

Little Brickhill Parish Council

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Dear Lakeisha

Planning Application reference PLN/2026/1114

We OBJECT to this Outline Planning Application relating to the proposed residentially led mixed use development, comprising 1,250 new dwellings, at Levante Gate, Little Brickhill.

The description of the proposed development is as follows:

“Outline application (matters of access to be considered, with matters of layout, scale, appearance and landscaping reserved) for a phased residential – led mixed use development comprising up to 1,250 new dwellings, including a 3FE primary school (up to 2.3ha) (Use Class F1), local centre (up to 0.8ha) (Use Class E and F2), mobility hub, communal heat hub, pumping station, formal and informal public open spaces, related landscaping, earthworks, drainage infrastructure and creation of new vehicular accesses off A4146 with associated infrastructure”.

Background

This representation follows several other objections that have been made in relation to the principle of development on this site. These include the previously refused planning application in 2017 (Application Ref: 17/03233/OUT), for a smaller residential led scheme and the submission of detailed representations made at the Regulation 18 and 19 stages of the emerging Milton Keynes City Plan 2050.

We note that a target decision date for the planning application has been set for October, to be considered under delegated powers. It is incomprehensible that the Council consider this to be a scheme that should be determined under delegated powers. This is a major planning application that will have a significant detrimental

impact on the local environment. Furthermore, the proposed site allocation, Policy GS18, has yet to be considered at Examination by an appointed Inspector. For these reasons we request that the planning application be considered formally at Planning Committee so that an opportunity exists for debate, as to the merits of the scheme, and in person objection.

Milton Keynes City Plan 2050 – Regulation 19 Consultation

As detailed in Little Brickhill Parish Council's Regulation 19 objection, made specifically in relation to Policy GS18 – Levante Gate Strategic City Extension, the Parish Council do not consider that the Regulation 19 plan is sound, based on the tests contained in the NPPF, and cannot therefore be adopted in its current form. This is of relevance to the determination of application ref: PLN/2026/1114.

In our opinion the proposed Levante Gate allocation has not been properly justified with the Council seemingly ignoring, or giving undue weight to, much of the relevant and significant evidence contained in the Sustainability Appraisal and related documents, particularly the Council commissioned landscape appraisals.

Furthermore, Little Brickhill Parish Council do not consider that the City Council have properly explored reasonable alternatives with the choices made, in relation to the Regulation 19 plan, resulting in unsustainable forms of development that simply won't be deliverable within the plan's timeframe. The Parish Council also have serious concerns relating to the effectiveness of the draft Local Plan in bringing forward sustainable development.

Clearly these matters, and the relevant evidence, are important factors and will need to be considered at Examination by the appointed Inspector who has the remit to decide that the plan is not sound based on, for example, the insufficient evidence available to support the allocation of Levante Gate; the unresolved infrastructure constraints; the resulting adverse environmental impacts; inconsistencies with the NPPF and the failure to satisfy legal requirements such as conformity with the Council's own Sustainability Appraisal.

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

Of relevance to the consideration of this current application (Ref: PLN/2026/1114) is a previous outline planning application that was refused, for a more modest residentially - led development of 500 homes on the Levante Gate site, in 2017. Application Ref: 17/03233/OUT, also included the provision of open space, Local Centre and primary school and was strongly objected to by the Parish Council and residents. The application was refused by the City Council on the basis that the application site is 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 has historically benefitted from the AAL designation and the proposed Brickhill's Special Landscape Area (SLA) designation. Indeed, the conclusions and advice contained within the evidence base relevant to the Local Plan, is that this landscape protection should remain, given the contribution of the site to the visual qualities of the wider area and ridge. The logic behind the 2017 refusal reasons therefore still stands, in relation to the significantly larger site promoted through Policy GS18, having now been validated by the evidence base relating to the Local Plan.

Given the above reasons and uncertainties relating to the emerging plan, it would be illogical and detrimental to grant consent for this current outline planning application, ref: PLN/2026/1114, for a far denser and harmful form of development in this location, effectively destroying the setting of this key approach to Milton Keynes.

As detailed in previous Local Plan representations, we consider that Levante Gate does not represent an appropriate sustainable opportunity for development and is not a site that should be considered to meet the Council's need and vision for growth. The planning application should be refused and the Local Plan development strategy reconsidered.

Principle of Development

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for Milton Keynes currently comprises Plan:MK, adopted in March 2019.

Paragraph 11(c) of the National Planning Policy Framework (NPPF) requires that development proposals that accord with an up-to-date development plan are to be approved without delay. In this respect outline planning application ref: PLN/2026/1114 is not consistent with the adopted Plan:MK, the outline planning application proposals being contrary to relevant key policies contained in the adopted plan as follows:

Policy DS1 of Plan: MK defines the Settlement Hierarchy where development will be focussed. The application site, as submitted, does not fall within the areas defined and is therefore contrary to adopted policy.

Furthermore, Policy DS2 of Plan: MK sets out the Council's Housing Strategy where new development is focused on, and adjacent to, the existing urban area of Milton Keynes as well as three key settlements. Again, the application site does not fall within the defined areas nor is it identified for development in a made Neighbourhood Plan, as detailed in criterion 6 of Policy DS2.

By reference to the adopted plan the application site also falls within open countryside, as defined by Policy DS5, where planning permission will only be granted for development which is essential for agriculture, forestry, countryside recreation, highway infrastructure or other development appropriate to a rural area.

We note that Milton Keynes City Council is also able to demonstrate a healthy five-year housing land supply. As there is no shortfall in supply the presumption in favour of sustainable development, set out in paragraph 11(d) of the NPPF, is therefore not automatically engaged.

In its decision making, the Council must also consider the emerging MK City Plan 2050 Regulation 19 draft (November 2025), which proposes the allocation of the site under draft policy GS18. Given the lack of policy compliance with the adopted Local Plan and national policy, the policies and allocations contained within the emerging plan should, at this time, carry limited weight. The draft allocation has not been adopted and is not, therefore, part of the statutory development plan. The draft Plan will need to be considered at Examination, where important questions remain to be considered regarding soundness and the proposed development strategy in general. Given the lack of compliance with adopted policy and the uncertainties relating to the emerging Local Plan, the submitted outline planning application should therefore be refused at the earliest opportunity.

Site Suitability

As documented in the Council's Sustainability Appraisal, the Levante Gate draft allocation does not perform well against the objectives as set out and is considered unsuitable to accommodate the development proposed by the application.

Paragraph 77 of the NPPF states that *"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by necessary infrastructure and facilities" (our underlining).*

In this respect, Little Brickhill Parish Council do not consider that the application site is well located or supported by the necessary infrastructure or facilities. 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.

Notwithstanding the objectives of policy GS18, to integrate the site with Milton Keynes, the outline proposals promote poor and unsafe connectivity across the A5 and the already busy A4146, with walking and cycling routes being limited.

Despite the intentions of the applicant to deliver the scheme quickly, the proposal will not be delivered early in the plan period for many reasons. Addressing the deficiencies in the provision, and maintenance 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 significant congestion at certain times of the day.

Allowing more development of this scale, with the access solution proposed, will significantly impact on highway safety and require the development of major new infrastructure before residential development can begin. This issue seems to have been overlooked in the submitted outline planning application and will cause inevitable delay, raising significant viability issues for any developer.

In our view the proposed scale of development does not have sufficient critical mass to support the proposed local services and facilities detailed 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 Council's Sustainability Appraisal and the vision set out in the applicant's Design and Access Statement.

Landscape Impact

Of critical importance to the consideration of this planning application is the adverse impact on, and loss of, high-quality landscape. The draft Policy GS18 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 and will not help to create an acceptable form of development. As demonstrated by the indicative landscape plans submitted with the planning application, 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 will destroy this key characteristic.

Little Brickhill Parish Council therefore object to the planning application and the loss of the proposed SLA designation, by new development, in the area covered by Levante Gate. The evidence relating to the importance of the area, in landscape terms, has been well documented with the former Area of Attractive Landscape Value designation, within the Milton Keynes border, including land between Station Road, Bow Brickhill and the A5 as well as the land south of the A5 to the east of the A4146, sensibly incorporating the area covered by the planning application.

In this respect 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. This evidence cannot be overlooked in the consideration of this outline planning application and the importance of maintaining open undeveloped land in this location.

The 2016 Landscape Character Assessment identifies 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; (our underlining)

- 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.

The application proposal 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 (May 2024)*, the existing landscape designations were reviewed, including the Area of Attractive Landscape designation at Levante Gate.

The National Planning Policy Framework (NPPF), 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 application site falls within the Brickhill Greensand Ridge which is described in the above-mentioned review as being 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 creates a strong sense of place”.

In terms of the report's Evaluation, the planning application 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 some depth and scenic quality to the landscape. (our underlining)
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”.

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 tranquillity and a sense of remoteness in parts. The submitted planning application 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 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 forms part of the setting to the woodland ridge and Little Brickhill village. Once destroyed the substantial damage caused will be irreversible.

Little Brickhill Parish Council considers that the issues relating to the impact of the proposed development on the local landscape should be a major consideration in refusing this planning application and for the City Council to reconsider the draft allocation of the site.

Locational Factors

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

The Levante Gate site will not provide the housing mix and affordable housing that is envisaged by Policy GS18. 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 preferable in offering an appropriate mix of dwellings.

The application 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.

Furthermore, the application site 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. Furthermore, the 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.

Transport

The planning application is outline with all matters reserved apart from access. Little Brickhill Parish Council do not consider that the proposed development can be properly accommodated on the site, in highway terms, given the quantum of development proposed and the existing infrastructure constraints.

The Parish Council also has reservations about the proximity and safety of the proposed new access points, onto the A4146, which is already at capacity at peak times of the day.

As previously mentioned, the existing roundabout adjacent to the site accommodates significant amounts of traffic, is considered dangerous in its current configuration and becomes congested at certain times of the day. Adding more traffic to the roundabout will create increased congestion and impact severely on road safety.

We note that the strategic modelling outputs from MKMMM and VISSIM micro simulation modelling are still to be completed, with the submitted Transport Assessment including no more than a qualitative assessment of the impacts and possible mitigation. The Parish Council consider this to be a significant omission, given the potential adverse impacts of the application proposal on highway safety and is not a matter that can be retrospectively included in the Transport Assessment (TA).

Furthermore, the submitted TA appears to rely on traffic data that does not reflect current traffic conditions or fully consider recent development in the surrounding area.

The TA also appears to underestimate future traffic demand by failing to include cumulative impacts from nearby committed developments and does not adequately demonstrate that additional vehicle movements can be accommodated without increasing highway safety risk.

In our view the TA does not adequately assess walking and cycling access, safe connectivity to Redway's, safe crossing points or provision for disabled users. Furthermore, the TA appears to overestimate active travel without demonstrating that safe and convenient infrastructure exists for pedestrians and cyclists.

The submitted Transport Assessment concludes that the proposed development will have no severe impact on highway safety or nearby junctions. However, the assessment appears to rely on traffic surveys that do not reflect current traffic conditions following recent nearby developments. Peak hour queues already extend beyond the lengths assumed in the modelling, resulting in delays and reduced network resilience. Given the lack of robust evidence the applicant should undertake updated traffic surveys and revised junction modelling before the application is even considered.

Design

Although only access is a matter for detailed consideration, the outline application must still provide enough information for the planning authority to conclude that a high-quality development could be delivered within the approved parameters. Little Brickhill Parish Council considers there to be insufficient design detail, submitted with the planning application, making it impossible to judge the proposal's true visual impact.

Given the isolated nature of the site the application proposal currently fails to respect the character, grain or townscape of the surrounding area with the submitted parameter plans proposing an overly dense form of development, particularly adjacent to the A4146, proposing buildings that could ultimately be too tall, bulky and dense for this location. Currently the parameter plans promote a wide range of development envelopes providing excessive flexibility for the submission of detailed schemes and insufficient control for the local planning authority.

The illustrative layout currently proposes open space adjacent to the existing residential development at Russwell Lane. We note that landscape buffers, existing and proposed trees and hedgerows, wildlife corridors and areas for play are proposed for this peripheral linear area. The Parish Council does not wish to see play areas located in this area as this would potentially erode the residential amenity enjoyed by existing dwellings.

As the design stands the Parish Council also has concerns relating to the uncertain public realm currently detailed in the application, given the importance of streets, squares, pedestrian routes and open spaces in influencing how a place functions. More detail is needed in this respect to allow the local authority to properly assess the application.

Furthermore, without a defined layout it is not possible to adequately assess overlooking, privacy, daylight, overshadowing, noise impacts or consider passive solar design, energy efficiency or sustainable drainage integration.

East -West Rail

As detailed in previous objections, the planning powers enjoyed by the East West Rail company will, in effect, overshadow 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 bypass routes, bridges

and the creation of nearby transport interchange hubs. Whilst the western section is operational, or near operational, the full link from Milton Keynes to Cambridge is not expected until the early 2030's.

This uncertainty throws considerable doubt on any plans MK City Council produce and provides a logical reason to refuse major planning applications, such as Levante Gate, until there is more certainty regarding the future of East – West Rail to the east of Milton Keynes. This major infrastructure project could have significant implications on the allocation of certain sites and their deliverability.

Conclusions

By way of context, Little Brickhill Parish Council consider that the Levante Gate allocation (Policy GS18) is unsound, has not been positively prepared and is not justified, effective or consistent with national policy, with much of the Council's relevant evidence base having been ignored. This is a key consideration in the determination of outline planning application ref: PLN/2026/1114 and one that weighs against refusal of the application.

Furthermore, Milton Keynes City Council have not properly explored reasonable alternatives which will result in constrained, unsustainable forms of development that won't be deliverable. These are matters that will need to be considered at Examination by the Inspector and could have implications for the adoption of the Local Plan. These are also matters that have significant implications on the consideration of this planning application which should not be determined until there is clarity regarding the soundness of the emerging Local Plan and Policy GS18.

In determining the planning application consideration should also be given to the refusal of a residential led outline planning application in 2017 (ref: 17/03233/OUT), which relates to the same site. This smaller application was refused given the intrusive form of development that was being proposed, in open countryside. The application proposal was considered to have a negative urbanising effect, adversely impacting on the open, rural character of the locality and the wider surrounding area. This situation has not changed with the current application proposing a much larger, denser and more harmful form of development.

Little Brickhill Parish Council considers that the adverse impact on the landscape is a key reason to refuse this outline planning application. The evidence base that informed the emerging Local Plan states that a protective landscape designation should remain in this location, given the contribution of the site to the visual qualities of the wider area.

Application ref: PLN/2026/1114 is also contrary to the NPPF in that the application proposal does not conform with relevant policies in the adopted Local Plan, namely Policies DS1, DS2 and DS5, relating to the Councils development strategy, hierarchy and the open countryside location of the site. These adopted policies should be given considerable weight, with the policies contained within the emerging plan given limited weight.

Milton Keynes City Council are also currently able to demonstrate a 5-year housing land supply meaning that the presumption in favour of development is not automatically engaged. This is an important consideration in the determination of this planning application.

The application proposals are contrary to Para 77 of NPPF in that the application proposal is not well located or supported by the necessary infrastructure and facilities.

Little Brickhill Parish Council considers that the application proposal won't deliver early in the plan period given the provision and maintenance burden of existing infrastructure causing a significant barrier to growth. Significant new infrastructure is required before new development can begin, causing delay and viability issues for the developer.

Little Brickhill Parish Council has major concerns regarding the impact of the additional traffic generated on highway movement and safety. The current A5 roundabout accommodates significant traffic and is dangerous and congested at certain times of the day. Adding to this will create increased congestion and impact severely on road safety. This has not been considered adequately in the submitted Transport Assessment which relies too heavily on qualitative assumptions and lacks the modelling outputs that would be expected for an application of this scale.

Notwithstanding the outline nature of the submitted planning application, Little Brickhill Parish Council considers that the proposed scheme contains insufficient design detail. The information provided in support of the application does not provide a robust framework on which to base more detailed proposals and provides excessive flexibility for the developer.

In relation to the proposed landscape buffer, the Parish Council do not wish to see play areas located adjacent to the existing residential development at Russwell Lane. Any play areas/recreational space focussed on this area will have an adverse impact on the residential amenity currently enjoyed by these properties.

Little Brickhill Parish Council consider that the implications and route of East – West rail, east of Bletchley, need to be understood more fully and factored into a coherent development strategy before sites such as Levante Gate are considered.

For the above reasons, Little Brickhill Parish Council respectfully requests that Outline Planning application ref: PLN/2026/1114 be REFUSED at the earliest opportunity.

Yours sincerely

A J Kemp

Clerk to the Parish Council