

30 November 2018

Mrs R Kidd
Neighbourhood Plan Examiner
153 Fonda Meadows
Oxley Park
Milton Keynes
MK4 1JQ

Dear Mrs Kidd,

**Ravenstone Neighbourhood Plan
Responses to representations made following Regulation 16 Submission**

By way of introduction, I am a planning consultant working with Ravenstone Parish Council and the Neighbourhood Plan Steering Group (NPSG), helping them to deliver their Neighbourhood Plan. We would like to take this opportunity prior to your examination of the Neighbourhood Plan to respond to comments made to the Regulation 16 consultation.

We have received the collated responses from Diane Webber at Milton Keynes Council and have made our comments to the responses below. We have only focused upon those points that seek changes to the plan or require a response from the NPSG in order to keep this manageable.

Mr Dawes, Local Resident

Concerns have been raised regarding the potential increase in traffic along North End as a result of the proposed housing allocation. Whilst traffic issues should be addressed as part of a future planning application, it has been considered at a high level when looking at the suitability of the site for housing.

The current uses on the site generate a degree of traffic through employee trips, deliveries and customer visits. The existing amount of traffic could increase substantially if the industrial buildings were used for employment in a more intensive manner in the future.

We are therefore of the view that Mr Dawes raises concerns that are right to be considered as part of a future planning application. Suitable mitigation measures could be taken to improve the route, for example providing pedestrian refuges in the highway verge, that would help to address the potential for conflict between different groups using North End.

Savills, for the Society of Merchant Venturers (SMV)

Until the NPSG received the latest representations from Savills, previous representations had made broad reference to their being land suitable for development adjoining the settlement boundary in their Client's control. We had considered the potential for developing the farmyards and barns in SMV's control and felt that there were valid reasons why these should not be included within the settlement boundary and / or allocated for development. This was included and discussed within the draft Neighbourhood Plan.

No other sites were put forward and the NPSG took the view that it would be inappropriate to select greenfield sites for consideration, as this would have directly conflicted with the community's preferences expressed in the survey questionnaire that directed new development towards brownfield land first, before greenfield sites are considered, in line with the requirements of the NPPF.

Policy CE1

The NPSG strongly disagree that Policy CE1 should be deleted. The policy seeks to protect the countryside of the Parish from sporadic development and protect the green fields surrounding the village that make an important and intrinsic contribution to the character and setting of the village, the significant number of listed buildings and the Conservation Area.

The NPSG are open to suggestions to refine the wording of the policy to align the content with Plan:MK but feel that it is important that a policy seeking to protect the countryside outside of the settlement boundary is included in the Neighbourhood Plan. This may be argued by some to be repetitious, but the protection of the countryside surrounding the village and the setting of Ravenstone is a cornerstone of the Neighbourhood Plan. It is an issue that the community felt very strongly about when responding to the survey questionnaire. Not including such a policy would be unacceptable to many residents and could threaten the success of the plan at referendum.

Important Views

Our evidence for defining the important views is called into question by Savills comments. We have referred back to past plans prepared and adopted for the village, which also defined these views, moving them forward to our modern-day Neighbourhood Plan. In doing so, the NPSG have carefully considered the appropriateness of including each area on its own merits, whether the view had changed, whether it remained an important part of the character and setting of the village and whether there were heritage assets that would be harmed should it be developed.

We have relied upon detailed knowledge of the village, for many on the NPSG this was gained from living in the village for a generation or more. Advice was also provided by me, a professional planning consultant with over 20 years' experience in the industry. The need for further assessment of the views was also discussed with Milton Keynes Council, which felt that moving forward the earlier adopted designations from the Village Plan into the Neighbourhood Plan was appropriate and that further landscape studies would not add to our own knowledge.

The nature of the views has not changed to any significant degree since the previous Village Plan was adopted in 1983, that is one factor that makes Ravenstone such a special place. It is therefore valid to carry forward the designations from that plan, the views being important to the community then, as they are now.

The argument being put forward by Savills that the basic conditions have not been met regarding the important views, is purely an attempt to discredit the requirement of the policy to protect the countryside surrounding the village and make it easier for them to promote their greenfield sites for housing development, against the community's wishes.

The NPSG are open to suggestions to refine the wording of the policy, for example changing the term 'important views' to 'protected green areas'. The term 'important views' was used in the 1983 Village Plan and the NPSG believe that 'important views' as a definition continues to make it obvious and clear why these areas are being protected. We do appreciate that in planning law terms there is not a right to a view, however, that is not the underlying purpose of the designation. It is not to protect the views for the benefit of an individual, but more to protect the views that influence the character and setting of the village in the wider sense and the designated heritage assets.

Consideration of Potential Housing Sites

As a point of correction, the draft Neighbourhood Plan considered all of the housing sites that had been suggested to the group at that time. Savills have now suggested two completely new sites that were not part of their earlier representations and could not be included in the draft Neighbourhood Plan.

The methodology used to select the potential housing allocation was based on sound and established planning principles to encourage the development of brownfield land. Discussions have taken place with the landowners of the preferred site and a letter of understanding has been signed to confirm that they agree to bring forward the site for development in the future. The NPSG disagree with the assertions being made that this site cannot and will not be delivered. Savills have raised concerns over the deliverability and viability of the preferred housing option to discredit the choice made by the NPSG in line with the communities wishes and promote their client's greenfield sites.

Land South of 16 Common Street

The site is greenfield land and outside of the existing settlement boundary. It is designated in the Neighbourhood Plan as one of the important views, where the countryside adjoins Common Street, important to the rural character of the village.

It lies outside of the Conservation Area and is adjoined by the boundary on three sides. Listed buildings are situated to the north and south of the site. There is no vehicle access to the site from Common Street, which is separated by the stream and a mature hedgerow.

The site was considered early in the Neighbourhood Plan preparation process, where land adjoining the settlement boundary was considered in turn on a large-scale aerial view of the village. The NPSG undertook a process of considering if sites were greenfield or brownfield, formed part of the setting of listed buildings, played an important part in establishing the rural character of the village. It was concluded that this site did not represent a suitable housing site, primarily due to the potential for impact on the character and appearance of the Conservation Area, the potential for harm to the setting of adjacent listed buildings and the loss of the field alongside Common Street, which is integral to the rural character of the village.

The NPSG consider that the site remains an unacceptable location for development.

Land to the north of Ravenstone House

The site is greenfield and is outside of the existing settlement boundary. It is within the designated Conservation Area and has listed buildings to the north and south. The site is another location where fields adjoin Common Street, enhancing the rural character and setting of the village.

The site is not designated as an area of attractive landscape, but that does not mean that it could or should be developed for housing. It still plays an important localised role in defining the setting of this part of the village, is part of the Conservation Area and within the wider setting of two listed buildings.

The site was considered as part of the settlement boundary review exercise and it was concluded at that time that no changes should be made.

The NPSG see no reason why this green field site should be allocated against the majority view held by the community to protect green field sites and focus new development in the village to brownfield site locations.

The NPSG consider that the site remains an unacceptable location for development.

Historic England

Historic England were consulted at the Regulation 14 stage, the NPSG have an email receipt confirming they had a copy of the draft Neighbourhood Plan. In answer to the other points made, there is not a local list of important buildings and features. An update of the Conservation Area character assessment is being undertaken by Milton Keynes Council, but may not be ready in time to be incorporated into the Neighbourhood Plan. As this is work in progress, the NPSG have not undertaken their own study of the village character but have placed great importance on ensuring that heritage assets including Listed Buildings, the Conservation Area and Scheduled Ancient Monuments and also the previously identified important views are sensitively treated.

The support offered by Historic England to Policy CD1 and CD3 are welcomed.

The alteration to include the words 'special interest' into Policy CD2 is acceptable.

The NPSG agree that Policy H2 should be amended to require a heritage impact assessment and a desked based assessment of archaeological interest as part of a submitted application.

It is also agreed that the second criteria of Policy H3 should be added to the wording of Policy BE1.

Rural Solutions, for Abbey Mill Homes

The comments made by Rural Solutions relate to the housing chapter of the Neighbourhood Plan and seek to promote their own site for a housing development. Regarding the comments made by Rural Solutions about the Regulation 14 consultation stage of the Neighbourhood Plan, their Client was fully aware of the stage the draft plan had reached in the process, attending both the initial open day to introduce the process and the open day to launch the draft version of the plan.

There was opportunity to put forward a site at the time and discuss it with any of the NPSG who were available at the events or afterwards, but this was not the case. The Neighbourhood Plan has been prepared in a transparent manner with regular public meetings, consultation events and copies of the plan distributed to every household, including Rural Solutions' Client. We dispute the suggestion that there has not been ample opportunity for landowners to put forward sites during this process.

This site has been considered fully by the Submission Neighbourhood Plan alongside the other options and assessed on the same basis. It was concluded that as a greenfield location outside of the existing settlement boundary, housing development should not be supported. This reflects the majority view expressed in the survey questionnaire that the countryside outside of the settlement boundary should be protected from development. Had the site been submitted earlier, the outcome of our assessment against the site selection methodology would have been exactly the same.

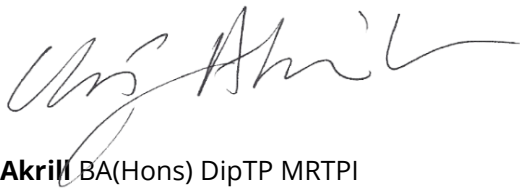
The NPSG have no confusion over the definition of previously developed v greenfield land. It is clear from the planning history that the site was described as a 'small-holding' and the building was described as "an open stable with integral lambing and feed rooms". Livestock made up the majority of animals kept on the land, with a single horse being specified. As there has been no change of use application made to equestrian use, the land was at that time and remains classified as agricultural. We therefore disagree with the view that the site is not in agricultural use and that the definition of previously developed land in the Glossary to the NPPF can or should be applied.

In order to clarify a point from past discussions, Rural Solutions' Client was advised that there was no intention to allocate *greenfield* sites outside of the settlement boundary, so there is in fact a distinct difference between this area of agricultural land and the proposed housing allocation on a brownfield site made in the Neighbourhood Plan.

The Neighbourhood Plan makes a robust assessment of the number of houses to be put forward. The number included already exceeds the housing need MKC have identified for the Neighbourhood Area and has planned positively for the future of the village, taking account the views and wishes of residents. It has been made clear that the approach being taken would not include greenfield site allocations and the NPSG therefore see no reason to increase the number of houses to include the site.

I trust that this response is useful and assists you when considering the Neighbourhood Plan and the representations made to it.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Akrell', with a long horizontal flourish extending to the right.

Chris Akrell BA(Hons) DipTP MRTPI

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