
Ravenstone Neighbourhood Plan

Representation on the draft Ravenstone Neighbourhood
Plan (dated July 2018)



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1. Introduction

- 1.1. These representations have been prepared by Savills on behalf of the Society of Merchant Venturers ('SMV') in response to the consultation being undertaken by Milton Keynes Council following the submission of the draft Ravenstone Neighbourhood Plan.

The Society of Merchant Venturers

- 1.2. The SMV is a private organisation, incorporated under the Royal Charter, that is the endowment trustee of the St. Monica Trust, a registered charity that owns and manages land within the charity's ownership at Ravenstone. The income generated from the holding is used to help fund the work of the charity, and any proceeds generated are similarly held for the benefit of the charity. The SMV have significant landholdings at and around Ravenstone and a land ownership plan illustrates the extent of that interest at **Appendix A**.
- 1.3. This ownership includes a number of 'parcels' of land on the edge of Ravenstone that are identified as 'important views' within the draft Ravenstone Neighbourhood Plan. Previous representations have highlighted the lack of evidence supporting this designation and set out that this land is available and suitable for small-scale residential development, and that has not been fully assessed during the preparation of the draft Neighbourhood Plan.

The Draft Ravenstone Neighbourhood Plan

- 1.4. The draft Ravenstone Neighbourhood Plan ('**the draft NP**'), prepared by Ravenstone Parish Council ('**the Parish Council**'), has been formally submitted to Milton Keynes Council. It is currently the subject of a six week consultation until the 1st October 2018.
- 1.5. In addition to the draft NP, the following documents prepared by the Parish Council are also being consulted upon by the District Council:
- Basic Conditions Statement ('BCS') (July 2018); and
 - Consultation Statement ('CS') (July 2018).
- 1.6. The Basic Conditions Statement includes a Screening Report for Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), having been prepared by Milton Keynes Council.

Report Structure

- 1.7. These representations set out a formal response to the current consultation and in particular the approach taken with regards to the draft NP, its justification, evidence base and the plan's ability to meet the basic conditions. These representations continue to set out the lack of evidence to support the designation of areas for 'important views' around Ravenstone. They also provide further information on SMV sites suitable

and available for small-scale residential development. In addition, comments are provided on specific draft policies within the draft NP.

1.8. The following section provides a summary of the representations made during the preparation of the Ravenstone Neighbourhood Plan. Section 3 of the report sets out the planning policy context relevant to the representations being made. Sections 4-6 will provide the SMV's representations to the draft NP, focusing on the following matters:

- 'Important Views' and Policy CE1;
- Site Selection methodology, Site Allocation Ref: PHA1, and Policies H1 and H2;
- The SMV's land on the edge of the settlement; and
- Windfall development and Policy H3;

2. Summary of Previous Representations

- 2.1. Representations were previously submitted to the Ravenstone Neighbourhood Plan Consultation Questionnaire in August 2017. At this stage, a land ownership plan was provided and it was highlighted that there is land within the SMV's ownership, immediately adjoining the existing settlement boundary, that is available and suitable for housing development.
- 2.2. In October 2017, a meeting was held with two members of the Neighbourhood Plan Steering Group. Discussions focussed on the potential opportunities of the SMV's land ownership on the edge of the settlement, limited infill development and barn conversions. At no point, during these discussions (or during the preparation of the Neighbourhood Plan) were the SMV asked to formally identify sites to be put forward for development.
- 2.3. In June 2018, the Parish Council consulted on their Regulation 14 'pre-submission' Neighbourhood Plan. There was no additional technical evidence provided with the consultation document. At this stage, despite the lack of evidence, the Parish Council proceeded to identify 'important views' across land on the edge of the settlement (including land in the SMV's ownership).
- 2.4. Furthermore, the Parish Council allocated their preferred site for housing development Site Ref: PHA1, without consideration of any of the SMV sites on the edge of the settlement. The Regulation 14 'pre-submission' Neighbourhood Plan only assessed the SMV's farmyards at Common Street and Stoke Goldington Road. As we explained at the meeting with the representatives of the Neighbourhood Plan Steering Group, the conversion of these buildings could be delivered either through permitted development rights and/or the re-use of redundant/dis-used buildings permitted in accordance paragraph 55 of the NPPF (2012) – and therefore they did not need to be considered in the Neighbourhood Plan.
- 2.5. Representations were submitted and focused on the following key points:
 - i. the lack of any evidence to justify the identification of the 'important views' and to restrict any development on land affected by these designations (Policy CE1);
 - ii. not considering/assessing the SMV's land on the edge of the settlement for suitable small-scale development and the lack of public consultation on where development should go in the village;
 - iii. the lack of evidence to support the suitability and deliverability of the proposed site allocation (Ref: PHA1);
 - iv. the need to amend Policy HE1 to not restrict sustainable infill development to 'one or two dwellings' only; and
 - v. the requirement to undertake a Strategic Environmental Assessment (SEA) and/or that no formal screening opinion had been issued by Milton Keynes Council.
- 2.6. Whilst it is acknowledged that Milton Keynes Council have subsequently issued a screening opinion confirming that an SEA/HRA is not required, the draft NP does not comprise of any modifications in relation to the outstanding points above.

3. Planning Policy Context

- 3.1. The Localism Act (2011) makes provision for Neighbourhood Planning, empowering local communities to develop a shared vision for their neighbourhood and deliver the sustainable development they need through planning policies relating to the development and use of land.

Basic Conditions

- 3.2. For a Neighbourhood Plan to proceed to a referendum, the Localism Act requires the appointed Examiner to consider whether it meets the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph 65 of the 'Neighbourhood Planning' section of the national Planning Practice Guidance (PPG).
- 3.3. The basic conditions are:
- “(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).”*
 - “(b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.”*
 - “(c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.”*
 - “(d) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.”*
 - “(e) The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).”*
 - “(f) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.”*
 - “(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”*
- 3.4. In order to meet the basic conditions, the Ravenstone Neighbourhood Plan must be in general conformity with the “...strategic policies contained in the Development Plan...” which in this instance comprises the Milton Keynes Core Strategy (July 2013), the 'Saved' Policies of the Milton Keynes Local Plan (December 2005) and the Site Allocations Plan (2018), and which will remain so until such time as they are replaced.

- 3.5. Milton Keynes Council are at an advanced stage in the preparation of their new Local Plan, 'Plan:MK', which will replace the Core Strategy (2013) and Local Plan (2005). In April 2018, the Council submitted the 'proposed submission' version of the Plan:MK to the Secretary of State for examination, with the hearings taking place in July and August. Subject to the findings of the Inspector (and any modifications), the new Local Plan is expected to be adopted later this year.
- 3.6. Given the advanced stage of the Milton Keynes Plan, Milton Keynes Council must consider whether the basic conditions will also have been met once the Neighbourhood Plan has been through Examination. 'Chapter 5' of the Basic Conditions Statement confirms that the draft NP has only been assessed in the context of the Milton Keynes Core Strategy (2013). Paragraph 1.10 of the 'proposed submission' version of the Plan:MK confirms that *"it is expected that the policies in made neighbourhood plans will continue to be applied once Plan:MK is in place. There may, however, be exceptional circumstances where revisions to over-arching strategic policies will affect neighbourhood plan policies and in those cases, a parish council may want to consider revising its plan"*.
- 3.7. As the draft NP has been submitted to the Local Planning Authority (LPA) before the 24th January 2019, the previous National Planning Policy Framework (NPPF 2012) will apply for the purposes of examining this plan (paragraph 214 of the new NPPF (2018)).
- 3.8. Given the emerging Neighbourhood Plan has only been assessed in the context of the Milton Keynes Core Strategy (2013), if the Neighbourhood Plan proceeds, it will become immediately out of date following the adoption of the Milton Keynes Plan.

4. Representations to the Draft Neighbourhood Plan - Policy CE1

- 4.1. This Section provides the representations to Policy CE1 'Countryside' of the draft NP made on behalf of the SMV.

Policy Wording and Justification

- 4.2. Policy CE1 reads:

"The countryside within Ravenstone Parish will be protected from sporadic and isolated development that would create new buildings or structures, other than those permissible under permitted development rights and required for the essential needs of agriculture and forestry or otherwise in compliance with the policies contained within the Local Plan.

Other new development will be supported only where it can be demonstrated that there are exceptional reasons in accordance with the NPPF.

The views of the countryside from within the village as defined on the proposals map will be protected from development in any case as they make a positive and important contribution to the setting and character of the village, Conservation Area, and the setting of the Scheduled Ancient Monument".

- 4.3. The draft NP notes at paragraph 5.3 that the "*setting of Ravenstone within the rural landscape is an intrinsic part of the character of the village, that contributes to the attractive appearance of the Conservation Area*". The draft NP goes on to add that the "*protection of these gaps is an important aspiration of the Neighbourhood Plan, to ensure that this defining character of the village is preserved for future generations*".
- 4.4. Furthermore the draft NP, at Annex C, includes a Policy Map from the 1983 Ravenstone Village Plan. This Plan identifies [amongst others] 'attractive views' and 'attractive vistas'. It is stated within the Parish Council's Consultation Statement that Milton Keynes Council have confirmed that "*using the earlier 1983 Village Plan as confirmation for our work is sufficient*".

Policy Critique and Assessment against Basic Conditions

- 4.5. The SMV have a number of concerns regarding the relevance of Policy CE1 and these are identified and addressed in more detail below:
- development in the countryside; and
 - important views

Development in the countryside

- 4.6. Policy CE1 of the draft NP is seeking to protect the 'countryside' (i.e. land outside the settlement boundary) at Ravenstone from new development. The Policy seeks to restrict any development of new buildings/structures to permitted development rights and that for essential needs of agriculture and forestry.
- 4.7. Saved' Policy S10 of the Milton Keynes Local Plan (2005) and Policy DS5 of the emerging Plan:MK similarly confirms that development in the 'open countryside' will be limited to agriculture and forestry etc. However, the emerging Plan:MK permits greater flexibility than Policy CE1 with reference to countryside recreation, and other development which is wholly appropriate to a rural area and cannot be located within a settlement. The differences in the policy wording will create ambiguity. As such, it is considered that this section of Policy CE1 is superfluous and should be deleted given that this is a strategic issue and dealt with through the Plan:MK and NPPF.
- 4.8. Furthermore, Policy CE1 states that other new development will be supported where "*exceptional reasons*" can be demonstrated in accordance with the NPPF. This appears to be an incorrect reference to the 'exceptional circumstances' section of the NPPF that is concerned with Green Belt (and not countryside). Paragraph 55 of the NPPF (2012) allows development/new homes in well-defined circumstances, such as need for rural workers, enabling development to secure the future of heritage assets, re-use of redundant buildings, and new dwellings where they are of exceptional design or innovative nature. Not only is this again a strategic level issue, the additional weight that the policy seeks to give to the 'countryside' goes beyond the borough wide countryside policy and is contrary to both this policy and the NPPF, thereby failing to meet basic conditions (a) and (e).
- 4.9. **'Important Views'**
- The evidence base*
- 4.10. Paragraph 5.3 of the draft NP seeks to provide some, albeit very limited, justification for the views identified on the Proposals Map. It is also noted, at Chapter 4 in the Consultation Statement, that the Parish Council consider that the 1983 Village Plan (which also identified similar views) is sufficient evidence to demonstrate the identification of the 'important views' in the draft NP.
- 4.11. No information is provided in the draft NP on the status of the 1983 Village Plan and whether it was indeed prepared as a statutory document for planning purposes. In addition, no supporting evidence is provided to demonstrate how these 'attractive views/vistas' were derived in the 1983 Village Plan.
- 4.12. Policy NE5 of the draft Plan:MK confirms that development proposals in the 'open countryside' will need to demonstrate that various aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures. This includes [inter alia] 'important views e.g. local landmarks'. However, there is no evidence within the draft NP that any of the views incorporate/protect any key local landmarks. For example, the Scheduled Ancient Monument and the Parish Church of All Saints.

4.13. Therefore, it does not appear that the inclusion of these 'important views' has been evidenced by any independent and robust advice of a qualified body to ascertain their importance. The requirement to provide further justification for these views is set out within the PPG where it states "*proportionate, robust evidence should support the choices made and approach taken*" (Paragraph 040 'Neighbourhood Planning' of the PPG). The 'important views' identified are however not based upon any robust landscape and heritage assessments. Furthermore, the limited evidence that has been used is out of date and as such, limited weight, at best, can be afforded to these documents. As such, it is not considered to comply with the requirements of the PPG with regards to the provision of evidence.

4.14. The SMV also questions the 'importance' of these views as no information/justification is provided within the draft NP on the direction of the views, whether views are visible from publically accessible locations, the visual interest, its beauty and/or whether it holds any value for the locality such as important local landmarks or historical features. As such, Policy CE1 fails to meet basic condition (a).

Protected from development

4.15. Firstly, it is important to distinguish between 'important views' and a 'right to a view'. The 'important views' are a landscape designation and can be identified where the view makes a very significant contribution to the 'character' of the area or, are of cultural and/or historic value. In English planning law, there is no such thing as a legal 'right to a view'. The fact is that no matter how long a view has been enjoyed, it cannot be enjoyed "as of right".

4.16. Policy CE1 states that the views of the countryside within the village as identified on the Proposals Map "*will be protected from development in any case*". Accordingly, the Policy appears to seek to apply a 'blanket restriction' to development on land designated as 'important views'.

4.17. Again, as stated above, no justification or robust evidence base, is provided for the views identified on the Proposals Map. These views have not been assessed and verified by relevant technical consultants and so proportionate and robust evidence, as required by (Paragraph 040 'Neighbourhood Planning' of the PPG, is missing.

4.18. The Parish Council's Basic Conditions Statement indicates that Policy CE1 – and the identification of 'important views' - is seeking to protect 'valued landscapes' (in accordance with paragraph 109 of the NPPF 2012). The Milton Keynes adopted Proposals Map demonstrates that there is 'an area of attractive landscape' to the south/south-east of Ravenstone (**see Appendix B**). 'Saved' Policy S11 of the Milton Keynes Local Plan (2005) confirms that within these 'areas of attractive landscape' development should not damage the special character of the area. However, the landscape/countryside on the edge of the settlement of Ravenstone has no such designations. Furthermore, none of the identified 'important views' support views out to this area of 'attractive landscape'.

- 4.19. In terms of the emerging Local Plan policy, the 'areas of attractive landscape' have been removed and replaced by a permissive criteria based policy (Policy NE5 of the draft Plan:MK). The draft policy adds that development proposals should take into account the findings of the Milton Keynes Landscape Character Assessment (2016). The Landscape Character Assessment (LCA), at page 50-51, identifies Ravenstone within Character Area 5a & b 'Ouse Undulating Clay Farmland'. The LCA notes that "*historic houses and parklands are distinctive features*" of this landscape character area. However, no historic houses or parklands are identified at Ravenstone and therefore the countryside on the edge of the settlement has not been identified within the Milton Keynes Landscape Character Assessment as having any such landscape qualities. Therefore, not only is this again considered a strategic level issue, but the Neighbourhood Plan policy seeks to go beyond the borough wide policy, to assign weight to views that would result in a policy that contradicts the evidence base presented by Milton Keynes Council to the Local Plan Examination. It therefore cannot be regarded as a 'valued landscape' and protected in accordance with paragraph 109 of the NPPF (2012)..
- 4.20. By applying a 'blanket restriction' to development on land designated as 'important views', Policy CE1 of the draft NP fails to comply with the strategic policies of the adopted and emerging development plan, and serves only to constrain development contrary to the overarching NPPF objective of achieving sustainable development. Accordingly, it cannot be said that Policy CE1 of the draft CE1 meets basic conditions (a), (d) and (e) on this basis.

Summary

- 4.21. The SMV consider that 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.
- 4.22. 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).
- 4.23. 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.

5. Representations to the Draft Neighbourhood Plan - 'Housing'

- 5.1. This Section provides the representations to the 'Housing' chapter, Policy H1 'Settlement Boundary' and Policy H2 'New Housing Allocation' of the draft NP made on behalf of the SMV.

Context and Justification

- 5.2. The SMV support the intent of the draft NP to deliver new housing in accordance with the views of local residents. The local residents identified a need for around 10 new houses over the plan period.
- 5.3. At paragraph, 10.6, the draft NP acknowledges that "*it was apparent that windfall infill within the existing settlement boundary would not provide sufficient housing*" – and therefore the draft NP identifies land for housing to meet local needs. The paragraph adds that local residents highlighted support for development on Previously Developed Land (PDL), that housing be provided in small scale groups or limited infill plots that respect the character and appearance of the village. However, the SMV question whether these 'preferences' have been delivered through the site selection process and, in particular, the allocation of Site Ref: PHA1 in Policy H2 of the draft NP.

Consideration of potential housing sites

Identification of sites

- 5.4. The draft NP, at paragraph 10.9, explains that during the initial consultation process local landowners were contacted to invite them to put forward sites for consideration as part of the NP.
- 5.5. The SMV suggested significant land was available and suitable for small-scale development, including land adjacent to the existing settlement boundary. There is no evidence as to how the Parish Council have assessed this land for the delivery of housing, and instead the draft NP identifies the majority of this land as 'important views'. Notwithstanding that there is no evidence and/or justification for their identification as 'important views' (see 'Section 4' above), the SMV consider that this land needs to be assessed for its suitability for housing against the site selection methodology. Furthermore, whilst there is a preference for development on PDL, the draft NP needs to consider all sites (including greenfield land) for their suitability to ensure that the overarching NPPF objective of achieving sustainable development is achieved in accordance with basic condition (d).
- 5.6. In particular, the SMV consider that there are a couple of sites that are suitable and deliverable for small-scale residential development immediately adjacent to the settlement boundary. The following sites have been identified for small-scale residential development and are fully assessed later in this section:
- a) the land to the south of 16 Common Street (shown on Figure 1); and
 - b) the land to the north of Ravenstone House (shown on Figure 2).

Ravenstone Neighbourhood Plan

Representation on Regulation 16 Draft Ravenstone Neighbourhood Plan

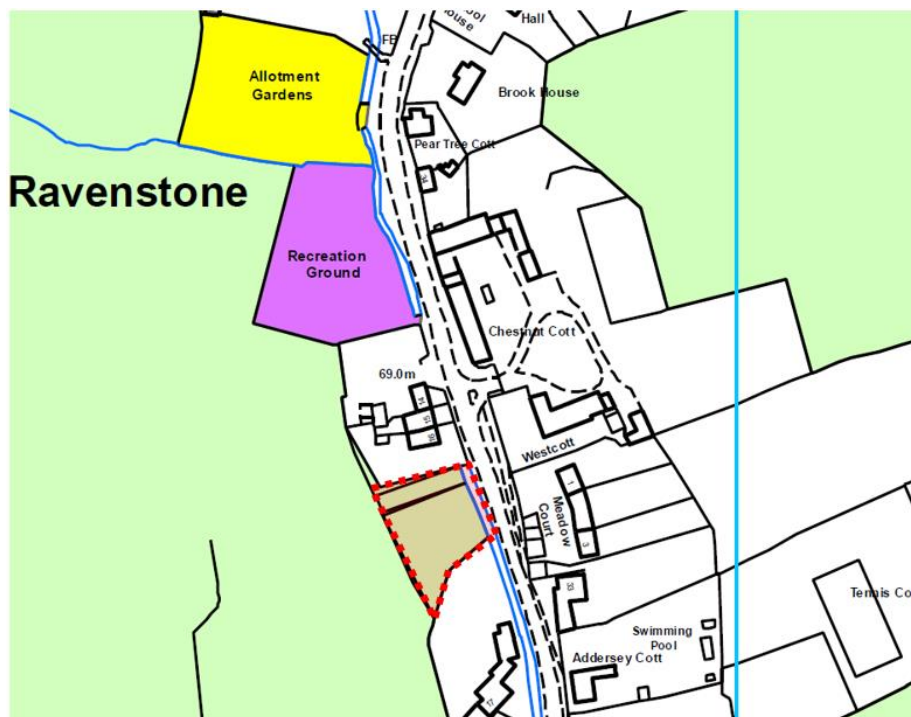


Figure 1 - Land to the south of 16 Common Street



Figure 2 - Land to the north of Ravenstone House

Community Consultation

- 5.7. The NPPF highlights the importance of community-led planning and the power that Neighbourhood Planning provides to local communities. The PPG, at paragraph 001 of the 'Neighbourhood Planning' section, confirms that Neighbourhood Plans gives local communities the opportunity to choose where they want new homes, shops and offices to be built. Clearly, therefore, it is vital for the draft NP to accurately portray the views of the community that it purports to represent.
- 5.8. At present this is not the case for the draft NP – as far as we are aware, no public consultation has taken place to seek local residents' preferences on where development should be located in the village. A public consultation should be carried out on all the available sites - including the SMV's sites identified above - to establish community preference. The results should then be considered alongside the outcomes of the site selection methodology to formulate the development strategy for Ravenstone. As such, the draft NP currently fails to meet basic conditions (a) and (d).

Policy H1: Settlement Boundary

- 5.9. The SMV supports the presumption in favour of sustainable development within the settlement boundary. However, the settlement boundary should not be finalised until all the potential sites for development have been assessed and the development strategy for Ravenstone confirmed.

Policy H2: New Housing Allocation (PHA1)

- 5.10. Policy H2 of the draft NP allocates Site Ref: PHA1 for up to 8 new dwellings. Whilst the approach to identify sites at the outset on Previously Developed Land (PDL) is supported by national and local planning policies, we have a number of concerns with the suitability of the 'site selection methodology' and allocation of Site Ref: PHA1. These are considered further below:

Employment Use

Community Questionnaire

- 5.11. Site Ref: PHA1 is the only employment site within the village. The SMV note that as part of the 'Questionnaire' 74% of local residents stated that encouragement should be offered for existing businesses to grow, but 64% were against allocating any land for new business/employment development (paragraph 2.36 of the draft NP).
- 5.12. This clearly demonstrates that there is significant community support for Site Ref: PHA1 to be retained for employment/business use. Indeed, given the local community support the draft NP should instead contain a policy to support and enhance the active employment use at Site Ref: PHA1. This is in accordance with the NPPF (2012) which places great weight on the importance of supporting a prosperous rural economy,

including the growth and expansion of all types of business and enterprise in rural areas (paragraph 28). However, the Parish Council has allocated the site for residential use and disregarded the views of the majority of local residents that wanted the draft NP to offer encouragement for existing businesses to grow.

- 5.13. The draft NP, at paragraph 10.6, states that local residents wanted housing provided in “*small scale groups*”. Currently, the draft NP delivers all the housing on one ‘larger’ site for 8 dwellings. However, the approach preferred by local residents seems to be for small scale sites to be distributed throughout the village.
- 5.14. Accordingly, it is not clear how the ‘site assessment’ has taken account of the views of local residents and therefore fails to accord with basic conditions (a).

Sustainability

- 5.15. The loss of Site Ref: PHA1 will make the village less sustainable as it is the only employment/commercial site in the village. The impact of the loss of the employment land has not been fully assessed within the ‘site assessment’, or on the village as a whole.
- 5.16. Paragraph 55 of the NPPF (2012) confirms that housing should be located where it will enhance or maintain the vitality of rural communities. The permanent loss of the site to residential use fails to support important rural jobs and the rural economy and no robust assessment has taken place to demonstrate that the loss of the employment site will not impact on the vitality of the village. As such, it cannot be said that the allocation of Site Ref: PHA1 in Policy H2 meets basic condition (a) and (d).

Deliverability

- 5.17. Footnote 11 of the NPPF (2012) confirms that “*to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on site within five years and in particular that development of the site is viable*”. The employment site is in active use and no information has been provided to demonstrate the site will be available and deliverable within the plan period and therefore fails to meet basic condition (d). In particular, the SMV has concerns over the following:
- the site is in active employment use and therefore not immediately available for development;
 - no details of the leases of the existing occupiers is known - and therefore no information has been provided to demonstrate that the site is deliverable within five years;
 - the site is in multiple ownership which could delay the sale of the site to a developer; and
 - the costs of de-contamination and clearing the site are unknown and could make the development of the site unviable.

Character

- 5.18. The development of up to 8 houses on Site Ref: PHA1 will impact on the character of the village. As acknowledged at paragraph 5.3 of the draft NP, the built form of the village is relatively linear and predominantly follows Common Street and North End. The development of this site for 8 dwellings will clearly result in a departure from the linear pattern of residential development along the east of North End.
- 5.19. The SMV consider that if Site Ref: PHA1 is to come forward for residential development, a linear development of c.3-4 dwellings could be accommodated on site which would respond positively to the character of the village.

Alternative Sites

- 5.20. With the above in mind, we consider that the approach to deliver all the village housing on Site Ref: PHA1 is flawed and does not meet the basic conditions.
- 5.21. The SMV has repeatedly advised that land on the edge of the settlement was available and suitable for development and that they were willing to discuss this further with the Parish Council/NP Steering Group to identify potential sites. However, no SMV sites on the edge of the settlement have been assessed by the Parish Council as part of the Neighbourhood Plan process. As set out above, the SMV have identified the following small-scale sites for development:
1. *the land to the south of 16 Common Street for 2-3 dwellings; and*
 2. *the land to the north of Ravenstone House for 1-2 dwellings.*
- 5.22. The local residents identified a need for around 10 dwellings in the village – the SMV's land identified has capacity for up to 5 new homes. Therefore, if appropriate the SMV is willing to work with the Parish Council/NP Steering Group to help identify further suitable sites for small-scale development within the SMV's ownership. Alternatively, if it can be demonstrated that the loss of the employment site (Site Ref: PHA1) is justified, in combination with a small scale scheme at Site Ref: PHA1 (i.e. 3-4 dwellings) and/or any other sites put forward to the draft NP considered suitable for small-scale development.

'Land to the south of 16 Common Street, Ravenstone'

- 5.23. The site extends to 0.1ha and is owned by the SMV in its entirety. The site is currently in agricultural use.
- 5.24. The site adjoins the eastern edge of the built up extent of Ravenstone, abutting the gardens of 16 Common Street and 17 Common Street. Common Street forms the western boundary, beyond which are a number of residential properties. Common Street is the main arterial route through Ravenstone. Open fields lie to the west.

- 5.25. Development of the 'Land to the south of 16 Common Street, Ravenstone' for between 2-3 dwellings, is a deliverable option for the following reasons:
- a) Residential development in this location would be in keeping with the surrounding area. The site is a logical extension to the settlement boundary and is effectively 'infill' development within the village.
 - b) The site is within walking distance to the village facilities, including church, allotments and recreation ground.
 - c) As set out at Section 4, there is no evidence to identify this land as 'important views', and the adopted Local Plan does not identify this land as an 'area of attractive landscape'. Furthermore, there is no evidence to suggest that the site is a 'valued landscape' in accordance with paragraph 109 of the NPPF (2012).
 - d) The site is close to a number of listed buildings, but it is considered that residential development can be sensitively designed to limit the impact upon these heritage assets.
 - e) Similarly, the site is adjacent to the Conservation Area – however, any residential development will be sympathetic, in scale and design, to the character and appearance of Ravenstone (in accordance with the other policies in the draft NP).
 - f) The site is located within Flood Zone 1, the lowest probability of flooding.
 - g) The scale of development is in keeping with the wishes of local residents and the need to identify "small scale groups" of development throughout the village.
 - h) The size of the site and scale of development lends itself to moderately sized houses, rather than large 'executive' homes. This type of 'smaller' housing will provide an opportunity for young families to live in the village, thereby enhancing its vitality.
 - i) The sites are within the sole control of the SMV and are available for delivery within the Plan period.

'The land to the north of Ravenstone House, Ravenstone'

- 5.26. The site extends to around 0.1ha. The site is owned by the SMV and is in agricultural use. The Site adjoins the western edge of the settlement, abutting the gardens of Ravenstone House and 'The Cottage'. Common Street forms the eastern boundary, beyond which are residential properties. Open fields lie to the east.
- 5.27. Development of the 'land to the north of Ravenstone House, Ravenstone' for between 1-2 dwellings, is a deliverable option for the following reasons:
- a) Residential development in this location would be in keeping with the surrounding area. The site is a logical extension to the settlement boundary and is effectively 'infill' development within the village.
 - b) The site is within walking distance to the village facilities, including church, allotments and recreation ground.
 - c) As set out at Section 4, there is no evidence to identify this land as 'important views', and the adopted Local Plan does not identify this land as an 'area of attractive landscape'. Furthermore, there is no evidence to suggest that the site is a 'valued landscape' in accordance with paragraph 109 of the NPPF (2012).
 - d) The site is close to a number of listed buildings, but it is considered that residential development can be sensitively designed to limit the impact upon these heritage assets.
 - e) The 'Land to the north of Ravenstone House' is identified within the Conservation Area – however this appears to be an anomaly given that the land is outside the settlement boundary (without any built development) and therefore should rightly be excluded from the Conservation Area boundary.
 - f) The site is located within Flood Zone 1, the lowest probability of flooding.
 - g) The scale of development is in and the need to identify "small scale groups" of development throughout the village.
 - h) The sites are within the sole control of the SMV and are available within the Plan period.
- 5.28. The above clearly demonstrates that the sites are suitable, available and achievable to enable the delivery of residential development that responds positively to the character of Ravenstone within the Plan Period. Moreover there are no significant constraints which will prevent development on the sites coming forward.

Summary

- 5.29. The SMV consider that 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.
- 5.30. 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.

6. Representations to the Draft Neighbourhood Plan – Policy H3

- 6.1. This Section provides the representations to Policy H3 'Windfall Infill Development' of the draft NP made on behalf of the SMV.

Policy Wording and Justification

- 6.2. Policy H3 reads:

"Small scale infill residential proposals for one or two dwellings will be supported where such proposals are located within the defined settlement boundary and where the following criteria can be met..."

Policy Critique and Assessment against Basic Conditions

- 6.3. The SMV supports the intention to deliver small-scale infill sites within the settlement boundary. However, the policy should not seek to restrict sustainable infill development to only "*one or two dwellings*". On this basis, Policy H3 does not meet basic conditions (a) and (d) given it effectively acts to restrict growth within the confines of the village. Policy H3, as proposed, is inflexible and is based upon a restrictive approach. Currently, the policy is contrary to the whole ethos of the NPPF and the presumption in favour of sustainable development. The policy should be amended to allow for positive growth.
- 6.4. The criteria in the policy should be worded positively to encourage sustainable infill development to come forward. Indeed, some of the criteria goes above and beyond national policy i.e. requiring a net gain in biodiversity. This is unlikely to be achievable on small sites and is therefore contrary to paragraph 109 of the NPPF (2012).
- 6.5. In terms of emerging policy, Policy DS2 of the draft Plan:MK confirms that the Council will permit development proposals within the defined settlement boundaries where they comply with all other relevant policies in the Plan:MK or Neighbourhood Plans. There is no restriction on the size/scale of development.

Summary

- 6.6. 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.
- 6.7. 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:

"Infill residential development will be supported where such proposals are located within the defined settlement boundary and where the following criteria can be met..."

- 6.8. The last bullet point should be re-worded to “*the scheme would minimise impacts on biodiversity and seek to achieve a net gain in biodiversity, where possible*”. In addition, again reference to the ‘important views’ should be removed (bullet point two).

7. Conclusions

- 7.1. These representations have been produced by Savills on behalf of the SMV. They respond to the Regulation 16 public consultation being undertaken by Milton Keynes Council following the formal submission of the Ravenstone Neighbourhood Plan (July 2018) by Ravenstone Parish Council.
- 7.2. 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.
- 7.3. 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.
- 7.4. 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.
- 7.5. 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.

Appendices

Ravenstone Neighbourhood Plan

Representation on Regulation 16 Draft Ravenstone Neighbourhood Plan



Appendix A – The SMV Estate Plan

NOTE:- Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office.
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NOTE:- Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

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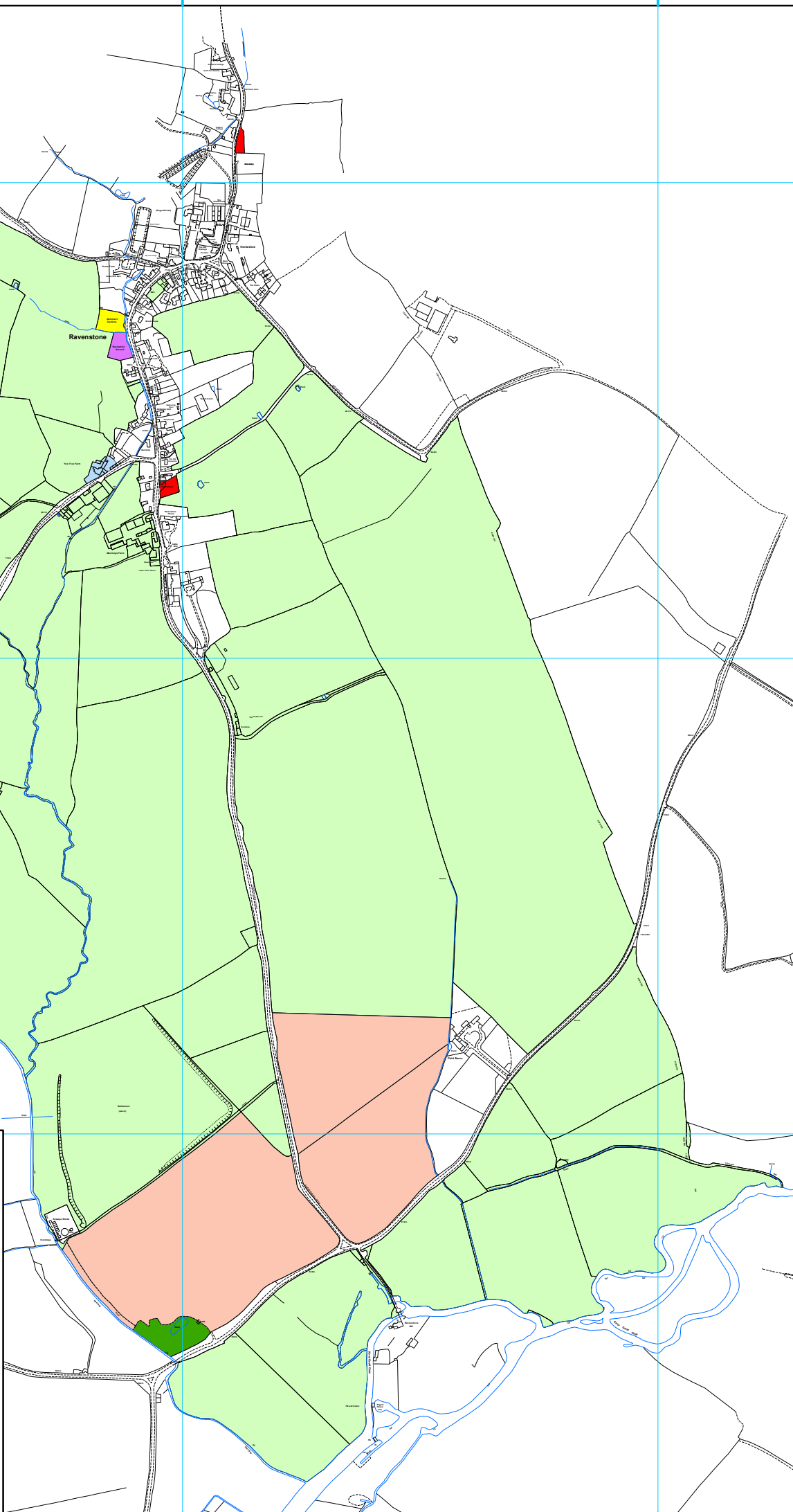
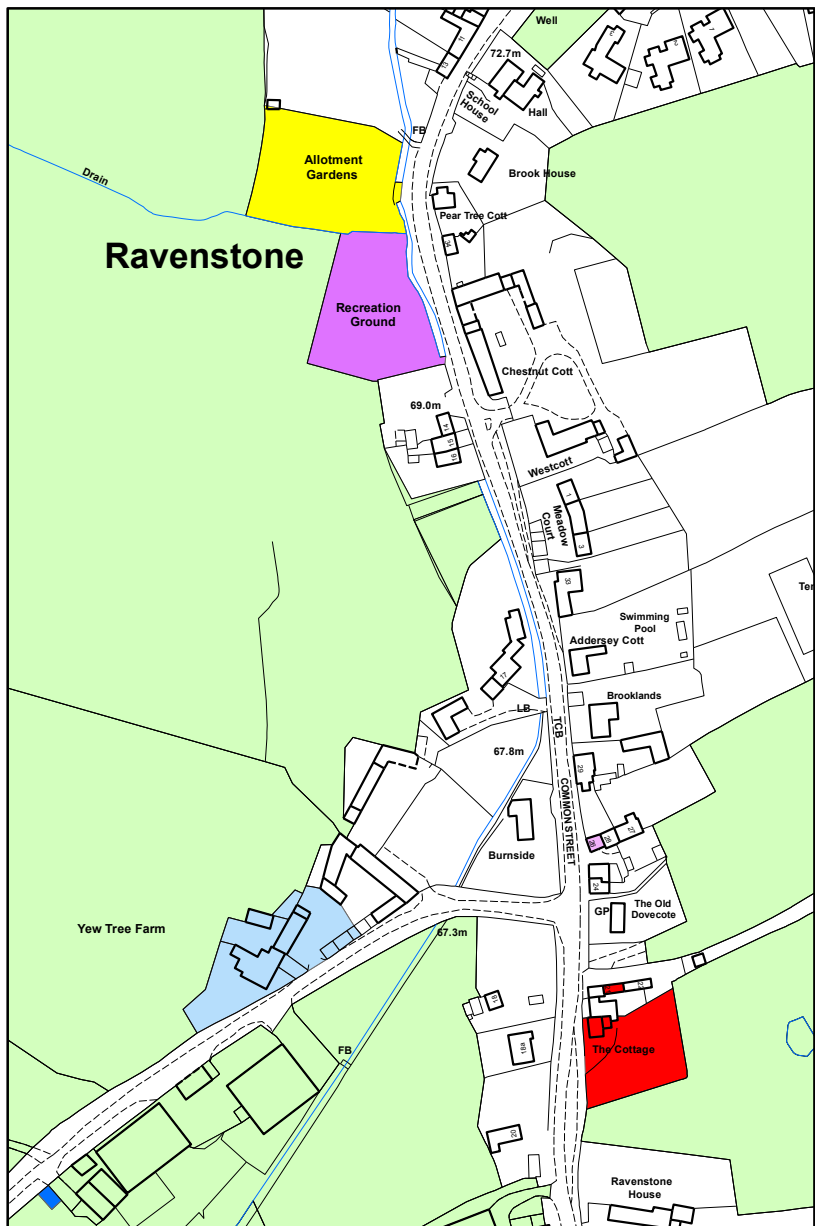
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1:3,000 Village Inset



Legend

- 21 Common Street
- 36 Common Street
- Allotment
- Mannings & Yew Tree Farm
- Old Gravel Workings Spinney
- Old Gravel Works
- Playing Field
- Yew Tree Farmhouse
- Yew Tree Water House
- Other Residential



CLIENT	
The Society Of Merchant Venturers	
DRAWING TITLE	
Ravenstone Estate	
SCALE	DRAWING No.
1:11,000 on A3	13 0246
66017	DATE
	29 April 2016

Ravenstone Neighbourhood Plan

Representation on Regulation 16 Draft Ravenstone Neighbourhood Plan

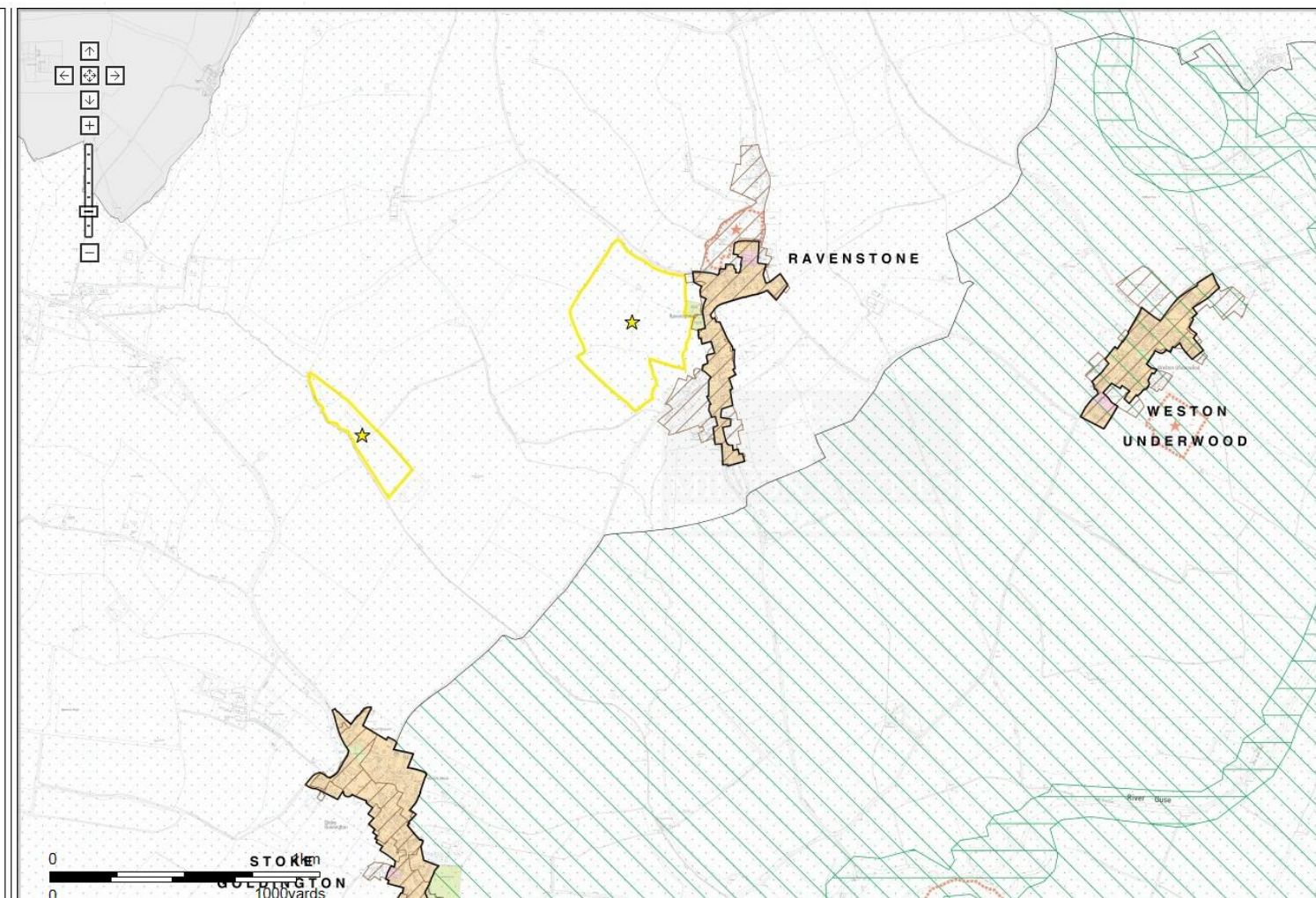


Appendix B – Extract of The Milton Keynes Adopted Proposal Map



Milton Keynes Local Plan
2001-2011
Adopted December 2005

Milton Keynes Core Strategy
Adopted July 2013



Green lines ('diagonal') – Areas of Attractive Landscape