

Representor ID: RP-156

UI Representor ID: 322

UI Representation ID: 873

Representor Name: Samantha Boyd

Representor Organisation: Vistry Group

Policy: Policy CMK1		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	
Paragraph		
Compliance Comment		
<p>We note that Policy CMK1 sets out that Central Milton Keynes will contribute to the delivery of around 16,000 additional new homes (including completions and commitments from 2022).</p> <p>We agree that the existing area of Central Milton Keynes represents a sustainable and logical location for growth. However, the proposed strategy and the level of growth proposed has not been underpinned by the required information to ensure that the approach proposed in this location is sound.</p> <p>We have significant concerns in relation to the deliverability of the identified 16,000 dwellings in Central Milton Keynes which undermines the effectiveness of the New City Plan.</p> <p>There is a lack of site-specific detail to justify the 16,000 homes which would only be achieved through wholesale redevelopment of many parts of CMK and the delivery of high-density development – which has significant viability challenges at the present time.</p> <p>There is a lack of consideration as to how the infrastructure implications of this level of growth will be delivered, with schools, GP surgeries etc... all needing to be provided to accommodate a growing population. Whilst there is an aspirational Masterplan, this is more design based and does not provide the justification for the proposed 16,000 dwellings.</p> <p>Whilst there is some contingency in the supply side to allow for under delivery generally, we consider that delivery over the plan period will be well below the 16,000 dwellings anticipated and that this will impact the effectiveness of the plan. To be found sound, we consider modifications will be necessary to increase the supply of deliverable sites allocated in the Plan.</p>		
Modification Comment		
To be found sound additional housing sites need to be identified to make up for the over optimistic delivery rates anticipated in Central Milton Keynes.		
Appear at examination?	Yes	

Appear at examination reason?
To discuss the site selection process in more detail

Representor ID: RP-156

UI Representor ID: 322

UI Representation ID: 873

Representor Name: Samantha Boyd

Representor Organisation: Vistry Group

Policy: Policy GS18		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	
Paragraph		
Compliance Comment		
<p>We note that Policy GS18 'Levante Gate Strategic City Extension' identifies a strategic allocation for a new mixed-use residential-led site to the south of the A5 and east of the A4146 including the delivery of around 1,250 new homes.</p> <p>We are of the view that the Levante Gate Strategic City Extension is highly isolated from the existing urban area of Milton Keynes. The site is separated by the A416 from Eaton Leys; it is noted that this is a high-traffic road and that vehicular movements will only increase with additional development likely to be directed to this area of Milton Keynes through allocations in the emerging Buckinghamshire Local Plan. The A5 will also act as a major barrier to the allocation to the north. Already we have seen development come forward on this edge of Milton Keynes, Newton Leys and Eaton Leys, which is highly detached from the existing settlement, particularly at a human scale in terms of their walkability and access to services. We are concerned that the same issues will occur should Levante Gate Strategic City Extension come forward and that this development will effectively become a dormitory suburb of the city, particularly as the proposed allocation site is even more poorly related to the city than the aforementioned developments in terms of its geography.</p> <p>Levante Gate Strategic City Extension scored very poorly in its assessment against the SA objectives. Indeed, there are a significant number of negative scores, of which several are double negatives. The explanation as to why the site was brought forward for development despite this scoring is not properly substantiated, particularly as site such as the Vistry site in Haversham, in a more sustainable location, are available.</p> <p>One big area of concern is in relation to the site being located in the proposed Brickhill Special Landscape Area; although the SA suggests that impact on the Landscape Area can be addressed through a landscape-led approach to design, why this is considered to be the case has not been evidenced. The site is also affected by noise from the A5 for which mitigation to address this impact will have implications on the masterplan for the site likely in the form of buffers thereby reducing the developable area.</p> <p>As in relation to South of Bow Brickhill Strategic City Extension, MKCC have failed to provide detailed transport modelling work as part of the evidence base and this means that the implications of Levante Gate Strategic City Extension cannot be</p>		

properly considered. Highways infrastructure improvements in this general area i.e. Bow Brickhill roundabout have been required as a result of recent developments. A combination of the proposed allocations at Levante Gate and South of Bow Brickhill will inevitably result in a significant uplift in highways movements and the capacity of the existing network to facilitate this is unclear, particularly given the additional development that is anticipated within Buckinghamshire Council's authority area. The development strategy should be underpinned by evidence to demonstrate that this site can come forward without causing significant harm to the highways network and the implications of the mitigation required on delivery timings should be evidenced. In summary, this site is poorly related to the existing built area of Milton Keynes and its suitability for development has not been properly demonstrated, leading to the allocation being unsound.

Modification Comment

The allocation should be deleted and alternatives identified through a proper consideration of reasonable alternatives.

Appear at examination?	Yes
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Appear at examination reason?

To discuss the site selection process in more detail

Representor ID: RP-156

UI Representor ID: 322

UI Representation ID: 873

Representor Name: Samantha Boyd

Representor Organisation: Vistry Group

Policy: Policy GS12		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	
Paragraph		
Compliance Comment		
<p>We note that Policy G12 'Redevelopment of Wolverton Railway Works' identifies Wolverton Railway works for an allocation of a mixed-use residential development including around 400 dwellings. The site is also allocated in both Plan:MK and the Wolverton Neighbourhood Plan. It is noted that the allocation in Plan:MK was carried through from previous planning documents. Questions must be raised as to why this site has failed to progress to date despite being allocated for development and this has not been addressed as part of the evidence base.</p> <p>Indeed, the site has a range of potential physical constraints including heritage, archaeology, ecology, the existing use and contamination. The SHLAA indicates that none of these matters have been evidenced as part of the site allocation process and has deferred them to a future planning application. The need to respond to the heritage context and existing contamination in particular may have design implications and result in significant costs which have implications on the viability of the site. Viability issues are even noted to in the SHLAA. No evidence is available to demonstrate how viability concerns are expected to be addressed and why MKCC consider that the site can come forward during the plan period.</p> <p>Overall, we consider that the suitability and deliverability of this site has not been demonstrated. Policy GS12 and the supporting evidence base has not been sufficiently justified.</p>		
Modification Comment		
Replacement of the site with alternative, deliverable sites		
Appear at examination?	Yes	
Appear at examination reason?		
To discuss the site assessment process in more detail		

Representor ID: RP-156

UI Representor ID: 322

UI Representation ID: 873

Representor Name: Samantha Boyd

Representor Organisation: Vistry Group

Policy: Policy GS17		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	
Paragraph		
Compliance Comment		
<p>We note that Policy GS17 'South of Bow Brickhill Strategic City Extension' identifies a strategic allocation for a new mixed-use residential-led site to the south of Bow Brickhill and east of Brickhill Road including the delivery of around 1,300 new homes. It should be noted, based on the evidence base documentation available, it is unclear what consideration has been given to identifying this site's capacity in view of its sensitive landscape context; identified site constraints include the proposed Brickhill Special Landscape Area and the need for buffers to Bow Brickhill and the Greensand Ridge. Therefore, we do not consider that the site capacity has been properly justified.</p> <p>We note that South of Bow Brickhill was submitted as two separate sites in the SHLAA (references: 110360 and 110361). The constraints summary for each respective site identifies that highways works will be required to facilitate the development, including a new access to the north and south of the site respectively. However, in relation to achievability, the SHLAA notes that 'this type of growth is outlined as being viable within the Viability Study and given there have been no major infrastructure constraints outlined to the delivery of an allocation in this location.'</p> <p>The SA only includes one, limited reference to any infrastructure works being required as part of the delivery of this proposed allocation and the wording, in our opinion, downplays the extent of works likely to be required: 'It is likely that walking, cycling and public transport routes would need to be upgraded and increased to serve new developments in this location'.</p> <p>However, MKCC have failed to provide detailed transport modelling work as part of the published evidence base for this consultation and this means that the implications of the South of Bow Brickhill Strategic City Extension on existing infrastructure, in conjunction with Levante Gate Strategic Extension under Policy GS18, and the recent development at South Caldecotte (which has yet to be fully completed) cannot be properly considered. This raises the question as to how the Viability Study has reached the conclusion that no major infrastructure constraints exist.</p> <p>Indeed, we note that recent developments in the vicinity of the site have resulted in the need for highways infrastructure improvements, specifically to Bow Brickhill</p>		

roundabout. It is, therefore, hard to comprehend how a combination of both South of Bow Brickhill and Levante Gate strategic allocations will not result in a significant uplift in highways movements and an impact on the existing network capacity, particularly in the context of existing allocations and those anticipated on the edge of Milton Keynes in Buckinghamshire Council's authority area moving forward. Based on such a context, we consider that the suitability of the site for development has not been properly justified.

MKCC have not demonstrated that this site can come forward without causing significant harm to the highways network as they have not provided detailed transport modelling as part of their evidence base; we consider that the extent of infrastructure improvements required to facilitate this development have not been established, which we consider will likely be extensive, and that this will have implications on development timeframes/viability.

Furthermore, as a result of the infrastructure works likely to be required, it is unclear why land South of Bow Brickhill is not subject to the same restriction on delivery until after 2038 that is proposed for East of Wavendon Strategic City Extension. The site is in the same catchment area as East of Wavendon, with the proposed northern access directly linking to this area, and this will, therefore, have a similar impact on the infrastructure as development East of Wavendon. The approach taken here in relation to the two sites is inconsistent.

Overall, we consider that the suitability and deliverability of this strategic development site has not been sufficiently demonstrated and the allocation is unsound.

Modification Comment

The evidence base needs to be updated to justify the suitability of the site for development. The site assessment process then needs to be reviewed to test the site against reasonable alternatives.

Appear at examination?	Yes
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Appear at examination reason?

To discuss the site assessment process in more detail.

Representor ID: RP-156

UI Representor ID: 322

UI Representation ID: 873

Representor Name: Samantha Boyd

Representor Organisation: Vistry Group

Policy: Policy GS2		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	
Paragraph		
Compliance Comment		
<p>Site Selection Process:</p> <p>The Sustainability Appraisal (“SA”) sets out that the site selection process was conducted utilising sites identified as ‘suitable, available and achievable’ in the SHLAA process. Concerns in relation to this process have already been outlined in a separate comment.</p> <p>However, it is noted in the SA that the ‘long list’ of sites considered also included some sites deemed ‘unsuitable’ in SHLAA. At 2.69, the SA states that the additional sites chosen were those that ‘could reasonably be considered as alternatives and may be able to be apart of the growth strategy in the MK City Plan 2050’. However, there is no transparency as to the process behind which sites were chosen.</p> <p>Although not depicted as locations for future growth in the key diagram, it is noted that the MK Growth Strategy 2050 allowed for growth in rural areas. Paragraph 60 stated that: ‘development of the right kind in the right places in our rural areas can help to sustain services and facilities within our villages.’ This has not been reflected in the site selection process and has meant that sites such as our site at Land at Fields Farm, Haversham have been discounted without appropriate justification. A more holistic approach to assessing sites as part of the SHLAA process, including giving thought to sustainability considerations and potential benefits that sites could offer, would have enabled a more fair and informed site selection process.</p>		
Modification Comment		
<p>A review of the Sustainability Appraisal and site selection process is required to ensure the most sustainable sites have been identified. This would result in alternative sites being identified for allocation including Wolverton Road, Haversham.</p>		
Appear at examination?	Yes	
Appear at examination reason?		
To discuss the site selection process in more detail		

Representor ID: RP-156

UI Representor ID: 322

UI Representation ID: 873

Representor Name: Samantha Boyd

Representor Organisation: Vistry Group

Policy: Policy GS19		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	
Paragraph		
Compliance Comment		
<p>We note that Policy GS19 ‘Shenley Dens Strategic City Extension’ identifies a strategic allocation for a new mixed-use residential-led site to the south of the A5 and east of the A4146 including the delivery of around 1,250 new homes.</p> <p>We are of the opinion that the Shenley Dens Strategic City Extension is proposed in a highly sensitive landscape context, and this has not been given sufficient weight in the decision to propose the site for strategic allocation in the Regulation 19 Plan.</p> <p>As part of the evidence base of the emerging New City Plan, MKCC have prepared a ‘Review of Local Landscape Designations’ (dated May 2024). This assessment identifies a number of proposed landscape designations; one of which washes over the site allocation – ‘Calverton Plateau Special Landscape Area’ (SLA). The recommendations of this work include: 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’. The allocation goes against this recommendation.</p> <p>As we set out in our Regulation 18 representation, the site was notably rejected as a strategic allocation by an Inspector during the examination of the Local Plan 2005 on the grounds that the development would impact on the landscape and that out of all the sites proposed for allocation at the time this one looked to be the most sensitive. Furthermore, the proposed allocation of the site as part of the Regulation 19 Plan feels very detached from Milton Keynes on the ground. This detachment is acknowledged within the Council’s own evidence base; at page 104 of the aforementioned Landscape Designation Review it is stated that ‘this is a rural landscape, which retains a strong sense of separation from Milton Keynes city which lies to the east.’ It is also noted that the site lies beyond the soft landscaping buffer built into the Western Expansion Area to the north, which was an intentional design feature intended to delineate the boundary to Milton Keynes to the sensitive landscape to the south.</p> <p>This detachment extends beyond just the landscape setting though as, other than in the case of education facilities, the proposed allocation is located outside of walking distance from key services and facilities (>20 minutes). This is particularly notable as the development proposed on the site is not of a scale in which these facilities can be</p>		

provided on-site. This will result in a car-reliant development and will not support the drive for sustainability that it is at the heart of the emerging New City Plan.

This reinforces our comments in relation to policy GS2 that there is an over reliance on sites on the edge of the urban area rather than more sustainable sites in the rural area, such as Fields Farm at Haversham.

Limited weight appears to have been given to the constraints of the site and insufficient evidence has been provided as part of the SA as to why a decision has been made to allocate the site in spite of its sensitive landscape context and relative isolation.

Looking at the site-specific SA assessment process, it is noted that the site performed very poorly. It received negative scores against 6 of the 9 objectives, begging the question why the site was considered to be a reasonable alternative. The landscape sensitivity noted above was a key identified constraint, but other matters flagged included the distance of the site from key services and facilities, limited public transport opportunities including bus, rail and MRT, limited ability to provide affordable housing and lack of new employment provision/limited access to employment opportunities. When compared with our site at Fields Farm, Haversham it is considered that this site performs worse when taken as a whole – but this comparison has not been made which we consider is a significant gap in the justification for the allocation.

Overall, we consider that the suitability and deliverability of the site has not been sufficiently demonstrated. Policy GS19 and the supporting evidence base has not been sufficiently justified.

Modification Comment

The site should be deleted from the plan and alternatives identified based on a proper consideration of reasonable alternatives.

Appear at examination?

Yes

Appear at examination reason?

To discuss the site selection process in more detail.

Representor ID: RP-156

UI Representor ID: 322

UI Representation ID: 873

Representor Name: Samantha Boyd

Representor Organisation: Vistry Group

Policy: Policy GS14		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	
Paragraph		
Compliance Comment		
<p>We note that Policy GS14 'Eastern Strategic City Extension' identifies a strategic allocation for a new mixed-use residential-led site to the north and east of Milton Keynes.</p> <p>Whilst we consider that the expansion of the existing allocation to the east of the M1 represents a logical approach to growth, we have concerns in relation to the accessibility of this site and the impact that this will have on the developable area. Plan:MK identifies delivery of around 5,000 new homes (including at least 1,475 homes within the plan period 2016–2031) as part of the Milton Keynes East Strategic Urban Extension. The New City Plan proposed the delivery of a further 16,000 homes (with around 7,750 homes with the plan period 2022–2050) under Policy GS14. We are of the view that the highways implications of 16,000 new homes in this broad area has not been evidenced. It is noted that there are four crossings over the M1 which provide access to the development area, including a new bridge funded by the Housing Infrastructure Fund which was considered necessary to make the 5,000-home allocation in Plan:MK acceptable. A further existing crossing is located at the Broughton Grounds Lane and this is limited in its capacity as it passes through the Eastern Expansion Area on the Milton Keynes side of the M1. No documentation (i.e. detailed transport modelling) has been included in the evidence base which confirms that the impact of a proposed allocation of this scale on traffic/existing capacity in relation to these existing crossings has been assessed and found acceptable. Furthermore, a strategic site of this scale will likely require enhancements to existing crossings and junctions. Without detailed highways modelling which would identify the extent of works required to mitigate the impacts of development, the deliverability of the site must be in question, particularly from a viability perspective, and this will undoubtedly have implications on when development on this site could commence. Indeed, it is noted that Policy GS15 'East of Wavendon Strategic City Extension' seeks to delay commencement of residential development of the East of Wavendon Strategic Extension until after 2038 in order to take into account the impact of infrastructure demand resultant from both the site and other existing commitments. However, we would argue that it would be more pertinent for the highways impacts of</p>		

development east of the M1 to be monitored, given the sensitive highways context identified at the point of its existing allocation.

The transport impacts of the existing allocation for 5,000 dwellings are yet to be realised, noting that the strategic site is still in the very early stages with some of the highway infrastructure in but no more than a few homes completed, and therefore, the impacts of development are entirely unknown. If the allocation of the site is to be found sound in principle, we consider that a delay should be built into the plan to account for the uncertainty in infrastructure impacts of the proposed expansion of the allocation to the east of the M1, as has been applied to the East of Wavendon allocation.

In additional, we have concerns about the assumed rate of delivery for the allocation – and the area to the east of the motorway as a whole. The 750 dwellings per year proposed east of the motorway is overly optimistic. Whilst it will be a very large area of development, this rate of delivery has not been seen in Milton Keynes previously and there has to be some uncertainty as to whether the 7,750 additional homes will be delivered in the plan period, which undermines the effectiveness of the draft Plan. We consider that the Council are being too optimistic about the delivery rate of the Eastern Strategic City Extension during the plan period, and that the suitability and deliverability of the site has not been sufficiently justified.

Subject to the suitability of the site being found sound, the issue with the rate of delivery could be addressed through modifications to the plan to identified additional land supply.

Modification Comment	
Identification of additional housing sites to compensate for the over optimistic delivery rate for the site.	
Appear at examination?	Yes
Appear at examination reason?	
To discuss the site selection process in more detail.	

Representor ID: RP-156

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Representor Name: Samantha Boyd

Representor Organisation: Vistry Group

Policy:		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	
Paragraph		
The MK City Plan 2050 delivers balanced growth across a wide range of locations which: Focuses on regenerating and reusing previously developed land, commonly referred to as brownfield land, to deliver as many new homes as possible; Maximises the delivery o		
Compliance Comment		
<p>Rural Growth:</p> <p>The approach taken in the SA which effectively rules growth in villages as part of an assessment of reasonable alternatives is too simplistic. The assessment 'Expansion of villages' captured in Table 2.3 essentially makes a blanket ruling about rural development without giving any consideration to the distinct differences between rural settlements and sites.</p> <p>For example, despite being located in the rural area, our site has incredibly strong sustainability credentials. As noted in relation to the SHLAA, the Site is located in walking distance of a mainline train station (Wolverton) and the extensive services/facilities available in Wolverton. The development of this site would also significantly contribute towards supporting the viability of existing bus routes.</p> <p>Although not strictly relevant to the examination of the New City Plan, the current (December 2025) consultation on revisions to the NPPF (Policy S5, bullet g) sets out that housing near railway stations is one of the exceptions to development outside settlement boundaries. It states:</p> <p>Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services; physically well-related to a railway station or a settlement within which the station is located; is of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and where the development would not prejudice any proposals for long-term comprehensive development in the same location.</p> <p>This direction of travel of national policy reinforces the fact that the Haversham Road site is the type of site that the Council should be giving consideration to when identifying sites for allocation.</p> <p>Development of the site would see enhancements to facilities in the settlement of Haversham through the provision of a new community building which could take the form of a community hall, shop, health facility or café. There is also a primary school</p>		

in the village. The development will also include the provision of a new Country Park – this will offer public access to what is currently private land, new walking/running routes, formal and informal open space, children’ play areas and the opportunity for significant biodiversity net gain. The site is also of a scale in which affordable housing would be delivered in reasonable number to meet identified housing needs. This profile does not fit the image of rural sites painted in Table 2.3 which makes sweeping assumptions about the sustainability of rural growth.

We would argue that the Council have become fixated on growth in certain typologies i.e. ‘within the urban area’ instead of focusing on what makes sites suitable for development. This focus on urban growth which is manifested in Policy GS1 ‘Our Spatial Strategy’ fails to recognise that some rural sites are more sustainable than selected sites, which are favoured just because they lie on the edge of the urban area. As discussed further below, this particularly relates to Shenley Dens Farm and Levente Gate, which score very poorly in the Council’s own SA yet are still proposed for allocation.

The Council’s approach also fails to recognise that rural areas need growth. For example, new development helps to support the viability of local services and facilities, and it also enables young, local residents to live in the area where they have grown up in. This is notably missing from the Plan and will impact of the vitality of the rural areas.

For these reasons, we do not think that the Strategy for Homes set out in policy GS2 is justified. We have provided specific comments on individual sites against the individual site policies.

Modification Comment

The Sustainability Appraisal and site selection process needs to be reviewed to ensure growth in rural areas has been properly assessed as a reasonable alternative.

Appear at examination?	Yes
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Appear at examination reason?

To discuss the site selection process and the consideration of alternatives in more detail.

Representor ID: RP-156

UI Representor ID: 322

UI Representation ID: 873

Representor Name: Samantha Boyd

Representor Organisation: Vistry Group

Policy:		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	
Paragraph		
A recommended growth option was presented in the Strategy for 2050 which would have seen growth directed towards Central Milton Keynes, Olney, east of the M1/Newport Pagnell, west of Cranfield, Woburn Sands and the Brickhills. The recommended growth optio		
Compliance Comment		
<p>Land at Fields Farm, Haversham (hereafter referred to as “the site”) was submitted by Vistry Group for consideration as part of the Call for Sites process. The site was renamed ‘Land north and East of Haversham’ by the Council and was given the site ID 110104.</p> <p>Reiterating points made in our Regulation 18 consultation response, Vistry Group would like to raise significant concerns as to how the site was assessed as part of the SHLAA process and how this has been translated into the reasonable alternatives that the Council has taken into consideration.</p> <p>The key concern which undermines the evidential basis for the identification of sites that could be considered as reasonable alternatives is the use of the placemaker tool and the lack of transparency in the process. Vistry consider that the process leads to numerous unexplained decisions which mean it is difficult to ascertain how constraints have been applied to site suitability.</p> <p>Whilst there is merit in using a standardised approach to assessing sites, a ‘tool’ based process is only as good as the information that is inputted. In relation to the Haversham Road site, it appears that the landscape impacts and best and most versatile land (as examples) have been assessed inappropriately as a result of the limitations of the tool-based process and the baseline information.</p> <p>With regard to landscape, we identified the area that lies in the Special Landscape Area as county park in the submitted masterplan. This was in response to the landscape sensitivity of this area of the site. The outputs of the model indicate that 25% of the site lies in the SLA and that this counts against the site – this should not be the case, particularly given the GI benefits the proposal would deliver.</p> <p>In terms of Agricultural Land, the ‘Suitability Commentary’ in the SHLAA notes that the part of the site nearest to the settlement has been ruled out on the basis that it is Grade 2 Agricultural Land (Grade 2 is considered being Best and Most Versatile (BMV) agricultural land). Firstly, as we set out at Regulation 18 stage, no ALC report is included in the evidence documents underpinning the emerging Local Plan and the</p>		

source of the raw data underpinning this PlaceMaker layer has not clearly been identified.

It is noted that if the Natural England data has been used, they notably state that their maps on ALC 'are not sufficiently accurate for use in assessment of individual fields or sites and any enlargement could be misleading'.

Therefore, ruling this part of the site out as unsuitable on the basis of this information would be inappropriate. We would also note that Environment Agency information indemnifies much of the land proposed to be allocated for development as 'Grade 3' – this could be grade 3a and therefore BMV. Without a site specific assessment, this is unknown and MKCC could be proposing allocation of BMV for development and taking an inconsistent approach to the assessment of sites.

It is also noted that there is inconsistency from MKCC in terms of how they treat BMV as it is noted that part of the allocation at South East MK and previous allocations to the east of Milton Keynes are shown as Grade 2 on the Natural England maps. The national government approach to BMV has not changed since these allocations so it is unclear why such a hard line is now being taken on the matter, particularly without consideration of the potential level of loss in the context of the level of BMV in the area.

Further, whilst it is noted that national policy seeks to protect unsustainable development on BMV Agricultural Land, it has not been justified why this necessitates a blanket ban on development. The development of BMV agricultural land is not strictly prohibited in national guidance or in the Planning Practice Guidance; instead Councils should 'aim to protect the Best and Most Versatile land from significant, inappropriate or unsustainable development proposals'. By contrast, development is explicitly directed away from Flood Zones 2 and 3 under policy, except in very specific circumstances. However, these two constraints are being treated as being of equivalent importance in the Council's methodology, which cannot be correct.

The impact of this process means that suitable sites such as our site at Haversham, have not been properly considered and ruled out of the consideration of reasonable alternatives unjustly. In our view, this means that not all the reasonable alternatives available to the Council have properly considered through the sustainability appraisal process.

This position is exacerbated by the fact that the approach to assessing sites does not properly consider the benefits of particular development proposals. For instance, the proximity of the site to Wolverton railway station should be a significant benefit of the proposal which would mean that it should be seen as favourable compared to other sites proposed for allocation where there will be a greater reliance on the car.

Modification Comment	
The Site Assessment Process needs to be updated to ensure a proper consideration of reasonable alternatives.	
Appear at examination?	Yes
Appear at examination reason?	
To discuss in more detail concerns with the lack of proper consideration of reasonable alternatives	