



MK City Local Plan 2050

Bow Brickhill Parish Council – Objection to Policy GS17: South of Bow Brickhill Strategic City Extension

1. Introduction

The following representations are made on behalf of Bow Brickhill Parish Council who wish to object to Policy *GS17 – South of Bow Brickhill Strategic City Extension* and the draft allocation pertaining to a mixed-use development to include in the region of 1,500 dwellings. The Parish Council request that the site be removed from the emerging plan as a potential allocation.

The draft allocation is entirely inappropriate for this site being unsustainable, proposed on land considered to be suitable for a Special Landscape Area (SLA) designation and, in our opinion, not of a sufficient size to enable the required community facilities and other infrastructure, as detailed in draft Policy GS17, to be delivered.

The location of the site, to the south of Bow Brickhill, bordering the A5 and Brickhill Road, forms one of the most attractive entry points into Milton Keynes with the proposed site area currently contributing to 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 Bow Brickhill, but also those living in the wider area, including other stakeholders such as The Greensand Trust.

As with the adjacent Levante Gate site, 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 appropriate and deliverable site options that can be included in a preferred Reasonable Alternatives package, providing more than the 53,000 dwelling figure stated 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.

We consider that the combination of land to the South of Bow Brickhill, for an additional 1,500 dwellings, 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 Bow Brickhill Parish Council's request to delete the south of Bow Brickhill draft allocation are as follows:

- the draft proposal will further erode the character of Bow Brickhill adding yet more large-scale development to an area which has already been asked to accommodate significant development, including SEMK. This proposal will also place unacceptable pressure on existing infrastructure.

- the proposal is contrary to the existing Area of Attractive Landscape and proposed Brickhill Special Landscape Area designation (SLA) and would destroy the established landscape setting in this area adversely impacting on the character of the ridge.

- the Reasonable Alternatives that form part of the Council's Sustainability Appraisal, including the land to the south of Bow Brickhill site, perform poorly against the defined sustainability objectives, being constrained, isolated and relatively 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 and planned infrastructure, before new development proposals are even considered, will cause a significant barrier to growth.
- Connectivity across Brickhill Road and the 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, notwithstanding the proposed and unrealistic transport improvements detailed in Policy GS17.
- As well as accommodating a single point of access to the site, Brickhill Street will have to absorb all traffic from SEMK, wishing to travel south west, as well as all traffic from South Caldecotte travelling in the same direction. This, combined with the traffic generated from the Bow Brickhill site, will create unsustainable traffic patterns that will adversely impact on highway safety.
- 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

The land south of Bow Brickhill draft allocation does not perform well against the Sustainability Appraisal objectives as set out. Bow 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 land south of Bow Brickhill 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 Brickhill Road with walking and cycling routes being limited. The proposed Mass Rapid Transport system that the Regulation 18 plan promotes, won't connect to the site with a key issue being the provision of suitable alternative transport infrastructure to enable the site to function.

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, including Levante Gate and land south of Bow Brickhill, 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, many of which are currently undeveloped. The land south of Bow Brickhill site is therefore a remote, unsustainable location being entirely contrary to the objectives set out in the Sustainability Appraisal.

Bow Brickhill Parish Council's interpretation of how the land south of Bow Brickhill draft allocation performs, against the Council's Sustainability objectives, 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 that may already be earmarked to provide new facilities.

Objective 2: Healthy Places

The site does not perform well in terms of enabling improvements to physical and mental health, effectively destroying the existing tranquil and pleasant characteristics of Bow Brickhill. Although a greenfield site it is not well connected to green infrastructure, being surrounded by arable fields, with other local strategic development that is meant to offer additional community facilities remaining undeveloped. Furthermore, it is questionable whether a site of this size will have the critical mass to support new health facilities in what is a peripheral location.

Objective 3: Climate and environmental action

The 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 the Bow Brickhill site, creating the need for better public transport connections. Bow Brickhill, Fenny Stratford and Bletchley train stations, although relatively close to the site, are characterised by their absence of public transport links. The need to retain and improve Bow Brickhill station and its connectivity to the wider area is essential, given the close proximity of Red Bull and other high profile business park locations.

Objective 4: High quality homes and neighbourhoods; healthy places

The land south of Bow Brickhill 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 predict how quickly the site will come forward. Furthermore, 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 Brickhill Road which would be exacerbated with the introduction of new development, adding to an already stressed highway infrastructure.

Objective 6 - Economic and Cultural Prosperity

The land south of Bow Brickhill site falls within the Brickhill SLA which should rule out any form of strategic development due to the potential 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. 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 community facilities, further eroding viability.

Objective 7 and 8 - Climate and environmental action

As detailed in the Council's Sustainability Appraisal, developments such as the Bow Brickhill draft allocation 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

The land south of Bow Brickhill site is relatively close to a variety of employment areas such as the Business Park situated at Caldecotte Lake; however, these are not accessible locations with poor connectivity to the site. Furthermore, the recently developed extensive B8 development, adjacent to the roundabout, will focus on warehouse and storage provision, requiring a relatively small employment offer. This 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. Furthermore, other nearby planned strategic development is at an early stage and will take years to build out, leading to the provision of piecemeal and badly planned community facilities and infrastructure.

3. Reasonable Alternatives

Sustainability Appraisal Growth Scenarios

Bow Brickhill Parish Council notes that the City Council have properly sought to consider Reasonable Alternatives, in line with national planning guidance, to identify a package of sites to meet the growth target of between 53,000 - 63,000 homes. The Council has been asked to plan for 53,000 homes in the plan period, 29,000 of which are already in the pipeline and due to come forward by 2050. The MK City Plan will therefore seek to allocate land for a further 24,000 to 34,000 new homes.

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 land south of Bow Brickhill 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 their Reasonable Alternatives assessment.

Currently Reasonable Alternative 1 (RA1), which includes Bow Brickhill and Levante Gate Strategic City Extensions, is expected to deliver 62,825 dwellings by 2050. However, the location 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 the top end of their aspirational housing target to be reached.

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, infrastructure and deliverability issues.

Reasonable Alternative 2 (RA2) removes sites affected by the Special Landscape Area (SLA,) including land south of Bow Brickhill, 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 would

contribute to a much-needed bypass/highway 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 South of Bow Brickhill and Levante Gate offer more sustainable alternatives that are deliverable, being well connected to existing facilities. These options 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 Bow 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 significant development in rural areas, such as land south of Bow Brickhill, will simply add to the extensive development already planned in the area, resulting in further congestion, higher cumulative carbon emissions and the need for significant infrastructure to overcome 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 land south of Bow Brickhill and Levante Gate, 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 and Levante Gate.

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 associated 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 designation 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 tranquillity through increased noise and pollution
- Loss of views to distinctive local landmarks through increased tree cover, which will attempt to buffer new development, in historically open areas.

Development on land south of Bow Brickhill 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, leading to coalescence and the erosion of local character.

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 covering the draft allocation site.

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 Bow Brickhill 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 this emerging Development Plan. The text supporting the evaluation stating:

"The land south of the A5 is recommended to be retained in the candidate SLA.

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 on to describe the important characteristics of the area that should be retained:

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

The report observes that the proximity to warehousing on Brickhill Road and residential development at Eaton Leys, and the associated A4146 and A5,

reduces tranquillity and a sense of remoteness in parts. Further development at Levante Gate and land south of 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 therefore 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. The draft allocation is currently proposed to cover an area including the majority of the low-lying land, up to the beginning of the scarp, effectively developing the valued lower slopes with only a small buffer between the two. The land south of Bow Brickhill site therefore forms part of the setting to the woodland ridge and once destroyed the substantial damage caused will be irreversible. In landscape terms, the existing buffer between the settlement and the ridge should therefore be retained.

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 determined. Development of the final route may result in new roads to bypass 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, including land to the south of Bow Brickhill.

Highway Impact

Providing a potential single access to the site from Brickhill Street will not work given that Brickhill Street will have to accommodate all traffic from SEMK, wishing to travel southwest, as well as all traffic from South Caldecotte travelling in the same direction. This, combined with the traffic generated from the Bow Brickhill site, will create unsustainable traffic patterns that will have an adverse impact on highway safety.

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.

Having regard to the above, Bow 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 select 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 plan adoption, by which time the political climate may have changed with major infrastructure projects, such as East West Rail, having more certainty.

We reiterate that the land south of Bow Brickhill site 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 the benefits envisaged in draft policy.

Notwithstanding the many negative aspects of developing on the SLA, relatively small sites such as land south of Bow Brickhill will not bring sufficient growth benefits to overcome the many landscape concerns, or make landscape led development viable.

The standalone site therefore performs poorly against the SA framework. It is an unsustainable location and a significant distance from Milton Keynes with the closest points of connection being strategic sites that are still undeveloped or suffer from poor connectivity. This standalone and peripheral option won't support significant new services and will destroy a valued landscape, the loss of which will be significant, further eroding the unique character of Bow Brickhill and the local area.

Bow Brickhill Parish Council therefore respectfully requests that Policy GS17 - South of Bow Brickhill Strategic City Extension be deleted from the emerging plan and that other more sensible and sustainable development options be (re)considered.