

Development Plans,  
Milton Keynes City Council,  
Civic,  
1 Saxon Gate East,  
Milton Keynes,  
MK9 3EJ

Date: 22nd. December 2025.


Hand delivered to Civic prior to 5.30pm deadline, and also sent by email to:-  
<ncp.engagement@milton-keynes.gov.uk>

Dear Sirs

**RESPONSE TO: POLICY GS19, SHENLEY DENS CITY EXTENSION,  
REGULATION 19 MK CITY PLAN 2050 – NOVEMBER 2025.**

I thank Milton Keynes City Council (MKCC) for the opportunity to comment on this important document, and would firstly like to apologise for not using the online system, but as this response is for one single policy only - GS19 - rather than the Plan as a whole, is somewhat lengthy and detailed, this letter format is preferred.

By way of introduction, my name is Graham Stewart, and 

  
Although now retired, my entire working life was spent in and around Milton Keynes, working with companies closely involved in the development of Milton Keynes, concentrating on planning, construction and development issues. I am an elected parish councillor within Whaddon Parish Council (WPC) and have been for some 20 years. I have helped the council prepare their submission to this current consultation but wish to make clear that this is my personal submission, which should be considered separately from that of WPC, although some content may be replicated. I was closely involved in the 2003/4 Milton Keynes Local Plan Inquiry and helped the Whaddon/Nash residents with their preparation of the 'A Ridge Too Far' submission, that helped the Planning Inspectorate Inspector make the decision to delete area 10.4 (the identical site now referred to as Shenley Dens, in this current

Regulation 19 exercise) from the Current Plan for Milton Keynes, and replace it with Area 11 (now known as Whitehouse).

I remind MKCC of these facts, as the issues today are no different to those 20 years ago. The pressure for housing numbers may have changed, but the underlying principle as to where the best and least damaging place to locate them has not, and in this regard and most importantly the landscape within the Calverton Plateau, up to and beyond the Shenley Ridge landform and beyond into Buckinghamshire has not changed. This is a simple housing v landscape debate, and for the following reasons I maintain that this particular GS19 policy remains unsound, is not based on robust evidence, is not consistent with National Planning Policy - although as this is written we await the latest iteration of the updated NPPF, and there are less damaging and destructive landscape areas on which to locate these houses - particularly to the east of MK, beyond the M1 motorway.

I have tried to explain the reasons why, in two sections, firstly, those relating to site specific matters - past and present, and secondly the evidence produced from the three LUC landscape reports, upon which the recommendation for allocation was, I imagine largely derived.

### **Section 1. Policy and Site Specific Matters.**

1. Policy GS19 Shenley Dens Strategic City Extension proposes a major residential development which would expand Milton Keynes westwards beyond and over the Shenley Ridge, a prominent and important landscape feature. This same site was previously proposed when the current Local Plan for Milton Keynes was being prepared back in 2003/4, but at that time it was known as Area 10.4, part of the Western Expansion Area. The proposed development of this particular site was hugely contentious back then, and remains so today, and is wholly inappropriate to be included within the current MKCC Regulation 19 City Plan 2050. The Inspector at the 2003 Inquiry forcefully recommended the sites deletion from that plan, and I ask MKCC to do so again now, because if it remains as an allocated site, it will represent one of the most controversial planning decisions that I and many others who share my long memory has, or will ever witness. It is worth recording here a few extracts from the 7th April 2004 Planning Inspectors Interim (Part 1) Report made by Inspector Keith Holland, using the same paragraph numbers for clarity: -

*6.1. The question of the extent of development within the Western Expansion Area (WEA) is one of the most controversial matters in the plan. .... Area 10.4 (the site now proposed as policy GS19 - Shenley Dens) was not identified as suitable for development in the Llewelyn-Davies (LD) work and it is this area that is the subject of the vast majority of objections to the WEA,*

*6.2. Oakhill Wood forms a strong visual boundary. The area to the west is a distinctive "natural area" with strong landscape features and attractive views. It is part of the Whaddon Chase ambiance. There is an ancient monument at Snelshall Priory and finally, the area forms a separate drainage catchment area draining north west. The LD study explained that the western boundary was determined in a way that respected "the landform, landscape, views and villages which exist in that area.*

*Any development further west would encroach into very high quality landscape with extensive and attractive views”.*

*6.3. In 1996 Llewelyn- Davies updated the 1992 work and reinforced the conclusions of the earlier work by stating that this part of the City is a sensitive topographical location where a permanent and defensible city edge must be created and the visual impact from the countryside protected. In 1998 another study was done at the request of SERPLAN to consider opportunities for further significant growth beyond that already committed or planned. Looking at constraints the study noted that to the west of the City there is a ridge (Shenley Ridge) that forms a division between what is called the urbanity of the new city and the rolling Buckinghamshire countryside.*

*6.5. I do not regard this (committed development in grid squares east/south-east of Whaddon) as necessarily a good reason for allowing further development on area 10.4 which lies on the slopes facing the Whaddon Valley to the north of the village. My judgement is reinforced by the fact that area 10.4 is visually separated from the SE corner of the designated area by the landform and the screening effect of Oakhill Wood.*

*6.6. If development was to occur on 10,4 (Policy GS19 -Shenley Dens) it would be visible from large parts of the Whaddon Valley. The Shenley Ridge is a significant feature in the landscape and I agree with the Llewelyn-Davies assessment that it is a feature that would form a logical and obvious boundary to development. .... I agree that the land to the east of Milton Keynes is suitable for long-term development as I consider that this area is much less sensitive in landscape terms than the Whaddon Valley. While I am not here considering the long term, I do not see the logic of regarding the Whaddon Valley as a long term development area. To do so disregards the qualities of the valley landscape and the merits of the Shenley Ridge as a logical and clear long-term boundary.*

*6.7. .... In my view, the combination of the character of the landscape and the distinctiveness of the ridge dictate that development should not “spill over” the ridge.*

*6.9. ....I agree that it is generally preferable to avoid harmful impacts altogether rather than use mitigation measures.*

**2.** There is considerable irony in the continued promotion of this particular and very contentious site. Over very many years, previous Planning Inspectors, M.K planners and landscape architects are to be applauded for their skill and sagacity in developing the City, and over these years there has been remarkable unanimity between professional planners, landscape architects and others that have been engaged in various studies and reports (including Council officers, Llewelyn-Davies, Babbie for AVDC, Developers of the Western Expansion are, local Parish Councils and not to mention the 408 residents of Whaddon and Nash) who supported these experts some 20 years ago and since, to protect the important and historical landscape that extends beyond the Milton Keynes City boundary into rural North Buckinghamshire.

Today however, when faced with having to provide an ever-increasing amount of housing, there are glaring exceptions in the form of MKCC and perhaps to a lesser extent Bucks Council (formerly AVDC), - but we do not yet really know their real intentions for withdrawing their original strong objection to this site - who are summoned by central Government to provide these apparently much needed new homes. I would not wish to denigrate the propriety or worth of MKCC's evidence in proposing the Shenley Dens site but would simply wish for them and their current landscape advisors LUC, to recognise the wider context in which their evidence has, so far been given. By supporting and advocating development that extends well beyond the containing topography on the western flank of the city in the form of the Shenley Ridge, it is a reprehensible and unforgivable act, simply because officers are ignoring well founded and proper planning principles and all of the forceful expert evidence that has gone before. To 'test' the suitability of this area once again, after such powerful previous recommendations simply to satisfy or 'over-supply' a housing number requirement demands far better reasoning, given the alternative sites that are available elsewhere within the confines of the Milton Keynes boundaries.

**3.** Twenty plus years ago, there was powerful opposition from the communities that will have to face the experience and full impact of housing development cascading down part of the steep southwest facing slope of the Shenley Dens Farm. Their evidence then, as now, is deserving of considerable weight, especially given the emphasis now placed by Government on 'community engagement' in the development of Local Plans, but which in practice appears to be limited in its actual happening, which may be recognisable by the lesser number of consultee responses this time around. I hold a full copy of the 2003 Whaddon/Nash 'A Ridge Too Far' proof of evidence submitted to the MK Local Plan Inquiry, which contains the names of the 408 resident names opposed to this development, which can be made available, if required. Some have passed, others moved, but new residents have taken their places and I suspect that many are unaware of what is happening now.

**4.** What then has been put forward in support of the Shenley Dens allocation? First, it clearly represents a sizable area of open countryside on which some 1000 new homes can be built to help meet the City's expansion requirements .... Although this may be in doubt because if the adjoining Buckinghamshire Council (BC) struggle to meet their own housing numbers it is rumoured that they may seek MKCC to help them out, by allowing these homes to be calculated within the BC housing numbers as opposed to the Milton Keynes requirement. Perhaps this is not an unreasonable request, because MKCC have over allocated their housing requirement within this emerging plan and do not necessarily require this site in the overall scheme of things. Either way, there is no justification for the cavalier disregard of the City's natural boundaries and the damage that would inevitably follow within the open countryside beyond, by either authority. In any event, if Shenley Dens is deleted the dwelling yield loss is easily made good by MKCC's own admission that the eastern expansion area could extend well beyond the 2050 plan end date, and an over provision of housing is already built in. Further, given the topography of the site and its relative inaccessibility to community facilities and services, both of which are not conducive to non-motorised modes of travel, these other sites east of the M1 motorway on flatter terrain must be preferred.

5. Secondly, the *“provision of land and planning obligation funding to accommodate a minimum of 15 pitches for Gypsies and Travellers to be delivered by 2035 in accordance with Policy HQH6”*. Whilst recognising the necessity for such provision, I fail to see or understand the logic of placing such a facility in a remote corner of the site in an area for proposed trees and a landscape buffer, which would presumably have an unwelcome access directly onto the Whaddon Road. Such communities, where it can be demonstrated there is an identified need, should surely not receive such privileged, remote and desirable siting within what would be designated as a landscape buffer. I had understood that such facilities should be sensibly and properly located where there is reasonable access to local facilities, shops, schools, healthcare, and public transport (not a lengthy uphill walk/cycle ride away), and not where they would have a significantly adverse impact on the countryside, landscape, biodiversity etc. - which the identified location clearly would have, - and where they could easily be connected to water, utilities and sewers etc. (again where this site is clearly not suitably located). Were this site to progress and eventually be allocated then this facility must be properly integrated within the expansion community, and if MKCC wish to hide them away or see separation from the new homes then surely it would be better to allocate it just to the west of Oakhill, within the confines of the existing protected woodland, with access taken from the development road system.

6. Thirdly, It is proposed that Layout and design of the site should seek to sustain, and where possible enhance, the setting and heritage value of the grade II listed Shenley Dens Farmhouse and non-designated barns. This would be an admirable improvement, but it begs the question as to why MKCC have not taken appropriate steps to force the improvement and rebuilding of this grade II listed building after it was mysteriously destroyed by fire some years ago. Major new development should not be the catalyst for such an important group of buildings within such an attractive landscape setting, to receive the attention it should have done by law, in the years immediately following its total vandalism. It is as though the council did not have regard for this asset, and only now on the back of unwelcome development, do they see a way for its full restoration. If the Shenley Dens site is removed, as it should be, I would expect MKCC to take urgent steps in consultation with the landowner to bring this listed farmhouse and outbuildings back into useful occupation.

7. Fourthly, *“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 integrate well with Whitehouse, Grange Farm and the surrounding network of active travel routes and routes for public transport. b. Routes for movement of public transport and general traffic through the site, with the primary access taken from Portway with appropriate retention and segregation of the MK Boundary Walk route, and secondary access from Tattenhoe Street (Western Expansion Area)”*.

The Indicative concept plan is totally unfit for purpose, and if there is to be serious debate about the appropriateness of this site then a much more accurate and detailed plan should be submitted. For instance, if Portway is to be the primary access, what does ‘appropriate retention and segregation of the MK Boundary Walk route’ really mean? The SPD for Shenley Park in Bucks demanded segregation in line with MKCC policy, but we now find that the hugely important MK Boundary Walk route (North Bucks Way) is likely to be totally severed, with the introduction of a

Pegasus crossing, which will clearly have a detrimental impact on smooth traffic flow, highway safety and not least the wildlife corridor, all so critical along this historic and well used route, that has huge potential to further improve public non-motorised traffic by walking, running, cycling, not to mention the equestrian fraternity. It is also clear that the building height schedule pays no heed to the policy requirement of ‘Adopt a sensitive landscape-led approach’, and will only lead to unacceptable sky-lining and ruination of the valley landscape over a very wide area. All in all, it seems little thought has gone into the Indicative Concept Plan, and therefore the proposed allocation of Shenley Dens – which is such a contentious site, must question whether or not the allocation is legally sound and based on robust evidence.

8. Fifthly, *“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”*. It is interesting and possibly significant that the Indicative Concept Plan shows no blue infrastructure whatsoever. When this site was proposed some 20 years ago, balancing lakes were shown roughly in the position where the suggested ‘Gypsy and Travellers’ site is now, indeed spilling over the adjoining County boundary into the Buckinghamshire countryside. However, there is no attempt now to explain how the surface water runoff from this development, which will run naturally into the catchment area of the Whaddon brook will be dealt with, without exacerbating the existing flooding problems further downstream at Beachampton, Stony Stratford and beyond. Complying with infrastructure strategy and open space standards does not necessarily solve problems, and in this regard the release of this site with insufficient evidence of its impact is unsound.

9. Sixthly, *“The location, scale and phased delivery of social infrastructure, services, community facilities and education etc. 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”*. Whilst understanding the sentiment behind this requirement, it should be said that this development is not necessary to further support the Western Expansion area, which when complete will be a self-sustaining area in its own right, especially with ample education and social facilities located within the Whitehouse and Fairfield districts. The proposed Local Centre at Shenley Dens is poorly located to service the remainder of this site and due to the relatively low density of housing that would be expected to be constructed on the visible sloping terrain, it would not be of sufficient scale to function properly with the required services necessary.

10. Having reviewed all the so-called benefits claimed for Shenley Dens, it is all too apparent that there is very little that can be said in favour of the area’s allocation. It has no redeeming features to offset the very substantial landscape and visual impact that the development would give rise to. Whilst this is a matter canvassed fairly extensively in the council’s evidence, especially within the three LUC landscape reports since 2022, the suitability of the site is a matter of judgement informed by site inspection, which will obviously become a vital part of the process when the site is examined at the Public Inquiry stage by the appointed planning Inspector. The LUC ‘Review of Areas of Attractive Landscapes in MK - 2024’, recommends the Calverton

Plateau (one of three sites) be included for development within planning policy in the forthcoming MK City Plan 2050, and seeks to support this justification by comparison with examples from other Local Planning Authorities, where policies have all been through Local Plan Examination, and suggesting that overall landscape policies within the new plan for MK could be worded to comply with these examples. By comparison, I wonder how many sites with landscape issues have been rejected at local Plan Inquiries? LUC makes no attempt to answer that question, only to point to those that might support the allocation of this contentious site. We should recall that this self same site was rejected at a Local Plan Inquiry! The most telling point within this document, that MKCC appear to have completely ignored appears at bullet point three under Chapter 4 – Evaluation and Recommendations, which states; *Avoid the introduction of large-scale elements, or development which breaches the ridge along the urban edge of Milton Keynes, which would have a visual impact over a wide distance.*”

This policy approach by LUC is wrong, because every site – especially those with serious landscape concerns should be evaluated on its own merits, and not justified by using other Local Plan decisions which may bear no similarities or comparison. This makes the recommendation of Shenley Dens as an allocation site unsound. In essence, where there is a need for major development to take place, the objective should be to devise policies which apply to local constraints and opportunities, thereby resulting in the right type of development in the right location and built in a way which is in keeping with its surroundings and which makes a positive contribution to the character and quality of the surroundings. This allocation does not meet that objective, In the case of Milton Keynes there is no lack of studies to aid the exercise as to where development might be located as the needs arise.

In considering the various studies undertaken over many years it is obviously important to have regard to the constraints and indeed the consultants brief and it seems to me that the LUC reports stopped at the Milton Keynes administrative boundary, and that they only really considered the land on the Calverton Plateau within MK itself. The exercise of considering the extent to which Shenley Dens is appropriate in a landscape context clearly needs to consider a much wider area within Buckinghamshire and it is evident that on this occasion this has not been demonstrated or properly achieved. Nevertheless, I offer some observations on the nature of the council’s case on this important issue.

11. Although the current MKCC administration and officers may wish to step aside from it, considerable weight should be attributed to the Llewellyn-Davies (LD) Milton Keynes expansion studies in 1992, 1996, and 1998. The 1992 study cannot be downplayed, as its sole and main purpose was to test how far the City could expand – irrespective of the demand for growth – until its environmental and lifestyle quality began to be eroded. Its conclusions on where the lasting edge on the western side of the city should be, are as valid today - if not more so - as they were when the report was first published. Equally, the factors which led LD to exclude the Area 10.4 (Shenley Dens Farm) remain entirely valid today. There has been little if no significant change to the landscape hereabouts but, if anything there is greater awareness of the need to protect the countryside as a natural resource, and for its own sake.

Whilst sadly recognising that defining outer limits to the City – or indeed any major development area, may become necessary, and that there are some that endorse such principles, careful thought and good respected planning principles should be

encouraged in the selection process, especially when there are or may be less sensitive and destructive development sites located elsewhere around the City..

12. Shenley Dens is clearly rural in character and isolated from Milton Keynes, and the topography, together with its physical and visual relationship to MK is totally different to the rest of the Western Expansion area which is still under development but with which MKCC wishes this site to adjoin. The markedly sloping landform and strong aspect to the southwest ensures that Shenley Dens Farm has a closer visual and physical association with the clay lowlands to the west, over which it has extensive views, rather than the urban landscape of MK. In these aspects it is totally different to the western expansion area, and it should be remembered that when the WEA was designed an extensive landscaped area was provided along the entire western boundary to enforce these separate and distinctly different elements, but which have yet to be completed and allowed to mature. The Shenley Ridge, which sits above Shenley Dens Farm is the most pronounced feature in this area, which together with the Oakhill woodland contains the built-up area and ensures that it has almost no landscape impact on the open countryside to the west. Thus, you must conclude that Shenley Dens Farm has a distinctly rural and unspoilt character which is largely unaffected by the proximity of built development, and this applies to an extensive area of clay lowlands to the west and southwest. The dominant influence of the ridge provides a landscape and visual watershed between MK and the open countryside to the west, and the obvious division between the urbanity of the new City and the rolling Bucks countryside which are elements that should and must be respected and retained.

13. Criteria 3 suggests that *“the site will adopt a sensitive landscape-led approach to the distribution, layout and design of development that satisfactorily mitigates impacts upon the valued characteristics of the Calverton Special Landscape Area”*. It is hugely important to note that whilst recognising the Calverton Special Landscape area this paragraph totally ignores the open countryside landscape to the west within Buckinghamshire. Whilst Shenley Dens itself has no special landscape designation it is worth noting that Government has moved away from a hierarchical approach to landscape and countryside protection and to therefore suggest, as some might, that this area is not worthy of some designated protection is of little consequence albeit adjoining the Whaddon LLA just further to the south, especially when the MKCC’s own landscape advisors have demonstrated by explaining in some detail what makes an attractive landscape. It will be enormously difficult, if not impossible on such an exposed, steeply sloping site to successfully mitigate the harm caused by the proposed development. Even with a landscape-led landscape policy it will be impossible to conceal the prominent skyline development as seen from the west and southwest and it would take a very considerable period of time – perhaps decades before development on the south facing slopes could be even partially screened by matured planting. Given the ability to look from lower land up towards newly built development on Shenley Dens it is doubtful that any landscaping, even when mature, would provide sufficient protection against buildings appearing on the skyline. When removing this self-same site from the current Plan MK the Inspector was insistent that development in the remaining Western Expansion Area should be set back well beyond the ridge line with substantial planting in front to avoid the unacceptable sky lining effect, but where due to the

flatness of the land to the east of the ridge, it may have to allow some minor 'glimpses' of development only. Subsequent master planning adopted this principle. However successful landscape-led mitigation might be, it is no substitute for deciding whether in the first place the site is intrinsically suitable for major scale-built development. This site is simply not in that category. Further, suggesting a landscape-led approach, is no justification for sanctioning a major new development spilling out beyond an obvious, natural, final boundary on the west of the City into a totally new area of attractive landscape unaffected by the urban presence of MK. Just because Milton Keynes may have to expand rapidly, I doubt that any Landscape specialist – if they are honest and stick to well known practise – would agree that Local Plan principles and land form considerations should not be ignored. Milton Keynes must surely as Llewelyn-Davies said, *'respect and identify finite boundaries when best addressing the outward direction of growth of Milton Keynes'*, or indeed any town or city. The approach that MKCC appears to be taking, by commencing the destruction of this valley landscape, is chilling in the extreme and the antipathy in community engagement. There must be other proper and well-founded ways of proceeding.

14. Development of Shenley Dens Farm would have a profoundly damaging and widespread landscape and visual impact. It would expose an extensive area of open, unspoilt, tranquil countryside to the 'delight' of urban Milton Keynes transforming pleasant countryside to urban fringe. The night-time effect would be equally profound, introducing an extensive area of illumination into an almost completely dark landscape. If the effect of developing Shenley Dens Farm were not enough by itself, there are serious and legitimate concerns about the strong precedent created for further outward extension of the built- up area. The Whaddon brook/stream is not a defensible boundary, as was claimed at the 2003 Inquiry (it is not even shown on the current concept plan), so once the urban breakout beyond the ridge has occurred it will be extremely difficult, if not impossible to hold back further development to the south and west of Shenley Dens. If this area is allocated the onward march to the southwest is a near certainty, as previous and current landowners and developers' intentions have already been made clear in speculative documents (New Lansdown to name one), and now, when a very substantial Whaddon valley site is promoted, put forward for consideration during the recent 'Call for Sites' exercise undertaken by BC for their own emerging Local Plan. If proof of precedence is required, one only needs to look at the recently proposed Shenley Park or Salden Chase developments which stand roughly at the head of the Whaddon Valley .... But in a totally different landscape setting. It is perfectly acceptable and right to claim that the Shenley Ridge is hugely relevant when considering the unstoppable tide of Milton Keynes.

15. One final comment, which refers back to the commentary by Inspector Godber back in 1966 when Milton Keynes was first designated. Some may recall that the Inspector said *"that he had no further room to manoeuvre"* – i.e. he had no choice other than to accept this area, but with strong misgivings about topography. He didn't even say that master planning could resolve the problems, it was more to the effect that if the land was developed, a master plan would assume that it was handled in an appropriate way. What is more appropriate is that the Minister in confirming the final decision found that he did indeed have a choice. He was not obliged to include this land in the designated area, he said that he had got a choice, and it was because of Inspector Godber's misgivings that the Minister chose to exercise his choice and

deleted the area. I am asking MKCC to take the same approach as the Minister did. MKCC does have a choice – your council is not compelled to include Shenley Dens Farm, as other more suitable sites do exist, and indeed this site may not even be needed to meet your housing requirements. I ask MKCC to exercise its discretion and delete the area known as Shenley Dens and replace it - if needed - with the more suitable sites that lie to the east of the M1 motorway, or elsewhere within the Milton Keynes district - where MKCC by its own admission admit that development proposed in the current plan is likely to continue for years after its end date of 2050.

16. For all of the foregoing reasons I urge MKCC to recognise that the Shenley Dens Farm site is a thoroughly unsuitable location to allocate, simply to provide additional housing. The allocation is both legally unsound and not based on robust evidence. Having considered the response by Whaddon Parish Council, and by not taking full account of that Council's earlier responses both to the MK Local Plan drafts and to the LUC landscape review, it becomes obvious that the Shenley Dens allocation is not based on robust evidence or consistent with national planning policy on landscape. Additionally, one could argue that whilst it might be deliverable by 2050 it is not necessarily positively prepared because in practise this site is not needed to meet identified housing need and could be considered as an unwarranted and unnecessary over-supply of homes, - indeed a speculative test of appropriateness, but 20+ years on - just for the sake of having an overly large housing supply. The Reg. 19 Mk City Plan 2050 states that 50,400 homes are needed, but the tally of homes within the document could provide 60,000 including a 19% buffer.

16. .... And finally, the significant 'about turn' by BC, and the former Aylesbury Vale District Council (AVDC) who both strongly opposed the sites allocation in the current Plan for MK, but who now suggest it might be possible if the development is 'Landscape-led' is reprehensible. This change of opinion, taken at officer level without any discussion with the elected member for the area, the Strategic sites committee or worse still their electorate that will have to live with the consequences, will be tested at the Public Inquiry stage. It now appears that BC may be changing tack again by proposing a swap of the housing site for the landscaped area to the south of Tattenhoe Street, Hazeley and Whitehouse, thereby not allowing housing to spill over the ridge onto the side valley slopes. Such a suggestion demonstrates the total lack of understanding as to why this wide landscape area was set aside and planned as important 'edge of development, landscaped open space' in the first instance, to respect the longer term protection of the open Buckinghamshire countryside to the west, and the far reaching views enjoyed by both MK and Bucks residents from the North Bucks Way. Sadly, both authorities in their desperate search for sites to satisfy Government imposed housing targets are turning their backs on the fundamental planning principles of protecting landscapes where possible.

If my memory serves me correctly the eastern part of this currently planned landscaped area, that actually fronts Tattenhoe Street, was originally planned to serve as a possible over-spill for Crownhill Crematorium, or as a garden of remembrance . Do these plans still have momentum? I think this just illustrates the lack of knowledge that Bucks County appears to demonstrate when making suggestions that are not fully explored or tested, both on the history of the site and the important landscape issues that are fundamental to ensure that their responses, like MKCC's responses are considered sound and based on robust evidence.

The following extracts are taken from Buckinghamshire County Council's Objection dated 22nd August 2003.:-

*Development is intrusive upon the local landscape and is detrimental to the character of Northern Buckinghamshire's villages and countryside.*

*The issues of landscape and local character are important ones, and the characteristics of Milton Keynes contrast sharply with the rural nature of the villages of Northern Buckinghamshire. The housing development that would spill over the ridgeline would not have regard to the landscape of the wider locality, would not respect the distinctive identity of the neighbouring villages, and far from enhancing local character, would damage local character beyond repair.*

*The proposal to develop beyond the ridgeline and up to the boundary of Aylesbury Vale is a choice based on administrative boundaries only, it pays no respect to local character, landscape and the wider locality.*

*Directly to the south and within a few hundred metres of the proposed development beyond the ridgeline, lies Whaddon and Nash Valley Local Landscape Area (LLA) as defined in Aylesbury Vale's current adopted Local Plan. The character of the Local landscape is therefore considered to be of a relatively high quality, and the views to, through and beyond the LLA contribute to this quality. If development is allowed to spillover the ridgeline the character of the Whaddon Nash valley will be spoiled forever.*

In respect of AVDC, I would not expect to repeat everything within their Proof of Evidence, produced for the Milton Keynes Local Plan Inquiry on the western Expansion area, but perhaps their Study conclusions are sufficient:-

*4.65. The western Expansion Area would have a significant adverse effect on Local Landscape character. Development as proposed would adversely affect the character of identified character areas. It would also create a highly significant visual impact upon a very wide area.*

*4.66. Confining western development to the Shenley Claylands Plateau character area would greatly reduce the adverse effects on the wider countryside, provided that development was kept back from the prominent plateau edge and suitably screened by a characteristic and strong boundary network of hedgerows reinforced with trees.*

*4.67. In landscape terms there are better areas in which to locate development so as not to adversely affect the better quality landscapes which are worthy of conservation.*

The change of attitude and position by Bucks Council is very difficult to understand, unless there are other factors coming into play that have been discussed between adjoining authorities, and that I am unaware of. I hope at the Public Inquiry to this Local Plan policy, that Buckinghamshire Council can explain why, - when the landscape and landform has not changed in the last 20+ years, - how they have come to their reversal of decision today? Simply to say that landscape policy on its protection has changed, is insufficient reason, especially when the landscape

condition and benefits have not changed, so one wonders whether there are more sinister reasons for suggesting that this area is no longer worthy of protection?

**17. Historical Setting.** Setting aside for the moment, policy and political influence being brought to bear by having to allocate thousands of new homes, the Whaddon Nash Valley is an historic landscape that can trace its origins, its sense of place, certainly back to the Norman Conquest. It was a favoured hunting ground of Queen Elizabeth 1, who on a visit to Whaddon Hall is reputed to have described the landscape as

*"A magnificent amphitheatre of wooded scenery"*

I would suggest that the northern part of that amphitheatre can still be seen from the village and the grade 2 listed Whaddon Hall and comprises the slope from the ridgeline, the site of Shenley Dens .... Albeit the proposal seeks to hide the worst elements of the development behind the Oakhill Woodland - but for how long?

In his History of Antiquities of the County of Buckinghamshire Vol 2 published in 1847, George Liscomb described the landscape around Whaddon as:

*"A surface varied and remarkably unequal, rising into considerable elevations, which present, especially near the eastern boundary, and the vicinity of the village, fine and interesting prospects"*

I imagine all the residents of the three surrounding villages would wish to preserve these "fine and interesting prospects" for current and indeed future generations, before the planners/developers destroy what good parts remain.

Crossing the defensible barrier of the ridge line will threaten the integrity of the historic Whaddon Chase Valley and will irreparably damage its rural landscape. At a time when there are alternative less sensitive sites, such unnecessary action pre-empted an unwarranted direction of future growth into the open countryside and sets a hugely damaging precedent threatening other valuable areas of rural landscape that otherwise would have been considered unacceptable for development due to their landscape constraints.

**18. Conclusion.** The impact of allowing the Shenley Dens to be developed is unacceptable and respecting the Shenley Ridge as an important edge to this part of the west of Milton Keynes for today and future generations is of far greater importance than the benefits brought about by 1000 new homes. The absence of 'specialness' by way of landscape designation is no warrant anywhere for development. The ability to access and enjoy the tranquillity of the Whaddon Valley and enjoy the extensive views over the clay lowlands to the west, from the North Bucks long distance bridleway, and indeed the network of local well used footpaths, is hugely relevant and should not be underestimated. The position is quite straightforward, on landscape grounds alone the extension of the Western Expansion Area over and beyond the Shenley Ridge is objectionable and should be removed. Only the most compelling evidence of the necessity for the development of such an extensive exposed area could justify the impacts of it, especially whilst far

more suitable land is available to the east of Milton Keynes beyond the M1 motorway. Such evidence is not forthcoming or available.

## **Section 2. The LUC Landscape Reports.**

**19.** Turning to the actual landscape evidence produced by LUC I have the following observation and comments to make:-

**This section of my response relates specifically to the three following documents, that form the Landscape evidence base for the proposed allocation of Shenley Dens under Policy GS19:-**

- **Milton Keynes Landscape Character Assessment (May 2022);**
- **The MK Valued Landscape Policy Review (Dec 2022);**
- **MK Review of the Local Landscapes Designations (May 2024)**

**20. Introduction.** As a northernmost parish within Buckinghamshire, Whaddon Parish shares a common boundary with MKCC along the entire southern boundary of Shenley Dens Strategic City Extension site - (Policy GS19), running from the Whaddon Road to the North Buckinghamshire Bridleway. Were this site to continue its progress within the MK City Plan and become an approved allocation its impact on the surrounding Whaddon Chase landscape would have irreparable and severe detrimental consequences, which would almost certainly lead to the total destruction of the historic Whaddon Chase Valley in years to come. As recognised by experts over many years, including the Inspector at the previous 2003 MK Local Plan Public Inquiry, this unnecessary incursion into valued open countryside must not be allowed, and it is in this regard I wish to comment on the landscape documents which have advised the strategic policy GS19, but which in the main appear to have been ignored, along with those worrying interconnected matters that would arise from the sites allocation.

For these very important reasons I cannot find that the allocation of this site is based on robust evidence, and to disregard such important past and present landscape recommendations including much of the three LUC reports and other advice makes this part of the plan legally unsound and its allocation totally unjustified.

Unfortunately I do not feel sufficiently knowledgeable and qualified to comment on other areas of landscape in the reports which are not so well known and understood by me, and therefore I refrain from doing so. I do however firmly believe that ever since the inception of Milton Keynes some 60 years ago, the Shenley Ridge has acted as a definitive barrier to development and so many landscape experts, planning Inspectors and conservationists cannot all be wrong in wisely suggesting that this area, known as the Whaddon Valley, should be protected and that less valuable landscapes to the east of MK City – beyond the M1 motorway – should be the preferred area for development. I maintain that view, especially knowing that within this Plan the newly proposed Eastern Expansion area will project well beyond the Plan period to 2050. It makes both planning and common sense to concentrate development into this area rather than begin the irreparable destruction of valued and historic landscapes to the West into Buckinghamshire.

## **21. Milton Keynes Landscape Character Assessment (May 2022).**

This document must be the starting point for my strong OBJECTION to GS19.

The LUC document when addressing Landscape Character does not stop at administrative boundaries but continues seamlessly into surrounding districts.

1,20 Paragraph 185 NPPF states that new development should be appropriate for its location, and should: *‘identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;*

Para 1.22 of this LUC document refers to current MK Local Plan Policy DS5 Open Countryside which states that development within the open countryside should be wholly appropriate to the rural area, that the scale and visual impact of extensions or ancillary structures should not have a detrimental impact on the open countryside.

But most importantly, the same Plan at Local Policy NE5 Conserving and enhancing landscape character states that development in the open countryside will need to respect the character of the surrounding landscape, and that the locally distinctive natural and manmade features that contribute towards landscape character, the historic setting and structure of villages and hamlets, important views and tranquillity and the need to protect against intrusion.

3.3 Formative Influences. - Physical influences The physical components of the landscape have the most tangible and fundamental influences upon its character, being the most permanent and least changeable aspect of its appearance. The underlying geology creates the ‘backbone’ of the landscape. The actions of weathering, erosion and deposition alter the landform, consequently influencing hydrological patterns and affecting the nature of soil conditions. This affects how humans have used and continue to exploit the landscape for agriculture, settlement, and industry and, consequently, influences the nature of the vegetation and fauna that the landscape can support.

Chapter 5 of this document covers the Landscape Character Profile of the Weald Clay Plateau. Paragraphs 5.153 – 5.160 immediately recognise that the plateau lies adjacent to the Western Expansion Area of Milton Keynes city a huge 7000 homes plus ongoing development area, but fails to recognise its importance to the surrounding Buckinghamshire open countryside, until the final paras 5.159 where it concedes that *“the Grade II listed Shenley Dens Farm, on the ridge north of Oakhill Wood, is now derelict, and is part of the historic landscape associated with the Whaddon Estate, within Buckinghamshire County”*. And then at 5.160

Where again it concedes that *“the LCA still retains a strong sense of separation from Milton Keynes city, despite the recent development of the Western Expansion Area. The valley landform along the Calverton Brook creates an enclosed character, while there are extensive views across the Aylesbury Vale to the west”*

Very sadly, this LUC document pays little and scant regard to the importance of the surrounding – and adjoining – Buckinghamshire landscape, which in my opinion a terrible and unforgivable error giving a totally false impression of the importance of this area, and most importantly the Physical dominance of the Shenley Ridge which barely gets a mention.

## **22. Milton Keynes Borough Council Valued Landscapes Policy Review Final Report Prepared by LUC December 2022**

1. This document describes the future approaches and recommendations, after consideration of current policies within previous local plans and landscape appraisal documents. LUC accepted that AVDC (now Buckinghamshire Council) adopted a different policy approach to MKC and incorporated AALs and LLAs into the VALP as policy NE5 Landscape character and locally important landscape. LUC also accepted in a 2018 addendum to their 2016 report that a landscape could be considered 'valued' for the purposes of Paragraph 109 of the NPPF despite the absence of designation in the emerging Vale of Aylesbury Local Plan.... Yet even with an AAL designation LUC do not appear to respect or comment on the importance of the Whaddon Valley landscape.

I find it totally unacceptable and beyond comprehension why AVDC very strongly objected to this development during the production of the current MK Local Plan to 2031, yet this time around the new Unitary Authority at Buckinghamshire Council finds it acceptable, as long as the development is 'Landscape-led'. Despite asking BC why this dramatic 'about turn' has occurred, I understand that Whaddon Parish Council has received no proper explanation other than that policy changes at a national level makes it now possible to do so. I also understand the question that was asked, as to why the early 2024 consultation response was made by a single officer and director, and was not discussed within the appropriate committee, with the local member or impacted residents, was simply that their standing orders allowed it. To my mind this is a reprehensible step taken possibly in the interests of the council rather than that of its electorate in north Buckinghamshire countryside, who may have to live with such a cavalier and devastating decision. The possible long term ruination of the historic Whaddon Valley, which is and should be enjoyed by Milton Keynes and Buckinghamshire residents alike is unforgivable.

2. When the new local plan, Plan:MK (2016-2031), was adopted in March 2019 MKC moved to a LCA based approach as set out in Policy NE5 Conserving and Enhancing Landscape Character.

- Policy NE5 states:
- A. Where development in the open countryside is acceptable in principle under other policies in this plan, it will need to be undertaken in a manner that respects the particular character of the surrounding landscape.

*My response:- MKCC may have incorporated 'landscape-led' comments in regard to the development of this land within their own district, by trying to hide part of the development behind the Oakhill Wood but have paid no regard to the more important landscape beyond, into Buckinghamshire, and the far reaching views that make this whole area such a popular recreational and desired landscape.*

- B. In particular, development proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

1. The locally distinctive natural and man-made features that contribute towards the landscape character and its quality.

- 2. The historic setting and structure of the villages and hamlets.
- 3. Important views e.g. of local landmarks.

- 4. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.

*My response:- MKCC have paid no regard to breaching the distinctive and natural Shenley Ridge, nor the settings of the nearby settlements of Whaddon, Nash and Beachampton that may not be fully impacted immediately, but once the integrity of the valley has been allowed to be blown apart by this first incursion then how will further destructive development be avoided? BC will almost certainly blame MKCC for starting the irreversible destruction of the valley, only to possibly target it for developments of its own making in years to come, within their current emerging new Local Plan for Buckinghamshire, or future iterations thereof.*

*A policy that mentions historic settings, important views, tranquillity and protection against light pollution, noise, and motion, would appear to meaningless and worthless if it is to be raped in this fashion.*

LUC and BC both recognise that *“It is well established that a landscape does not have to be a ‘valued landscape’, or designated, to be afforded protection from inappropriate development”*. but no attempt is made to determine what makes development inappropriate. I would argue strongly, supported by other landscape professionals – especially from the 2003 Public Inquiry into this same site, that the policy GS19 Shenley Dens Site falls firmly into the category of inappropriate development.

At para 4.18 LUC suggests the following policy: *“Development will be permitted that:- does not adversely affect the special landscape character of the area and landscape context of Milton Keynes City – and makes a positive contribution to the landscape character of the area”*.

*My response:-* No amount of Landscape and Visual Impact Assessments (LVIA) or landscape appraisals can possibly overcome the irreparable damage that will be done to the Whaddon Valley once the distinctive Shenley Ridge has been breached, and no amount of new landscaping - even that suggested by the Bucks Council 'land-swap' - can possibly conserve and enhance the rural landscape, including conservation and protection of valued views, and for LUC or MKCC to suggest otherwise is a blatant denial of their otherwise green credentials.

### **23. Milton Keynes Borough Council Valued Landscapes Policy Review Final Report Prepared by LUC December 2022**

Sadly LUC paid little regard to the submission by Whaddon Parish Council dated 22nd March 2024, in response to this important consultation - which I was pleased to be involved with, and it was evident that the consultants concentrated on the Milton Keynes district rather than taking account of the wider landscape into Buckinghamshire and in so doing, ignored the importance of not breaching the Shenley Ridge and the damage that would be caused now and into the future.

### **24. From the review of Local Landscapes designations 2024 by LUC:-**

Chapter 4 Evaluation and Recommendations Summary of special landscape qualities

1. The open, elevated plateau, with an intact agricultural character, has a strong sense of place and provides a rural setting to Milton Keynes city.
2. Small deciduous woodland copses, trees and hedgerows support biodiversity, form part of an important green infrastructure network and create a strong landscape structure.
3. Small streams cross the area providing topographic and ecological interest and contributing to green infrastructure.
4. Historic estates and small villages with a strong local vernacular provide a connection to history, cultural identity and aesthetic value. There are historic links to the Whaddon Chase forest and parkland in the south.
5. The open character of the plateau allows long-distance views from the ridges to the surrounding landscapes both within and outside of Milton Keynes and contributes to a strong visual character.
6. The network of Public Rights of Way, including the promoted Milton Keynes Boundary Walk, connects the settlements and provides recreational access through the landscape from Milton Keynes city.

***My comment:-** Sadly these very important factors have seemingly been ignored by MKCC when making the very questionable decision to allocate the Shenley Dens site. This makes the proposed designation unsound, by not following sound and robust evidence and by ignoring well founded and recognised planning principles.*

### **Full evaluation**

The following description of the landscape of the candidate SLA relates to each assessment criteria considered when identifying landscape value.

**Natural heritage qualities:** The area has important natural heritage features. Oakhill Wood in the south is an important area of woodland, recorded as ancient woodland (although largely replanted), which is part of the North Bucks Way Wildlife Corridor, and forms part of the wider green infrastructure network. Smaller linear woodlands, riparian woodland and meadows along the Calverton Brook also provide ecological interest. Priority habitat traditional orchard and unimproved species-rich calcareous grassland, designated as a Local Wildlife Site (LWS) at Old Limestone Quarry, are surviving semi-natural habitats. These Milton Keynes 102 Chapter 4 Evaluation and Recommendations provide evidence of ecological interest which contribute positively to landscape character, where they occur.

**Cultural heritage qualities:** The area has considerable heritage interest. The historic field pattern was formed by Parliamentary enclosure, which was further subdivided in the 18th and 19th centuries. Some ridge and furrow field patterns are still evident within the landscape. Historic hamlets at Lower Weald, Calverton and Upper Weald contain a number of listed buildings and are designated as part of the Calverton Conservation Area. A distinctive local vernacular of limestone also contributes to the cultural interest of the landscape. There is a distinctive parkland landscape around Calverton House. In the south, time-depth is provided by Oakhill Wood and its surroundings which formed part of the medieval hunting ground of Whaddon Chase, which extends into Buckinghamshire. These features all provide evidence of cultural interest which contribute positively to landscape character. There are no known associations with notable people, events or the arts.

***My comment:-** Note, no mention whatsoever about the distinctive parkland setting around the Listed Whaddon Hall, which in its own right is more visible and*

*accessible. I have previously mentioned associations with notable people, which the consultants failed to mention. Again there seems to be concentration on the Milton Keynes district and little regard for the adjoining Buckinghamshire countryside.*

**Recreation value:** Recreational access is good across the area. The Milton Keynes Boundary Walk is the main public access through the landscape and provides important recreational links into the countryside from Milton Keynes city. The North Bucks Way also crosses the south-east of the area.

**Landscape quality (condition and intactness):** The rural landscape is generally in good condition with some local detractors. The parkland at Calverton House is in good condition, with parkland features such as mature trees in pasture. Hedgerows across the landscape are generally in good condition, with a strong network of hedgerow trees. However, there has been some reinforcement by post and wire fencing, and some localised loss of hedgerows. Wire fencing along the Calverton Brook is sometimes unsightly. Conversion of pasture to horse grazing has created a slightly unmanaged character in parts. Milton Keynes 103 Chapter 4 Evaluation and Recommendations Electricity pylons between Calverton and Upper Weald are the main detracting features in the landscape.

The Grade II listed Shenley Dens Farm, part of the historic landscape associated with the Whaddon Estate, is now derelict.

*My comment:- As previously mentioned, the owners of the land have sadly allowed this listed building to fall into disrepair, and following the fire MKCC have not pursued the restoration of this listed building as they should have done. The current condition of the 'derelict' building should have no influence whatsoever on the decision or not to allocate this land, and whatever the final decision MKCC must ensure that the building is restored to its original condition so that its importance in the landscape and its association with the Whaddon Hall Estate is recognised and replaced.*

**Local distinctiveness:** The plateau topography, which falls gently west into Buckinghamshire, is incised by the Calverton Brook forming a steep sided valley in the centre of the LCA, which contributes positively to the landscape. The parkland character around Calverton and Lower Weald provides a sense of place. The vernacular of brick and limestone also contributes to local character. The landscape forms a strong rural setting to Milton Keynes city, especially the recently constructed Western Expansion Area.

**Perceptual and scenic:** This is a rural landscape, which retains a strong sense of separation from Milton Keynes city which lies to the east. There is also a sense of tranquillity, despite recent development of the Western Expansion Area. The A5 to the east and A422 to the north are occasionally audibly intrusive. Settlement is concentrated in historic villages located along a single local road resulting in a traditional rural character. Enclosure along the Calverton Brook contrasts with the open character on higher ground in the north and south which enables extensive views across the Aylesbury Vale to the west and wooded horizons to the north. This contributes to a strong visual character.

**Functional:** The small streams, woodlands and hedgerows form part of the healthy functioning of the landscape, and the multifunctional green infrastructure network.

*My comment:- It appears that MKCC when allocating this part of the Calverton Plateau area have paid little or no regard to the many important comments and references made within the LUC landscape reports, and that this exercise of*

*allocating Shenley Dens, is simply designed to test yet again the resolve of many who either wish to protect, or those that have recommended that protection should occur, within the important Whaddon Valley landscape. It is my hope that were this site to remain allocated then the Inspector appointed by the Governments Planning Inspectorate will endorse what previous inspectors and ministers have strongly recommended and remove this site yet again from the Local Plan, with a forceful recommendation - as before - that the Shenley Ridge should remain a lasting edge to the City in this location and hopefully in perpetuity.*

#### **Chapter 4 Evaluation and Recommendations**

##### **Management guidelines Protect**

Provided below are just 3 of 10 relevant bullet points:-

1. Conserve the long views and intervisibility within the historic Whaddon Chase landscape between the Calverton Plateau and Buckinghamshire.
2. Protect and conserve ancient woodland at Oakhill Wood.
3. Conserve the open character of the landscape.

#### **Chapter 4 Evaluation and Recommendations**

1. Plan for climate change, researching appropriate species mixes and designing woodland to minimise damage as a result of increased storms.
2. Retain the characteristic settlement pattern of small historic ridgetop villages, avoiding out of scale residential developments.
3. Avoid the introduction of large-scale elements, or development which breaches the ridge along the urban edge of Milton Keynes, which would have a visual impact over a wide distance.
4. Encourage sensitive management of new development, ensuring the existing historic villages retain a sense of separation from new development on the edge of Milton Keynes city.
5. Ensure a strong landscape structure to the adjacent parkland areas within the Western Expansion Area, providing a landscape buffer to soften the impact of residential areas on adjacent landscapes.
6. Reference the pattern of local buildings materials and local identity in any new development or boundary treatments.

*My comment:- Without going into detail of every point, it seems to me that once again MKCC have ignored the advice and recommendations of their appointed Landscape advisors. All of my concerns are adequately expressed in point 3 above, which is worth repeating here:- “**Avoid the introduction of large-scale elements, or development which breaches the ridge along the urban edge of Milton Keynes, which would have a visual impact over a wide distance”.***

*I do not believe that this could be spelt out any clearer, - so why are MKCC simply ignoring this recommendation?*

#### **Chapter 5 Planning policy recommendations**

5.1 Three candidate SLAs are recommended for inclusion within planning policy in the forthcoming MK City Plan 2050:

1. Ouse Valley;
2. Brickhills;
3. Calverton Plateau.

5.2 The policy wording for SLAs could be part of an overall landscape policy, or a separate SLA policy. Examples from other Local Planning Authorities, which show both approaches, are given below. These policies have all been through Local Plan Examination.

*My comment:- I am not familiar with the Ouse Valley and Brickhills sites, and will leave others to comment on the suitability for proposed development, but in all cases I do not believe it is appropriate or right to base policy recommendations on other non related sites that appear to support the development areas that MKCC wish to promote and achieve. There is a fundamental planning principle that each site should be evaluated on its merits or otherwise, and I have no doubt that if the Shenley Dens site were compared to those sites that led to policies being adopted in other non related Local Plans then there would be points of conflict or dispute. Whilst possibly relevant, MK policies should be directly related to circumstances in MK and not elsewhere.*

*I believe there is more than sufficient evidence to recommend the removal of the Shenley Dens site from the Regulation 19 MK City Plan 2050, as the allocation is unsound, not robustly evidenced and by not following the clear advice of their own landscape advisors makes it unjustified and wholly inappropriate.*

**25.** I note the new revisions to the NPPF at Policy N2 which intends to ensure that new development contributes positively to biodiversity and the environment, and that when minimising impacts, developments must consider landscape character and existing natural features. Whilst only open to consultation at the present time, some weight should be afforded to this emerging document and in so doing MKCC must recognise that the Shenley Ridge - as clearly recognised by many professionals in years past - must qualify as an existing **'natural feature'**.

I thank MKC for considering this response, and hope that after further careful consideration, that they find the allocation of Shenley Dens is unsafe and unnecessary and that Policy GS19 should accordingly be removed from the MK City Plan to 2050.

Yours faithfully,

Graham Stewart.

