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31<sup>st</sup> August 2018

Neighbourhood planning  
C/O Development Plans Team  
Milton Keynes Council  
Civic Offices  
1 Saxon Gate East  
Central Milton Keynes  
MK9 3EJ

Dear Sir / Madam,

**RAVENSTONE NEIGHBOURHOOD PLAN  
REGULATION 16 SUBMISSION DRAFT CONSULTATION**

These representations have been prepared by Rural Solutions Ltd, and submitted on behalf of our clients, Mr & Mrs Pacifici / Abbeymill Homes, who have land interests in the village of Ravenstone.

They follow the submission of representations to the Regulation 14 consultation earlier this year.

Our client supports the principle of the Neighbourhood Development Plan (NDP), and the Plan's overall objective to ensure that development in the parish is appropriately managed moving forwards. However, they have some concerns regarding robustness of the proposed approach to housing delivery in the village. The comments within set out our concerns and suggested remedies, including identification of a site for housing development.

If you require any clarification or additional information, please do not hesitate to contact me.

With kind regards

**Shelley Coffey**  
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## Chapter 10. Housing

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 'PHA1', 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<sup>1</sup> established that a collection of paddocks associated with a stable building

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<sup>1</sup> 7 Appeal Ref: APP/Y0435/W/17/3178790

Land to the Rear of Castle Road and North of The Glebe, Lavendon, Olney MK46 4JE

was all considered previously 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.

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.
11. We question therefore whether this element of the plan preparation is consistent with the Framework, and therefore complies with basic condition 1.
12. Secondly, there are other inconsistencies between the assessment of our site PHA4 and the adjacent site PHA1 proposed for allocation.
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.
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.
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.
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.

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.
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.
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.
20. Therefore, in summary, whilst we welcome the acceptance that the 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.
21. In addition, notwithstanding these comments at 6 above, we also retain some concerns regarding the suitability and viability of proposed allocated site PHA1.
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.
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.
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.

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 sites 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.
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.
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.
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. 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.
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.
30. The neighbourhood plan then also includes a policy for windfall infill developments.
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'.
32. We therefore question whether the policy is slightly toothless in its current guise. 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.

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.

#### General Comments

34. It is mentioned in general that references to the National Planning Policy Framework should be updated to reference the current 2018 version.

#### Basic Conditions Statement

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.

## Appendix A: Extract from Regulation 14 Representation

### Alternative Housing Site at Land at Horseshoe Farm

14. As discussed at point 6 above, our client owns land within and adjacent to the village, known as Horseshoe Farm.
15. Within this landownership is previously developed land currently occupied by stable buildings and associated paddocks which could be made available for development. See the enclosed plan.
16. The site would be accessed via the existing Horseshoe Farm site and it is envisaged could deliver three good sized family homes to complement the existing two dwellings at Horseshoe Farm.
17. The site is a natural infill plot sited to the north of the residential properties at The Close and the south of the business park identified as site PHA1.
18. The site would provide a natural infill and rounding off of the north eastern edge of the village. If developed it would extend the village no further than the existing easterly extremities of the village.
19. The site would involve the development of a brownfield site and accord with residents wishes to protect wider greenfield and agricultural land from development.
20. The village settlement boundary could be amended to include the part of the Horseshoe Farm site currently outside the settlement limits, similarly to as proposed for the PHA1 site.
21. Wider landownership to the east of the site would also allow for additional enhancements to be delivered in conjunction with any development including landscaping and an extended public access footpath to link in with the existing footpath network in this part of the village.
22. The site is not identified as an important open space or affecting an important view. Its development would also not adversely affect the setting of the conservation area or any listed buildings, subject to a sympathetic and high-quality design being brought forward. Guiding principles for the site's development could be set out within a policy within the NP.