

# Little Brickhill Parish Council

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## **Plan MK2050 Consultation**

I have been asked by my Parish Council to respond to the above-mentioned Plan MK2050 Consultation and our comments are noted below.

### **Little Brickhill Parish Council – Objection to Policy GS18: Levante Gate Strategic City Expansion**

#### **1. Introduction**

Little Brickhill Parish Council wish to object to Policy *GS18 - Levante Gate Strategic City Expansion* and the draft allocation pertaining to a mixed-use development to include in the region of 1,250 dwellings. The Parish Council request that it be removed from the emerging plan as a potential allocation.

The draft allocation is entirely inappropriate for this site being unsustainable, isolated, on land designated as a Special Landscape Area and, in our opinion, not of a sufficient size to enable the required community facilities and other infrastructure, as detailed in draft Policy GS18, to be delivered.

The location of the site, adjacent to the A5, forms one of the most attractive entry points into Milton Keynes with the site area currently forming part of the wider landscape setting for the Greensand Ridge, creating a recognisable and important urban to rural transition. It is a landscape that is highly valued not only by the residents of Little Brickhill, but also those living in the wider area, including other stakeholders such as The Greensand Trust.

The decision to allocate the site in the draft plan is illogical and has, we believe, been included late in the process to create the aspirational housing numbers that the draft plan prescribes. Most importantly, the draft allocation does not score well

when assessed against the sustainability criteria included in the Council's evolving Sustainability Appraisal.

There are, we believe, a number of other more deliverable site options that can be included in a preferred Reasonable Alternatives package, providing more than the 53,000 dwelling figure provided in the OAN and close to the 63,000 aspirational dwelling target.

The Development Plan is an important document requiring a proper, well thought through and balanced strategy in respect of future site allocations. This strategy should not result in the destruction of valued landscape.

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

The City Council will be aware that a previous planning application was refused for residential development on this site in 2017. Application Ref: 17/03233/OUT, for 500 homes, open space, Local Centre and primary school, was strongly objected to by the Parish Council and local residents, and was refused by Members on the basis that the site was located outside of the settlement boundary of Milton Keynes, falling within land designated as 'Open Countryside' and in an Area of Attractive Landscape as designated in the extant Plan:MK.

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

Although planning policy has evolved since 2017 the site and wider area still benefits from the AAL designation and now the proposed Brickhill's Special Landscape Area (SLA). The site therefore remains protected in landscape terms and is considered to contribute greatly to the visual qualities of the wider area and ridge. The logic behind the 2017 refusal reasons therefore still stand and are more relevant now to the significantly larger site that is being proposed through the draft plan.

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

We consider that the combination of land to the South of Bow Brickhill, for an additional 1,500 dwellings (which also falls within the SLA), together with Levante Gate, do not represent good sustainable opportunities for development and are not sites that should be considered to meet the Council's need and vision for growth.

Furthermore, the plan's requirement for a "landscape led" approach to development, fully informed and shaped by appropriate landscape surveys and impact assessments is no more than a token gesture. It will not be possible to provide an effective landscape solution, in this location, for such a dense form of development. As identified in many of the Council's landscape focussed evidence base documents, a key feature of the area is the lack any development and its openness. To allow any form of development in this area will destroy this key characteristic.

In summary, the key reasons for Little Brickhill Parish Council's request to delete the Levante Gate draft allocation are as follows:

- a planning application for development of a smaller residential scheme was refused in 2017 due to the impact on the landscape and the urbanising effect that development would bring. The logic for refusing the planning application in 2017 is still relevant today.
- the proposal is contrary to the existing AAL and proposed Brickhill Special Landscape Area designation (SLA) which would destroy the established landscape setting in this area.
- the Reasonable Alternatives that form part of the Council's Sustainability Appraisal and include the Levante Gate site, perform poorly against the defined sustainability objectives, being constrained, isolated and remote from nearby local community facilities resulting in an unsustainable form of development.
- The site is not of a sufficient critical mass to enable the required infrastructure to be delivered and will be unviable due to the upfront mitigation costs.
- Addressing the provision and maintenance burden of existing infrastructure, before new development proposals are even considered, will cause a significant barrier to growth.
- Connectivity across the A4146 and A5 and to key transport nodes, and other public transport connections, are poor which will exacerbate the isolated nature of the site and result in increased car use.
- The site is isolated, falling out with the Redways network and will place increased pressure on the existing busy road network.
- the site will not provide the mix of uses envisaged in draft policy due to its isolated location and infrastructure requirements, impacting on viability and the delivery of 40% affordable housing.

## **2. Sustainability Appraisal**

As documented in the Council's Sustainability Appraisal, the Levante Gate draft allocation does not perform well against the objectives as set out. Little Brickhill Parish Council and local residents are at a loss to understand why this has been ignored by the Council when there are other more suitable alternatives.

The Levante Gate site falls within open countryside and is isolated being situated away from Milton Keynes and the established grid system and Redway network. Furthermore, there is poor connectivity across the A5 and the already busy A4146 with walking and cycling routes being limited. The proposed Mass Rapid Transport system that the Regulation 18 plan promotes, won't reach Levante Gate with a key issue being the provision of suitable alternative transport infrastructure to enable the site to work.

Addressing the provision and maintenance burden of existing infrastructure, before new development proposals are even considered, will cause a significant barrier to growth. For example, the A4146 and existing McDonalds roundabout and associated junctions, are currently difficult to navigate and are operating at a stressed capacity resulting in congestion at certain times of the day. Allowing more large-scale development will significantly impact on highway safety and require the development of major new infrastructure before residential development can begin. This will cause delay and raise significant viability issues for any developer.

In our view the proposed scale of development does not have a sufficient critical mass to support the proposed local services and facilities endorsed in the draft Local Plan, resulting in an inevitable reliance on facilities elsewhere. Levante Gate is therefore a remote, unsustainable location being entirely contrary to the objectives set out in the Sustainability Appraisal.

Little Brickhill Parish Council's interpretation of how the Levante Gate development performs against the Council's Sustainability objectives, very much mirror the Council's own initial interpretation and can be summarised as follows:

**Objective 1: High quality homes and neighbourhoods; healthy places. Climate and environmental action**

The site performs poorly being isolated and remote from existing facilities and is unsustainable. Furthermore, the site is not large enough to provide new facilities to encourage walkability, with poor connectivity to existing adjacent areas.

**Objective 2: Healthy Places**

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

**Objective 3: Climate and environmental action**

The Levante Gate site does not have good connectivity to existing public transport with residents relying on the car as the key mode of travel, leading to unsustainable travel patterns that will create further pressure on the existing highway

infrastructure. The proposed Mass Rapid Transport system (MRT) is not intended to serve peripheral locations such as Levante Gate, creating the need for better public transport connections that currently don't exist and would be difficult to implement. Bow Brickhill, Fenny Stratford and Bletchley train stations, although relatively close to the Levante Gate site, are characterised by their absence of public transport links.

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

The Levante Gate site again performs poorly against this objective and will not provide the housing mix and affordable housing that is envisaged. Given the location and quantum of development being proposed it is difficult to envisage how quickly the site will come forward. The site does not lend itself to providing 40% affordable housing given its relatively small size, its isolated nature and peripheral location away from community facilities. This would make the provision of affordable housing unviable for most developers with larger sites or sites in more (sub)urban locations, close to existing facilities, being more preferable in offering an appropriate mix of dwellings.

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

There will be inevitable noise and air pollution from the busy A5 and A4146 which would be exacerbated with the introduction of new development to an already stressed highway infrastructure.

**Objective 6 - Economic and Cultural Prosperity**

The Levante Gate site falls within the Brickhill SLA which should rule out any form of strategic development due to landscape impact and loss of views. The Council's observation that housing numbers could potentially be reduced for the site and a "landscape led" approach to development specified, will not mitigate against the substantial landscape impact of development on this area which is characterised by its openness and general absence of development. Furthermore, the site is characterised by the presence of Grade 3 and 4 Agricultural Land across the site, with Grade 3 being protected. Clearly any reduction in the developable area, resulting from a landscape led approach, will also have a significant impact on the delivery of infrastructure and further erode viability.

**Objective 7 and 8 - Climate and environmental action**

As detailed in the Council's Sustainability Appraisal, developments such as Levante Gate can be required to be delivered in line with water efficiency measures as well as supporting the creation of a zero-waste economy.

**Objective 9 - Economic and cultural prosperity**

Levante Gate is not close to a variety of accessible employment areas apart from the recently developed extensive B8 development, adjacent to the roundabout,

which will focus on warehouse and storage provision, requiring a relatively small employment offer. The site remains unlet since completion which we believe reflects the lack of demand for this peripheral location given its poor connectivity to main arterial routes. Connectivity to Bletchley is also poor from the site, as well as connections to other employment nodes, District Centres and CMK, which in the absence of strong links would typically be reached by car.

### **3. Reasonable Alternatives**

#### **Sustainability Appraisal Growth Scenarios**

Little Brickhill Parish Council notes that the City Council have properly sought to consider Reasonable Alternatives, in line with the NPPF, to identify a package of sites to meet the growth target of between 53,000 - 63,000 homes. The Reasonable Alternatives have been tested against the Sustainability Appraisal objectives as a package to meet growth targets and sustainability objectives.

It is disappointing that freestanding settlement options have not been considered in more detail as being potentially suitable for development, especially in the light of the Labour Government's pledge to significantly increase the rate of housebuilding by developing new freestanding settlements, some of which might be concentrated on the M1 corridor. This would avoid the need to consider sites such as Levante Gate that are constrained and benefit from important landscape designations.

An authoritative industry research report "*Start to Finish*", produced by Lichfields in 2020, highlights the benefits of new settlements in terms of their ability to rapidly assemble infrastructure and deliver development quickly in appropriate locations, without the need to focus on overly constrained land or impact on valued landscapes.

The Lichfield research concludes that large sites of over 2,000 units can deliver more homes per year over a longer time period, with this seeming to ramp up beyond year five of the development timeline. Large scale greenfield sites deliver at a quicker rate than their brownfield equivalents with the average rate of build out for greenfield sites being 34% greater than the equivalent figure for those on brownfield land.

We would therefore urge the City Council to consider potential new settlement options in more detail as part of the Reasonable Alternatives assessment.

Currently **Reasonable Alternative 1 (RA1)**, which includes Levante Gate and Bow Brickhill Strategic City Extensions, is expected to deliver 62,825 dwellings by 2050. However, the options listed do not perform well when assessed against the Sustainability Appraisal objectives, with the inclusion of Levante Gate and land south of Bow Brickhill having a detrimental impact on the Brickhills Greensand Ridge SLA.

The Parish Council considers it unreasonable to include these sites, as the City Council's preferred option, simply to enable them to meet the top end of their housing target.

Notwithstanding the need to consider new settlement options, some of the remaining reasonable alternatives listed would deliver an appropriate quantum of development by 2050 without the need to destroy key landscapes or to use sites where there will clearly be land assembly and deliverability issues.

**Reasonable Alternative 2 (RA2)** removes sites affected by the Special Landscape Area (SLA,) including Levante Gate, with the Council's expected delivery quantum being 59,075 dwellings by 2050. As documented in the Sustainability Appraisal, RA2 scores more positively against the SA framework and is a far more logical alternative, preserving the SLA designation.

**Reasonable Alternative 3 (RA3)** also removes the sites affected by the SLA, and includes land West of Olney, with the expected delivery of 60,075 dwellings in the plan period. The allocation of strategic development at Olney should result in much needed bypass improvement works to solve the existing congestion problems within the town.

**Reasonable Alternative 4 (RA4)** is the same as RA1 but removes East of Wavendon and adds West of Olney with an expected delivery of 60,825 by 2050. Again, the focus on a more dispersed approach with development concentrated on Olney is supported.

In our opinion RA1 should not therefore be the preferred option. The other alternatives that exclude Levante Gate and South of Bow Brickhill offer more sustainable options that are deliverable, being well connected to existing facilities. These options are more sustainable, support walking and are more self-contained, providing mixed use communities that will enable the delivery of new community facilities with good connection to public transport, health facilities and green space.

The City Council's overall aim to concentrate development in the urban area is supported by Little Brickhill Parish Council and aligns with Government policy to provide sustainable opportunities for renewal and regeneration, supporting walkable, people friendly, healthy places with less carbon emissions.

Conversely, allowing piecemeal development in rural areas such as Levante Gate, will result in further congestion, higher cumulative carbon emissions, the need for significant infrastructure to overcome significant site constraints, resulting in viability issues and slow delivery. The approach adopted in the draft plan is therefore contrary to national planning guidance and we ask the City Council to therefore reconsider their housing delivery strategy.

#### 4. Landscape Impact

From the Parish Council's perspective, the loss of the proposed SLA designation in the areas covered by Levante Gate and land south of Bow Brickhill, is the most serious aspect resulting from the draft allocation. The former Area of Attractive Landscape Value, within the Milton Keynes border, included land between Station Road, Bow Brickhill and the A5 as well as the land south of the A5 to the east of the A4146, incorporating the area covered by the draft allocation.

The *Central Bedfordshire Landscape Character Assessment 2016* provides an important overview of this character type, which the Character Assessment confirms as spreading across the Central Bedfordshire and Milton Keynes borders. The document correctly states that the settlement character is closely linked to that of the Greensand Ridge, with the strong agricultural feel, evident in surviving historic field boundaries, farmsteads and agricultural buildings further linking this area to the character of the Greensand Ridge, effectively acting as a clear buffer zone between the ridge and more suburban development beyond. The Greensand Ridge and the lower field patterns therefore form a key part of its overall landscape character and value.

The 2016 Landscape Character Assessment further identified the Special Landscape Area as a priority for areas in which landscape character is at risk of erosion, with the following threats being identified:

- Development pressure from urban areas creating a spread of suburbanisation at the foot of the scarp and potential coalescence of distinct village settlements.
- Loss of tranquility through increased noise and pollution
- Loss of views to distinctive local landmarks through increased tree cover, which will attempt to buffer new development, in historically open areas.

Development at Levante Gate will therefore destroy the above established landscape qualities that have historically led to the previous Area of Attractive Landscape designation (AAL) as well as the proposed Special Landscape Area (SLA) designation.

We note that In the Council's *Review of Local Landscape Designations in May 2024*, the existing landscape designations were reviewed, including the Area of Attractive Landscape designation at Levante Gate.

The National Planning Policy Framework, at paragraph 180, states that planning policies and decisions should contribute to and enhance the natural local environment by protecting and enhancing valued landscapes. The Levante Gate draft allocation falls within the Brickhill Greensand Ridge which is described in the report as a distinctive feature, creating a strong sense of place as follows:



*“A highly distinctive landscape which forms part of a wider ridge extending beyond Milton Keynes. The steep escarpment which rises to a woodland plateau is distinctive in its geology, topography and its strong visual character as a wooded backdrop to Milton Keynes city. The patchwork of pastoral and arable fields on the lower slopes also create a strong sense of place” (our underlining)*

In terms of the report's Evaluation, the area is proposed for designation as an SLA in the emerging Development Plan. The text supporting the evaluation stating:

*“The land south of the A5 is recommended to be retained in the candidate SLA. Although the A5 cuts through the ridge and is a modern influence on the landscape, the village of Little Brickhill which is located immediately south of the trunk road, provides time depth and scenic quality to the landscape.*

*The proposed boundaries of the candidate SLA follow Bow Brickhill Road, Brickhill Road and the A4146 to include the shallower slopes of the ridge due to their importance as a rural setting to the wider ridgeline”. (our underlining)*

The report goes onto describe important characteristics of the area that should be retained:

- A relatively remote elevated area, with long distance views from the edge over MK City and the rest of the Borough. The wooded ridge forms a distinctive backdrop for views across the borough and provides a unique setting to MK City.
- Open agricultural fields on the shallower slopes are an important factor.
- Limited development on the ridge and lower slopes is a key feature.

The report observes that the proximity to warehousing on Brickhill Road and residential development at Eaton Leys, and the associated A4146 and A5, reduces tranquility and a sense of remoteness in parts. Further development at Levante Gate and Bow Brickhill would further exacerbate this.

The report further identifies future development pressures that will result in the encroachment of development into views across the valley. The advice to the City Council, in terms of their future development management regime, is fully endorsed by the Parish Council as follows:

- to maintain the general absence of development in the area, retaining the primary uses for agriculture and forestry.
- ensure that the long-term panoramic views across the valleys are retained and promoted.

These special landscape qualities are therefore important and numerous and should not be eroded at the expense of meeting aspirational housing numbers. As documented, the Levante Gate site therefore forms part of the setting to the

woodland ridge and Little Brickhill village, and once destroyed the substantial damage caused will be irreversible.

## **5. Other Matters**

### **East -West Rail**

The planning powers enjoyed by the East West Rail company will, in effect, trump any planning powers resulting from the adopted Local Plan with the exact alignment of the route currently not fixed. Development of the final route may result in new roads to by pass routes, bridges and the creation of nearby transport interchange hubs. This uncertainty throws considerable doubt on any plans MK City Council produce and provides a logical reason to delay the Local Plan process until there is more certainty regarding the future of East – West Rail to the east of Bletchley. This major infrastructure project could have significant implications on the allocation of certain sites and their deliverability.

## **6. Conclusion**

The Council has been asked to plan for 53,000 homes in the plan period. 29,000 homes are already in the pipeline and due to come forward by 2050. The MK City Plan will seek to allocate land for a further 24,000 to 34,000 new homes.

Little Brickhill Parish Council considers that it is naive to assume that Milton Keynes has only limited constraints that justifies providing for more development in the plan. Whilst it is good practice to plan above the OAN figure, to create a buffer, it is vitally important to choose the correct sites.

An aspirational growth target of 63,000 homes is considerably more than is necessary. Choosing appropriate, unconstrained and deliverable sites is the most important consideration in relation to the current plan review, with the opportunity to review the development trajectory within 5 years after adoption, by which time the political climate may have changed and major infrastructure projects, such as East West Rail, have more certainty.

We reiterate that Levante Gate does not perform well when tested against the SA framework; neither does it work as part of a package of sites and won't deliver benefits in combination with other nearby sites that will suffer the same constraints to development in terms of deliverability and viability.

Notwithstanding the many negative aspects of developing on the SLA, smaller sites such as Levante Gate will not bring sufficient growth benefits to overcome the many landscape concerns, or make landscape led development viable.

The standalone Levante Gate site therefore performs poorly against the SA framework as acknowledged by the Council. It is an unsustainable location and a significant distance from Milton Keynes with the A4146 separating the site from the city, with the closet points of connection being South Caldecotte and Eaton Leys,

which are still undeveloped. This standalone and peripheral option won't support significant new services and will destroy a valued landscape, the loss of which will be significant.

Little Brickhill Parish Council therefore respectfully requests that Policy GS18 - Levante Gate Strategic City Expansion, be deleted from the emerging plan and that other more sensible options be (re)considered.

Yours sincerely

Alan Kemp  
Clerk to the Parish Council