



Ravenstone Neighbourhood Plan

Summary of responses received to Regulation 16 publicity period

<p>Rural Solutions on behalf of Mr & Mrs Pacifici/Abbeymill Homes</p>	<p>Chapter 10. Housing</p> <ol style="list-style-type: none"> 1. Overall, we support the ambition of the Neighbourhood Plan (NP) to deliver the levels of housing to meet the needs and aspirations of residents in the village, while respecting the rich historical fabric of Ravenstone. 2. We note the NP concludes that such levels of housing would not be delivered through relying on windfall sites within the existing settlement (paragraph 10.6). The NP has therefore determined to identify land to allocate for housing purposes. 3. The NP reports that overall there was support for such sites to be previously developed land rather than greenfield sites, and for such sites to be small scale or infill in character, rather than large sites, thus respecting the character and appearance of the village (paragraph 10.6). We support these guiding principles. 4. During our Regulation 14 consultation we expressed serious reservations with the robustness of the site selection process. This concern was twofold; firstly, regarding the consultation process as our client, a landowner in the village, had not been contacted as suggested by the plan, to discuss land that might be available for development ; and secondly the suitability of the identified housing site ' PHA 1 ', in particular. 5. Our Regulation 14 response then put forward our client's site for consideration. The comments from our Regulation 14 representation in relation to promoting the site for allocation are included in Appendix A of this representation for the benefit of the examiner. 6. We note that the Regulation 16 Plan does now include reference to this site - now referred to as PHA4 - and assesses it under the same criteria as the original three sites which underwent consideration. 7. We have several comments regarding this site assessment. 8. Primarily this relates to the assessment of the site as a Greenfield site. The current use of the site is an equestrian use; it hosts a collection of stable buildings and a range of associated paddocks. 9. With reference to Annex 2 of the Framework, the definition of previously developed land is 'land which is or was occupied by a permanent structure including the curtilage of the developed land '. A recent appeal decision in the borough established that a collection of paddocks associated with a stable building was all considered previously
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	<p>developed land (the full decision is contained in Appendix 2 of this representation). We therefore disagree with the NDP's assessment that our client's site is a greenfield site.</p> <p>10. It seems there is some general confusion in the plan as to the definition of previously developed v greenfield land as it is noted that sites PHA2 and 3, which are sites occupied by agricultural buildings, were assessed as brownfield land, whilst it is clear from the definition in the Framework that previously developed land does not include agricultural land and buildings.</p> <p>11. We question therefore whether this element of the plan preparation is consistent with the Framework, and therefore complies with basic condition 1.</p> <p>12. Secondly, there are other inconsistencies between the assessment of our site PHA4 and the adjacent site PHA1 proposed for allocation.</p> <p>13. For example, the site assessment introduces the site as 'well related' to the existing settlement boundary, whereas site PHA4 is described as lying outside the boundary, and that the settlement boundary would have to be extended to include this land for development. That is the same as PHA1, which also lies outside the existing settlement boundary. It is also noted that our client was also verbally advised by the Chair of the Parish Council prior to making any submissions relating to his site that no land outside the existing settlement boundary would be considered for development, which has not been the case with the inclusion of PHA4.</p> <p>14. Similarly, site PHA4 is adjacent to the existing the settlement boundary and extends no further than that boundary to the south edge of the site, and also to extents to the north should PHA1 become included within the settlement boundary. The assessment with regards this matter is therefore inconsistent despite the close proximity of the two sites, and the similarities in their relationship to the existing defined settlement boundaries.</p> <p>15. Again, the assessment on PHA1 refers to the low-quality appearance of the existing buildings which do not make a positive contribution to the setting of the nearby heritage assets. This assessment would equally apply to site PHA4, but no similar assessment is made of the impact on the heritage assets.</p> <p>16. Finally, it is commented that including site PHA4 in addition to the 'preferred allocation' i.e. PHA1 would result in allocation of more dwellings than the majority of village residents supported.</p> <p>17. Firstly, it is commented that site PHA4 should be assessed on the basis of its own merits and on an equal footing against the other previously submitted sites, not on the assumption that site PHA1 had already been chosen to come forward.</p> <p>18. Furthermore, the resulting allocations would total 11 dwellings compared to the 'up to 10' dwellings suggested as supported by the community consultation. It is not considered that a single additional dwelling would result in a plan significantly out of step with community aspirations.</p> <p>19. Furthermore, no engagement was forthcoming from the NP Steering Group regarding putting two dwellings on the site should it be considered that 10 dwellings should be the absolute maximum.</p> <p>20. Therefore, in summary, whilst we welcome the acceptance that the</p>
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	<p>site should be considered in the plan, we question whether genuine consideration has been given to its inclusion as an allocation. It is noted that the site assessment proforma identifies no technical bars to development (for example in respect of flood risk, access, impact on views or heritage assets etc). If it is accepted as per our representation that the site should be considered a previously developed site in its entirety, then the remaining sole reason for not allocating the site appears to be the objection to the allocation of one additional dwelling over the expressed preferred number of dwellings.</p> <p>21. In addition, notwithstanding these comments at 6 above, we also retain some concerns regarding the suitability and viability of proposed allocated site PHA1.</p> <p>22. The site currently provides for the only business space in the village. The existence of this space contributes to the viability of the village as a sustainable village and somewhere that people can live, work and play. We consider the loss of the business units would be to the detriment of the village. We note the Consultation Statement refers to pending retirement of the current occupiers thus suggesting the employment site is redundant. However, no consideration seems to have been given to retaining the site to meet employment needs of future generations in the village.</p> <p>23. The inclusion of this allocation is therefore considered to fail to meet Basic Condition test 3 to contribute to the delivery of sustainable development.</p> <p>24. It is also understood that the site is in multiple ownership and that the value of the land would not accommodate the owner's aspirations in respect of value for their individual units from a site containing 8 houses. This is due to multiple factors including a need for demolition, contamination remediation costs and the need for a road at adoptable standards etc.</p> <p>25. We do not consider that a robust NP should rely on a single site to deliver the identified housing requirement if there are doubts about that site's deliverability. If it does there is a risk that the plan fails to meet the Basic Conditions test 2 in not resulting in sustainable development, as it would fail to meet a key social aspect of sustainable development as defined by paragraph 8 of the Framework, to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations.</p> <p>26. In such a circumstance, the robustness of the plan would be enhanced if additional sites should also be identified. The delivery of such additional sites could be phased over the plan period if it is considered that cumulatively their concurrent delivery would be detrimental to the village.</p> <p>27. We understand that site PHA1 is proposed for the delivery of eight houses. Combined with an additional three units on Horseshoe Farm, we consider this is still in the scale of development that the village survey suggests would be supported by residents.</p> <p>28. We note on this matter the NP methodology for establishing that up to 10 houses would be supported by the 'majority' of residents is subjective. It starts from the premise that 33% of residents voted for between 1 - 5 dwellings, which is the largest category but not a majority.</p>
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	<p>The NP then suggests adding the next category, 5 – 10, with a further 20%, gives a majority (53%) and therefore is the chosen figure. However, similarly, adding the respondents in support of 10 to 15 (19%) would equally have given a majority, this time of 52%. With the voting for 5 -10 and 10-15 categories being almost identical (20% and 19% respectively) this perhaps suggest a figure in the mid- range of 12 to 13 would be more reflective of overall views.</p> <p>29. Whilst we acknowledge that the setting of a number for allocation in this way is not an exact science, we suggest the inclusion of our client's site at Horseshoe Farm, taking the number of proposed allocated dwellings to 11, would be in line with the numbers supported by respondents to the survey.</p> <p>30. The neighbourhood plan then also includes a policy for windfall infill developments.</p> <p>31. We note however that paragraph 10.17 of the NDP states that 'there are few infilling opportunities left in the village which would not have significant adverse effects on either the character of the village, the setting of a listed building, or an important gap view '.</p> <p>32. We therefore question whether the policy is slightly toothless in its current guise.</p> <p>A suggested amendment could be to extend the policy to allow proposals 'within or immediately adjacent 'the settlement boundary. This may allow more scope for development whilst the other criterion in the policy would still ensure sites proposed for development were appropriate in all other respects.</p> <p>33. Without any amendments to Policy H3 it seems clear that windfall development cannot be relied upon to bring forward housing development, again failing to contribute to meeting Basic Condition 2 as discussed at paragraph 23 above.</p> <p>General Comments</p> <p>34. It is mentioned in general that references to the National Planning Policy Framework should be updated to reference the current 2018 version.</p> <p>Basic Conditions Statement</p> <p>35. It is commented that paragraph 4.3 in the Basic Conditions Statement includes no recognition of the social role of providing sufficient housing meet the needs of present and future generations.</p>
Canal & Rivers Trust	No comments.
Historic England	<p>The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance – the appendix to this letter contains links to this website and to a range of potentially useful other websites.</p> <p>We welcome paragraphs 1.1 - 1.6 on the historical development of the parish and paragraphs 1.11 - 1.18 on heritage assets within the parish. We particularly welcome the reference to the Milton Keynes Historic</p>

	<p>Environment Record as National Planning Practice Guidance states “... <i>where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions</i>”.</p> <p>However, Is there a list of locally-important buildings and features ? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. Also, National Planning Practice Guidance notes that “<i>The local Historic environment record and any local list will be important sources of information on non-designated heritage assets</i>”.</p> <p>If so, then reference should be made to it within the Plan, If not, then the preparation of such a list would be an excellent community project to further add to the evidence base for the Plan. The appendix to this letter contains a link to our advice on local listing and we would be pleased to advise further.</p> <p>Has the designation of the Conservation Area been reviewed since 1970? Is there a Character Appraisal and/or Management Plan for the Conservation Area?</p> <p>Paragraph 2.10 will need to be revised to reflect the revised National Planning Policy Framework published in July 2018.</p> <p>Did the parish survey questionnaire include a question about the historic environment?</p> <p>We note that the challenges for the community include protecting and enhancing the character of the village and the Vision refers to the rural character of Ravenstone. Has any study been undertaken to establish that character and what contributes to or detracts from that character ?</p> <p>We consider that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. We believe that characterisation studies can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.</p> <p>The preparation of a Village Design Statement or Character Assessment would be another very useful addition to the evidence base for the Plan and a potential community project. The appendix to this letter contains links to characterisation toolkits and again we would be pleased to advise further.</p> <p>Has there been any or is there any ongoing other loss of character, particularly in the Conservation Areas, e.g. through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc that affect local character?</p> <p>There are no designated heritage assets in the parish on the Historic England Heritage at Risk Register. However, the Register does not include Grade II listed secular buildings outside London. Has a survey of the condition of Grade II buildings in the Plan area been undertaken? If not, this could be another project to add to the evidence base for the Plan.</p>
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	<p>We feel that the Vision reads more as an aim or objective of the Plan rather than a vision for the community. We suggest that it could set out how the local community would like Ravenstone to be in 2031. We would hope that that vision would include something like <i>“a conserved, enhanced, appreciated and valued historic environment”</i>.</p> <p>We note the objective to protect the views of the countryside surrounding the village which are considered to be an integral part of the character of Ravenstone and the Conservation Area. We presume that the green shaded areas on Figure 15 are intended to indicate these views? If so, they might be construed as indicating that the views are limited in extent to the shaded area – is this the intention? How have these views been identified? In a Conservation Area Character Appraisal?</p> <p>We would have liked to see a specific objective under Character and Design for the conservation and enhancement of the historic environment of the parish.</p> <p>We welcome Policies CD1 and CD3, which we consider to be consistent with paragraph 125 of the National Planning Policy Framework: <i>Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.</i></p> <p>However, as noted earlier in this letter, we are not clear if there is an <i>“understanding and evaluation of each area’s defining characteristics”</i> – there is no mention of any Village Design Statement or character assessment of the conservation area, the village or the Parish, although we note the reference to previous Village Plans.</p> <p>We welcome Policy CD2, although we suggest one slight amendment – the inclusion of the words <i>“special interest”</i> between <i>“significance”</i> and <i>“quality”</i>.</p> <p>We welcome the inclusion of heritage constraints as a criterion in the site selection methodology. We note that the housing site allocated by Policy H2 is identified as potentially affecting a range of designated and non-designated heritage assets – the Grade II listed Almshouses, the Ravenstone Priory Scheduled Ancient Monument, the Grade I listed All Saints Church and potential buried archaeological remains. It also appears to be partly within the Conservation Area.</p> <p>We note that this is a previously-developed site and that <i>“The existing buildings on the site are relatively low quality and do not make a positive contribution to the setting of the Almshouses or the SAM”</i>. We therefore agree that it could potentially result in an enhancement to the setting of the designated heritage assets, although residential development is likely to be more intensive and could therefore be harmful.</p> <p>Therefore, whilst we welcome the requirement in Policy H2 for the development to be very sensitive to nearby heritage assets, we consider that in order for the allocation of this site for housing development to be</p>
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	<p>acceptable to us, it should be justified and supported by a Heritage Impact Assessment that identifies the significance of the Conservation Area and nearby heritage assets, the likely effect of the development of the site on that significance and how any development proposals could avoid or mitigate any harmful impacts,</p> <p>In addition, whilst we welcome the requirement in Policy H2 for a development proposal to be supported by an appropriate archaeological desk based assessment.</p> <p>However, it may be necessary to undertake a field evaluation if the desk-based assessment identifies likely archaeological interest,</p> <p>We also suggest that, to make the Plan's allocation of this site more robust, it should be clearly explained why this site has been selected over the other potential housing sites.</p> <p>We welcome the second criterion of Policy H3, and would like to see it included in Policy BE1.</p> <p>Finally, the preparation of the Neighbourhood Plan offers the opportunity to harness a community's interest in the historic environment by getting the community to help add to the evidence base perhaps by, as noted in our comments above, the preparation of a local list of locally important buildings and features, a character assessment or Village Design Statement, or a survey of Grade II listed buildings to see if any are at risk from neglect, decay or other threats.</p>
National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>
Natural England	<p>Natural England does not have any specific comments on this neighbourhood plan.</p>
Mr Dawes, resident	<p>We write regarding the suggested housing development in the Plan in North End.</p> <p>North End is an important facility for the village in that it provides a facility for residents and visitors in that they can walk with or without their dogs up to the top of the lane and then follow the footpaths either to Horton or Weston Underwood. They do this in increasing numbers often stopping to look at the Church.</p> <p>Our concern in the light of the above is the increasing volume of traffic using the lane which is very narrow particularly by the cemetery. The industrial buildings do not generate much traffic but the proposed development would as most residents have two cars and there has been a massive increase in delivery vans. The change of ownership of Horseshoe Farm has also led to a traffic increase.</p> <p>We have property on both sides of the lane with four gates onto the lane, three of which are blind exits and the fourth by the cemetery means that we block the lane when using the gate, usually to load livestock within the 20 minute deadline.</p> <p>The proposed development would need very careful thought at the planning stage but in our view would lead to traffic capacity on North End at the very least. Any further development of, say, three houses would take traffic over an acceptable level.</p>

	Without wishing to over dramatise the problem, the increase in traffic on the lane is an accident waiting to happen.
Savills on behalf of the Society of Merchant Venturers	<p>Policy CE1</p> <p>Policy CE1 fails to meet the basic conditions and is unclear about the overall aim of Policy CE1 given its protection of the ‘countryside’ is at odds with both national and local strategic policies. Furthermore, the designation of the ‘important views’ is not justified by any evidence to demonstrate they should be protected from development in any case. As such, the ‘important views’ on the Proposals Map and reference to them in the draft NP should be deleted. Indeed, reference to the ‘important views’ should also be deleted from Policies CD1, CD2, H1 and H3 (and the ‘site assessment methodology’ & any other supporting text). With the above in mind, in order for the Neighbourhood Plan to meet the basic conditions and progress to referendum, it is recommended that Policy CE1 is deleted.</p> <p>Housing</p> <p>The Parish Council’s approach to the ‘site selection process’ and the allocation of Site Ref: PHA1 has significant potential to undermine the delivery of sustainable development and the overall vitality of the village, contrary to basic conditions (a) and (d). This reinforces the need to consider further the development strategy for Ravenstone and approach to identify sites for housing. In this respect, the SMV consider that their land on the edge of the settlement is available and deliverable for small-scale housing, and should be allocated for housing in a revised Policy H2.</p> <p>Policy H3</p> <p>Policy H3 will restrict sustainable development within the settlement boundary conflicting with the overarching objective of the NPPF. Accordingly, it cannot be said that Policy H3 of the draft NP meets basic conditions (a), (d) and (e) on this basis.</p> <p>In order for the plan to meet the basic conditions and progress to referendum, it is recommended that the wording of the policy is amended to: <i>“Infill residential development will be supported where such proposals are located within the defined settlement boundary and where the following criteria can be met...”</i></p> <p>The last bullet point should be re-worded to <i>“the scheme would minimise impacts on biodiversity and seek to achieve a net gain in biodiversity, where possible”</i>. In addition, again reference to the ‘important views’ should be removed (bullet point two).</p> <p>Conclusions</p> <p>The SMV support the Neighbourhood Plan in Ravenstone, however the draft NP still fails to address the SMV concerns raised throughout the production of the Neighbourhood Plan. It is considered that the draft NP fails to meet the basic conditions on the basis that it is not in general conformity with national policies and guidance and the strategic policies of Milton Keynes Council, including the emerging Plan:MK. In addition, the draft NP fails to support the delivery of sustainable development.</p>

	<p>No compelling evidence has been provided by the Parish Council to support their proposed designation of 'important views', or demonstrate that such a designation meets the requirements of national planning policy and guidance. Furthermore, these designations have the potential to significantly undermine the delivery of sustainable development throughout the plan period by applying a 'blanket restriction' in respect of sites on the edge of the settlement in the 'countryside' – this is in direct conflict with advice contained within local policy, the NPPF and PPG. The draft NP, and its proposed allocation of Site Ref: PHA1, fail to meet 'basic conditions' (a), (d) and (e). Indeed, the Parish Council has not considered the impacts on the sustainability and vitality of the village due to the loss of the only employment site in the village for housing. Furthermore, the SMV's land on the edge of the settlement has not been considered. The SMV's land would deliver small scale housing that would deliver the aims and objectives of the Neighbourhood Plan. In its current form, the draft NP cannot proceed to a referendum and an examination hearing must take place to fully consider and address the fundamental implications the draft NP will have for the delivery of sustainable development and housing through the lifetime of the plan.</p>
South Northamptonshire and Cherwell Council	<p>South Northamptonshire Council has no formal comments to make. However, we would like to commend the Parish Council, in particular, for what appears to be a well presented plan with a pragmatic approach towards housing delivery in this very small settlement.</p>