhance connectivity with Eaton Leys to the west of A4146, the existing controlled pedestrian crossing facility which is included as part of the access junction that currently serves Eaton Leys, would be incorporated within the design of the northern access to serve the Proposed Development and is described later in this TN. This would then link the existing footway with the western side of A4146 and enable new residents to access the existing northbound bus stop and Eaton Leys if necessary. A second controlled crossing further south along A4146 is also planned for active travel users to ensure routes can be as direct as possible. The vehicular access strategy to serve the Proposed Development is explained later in this TN.
- 6.2.3. Linkages to the existing Redway network off-Site are essential to connect with the extended Redway network that is proposed within the Site for easy, attractive, and safe active travel by residents. In this regard, the proposed Redway network will facilitate access for active travel users to all the

²¹ DfT, July 2020; *Cycle Infrastructure Design, Local Transport Note 1/20*

residential land parcels and connect with the existing commercial area and the proposed primary/secondary access points located on A4146.

- 6.2.4. A connection for cyclists to Bow Brickhill Station is available through the South Caldecotte logistics park. A more direct route along Brickhill Road is therefore not necessary but could be discussed with MKCC in conjunction with wider connectivity proposals for active travel users, and through the allocation of South of Bow Brickhill in the draft City Plan 2050.
- 6.2.5. Permeability through the Proposed Development for pedestrians and cyclists would be provided through both 'on-road' and 'off-road' footways and cycleways, linking up with the existing infrastructure and PRow network to maximise opportunities along different desire lines. The connection with the proposed primary traffic signal controlled access on A4146, which is described in more detail below, would facilitate active travel trips between the Proposed Development and Eaton Leys towards either the newly upgraded footpath that connects with the Redway at Watling Street or to Bletchley via the new bridge over the River Ouzel. Further south, the proposed Redway within the Site would also connect with the existing PRow network to the west of A4146 via a traffic signal controlled crossing incorporated within a secondary access as described below. New infrastructure for cyclists would be provided in compliance with the DfT's LTN 1/20 guidance.²²
- 6.2.6. For the existing PRow to be included within the movement strategy, routes would need to be upgraded to become well surfaced, lit, and safe to provide well connected and easy access to and through the Site. Alternatively, the PRow network can remain more rural in nature and would only be considered as supplementary to purpose-built cycleways and footways, providing a mainly leisure facility.

6.3 PUBLIC TRANSPORT

BUSES

- 6.3.1. Services will be provided to tie-in with the prevailing Milton Keynes bus strategy at the time of implementation. Currently this is likely to involve investment in MK Connect, the demand responsive bus service across the MK area, connecting residents with bespoke destinations across the city.
- 6.3.2. Popular destinations for the Site are likely to include Bow Brickhill, Fenny Stratford and Bletchley rail stations for onward travel, Central Milton Keynes, and major employment/shopping areas.
- 6.3.3. If required and in conjunction with proposals for the Eaton Leys development, to increase patronage, scheduled services could be extended and diverted into the Site to connect with a centrally located Mobility Hub as described below and include additional bus stops within the Site; alternatively, financial contributions could be made towards enhancing service frequencies and/or improved infrastructure.

RAIL

- 6.3.4. The availability to connect with rail services is important for the Site, with cycle routes and demand responsive bus connections a key part of the movement strategy for the development.
- 6.3.5. East-West Rail (central section) will follow the Marston Vale line from Bletchley to Bedford, via Fenny Stratford and Bow Brickhill. Options for station access will change once EWR is progressed

²² DfT, July 2020; *Cycle Infrastructure Design, Local Transport Note 1/20*

along the Marston Vale Line, however connections from the Site to Bletchley will always be important to provide longer distance sustainable travel to Oxford, Bedford and eventually to Cambridge.

6.4 MOBILITY HUB

VISION

- 6.4.1. A 'Mobility Hub' is more than just the provision of transport facilities. Although they are the primary focus, the users are integral to the development, implementation, and success of a mobility hub and to ensure that there is a strong 'sense of place,' economic vitality in a location with attractive community space where residents are also able to meet.
- 6.4.2. The functionality of a mobility hub would serve to:
- Reduce the reliance on the use of private vehicles;
 - Raise the profile, visibility, and availability of a range of shared and sustainable travel modes and efficient integration of transport options;
 - Focus on the user experience and ensures safety and security for all travellers;
 - Improve air quality by reducing emissions;
 - Cater for multi modal trips with seamless switches between modes;
 - Meet 'first last' mile objectives to provide connectivity with local bus services and rail hubs;
 - Create a community focal point and creates a 'sense of place';
 - Provide the opportunity to reduce parking provision;
 - Allow for flexibility to embrace technological innovations and foster resiliency; and
 - Manage the integration of transport to provide 'Mobility as a Service' (MaaS)²³
- 6.4.3. Through the implementation of a centrally located Mobility Hub on the Site, shared transport and active travel behaviour would be embedded in the future residential community and facilitate behavioural change to provide greater choice and accessibility.
- 6.4.4. Most journeys in England are short with 25% of trips under 1.6km (i.e. 1 mile) and 68% under 8km (i.e. 5 miles).²⁴ The majority of these trips are currently made by private motor vehicles which contribute towards increased emissions and poor personal health. The provision of a Mobility Hub would encourage and enable these short distance trips to be completed by other active modes such as walking and cycling and support the mobility needs of a '20-minute neighbourhood'.²⁵

FACILITIES

- 6.4.5. Figure 6-3 illustrates a Mobility Hub and the some of the facilities that could be provided on the Site, which include:

²³ Mobility as a Service (MaaS) in the UK: change and its implications; Government Office for Science; December 2018

²⁴ National Travel Survey: England 2018, Department of Transport, 31 July 2019

²⁵ Sustrans, 16 December 2020: [What is a 20-minute neighbourhood? - Sustrans.org.uk](https://www.sustrans.org.uk/what-is-a-20-minute-neighbourhood/)

- Secure and weatherproof bus stops/shelters to accommodate either scheduled services or MK Connect on demand services;
- car club electric vehicles (EV) and parking space(s);
- E-bike share/hire;
- EV charging points;
- Secure pedal cycle parking stands;
- Bike tyre pump and repair facilities;
- Local community digital information terminal;
- Café/Kiosk; and
- Delivery lockers to accommodate 'first/last mile' trips and minimise large delivery vehicles having to access residential roads.

Figure 6-3 - Example Mobility Hub (source: ComoUK)



OPERATIONAL CONSIDERATIONS

- 6.4.6. It is envisaged that the travel requirements for the Site would be implemented and managed for each of the proposed land uses in accordance with an agreed Framework Travel Plan (FTP) that would be managed by either a bespoke Management Company or potentially a charitable organisation (e.g. the Plunkett Foundation or The Land Trust) who would also be responsible for the day to day running of the Mobility Hub. This would include liaising with the selected operators of the car club and 'e' bikes and provide current information updates to local residents at the Hub and via a community App.
- 6.4.7. The Management Company would also be responsible for liaising directly with MKCC and other key stakeholders such as energy and fuel companies to ensure that operational needs of the Mobility Hub are reviewed, monitored, and updated on a frequent basis.

EXAMPLES

- 6.4.8. There are numerous examples of across Europe where Mobility Hubs have been successfully delivered. Bremen in Germany has created a network of more than 40 mobility hubs with many

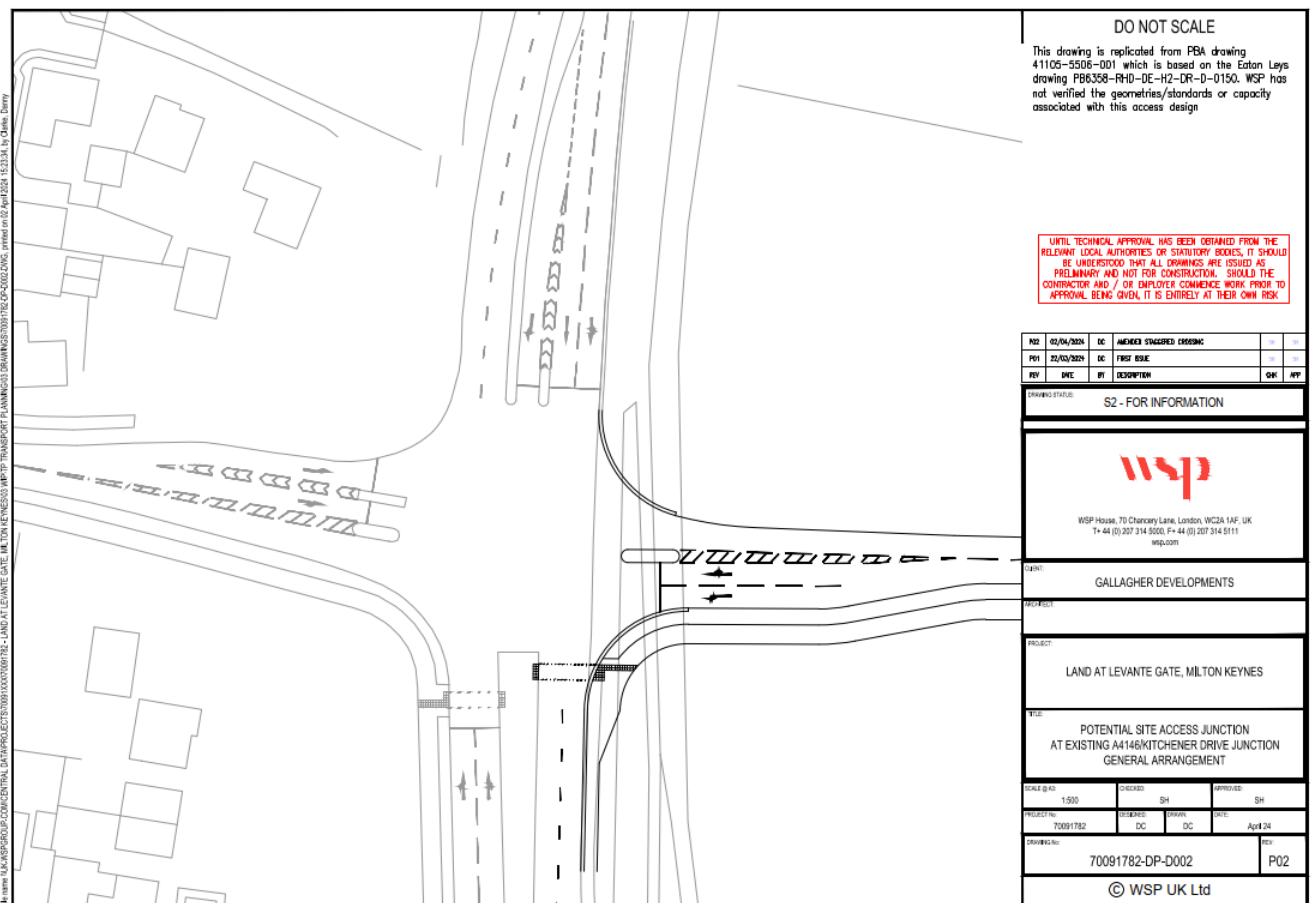
expanding into residential areas and suburban neighbourhoods. The Hubs have been located so they connect the local bus/tram network with shared mobility service (e.g.: car clubs) and cycling.

- 6.4.9. In the UK, British Petroleum (BP) has a mobility hub²⁶ located at the O2 Arena on the Greenwich Peninsula which includes EV charging facilities, a car club operated by Enterprise, 'e' bike facilities and pedal bikes promoted by Brompton. All these facilities are accessed through a digital platform complemented by parcel storage to accommodate first/last mile deliveries.

6.5 VEHICULAR ACCESS

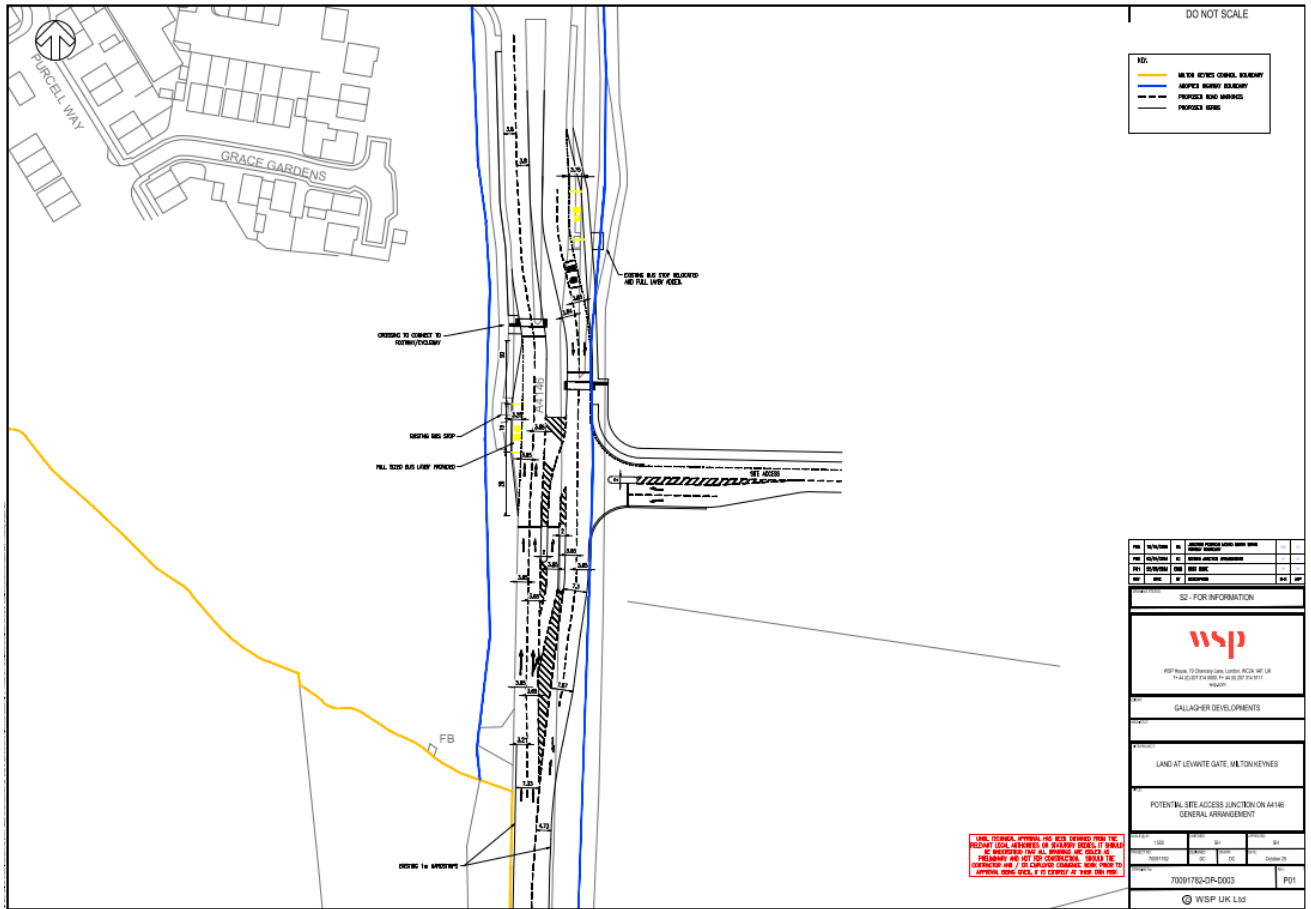
- 6.5.1. Access into the Site for vehicles is proposed from A4146 via a fourth arm on the existing Kitchener Drive traffic signal controlled junction to Eaton Leys. That arrangement is illustrated below in Figure 6-4 and was previously accepted by MKC Highways. A second access is also proposed further south along A4146 as indicated below in Figure 6-5 and would be traffic signal controlled to incorporate safe crossing facilities for pedestrians and cyclists as indicated above. Further refinement, capacity assessments and detailed design will be progressed to ensure that both the primary and secondary access arrangements are fully inclusive for active and sustainable modes of travel to enhance the connectivity with the existing network of routes for pedestrians and cyclists and the consented development at Eaton Leys.

Figure 6-4 – Proposed Primary Vehicle Access via A4146



²⁶ [bp mobility hub | Products and services | Home](#)

Figure 6-5 – Proposed Secondary Vehicle Access via A4146



7 POTENTIAL IMPACTS AND MITIGATION

7.1 TRIP GENERATION AND POTENTIAL DISTRIBUTION

- 7.1.1. The potential traffic impact of the Proposed Development on the local highway network is expected to be predominantly to the north/east on the MKCC road network and not to the south/west on the BC network. This is a consequence of the location of the Site in relation to the main desirable destinations such as the Central Milton Keynes and Bletchley, the M1 motorway (i.e. for long distance journeys) and major employers further afield at Luton, Northampton, and Bedford.
- 7.1.2. The assessment of the previous proposals for the Site considered that 93.6% of development generated vehicle trips would route via the A5/A4146 Kelly's Kitchen roundabout. It is likely that this will remain the case but will be confirmed using the MKMMM as previously indicated. Notwithstanding, the number of vehicle trips to be generated by proposals brought forwards now is likely to be lower than predicted previously in 2017 as a result of the changes in post COVID-19 working patterns and the need for changing travel behaviours in response to the climate change emergency and to reduce congestion on the highway network via a 'step-change' in travel behaviours. In this regard, appropriate mitigation would be provided to encourage active and sustainable travel modes as well as reducing the need to travel particularly during peak periods and to reduce the number of single occupancy vehicle trips.

MODELLING APPROACH

- 7.1.3. Following ongoing discussions with MKCC, NH and BC it is agreed that the MKMMM will provide a robust basis for initially determining cross boundary impacts. Outputs from the MKMMM would then be used to determine the locations where greater detail is required to consider the impact of the Proposed Development. More detailed local modelling using VISSIM microsimulation and Junctions/Linsig will be completed as necessary. A VISSIM model for the 2024 baseline scenario has been built based on observed survey data, and has recently been approved by MKCC.

7.2 JUNCTION CONGESTION 'HOT SPOTS'

A5/A4146 KELLY'S KITCHEN ROUNDABOUT

- 7.2.1. Given the locational characteristics of the Site, the impact of traffic generated by the Proposed Development is likely to be greatest at the A5/A4146 Kelly's Kitchen roundabout given the likely distribution of trips. The improvement implemented by the South Caldecotte development was intended to provide a '*nil detriment*' solution to the impacts of its own development only in the AM peak, with some betterment in the PM peak. Hence, subject to further detailed modelling using the MKMMM, there may be some capacity headroom in the PM peak to absorb impact of the Proposed Development without the need for additional mitigation.
- 7.2.2. It is considered that a full assessment of the A5/A4146 roundabout will be required in conjunction with NH, MKCC and their consultant Aecom. In this regard, the VISSIM model that has been developed by WSP would consider the cumulative impact of the Proposed Development and the functionality of the existing junction arrangement to determine the need for appropriate mitigation measures.
- 7.2.3. It is understood that NH are also completing a study of the Kelly's Kitchen roundabout with their consultant Aecom, to determine the likely improvements that would be needed to accommodate the

anticipated local and regional growth. A further update from NH on that study is expected early in 2026.

BRICKHILL ROAD/STATION ROAD

- 7.2.4. The impact on the Brickhill Road/Station Road junction was previously considered to be of concern; however, The Guinness Partnership proved that the impact on the junction was not significant but rather the increase in queuing was because of the railway level crossing. It is not anticipated that improvements would be needed to this junction as a result of the Proposed Development, however an assessment would be completed in due course to confirm this. Improvements may be required as part of the separate draft allocation for Land South of Bow Brickhill.

V10 BRICKHILL STREET/A4146 BLETCHAM WAY

- 7.2.5. Some traffic from development at the Site may route along V10 Brickhill Street to access A4146 to the northeast of the Site for access to/from M1. However, based on the assessments completed for the previous proposals, it is not anticipated that improvements would be required at this junction. Nevertheless, an assessment would be completed in due course to confirm the impact on the junction.

A4146/GALLEY LANE AND A4146/STOKE ROAD

- 7.2.6. The distribution of traffic towards the Buckinghamshire highway network is anticipated to be minimal, with impacts at the roundabouts to the south along A4146 not expected to require mitigation. Continued early discussions with BC will ensure the scope of the study area is agreed and a full assessment of that study area is completed in due course.

A5/A421 REDMOOR ROUNDABOUT

- 7.2.7. HE (i.e. now NH) previously commented on the potential impact of development at Levante Gate on the A5/A421 Redmoor roundabout junction causing queuing on the mainline of A5. HE requested a planning condition to require monitoring, assessment and potential mitigation prior to commencement had the previous application been approved.
- 7.2.8. A5/A421 Redmoor roundabout would potentially provide an attractive route to Central Milton Keynes (CMK) for some vehicles from the Site using A5 and this would be reviewed as part of a wider modelling exercise. Notwithstanding, the development Vision and Movement Strategy would be heavily focused on active and sustainable travel prioritised over the use of the private car as indicated in this TN. In conjunction with MKCC's aspirations for MRT in the vicinity of the Site linked to CMK, it is anticipated that through the completion of a subsequent detailed TA, it is unlikely that the impact of additional traffic on the A5/A421 Redmoor roundabout would require mitigation.

7.3 DRAFT MK CITY PLAN 2050 EVIDENCE BASE

MILTON KEYNES MULTI MODAL TRANSPORT MODEL (MK MMTM)

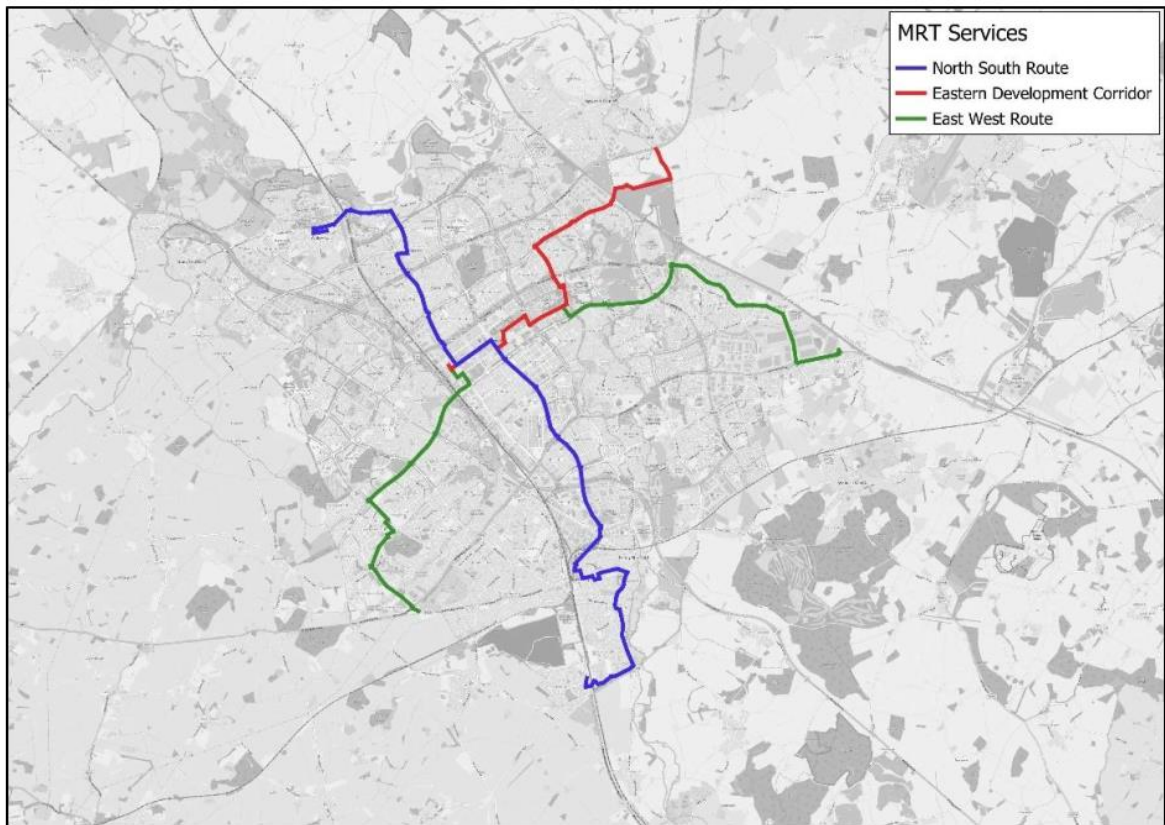
- 7.3.1. The MK MMTM forms part of the Regulation 19 evidence base for Milton Keynes City Plan 2050²⁷. It supports the modelling and forecasting work underpinning transport and infrastructure planning for the City's growth strategy, to ensure that there is an established transport strategy aligned with

²⁷ MKCC, October 2025, Milton Keynes Multi Modal Transport Testing

housing and economic growth which complies with the national decarbonisation and sustainability policies.

- 7.3.2. The MK MMTM includes a base year of 2019 (adjusted in 2023 for covid travel patterns), and a reference case and forecast year of 2050. Planned highway improvements are included in the 2031 reference case model along with all Plan:MK 2031 development allocations that are reasonably likely to be permitted and implemented. The forecasting scenario for 2050 includes all of the draft allocations from the City Plan 2050 along with other committed infrastructure schemes.
- 7.3.3. The proposed MK Metro (MRT) system is included in the ‘Priority 1’ scenario along five radial corridors in 2050 (including to the Lakes Estate to the south west of the Site) as shown in Figure 7-1. The MRT is not included in the ‘Priority 2’ scenario tested to support the Local Plan, to provide an understanding of the transport impacts of the City Plan 2050 with and without the scheme in place to assist in evaluating the benefits of implementing the scheme. The Priority 2 scenario includes less housing and jobs growth than the Priority 1 scenario overall, however in proximity to the Site the assumptions are the same.

Figure 7-1 – MRT Routes included in the MK MMTM Priority 1 Scenario²⁸



- 7.3.4. Growth in traffic in the reference case scenario in 2050 to reflect the increase in housing and jobs is forecast to increase most on the SRN including A5 and the grid road network more than on the local road network such as A4146. This is in part because of the unique nature of the road system in

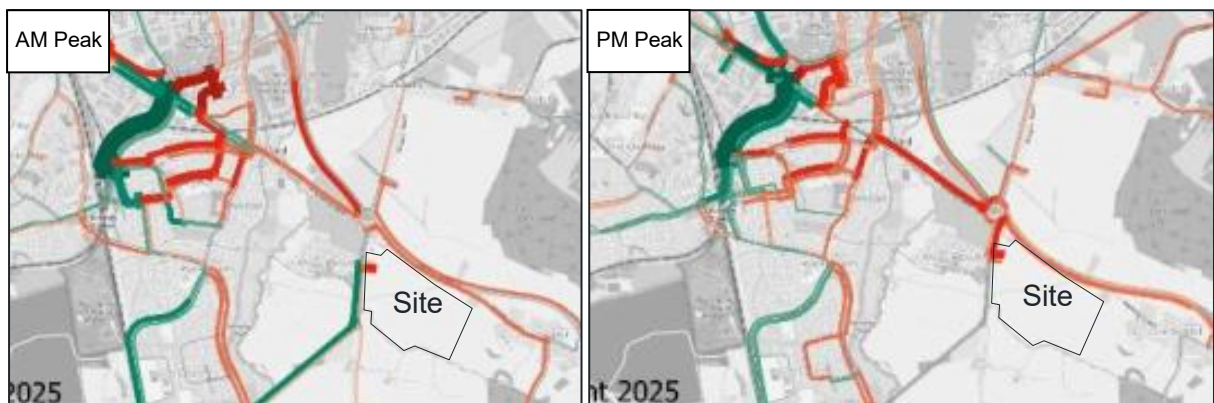
²⁸ Figure 2.5, Aecom, November 2025, Milton Keynes Multi-Modal Transport Model – Milton Keynes City Plan Forecasting Report

Milton Keynes which offers multiple different route choice alternatives. The largest increases in traffic in the reference case scenario also included on V10 Brickhill Road, southbound, presumably in relation to the Plan:MK 2031 allocation at South East Milton Keynes and associated highway connection amendments/Bow Brickhill bypass.²⁹

MK MMTM City Plan 2050 Forecast Results

- 7.3.5. The forecasting scenario for 2050³⁰ includes all of the draft allocations from the City Plan 2050 along with other committed infrastructure schemes including the MRT. The forecast model convergence is good with all time periods meeting the Transport Analysis Guidance (TAG) criteria, i.e. the MK MMTM City Plan 2050 model is TAG compliant.
- 7.3.6. The MK MMTM mode splits show an increase in car trips in 2050 compared to the baseline 2019 model, with only a 1.8% mode share for MRT. This is considered to be low compared to the aspirations of the Local Plan regarding the hierarchy of travel and behavioural change to more active and sustainable modes of travel. It is therefore considered that the MK MMTM is overly robust in the assumptions regarding vehicle trips on the highway network.
- 7.3.7. Compared to the 2050 reference case scenario, the greatest traffic increases related to the City Plan 2050 are forecast to be on the A5 link with modest flow increases at A5 Kelly’s Kitchen roundabout but additional vehicle delays of potentially 90 seconds or more due to the congested nature of the junction.
- 7.3.8. A4146 is expected to see a reduction in traffic northbound in the AM peak as a result of planned growth combined with the implementation of the MRT scheme. In the PM peak there is no difference shown on A4146 between the reference case and City Plan 2050 scenarios. This is shown on Figure 7-2 for the AM and PM peaks, where increases in traffic are shown by red lines with increasing thickness, with decreases shown by green lines.

Figure 7-2 – 2050 Priority 1 vs 2050 Reference Case, AM Peak³¹



- 7.3.9. The differences between the 2050 reference case and City Plan 2050 scenarios in relation to link and junction capacity show a deterioration of capacity at A5 Kelly’s Kitchen roundabout and along

²⁹ Shown on Figure 2-7 of the MK MMTM Forecasting Report (footnote 30)

³⁰ Aecom, November 2025, Milton Keynes Multi-Modal Transport Model – Milton Keynes City Plan Forecasting Report

³¹ Extract of Figure 4-4, Aecom, November 2025, Milton Keynes Multi-Modal Transport Model – Milton Keynes City Plan Forecasting Report

Watling Street in both the AM and PM peaks, but an improvement in capacity along A4146 in both peaks.³² The associated delay per vehicle related to the deterioration of capacity is between 1-15 seconds along A5 and Watling Street, with slightly longer delays of 15-30 seconds on the approaches to A5 Kelly's Kitchen roundabout.³³

- 7.3.10. Table 4-4 of the Forecasting Report summarises the impacts of the City Plan 2050 on key junctions. It is noted that the A4146 northbound approach to A5 Kelly's Kitchen roundabout is adversely impacted in 2050 but not in 2031. The Watling Street eastbound approach to the junction is not impacted in either forecast year.
- 7.3.11. The MK MMTM Forecasting Report notes that more detailed local junction models are needed for the most congested junctions to investigate the cumulative impacts of the proposed developments on the highway network's operational efficiency. As discussed and agreed with MKCC, NH and BC, a VISSIM microsimulation model has been built to test the impact of the Levante Gate development on A5 Kelly's Kitchen roundabout in the forecast year of 2037 (full occupation) and NH are currently progressing a study to consider the mitigation that could be required. Further detail will be forthcoming from NH in early 2026.
- 7.3.12. The impact of the MRT is shown by the difference in the results for the Priority 1 and Priority 2 scenarios. The results show that overall the MRT scheme will reduce the highway traffic across Milton Keynes, thereby mitigating some of the impacts of the MK City Plan 2050.
- 7.3.13. Overall, the impact of the City Plan 2050, including development at Levante Gate, does not appear to have a significant adverse impact on the operation of the highway network in the vicinity of the Site in terms of volume of traffic, link and junction capacity, or delay. Whilst some impacts are shown, the introduction of MRT is considered to be sufficient mitigation when considered at a high level using the MK MMTM.

INFRASTRUCTURE DELIVERY PLAN, NOVEMBER 2025

- 7.3.14. The Infrastructure Delivery Plan (IDP) (November 2025) is an evidence document supporting the Milton Keynes City Plan 2050. It identifies strategic infrastructure needed to deliver the growth in homes and jobs planned for in the City Plan, to the year 2050. In relation to transport, the IDP considers highways/structures, rail, public transport (including MRT), active modes and freight.
- 7.3.15. The Site is categorised as part of the 'South East' study sub area 4, which is expected to see growth of 6,384 homes between 2022 and 2050, with an increase in population of 14,942 people. Planning applications for housing developments on the strategic allocation sites within each sub area will need to address the specific infrastructure requirements and needs through a mixture of provisions and / or contributions through MK Tarriff and Section 106 Agreements.

³² Figures 4-27 and 4-29, Aecom, November 2025, Milton Keynes Multi-Modal Transport Model – Milton Keynes City Plan Forecasting Report

³³ Figures 4-34 and 4-36, Aecom, November 2025, Milton Keynes Multi-Modal Transport Model – Milton Keynes City Plan Forecasting Report

Highways

- 7.3.16. Table 14 of the IDP provides a city-wide overview of highways/structures. It notes areas of congestion occur during weekday peak periods at key junctions. Infrastructure required to support the strategic allocations in the City Plan 2050 include:
- *“Expansion of grid road network, route continuity and Redway network.*
 - *Potential enhancements to M1 Junction 14 in discussion with National Highways.*
 - *EWR likely to require replacement of level crossings at Bow Brickhill and Woburn Sands stations; need for alternative routes / bridge replacements (if EWR provides significant rail service increase).*
 - *More detailed site-based assessment to be conducted at planning application stage; off-site mitigation may be identified.*
 - *Need for road improvements to be considered in light of policies to encourage more sustainable travel behaviour, e.g. congestion versus influencing mode choices.*
 - *Road traffic demand management measures (e.g. car parking demand management such as reductions in spaces or dynamic pricing) together with public transport and walking and cycling enhancements would reduce comparative convenience of car trips within the city.”*
- 7.3.17. Sub area 4 specifies congestion issues including at A5 Kelly’s Kitchen roundabout, with the area primarily served by A5 and A4146. The projection is that there will be an additional 29,500 daily two-way vehicle trips in the sub area by 2050.
- 7.3.18. Projects Tr.H25 and Tr.H26 are listed in the IDP as relevant to the Site and to the allocation for land South of Bow Brickhill:
- Tr.H25
 - Required to unlock sites
 - Post 2030 delivery (2032-2040)
 - £10m, anticipated funding gap £9.5m to be covered by NH RIS3 and developer contributions
 - Highway connections, on-site highways and existing highway capacity upgrades associated with new Development. Specifics of project requirements to be developed as sites are assessed in more detail. Highways projects could include improvements to the large A5-A4146 Kelly’s Kitchen Roundabout which sits on National Highways’ Strategic Road Network. The junction is already signal-controlled, however additional development traffic may require additional enhancements to optimise performance, or a more significant improvement which addresses capacity issues.
 - Tr.H26
 - Required to unlock sites
 - Post 2030 delivery (2032-2040)
 - £10m, secured funding (EWR)
 - Highway connections, on-site highways and existing highway capacity upgrades associated with new Development. Specifics of project requirements to be developed as sites are

assessed in more detail. Highways projects could include upgrade of Brickhill Road which is currently formed of a single carriageway road between the newly built MK Business Park development and the Marston Vale Line level crossing. Improvements may also be required to the mini roundabout junction linking Brickhill Road and Station Road. As part of EWR, consideration is being given to options for replacing the existing level crossing with a new overbridge.

Public Transport

- 7.3.19. Table 16 of the IDP provides a city-wide overview of public transport, noting that the fixed bus route network has been scaled back with MK Connect filling in gaps where buses used to operate. The innovation hub for transport technology presents opportunities for further trials in the future. Infrastructure required to support the strategic allocations in the City Plan 2050 include:
- *“Some bus service routes will require extension of detours to serve major new developments.*
 - *Alternatively, sites will only be served by MK Connect services or by walk/cycle to nearest bus route.*
 - *There would be need for further expansion of planned MRT network beyond what has been identified through feasibility work, including additional capacity (increased service frequencies and hours of operation, different configuration of MRT vehicles/rolling stock, and revised or expanded stations/interchanges to accommodate more passengers) and additional priority infrastructure (including additional priority infrastructure and potentially reduction in general traffic road space).*
 - *Increase of vehicles on the MK Connect vehicle fleet will be required to cover an expanded zone (or zones) of operation.*
 - *Additional bus priority infrastructure may be required to make journey times on public transport competitive with those of private cars.”*
- 7.3.20. Sub area 4 is noted for having very limited bus services which pose a capacity concern, but the introduction of the Loop service has improved access to bus services. The projection is that there will be an additional 1,400 daily two-way passenger transport trips in the sub area by 2050.
- 7.3.21. Projects Tr.PT8 and Tr.PT19 are listed in the IDP as relevant to the Site, with Tr.PT8 also relevant to the allocation for land South of Bow Brickhill and Tr.PT19 the city-wide MRT provision.
- Tr.PT8
 - Required to unlock sites
 - Post 2030 delivery (2032-2040)
 - £550,000, anticipated funding gap £330,000 to be covered by developer contributions
 - Connections to MK wide public transport infrastructure, capacity increases and on-site routes and stops associated with new Development. Specifics of project requirements to be developed as sites are assessed in more detail. Public transport projects could include making improvements to bus service provision to link new developments with key trip attractors as transport hubs. The sub area is currently served by Arriva's Loop services which route between Caldecotte, Little Brickhill and Woburn Sands, and the infrequent M6 service which

links to Amazon's logistics base in East MK. Extensions to the Loop or other services could be required as well as improvements to bus stop facilities. There is expected to be a review and adjustment to bus routes with the introduction of the MRT, and also to ensure services better connect to East West Rail stations.

- Tr.PT19
 - Required to unlock sites
 - Scheme to open in 2028
 - £240m, anticipated funding gap £48m
 - Trackless public transport system, approximately 50km in length.

Active Modes

7.3.22. Table 17 of the IDP provides a city-wide overview of active modes, noting the Redway facilities for active users segregated from traffic, rural areas not well served by the cycle network, and the size of the city may make cycling unviable for some travelling across from the north and east towards railway stations. Infrastructure required to support the strategic allocations in the City Plan 2050 include:

- *“High quality walking / cycling routes including extension of Redway network to cover strategic allocation, as well as additional bike and e-scooter sharing, are needed to achieve greater modal shift.*
- *Potential need for speed limit reductions within local neighbourhoods to improve walk and cycle safety.*
- *In addition to incremental expansion of Redway network to serve new developments, level of growth may justify more improvements to and renewal of walking and cycling infrastructure (could include new surfacing, lighting and wayfinding, improvements to overbridges and underpasses, consideration of Copenhagen crossings at junctions across the Redway network, and additional, higher priority super-routes).”*

7.3.23. Sub area 4 is noted for having very limited Redway provision. The projection is that there will be an additional 6,200 daily two-way walking and wheeling trips in the sub area by 2050.

7.3.24. Projects Tr.AT32 and Tr.AT33 are listed in the IDP as relevant to the Site and to the allocation for land South of Bow Brickhill:

- Tr.AT32
 - Required from early occupation
 - Post 2030 delivery (2032-2040)
 - £2m, anticipated funding gap £1.2m to be covered by developer contributions
 - Connections to MK wide active mode networks, on site pedestrian and cycle routes associated with new Development. Specifics of project requirements to be developed as sites are assessed in more detail. Active Travel projects could include better crossings at and routes around the Kelly's Kitchen Roundabout. There is currently controlled crossings on the A5 north and A4146 west arms of the junction, therefore additional crossings may be required on some or all of the other arms of the junction or an alternative grade-separated crossing facility across the A5.

- Tr.AT33

- Required from early occupation
- Post 2030 delivery (2032-2040)
- £4m, anticipated funding gap £1m to be covered by EWR
- Connections to MK wide active mode networks, on site pedestrian and cycle routes associated with new Development. Specifics of project requirements to be developed as sites are assessed in more detail. Active Travel projects could include alternative crossing facilities for pedestrians and cyclists which provide connectivity over the Marston Vale Line which is expected to see a significant increase in rail services resulting from EWR. A new line-side active travel route is being considered between Fenny Stratford and Woburn Sands stations (which will also form part of a longer 'Varsity Way' strategic active mode route).

Other Strategic Schemes

7.3.25. The IDP also notes that projects Tr.R1, Tr.R2, Tr.R6 and Tr.F10 are relevant to the Site, noting the city-wide or sub-regional area of impact.

- Tr.R1

- Longer term policy priority
- 2022 – 2031
- £16.67m (1/3 of total cost to MKCC), secured funding (Network Rail)
- Rail link between Oxford and Bletchley, linking to the WCML and allowing services from Oxford and potentially Aylesbury onwards towards Milton Keynes Central and Bedford via the Marston Vale Line. Proposals include the provision of two additional platforms.

- Tr.R2

- Longer term policy priority
- 2022 – 2031
- EWR funded
- East-West Rail scheme which requires investment in the existing Marston Vale Line.

- Tr.R6

- Longer term policy priority
- Timescales to be confirmed
- £600,000, anticipated funding gap £240,000, to be covered by developer contributions
- Local connectivity improvements to 3 stations on the Marston Vale Line

- Tr.F10

- Longer term policy priority
- Post 2030 delivery (2032-2040)
- £3m, anticipated funding gap £2.25m
- City wide freight infrastructure investment required to support MKCP2050 Plan Growth. Specifics of project requirements to be developed as sites are assessed in more detail. City-wide freight related projects could include a strategic review of lorry parking requirements, including whether a long-term solution is needed to addressing informal lorry parking occurring on Fen Street once this opens to through-traffic.

Summary

- 7.3.26. The Proposed Development acknowledges the strategic infrastructure schemes identified within the IDP, including those relating to highways, public transport, and active travel networks that are necessary to support the planned growth at the Site. Further assessment will be required through a planning application to determine the specific schemes required.
- 7.3.27. Scheme Tr.R6 is questioned regarding the relevance to the Site in the context of EWR and the plan to close Bow Brickhill and Fenny Stratford stations. Interim improvements could be made to provide improved connectivity for new residents, but it should be recognised that any such improvements could be very short-lived, dependent on timescales to implementation and programme for the closures, therefore a cost-benefit review should be completed.
- 7.3.28. In line with the requirements of the NPPF, the Proposed Development will contribute in a proportionate manner to the directly related impacts arising from the scheme, ensuring that mitigation measures are targeted and scaled appropriately.
- 7.3.29. This approach will be secured through planning obligations and agreements, with contributions focused on those infrastructure projects that are essential to accommodate the additional demand generated by the development. The strategy aligns with the principle of delivering sustainable growth while safeguarding the operational efficiency of the transport network and supporting the wider objectives of decarbonisation, health and wellbeing.

7.4 MITIGATION

- 7.4.1. The key objectives for any mitigation to be provided by the Proposed Development will relate back to the MKCC City Plan objectives around:
- Decarbonisation: reduce emissions through active travel and public transport.
 - Health and Wellbeing: encourage walking and cycling for short trips (noting that 68% of trips are under 8 km).
 - Flexibility: infrastructure delivery aligned with phased development and responsive to real-world traffic patterns.

MOVEMENT VISION AND BEHAVIOURAL CHANGE

- 7.4.2. The Vision and Movement Strategy aims to reduce the need to travel and prioritise sustainable modes, which will help to mitigate the impacts of development through reduced car use. The principles to be developed further through a planning application include:
- Travel hierarchy through design: active modes first (walking, wheeling), then public transport, and finally private car use.
 - Placemaking principles: design to maximise internalised trips and minimise external travel.
 - On-site facilities: community amenities, a new primary school, delivery hubs, and digital infrastructure to support remote working.
 - Mobility hub: centralised hub to enable modal shift and support a “20-minute neighbourhood” concept, encouraging short trips by active modes rather than car.

HIGHWAY CAPACITY – MONITOR AND MANAGE

7.4.3. Taking an adaptive approach to highway capacity improvements, rather than over-providing highway capacity upfront, the plan proposes a monitor and manage strategy in relation to any mitigation that is identified as necessary through the transport modelling, including at A5 Kelly's Kitchen roundabout and on the local highway network in Milton Keynes and Buckinghamshire:

- Monitoring framework: continuous assessment of traffic conditions post-first occupation to completion.
- Trigger points: specific thresholds for congestion or performance indicators will activate mitigation measures.
- Stakeholder agreement: triggers and interventions to be agreed with MKCC, BC, and NH.
- Integration with NH Schemes: Coordination with any National Highways projects to ensure consistency and avoid duplication, especially for A5 Kelly's Kitchen roundabout.

8 SUMMARY AND WAY FORWARD

- 8.1.1. The Vision and Movement Strategy for the Proposed Development adopts the travel hierarchy of reducing the need to travel, followed by active and sustainable modes in advance of accommodating vehicle trips. This will be key to ensuring a sustainable 'place led' development is provided that will integrate with the surroundings and enhance connectivity with the committed developments at Eaton Leys and South Caldecotte.
- 8.1.2. The Site location can be made more sustainable through the implementation of improvements to the local transport network to ensure compliance with local and national planning policies, including paragraphs 110 and 116 of the NPPF. The locational characteristics of the Site provide an excellent opportunity to enhance connectivity with Fenny Stratford to the northwest and to take advantage of MKCC's emerging proposal for the MRT.
- 8.1.3. The MK MMTM City Plan 2050 modelling assessments show overall, the impact of the City Plan 2050, including development at Levante Gate, does not appear to have a significant adverse impact on the operation of the highway network in the vicinity of the Site in terms of volume of traffic, link and junction capacity, or delay. Whilst some impacts are shown, the introduction of MRT is considered to be sufficient mitigation when considered at a high level using the MK MMTM.
- 8.1.4. Utilising the site specific MKMMM outputs and more detailed modelling of A5 Kelly's Kitchen roundabout using a VISSIM model, appropriate mitigation solutions would be identified to address potential highway congestion with the Proposed development fully occupied. Highway improvements would only be required as a last resort and would be related in scale to the impact of the Proposed Development. In this regard, a 'Monitor and Manage' approach may be more appropriate prior to the implementation of any subsequent highway improvements linked to development phases.
- 8.1.5. The Proposed Development would be fully accessible by active travel and sustainable travel modes with connectivity to local facilities. Vehicle access would be from A4146 via two signalled controlled access points that would also incorporate safe crossing facilities for pedestrians and cyclists. Both commercial and demand responsive bus services would have the ability to circulate within the Proposed Development and connect with a centrally located mobility hub, that would also link with proposed Redway routes across the Site within a sustainable walking and cycling catchment of the new homes.
- 8.1.6. Mitigation will be provided to reduce the impact of the Proposed Development to acceptable levels in accordance with the NPPF, aligning with the key objectives of the MK City Plan 2050 regarding decarbonisation, health and wellbeing and flexibility around future-proofing infrastructure.
- 8.1.7. Overall, development of the Site would therefore make a positive and sustainable contribution to the emerging MKCC City Plan 2050.

APPENDIX A - PLAN:MK 2016-2031 TRANSPORT POLICIES

Plan:MK 2016 - 2031 was adopted in March 2019 and sets out the Council's approach and policies for the Borough for the period up to 2031. The following transport policies are relevant to the Site.

The vision for the borough is:

'By 2031 Milton Keynes will be known internationally as a great city within a thriving rural hinterland. Its thriving knowledge-based economy, its first class lifelong education and training, its diverse population with their excellent, lively and varied culture, its sport and leisure opportunities, and its range of different, high quality places to live, together with the green, open and spacious layout and a transport system that makes its facilities easily accessible to all, will have enhanced its reputation as a pleasurable and exciting place to live, work, play and visit.'

Objective 12 of the strategic objectives relates to transport as follows:

'To manage increased travel demands through: Smart, shared, sustainable mobility. Promoting improvements to public transport and supporting the development of the East – West rail link between Oxford and Cambridge, including the Aylesbury Spur. Encouraging an increased number of people to walk and cycle by developing an expanded and improved redway network. Extending the grid road pattern into any major new development areas. Utilising demand management measures to reduce the growth of road congestion, whilst upgrading key traffic routes such as the A421, A422 and the A509.'

Policy CT1 Sustainable Transport Network sets out requirements for how the Council will promote sustainable development:

- *'i. Promote a safe, efficient and convenient transport system*
- *ii. Promote transport choice, through improvements to public transport services and supporting infrastructure, and providing coherent and direct cycling and walking networks to provide a genuine alternative to the car*
- *iii. Promote improved access to key locations and services by all modes of transport and ensure good integration between transport modes*
- *iv. Manage congestion and provide for consistent journey times*
- *v. Promote and improve safety, security and healthy lifestyles*
- *vi. Continue to engage with relevant stakeholders along the East-West Rail line and Expressway to identify operational benefits, which provide additional support for a more sustainable transport strategy and/or economic growth of the city*
- *vii. Engage with the National Infrastructure Commission to set in place connections from Central Milton Keynes to surrounding communities, including a fifth track constructed between Bletchley and Milton Keynes Central*
- *viii. Promote the usage of shared transport schemes in the borough.'*



Policy CT2 Movement and Access requires development proposals to:

'minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future.'

In relation to planning applications Policy CT2 states that development proposals will be permitted that:

- *'(A)1. Integrate into our existing sustainable transport networks and do not have an inappropriate impact on the operation, safety or accessibility of the local or strategic highway networks;*
- *2. Mitigate impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, through the provision of, or contributions towards necessary and relevant transport improvements including those secured by legal agreement;*
- *[...]*
- *6. Do not result in inappropriate traffic generation or compromise highway safety;*
- *(B). Development proposals that generate significant amounts of movement or impact on level crossings must be supported by a Transport Statement or Transport Assessment and will normally be required to provide a Travel Plan, with mitigation implemented as required.'*

Policy CT3 Walking and Cycling states:

'The Council will support developments which enable people to access employment, essential services and community facilities by walking and cycling.'

Policy CT5 Public Transport states:

'Development proposals must be designed to meet the needs of public transport operators and users. In particular:

- *i. Road layouts must include direct, convenient and safe public transport routes and be free of obstructive parking;*
- *ii. Public Transport priority measures must be implemented, where appropriate;*
- *iii. Where appropriate and necessary, all houses and most other developments must be no more than 400m from a bus stop;*
- *iv. Bus stops must have good pedestrian access, be open to public supervision and be sheltered where appropriate; and*
- *v. Specific consideration must be given to the provision of public transport services in planning new development.'*

Policy CT6 Low Emission Vehicles requires new facilities for low emission vehicles to be integrated into major new developments. All new developments will be required to provide electric vehicle charging infrastructure in accordance with the Council's parking standards.

APPENDIX B – MK CITY PLAN 2050 – DRAFT POLICY GS18

Policy GS18 Levante Gate Strategic City Extension
Policy type: Strategic
Objectives: 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 13, 14
Site/sub-area: Levante Gate
<p>A. The Levante Gate Strategic City Extension is allocated for a new, mixed-use, residential-led, strategic development to the south of the A5 and east of the A4146.</p> <p>B. Development proposals within the Levante Gate Strategic City Extension should be in accordance with a Framework Masterplan and site-based area Design Code that are consistent with the criteria below and wider plan policies and approved by the Council prior to planning permission being granted.</p> <p>C. Development proposals within the Levante Gate Strategic City Extension will be required to meet the following criteria:</p> <ol style="list-style-type: none"> 1. Delivery of around 1,250 new homes through a comprehensive masterplan approach providing a range of house size, type and tenure, including affordable, older persons and specific needs housing; 2. Adopt a sensitive, landscape-led approach to the distribution, layout and design of development that satisfactorily mitigates impacts upon the valued characteristics of the Brickhills Special Landscape Area; 3. Provision of early years and primary education facilities, and SEND provision appropriate to the scale and nature of the development proposal, and make necessary contributions to the provision of secondary education facilities located within the South of Bow Brickhill Strategic City Extension; 4. Contributions toward the provision of primary healthcare facilities within the South of Bow Brickhill Strategic City Extension, together with contributions to wider health and social care infrastructure, appropriate to the scale and nature of the development proposal; 5. Provision of local centres, as appropriate to the scale and nature of the development proposals; 6. The location, scale and phased delivery of social infrastructure, services and community facilities is planned to ensure they are in place to support new communities from the early phases of development in line with Policies GS4 and PFHP1; 7. Provision of green and blue infrastructure and open space, in line with an approved Strategic Green and Blue Infrastructure and Open Space Strategy for the Strategic City Extension in accordance with the Infrastructure Delivery Plan, the Council's Nature, Green and Blue Infrastructure Strategy, and open space standards; 8. An integrated network of low- and zero-carbon energy infrastructure from building scale to neighbourhood or district scale; 9. The phased introduction of a comprehensive transport network and infrastructure that follows the movement hierarchy set out in Policy GS4, and to specifically include: <ol style="list-style-type: none"> a. Segregated routes for active travel and provision of interchange hubs that integrates well with Eaton Leys, South of Bow Brickhill Strategic City Extension and the surrounding area and network of active travel routes and routes for public transport; b. Routes for movement of public transport and general traffic through the site, with access taken from the A4146; c. Infrastructure and traffic management measures to mitigate impacts upon the wider highway network; 10. Be informed by appropriate surveys and assessments of built heritage and ecology with appropriate mitigation of impact; and 11. Pre-determination archaeological evaluation has been undertaken and provided in support of development proposals.



Figure 4. Indicative Concept Plan for the Levante Gate Strategic City Extension



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