



## **CONSULTATION RESPONSE:**

### **Milton Keynes City Plan 2050 – Regulation 19 consultation**

#### **A. Summary**

1. Whaddon Parish Council (WPC) thanks Milton Keynes City Council (MKCC) for the opportunity to comment. We focus our response on three issues on which we object:
  - i) The proposed housing development for Shenley Dens Strategic City Extension (SCE)
  - ii) The proposed locations of new pitches for Gypsies and Travellers
  - iii) Policy GS7 Wind and solar development spatial strategy
2. WPC objects to the inclusion of the Shenley Dens SCE in the Proposed Submission (Regulation 19) MK City Plan 2050. This 1,000-home site just north of Whaddon would breach the Shenley Ridge and threaten the integrity of the Whaddon/Nash valley – a landscape with demonstrable physical attributes ‘beyond the ordinary’.
3. WPC’s position is that, as drafted, the Shenley Dens allocation is not sound and not legally compliant. In particular, it is not justified against reasonable alternatives (e.g., further expansion east of the city beyond the M1, where the wider landscape is less sensitive), and not consistent with National Planning Policy Framework (NPPF) requirements to protect and enhance valued landscapes, to allocate land with the least environmental or amenity value, and to provide proportionate evidence and effective delivery mechanisms.

#### **B. Key questions for MKCC**

4. What evidence supports the breach of the Shenley Ridge and the loss of valley integrity, and how have alternatives been considered?
5. What evidence does MKCC have to believe that the findings of the Planning Inspector in 2004 no longer stand?
6. On what basis does MKCC believe that development of this scale in the Calverton Special Landscape Area meets its goal to “Conserve and, where possible, enhance the special character and key landscape qualities of the area?”

7. If the development should proceed, how will MKCC ensure meaningful engagement with Whaddon, Nash, and Beachampton, and secure joint mitigation measures?
8. If the development should proceed, will MKCC investigate adaptations to the proposal to reduce the impact on Shenley Ridge?
9. Why does MKCC think it is justifiable to put a disproportionate share of new pitches for Gypsies and Travellers on the western border of the city?

### **C. Background**

10. 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, but at that time it was known as Area 10.4, part of the Western Expansion Area. The proposed development of this 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 we ask MKCC to do so again.
11. There has previously been remarkable agreement about protecting the important and historical landscape that extends beyond the MK City boundary into rural North Buckinghamshire. This consensus has encompassed professional planners, landscape architects and others that have been engaged in various studies and reports, including Council officers, Llewellyn-Davies, Babbie, developers of the Western Expansion area, Parish Councils and residents of Whaddon and Nash.

### **D. MKCC Plan proposals**

#### Landscape

12. However, there is now a glaring exception in the form of MKCC. Twenty years ago, there was powerful opposition from the communities that will have to face the experience and full impact of development cascading down the steep southwest facing slope of the Shenley Dens Farm. Their evidence then, as now, is deserving of considerable weight, especially given the emphasis placed by Government on 'community engagement' in the development of Local Plans.
13. There is no justification for the cavalier disregard of the City's natural boundaries and the damage that would follow within the open countryside beyond. It appears 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 properly achieved.
14. 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

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rest of the Western Expansion area which is still under development but with which MKCC wish 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. 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, 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 retained.

15. Having reviewed the landscape assessments undertaken by LUC for MKCC, WPC does not have full confidence in their conclusions. There are numerous references within the three evidenced background documents (MK Landscape Character Assessment – May 2022; The MK Valued Landscape Policy Review – Dec 2022; and the MK Review of the Local Landscapes Designations – May 2024) to suggest that MKCC have taken insufficient regard of their landscape consultants’ advice and recommendations, and in so doing have disregarded the importance of the Shenley Ridge as a prominent 'natural feature', which should act as long term barrier to stop encroaching development 'spilling over', that will otherwise destroy the open countryside and long distance views beyond into Buckinghamshire.

#### Transport

16. Regarding transport, WPC are extremely concerned about existing traffic congestion, both on the A421, and rat running that occurs through Whaddon Village to and from all parts of Milton Keynes to the A421 and beyond. Were the Shenley Dens site to be developed , even without an access directly onto the Whaddon Road (which would be strongly objected to by this council and residents) it would be essential that MKCC and Bucks Council must work together to ensure that current traffic problems are not exacerbated. This can only be achieved by both authorities working jointly together to bring about improvements to the A421 – including appropriate dualling, and necessary improvements to the three roundabouts, namely the Whaddon ‘crossroads’ one, Bottledump roundabout and that at Tattenhoe (Snelshall Street V1 in MK) – including any new roundabout at Shenley Park should that development proceed. If the development proceeds, then all traffic must distribute in and out through the Milton Keynes grid road system, but even then, a very careful Traffic Impact assessment – including an ‘origination and destination’ survey - must be instigated to understand what is actually happening to local traffic patterns, because 1000 new homes would place huge pressure on already at, or over capacity roads, both in and around Milton Keynes and the surrounding Buckinghamshire villages.

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17. Furthermore, if Portway is to be the primary access, what does ‘*appropriate retention and segregation of the MK Boundary Walk route*’ really mean? 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.

#### Blue infrastructure

18. Regarding blue infrastructure, 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 of the suggested ‘Gypsy and Travellers’ site, indeed spilling over into the adjoining county and Buckinghamshire countryside, but there is no attempt 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.

#### Overall

19. Overall, 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. 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. The night-time effect would be equally profound, introducing an extensive area of illumination into an almost completely dark landscape.

### **E. Alternative to Shenley Dens**

20. 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 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.
21. In any case, we note that MKCC have over allocated their housing requirement and do not necessarily require these houses to meet their targets.

### **F. Bucks Council and Soundness of GS19 Shenley Dens**

22. WPC notes that Buckinghamshire Council (BC) does not object to the principle of the Shenley Dens development, but that they query the allocation criteria and the chosen boundary. During the previous early 2024 consultation BC suggested that any development must consider visibility beyond the ridge line from Oakhill Wood running north-westerly and the impact on landscapes into north Buckinghamshire.

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23. WPC takes issue with BC on their stance, because if 'Policy Soundness' is properly interpreted then the site should not be allocated at all, due to their comments made back in 2003/4, which were a complete reversal to those being made today. In their latest response BC suggest that the housing allocation could be moved to abut Tattenhoe Street, thereby taking the 1000 new homes further away from the Shenley Ridge and integrating them better into the urban area of Milton Keynes. They say that this action *'would more likely take development of the 1000 new homes from spilling over the 110m/100m ridgeline and thus being visible and adding an urbanising effect on the surrounding countryside'*. WPC notes that no mention whatsoever is made by BC about replacing or enhancing whatever screening landscape that might remain? These are valid concerns should the development proceed, but BC it would appear, fail to take account of why this wide landscape strip was incorporated within the Western Expansion Area in the first place.
24. Coming from the Buckinghamshire countryside to the south-west, and travelling north-east into MK, once you cross the Shenley Ridge the topography is fairly flat for some distance and then falls very gradually towards MK. This open space was designed as a heavily landscaped area to establish a green edge to this part of the city and to allow only 'glimpsed' views of new development, rather than to allow sky-lining, which will occur should any form of intensive development be allowed within this general area. It was also originally intended, when the WEA was planned/designed that the area alongside Tattenhoe Street would likely become an overspill area for the Crownhill Crematorium, as a burial ground and garden of remembrance. WPC wonders whether these possible uses are still envisaged, or whether they have been abandoned by MKCC and if so whether alternative expansion for Crownhill has been allocated. Whatever the current position it is evident that the current BC officers/members are unaware of the planning history and thinking in relation to the Western Expansion Area or are prepared to ignore it. WPC is not!

#### **G. Accommodation for Gypsies and Travellers**

25. MKCC assess that 69 new pitches are required for Gypsies and Travellers. It is proposing 15 pitches by 2030 West of Whaddon Road and 15 pitches by 2035 as part of the SCE. This is a total of 30 pitches, representing a disproportionate share of the net increase in pitches on the western border of the city.
26. Regarding the 15 pitches to be part of the SCE, it is not logical to place such a facility in a remote corner of the site in an area for proposed trees and a landscape buffer.

#### **H. Renewable energy**

27. We object to policy GS7 as currently drafted, on grounds of soundness. We request that a policy criterion be added on avoiding adverse landscape and visual impacts and through mitigation and detailed design address identified harm to all landscape including those in Buckinghamshire. Whilst development for solar farms can be mitigated to an extent by landscape mitigation – there is likelihood for some adverse landscape and visual impact from panels sited on the downward slopes visible into Buckinghamshire.

## I. Conclusion

28. We urge MKCC to recognise that Shenley Dens Farm is a thoroughly unsuitable site to allocate as its proposed allocation is both legally unsound and not based on robust evidence. By not taking full account of WPC's responses both to the earlier Local Plan draft and its response 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, 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.
29. 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 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 area could justify the impacts of it, and such evidence is not provided. Far more suitable land is available to the east of Milton Keynes beyond the M1 motorway.
30. We thank MKCC for the opportunity to comment. Most importantly, we reiterate that Policy GS19 Shenley Dens should be removed from the final plan because it is unsound, and not based on reliable and robust evidence. We request that MKCC will consider carefully the raised in our submission.

Yours sincerely

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Clerk & RFO Whaddon Parish Council

Whaddon Parish Council

[Redacted contact information]

## **Appendix – previous statements on the prospect of development in the area**

31. *“Oakhill Wood forms a strong visual boundary. The area to the west is a distinctive ‘natural’ area with strong landscape features and attractive views.”*

Llewelyn-Davies, 1992, for the MK Expansion Study.

32. *“This part of the city is a sensitive topographical location, where a permanent city edge must be created and the visual impact from the countryside protected.”*

Llewelyn-Davies, 1992, for the MK Expansion Study update.

33. *“The housing development would spill over the ridgeline, should this policy be adopted 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” and “This proposal would only add to the visual intrusion, and any further erosion of the landscape should be restricted.”*

Buckinghamshire Council, October 2003, response to the MK Plan

34. *“I do not see the logic of regarding the Whaddon Valley as a possible long term development area. To do so, disregards the qualities of the Whaddon landscape and the merit of the Shenley Ridge as a logical and clear long term boundary.”*

Planning Inspectorate, 2004, MK Local Plan Public Enquiry 2004

35. *“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.”*

LUC, 2024, Evaluation and Recommendation to MKCC on the Calverton Plateau