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26057/A3/EF/MK/dw

BY EMAIL: neighbourhoodplanning@milton-keynes.gov.uk

13th January, 2023

Dear Sir/Madam,

**HAVERSHAM-CUM-LITTLE LINFORD SUBMISSION NEIGHBOURHOOD PLAN:
REPRESENTATIONS SUBMITTED ON BEHALF OF L&Q ESTATES LTD**

We write on behalf of our client L&Q Estates Ltd in response to Milton Keynes City Council's consultation on the Submission Haversham-cum-Little Linford Neighbourhood Plan (hereafter referred to as 'the Plan').

As background, L&Q Estates have land interests within the Parish which were promoted to Milton Keynes Council as part of the preparation of Plan:MK at North Milton Keynes and are being promoted through the Plan:MK review process.

Representations were submitted on behalf of L&Q Estates in response to Haversham-cum-Little Linford Parish Council's consultation of the Pre-Submission Plan in April 2022 (a copy is enclosed at **Appendix 1**). The following representations do not seek to rehearse previously made points (which are taken as read) and instead build up our earlier representations, with specific focus on the new 'Supporting evidence for Policy HLL10 Important Views' document published alongside the Plan.

Policy HLL10 Important Views

Within our earlier representations we commented on the lack of evidence base to justify some of the identified views. In this regard, we welcome the preparation of the further evidence relating to 'Important Views'.

However, we do not support all of the content of the document.

Firstly, the evidence base for Policy HLL10 should be revised to refer to the updated 2022 Milton Keynes Landscape Character Assessment (within which all of the view locations lie within Landscape Character Type (LCT) 2 Undulating Valley Slopes; Landscape Character Area (LCA) 2a. Ouse Northern Undulating Valley Slopes).

Moreover, the evidence base should be revised to remove views which include detracting features identified in the published character assessment; or where reliance is placed on the degraded condition of features which actually require maintenance and restoration, as also set out in the published character assessment.

On a related point, the published character assessment identifies 'unclipped hedges' as a 'key characteristic'. This is relevant as at various points the supporting evidence includes views (including views 3, 8, 9 and 10) which are obtained across a landscape rendered more open by lack of the locally distinctive unclipped hedges, replaced by fencing or clipped hedges. Management guidance for LCT 2 states: '*Conserve and strengthen the traditional landscape pattern and structure, as well as increasing biodiversity interest through the maintenance or restoration of hedgerows with native species. Consider the addition of hedgerow trees to provide additional structure in the landscape.*' The supporting evidence should be reviewed in this respect.

The document should also specify what constitutes a 'significant adverse impact' as without any robust criteria the requirement to avoid such impacts is unsubstantiated.

We recommend that the constituent elements of each view should be broken down to identify which are the key focal features and which are the subsidiary focal features. For example, in various views, there are features which are not representative of high-quality aspects of the landscape (as set out in the published character assessment) and which are clearly not as important for maintaining in the view as other elements. These features should be recognised as of lesser or no importance on the basis that any change in views of such features would be very unlikely to have a significant adverse impact.

In respect of specific views, we have the following comments:

View 2

As set out in our earlier representations, the view shown only exists as a result of a large gap in a locally distinctive unclipped hedgerow which has not been subject to positive management to maintain the structure and integrity of the hedgerow.

Guidance for LCT 2 states: '*Conserve and strengthen the traditional landscape pattern and structure, as well as increasing biodiversity interest through the maintenance or restoration of hedgerows with native species. Consider the addition of hedgerow trees to provide additional structure in the landscape.*' The description of LCA 2a states that '*hedgerows are in variable condition*'. By way of contrast, the hedgerow flanking the southern side of High Street, to the north of this viewpoint, is intact and coherent, albeit has been partly clipped. Given this evidence in the published character assessment, it is not considered appropriate that the Plan should contain a policy that refers to an Important View which is clearly representative of a degraded condition of hedgerow; and where the character assessment states hedgerows should be '*maintained*' or '*restored*'.

Furthermore, the left-hand side of View 2, as shown in the supporting evidence, includes an example of what the published commentary for LCT 2 describes as '*out of character conifer shelter belts and hedgerows*.' It is not considered appropriate that the Plan should contain a policy that refers to an Important View which includes a notably prominent example of an identified detracting feature of the published character assessment.

To the right-hand side of this view (not shown in the photograph), the urban edge of New Haversham is clearly evident. The published guidance for LCT 2 states that a development management objective is to '*...improve the suburban edges of settlements such as Olney through the use of native hedgerows and woodlands...*' Again, it is not considered appropriate that the Plan should contain a policy that refers to an Important View which includes a notably prominent example of an identified detracting feature of the published character assessment.

Taking account of the above, View 2 should be removed from the policy.

View 5

Page 9 of the supporting evidence incorrectly sets out that '*this point has uninterrupted views in all directions*' when in reality the view is from the junction of four hedgerows which form substantial interruptions in the views obtained.

In addition, it is incorrect to describe '*...views in all directions of agricultural fields edged by mature mixed hedges...*' as the view to the south-east is of the exposed edge of New Haversham, at a distance of only approximately 200m (not '*in the distance*' as the document suggests).

The published guidance for LCT 2 states that a development management objective is to '*...improve the suburban edges of settlements such as Olney through the use of native hedgerows and woodlands...*' It is not considered appropriate that the Plan should contain a policy that refers to an Important View which includes a notably prominent example of an identified detracting feature of the published character assessment.

View 5 should be removed from the policy, or at least that part of it which is directed at the urban edge of New Haversham.

View 6

The supporting evidence incorrectly suggests on page 10 that View 6 '*illustrates how the urban development of New Haversham in the 1930s was achieved with limited impact on the rural character of the wider locality.*' In fact, as is seen in View 5, the urban development of New Haversham has a notable visual influence on the wider landscape to the west. As such, the comment provided within the supporting evidence, which is not substantiated, should be removed from the description of View 6.

We trust that the enclosed representations are duly made and look forward to receiving confirmation of receipt.

Please contact the writer on 0118 943 0000 or by emailing michael.knott@bartonwillmore.co.uk should you require any further information or have any queries.

Yours faithfully,



MICHAEL KNOTT

Director

cc. R. Edwards - L&Q Estates Ltd

APPENDIX 1

BIRMINGHAM
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25th April, 2022

Dear Sir/Madam,

**HAVERSHAM-CUM-LITTLE LINFORD PRE-SUBMISSION NEIGHBOURHOOD PLAN:
REPRESENTATIONS SUBMITTED ON BEHALF OF L&Q ESTATES LTD**

We write on behalf of our client L&Q Estates Ltd in response to Haversham-cum-Little Linford Parish Council's consultation on the Haversham-cum-Little Linford Pre-Submission Neighbourhood Plan (hereafter referred to as 'the Plan').

As background, L&Q Estates have land interests within the Parish which were promoted to Milton Keynes Council as part of the preparation of Plan:MK at North Milton Keynes and is being promoted through the Plan:MK review process.

Our representations on the Plan, relating specifically to Policies HLL5, HLL9, HLL10 and HIL12, are set out below.

Policy HLL5: High Quality Design

While we recognise the ambition of the policy, we do not consider that, as drafted, it is consistent with national policy or in general conformity with the development plan. Moreover, the policy does not promote sustainable development. As such, we recommend modifications to the policy as set out below.

As a starting point, the supporting text sets out at paragraph 5.27 that the standards and requirements should be regarded as setting the design brief for a proposal, but the applicant may depart from them where it can be justified in the circumstances. We welcome the implicit recognition that in some circumstances it may be justifiable to depart from the policy. In this regard, we recommend that the policy should be written so that it encourages and supports high quality design rather than identifying overly prescriptive requirements.

Part A. ii. unnecessarily constrains the forms of building which will be supported and is overly prescriptive. The requirement for buildings to be of 1 or 2 storeys in height does not appear to be substantiated by evidence, including in the Design and Environment report (which forms part of the Plan's evidence base).

Part B. v. is understood in principle, however it may not always be appropriate to have grass verges between buildings and roads and there may be alternative ways to provide a sense of space and openness. Indeed, it may be possible to provide alternative planting, either at verges or elsewhere within development, which could provide a greater biodiversity and amenity benefit.

We consider that Part B. vi. should promote the retention of mature trees and hedgerows where possible rather than imposing a blanket constraint which takes no account of the quality of the trees present, some of which it may not be desirable or safe to retain.

Part B. viii. is ill-defined and it is unclear how the policy would be used to assess development proposals, contrary to paragraph 16 of the National Planning Policy Framework which states that plans should contain policies which are clearly written and unambiguous. For example, what constitutes a style is not clear, neither is the geographical area across which the dominance of a style will be assessed.

Taking account of the above, we recommend that Policy HLL5 is amended as follows (recommended additions are underlined and deletions are struck through):

A. Development proposals, including alterations and extensions to existing buildings, will be supported, provided their scale, density, massing, height, landscape design, layout and materials reflect and enhance the architectural and historic character and scale of the surrounding buildings and landscape in the parish and its settlements as follows:

BUILT ENVIRONMENT

i. Proposals should respect heritage assets and their settings in the locality in accordance with their significance.

BUILDING FORM

ii. Building heights should be informed by the surrounding context of 1 or 2 storeys.

STYLE

iii. Extensions and other building work to existing buildings should consider the use of ~~will be required to be constructed from materials and design matching the existing building and particular attention should be paid to conformity of form and design with the~~ adjacent buildings.

B. Development proposals in New Haversham should specifically demonstrate regard for the following design principles, as appropriate:

LEGIBILITY

iv. Proposals should have full regard, where appropriate, to the importance of the distinct and prominent Wolverton Railway Viaduct as a landmark building on the edge of the parish.

LAYOUT

v. Proposals should promote ~~maintain the pattern of grass verges between buildings and the road providing~~ a sense of space and openness.

OPEN SPACE/LANDSCAPE

vi. Mature trees along prominent roads, particularly Wolverton Road, and mature hedgerows of the surrounding countryside, should be retained where possible as a distinctive feature of the village.

BUILDING FORM

vii. Proposals should sustain the pattern of a mix of predominantly semi-detached properties, and some detached, short terraces and bungalows.

viii. Proposals should include a mix of building styles and materials that will result in one building material or style dominating the area will not be supported.

Policy HLL9: Green and Blue Infrastructure

The objective of Policy HLL9 is supported, however the criteria for identifying land to be included in the Network is not specified within the Plan. As such, it is unclear whether all of the identified land contributes to the integrity of the Green and Blue Network.

We note that Part C of the policy seeks to resist proposals that would result in the loss of land within the Green and Blue Infrastructure Network and that would undermine its integrity. In the context of our comments above, whilst we agree that the integrity of the Network should be maintained and improved (as Part B sets out) we do not consider that it is appropriate to resist proposals that would result in the loss of land within the Network when there is no apparent basis for the identification of land to be included in the Network and the land in question may not contribute towards the Network's integrity.

Moreover, a proposal which undermines the integrity of the Network would be contrary to Part B, with the first sentence of Part C therefore superfluous. We therefore recommend that Part C is amended to delete the first sentence. This amendment will ensure the policy is positively written, consistent with neighbourhood planning guidance provided by Locality (2021)¹.

Policy HLL10: Important Views

Policy HLL10 seeks to protect identified Important Views. While the principle of protecting important views is accepted, the evidence base to justify some of the identified views is lacking or entirely absent.

View 2 is from the Public Right of Way south of High Street, looking south at a ruined former water tower and the valley floor and city beyond, through a gap in the hedgerow that exists only through lack of management. It is not therefore considered to be valid as an Important View as robust hedgerow management would result in screening of this view.

We welcome the reference at paragraph 5.46 to the policy not seeking to 'prevent any development lying within a view'. This is a sensible and appropriate approach and we welcome the policy wording which sets out that only development which would have a significant adverse impact on the view will not be supported.

¹ [How to write planning policies for your Neighbourhood Plan - Locality Neighbourhood Planning](#)

Policy HLL12: Managing Road Safety

The policy as drafted seeks contributions towards improving highway safety within the Parish. This aim is supported in principle. However, development proposals should not be expected to improve highway safety beyond the extent to which it is relevant and directly related to the proposal. Moreover, mitigating the impact of development is required by other policies within the Development Plan and, as such, the policy is considered superfluous.

We trust that the enclosed representations are duly made and look forward to receiving confirmation of receipt.

Please contact the writer on 0118 943 0000 or by emailing michael.knott@bartonwillmore.co.uk should you require any further information or have any queries.

Yours faithfully,



MICHAEL KNOTT
Director

cc. R. Edwards - L&Q Estates Ltd