

Representor ID: RP-147

UI Representor ID: 34

UI Representation ID: 862

Representor Name: Hayden Seed

Representor Organisation: Storey Homes

Policy: Policy GS2		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	No	Yes
Paragraph		
Compliance Comment		
<p>3.4.1 We acknowledge the Plan's minimum requirement (50,372) and total supply (59,779), and the 19% buffer to manage risk. However, the concern is that almost all of the supply is city-focused; villages are reliant on an unquantified NP contribution and a windfall allowance constrained by a threshold of fewer than 10 homes.</p> <p>3.4.2 Regarding the windfall allowance, given there is limited policy provision for any development at scale within the villages, the likelihood that development which meets the housing needs of the general population being delivered through this mechanism will be extremely limited.</p> <p>3.4.3 Consequently, it is clear that there is an absence of any specific strategy for the delivery of homes within Olney and the villages, essentially leaving it to local groups to determine whether they would like to deliver housing.</p> <p>3.4.4 Whilst we agree that local people should have a significant sway in the type and location of housing, leaving housing to be allocated through Neighbourhood Plans is a fundamentally flawed approach, given the complexities associated with establishing housing need and the preparation of Neighbourhood Plans.</p> <p>3.4.5 Furthermore, as quoted within the Sustainability Appraisal (Nov 2025), the national funding for neighbourhood planning has reduced, making the task even more challenging than it was before. As such, the likelihood will be that no development will be allocated in Sherington, nor any other villages for the next 25 years.</p> <p>3.4.6 As stated above, it is clear that a housing requirement for the villages needs to be outlined by the Council in-line with specific housing requirement. This could be based on the approach taken by the standard method, utilising existing housing stock and affordability calculations to determine and advise local people on the numbers that are required in order for an area to continue to meet demand over the plan period.</p> <p>3.4.7 The Housing Strategy as it currently stands relies very heavily on complex and aspirational housing numbers expected to be found within Central Milton Keynes (CMK). Whilst this is commendable, it is overly ambitious since the majority of homes are to be delivered on unidentified sites and will rely on the redevelopment of existing buildings / brownfield sites. These are not the same as site specific allocations, which</p>		

have been extensively tested to ensure capacity for delivery and there is no certainty that the number of houses slated for CMK can and will be delivered.

3.4.8 This mix risks delivery shortfalls, particularly in the first 10 years and also beyond as there is no certainty of supply. It is also opposed to Paragraphs 69 – 70 of the NPPF on setting (or providing) neighbourhood housing requirements / indicative figures. As such, it is suggested that a small, plan-led rural component (allocated or contingency) would make the plan more effective and resilient whilst maintaining consistent with its urban focus

3.4.9 In order to create room for these additional allocations, the overall housing requirement should be increased to cater for this. Or, alternatively, the numbers which are expected to be found within Central Milton Keynes could be reduced slightly in favour of a rural contingent, creating more balanced spread of development and ensuring the plan benefits the residents of both the City itself and the rural hinterland beyond.

3.4.10 Whilst we support managing scale in rural areas, the current approach to the Tier 2 settlements is unnecessarily restrictive and limits numerous sustainable village opportunities that can deliver early, address local needs and potentially address the lack or deterioration of the local infrastructure / services such as schools, shops etc. The policy would be more effective and justified if it provided a clear route for non-strategic allocations in these areas.

Modification Comment

3.4.11 Amend Policy GS2 and supporting text to introduce a non-strategic allocations programme to identify a limited number of small / medium sites (e.g. 10 – 50 dwellings) within or adjoining Tier 2 settlements (including Sherington) to deliver in years 1–10, equivalent to c. 3 – 5 % of the total supply (1,800 – 3,000 homes) without reducing strategic allocations.

Appear at examination?	Yes
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Appear at examination reason?

SH wish to participate in the hearing sessions where the policy wording for GS1 is discussed. Our representations raise issues that would benefit from discussion.

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Policy: Policy GS2		
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Yes	No	Yes
Paragraph		
Compliance Comment		
<p>3.4.1 We acknowledge and support the Plan’s minimum requirement (50,372) and total supply (59,779), and the 19% buffer to manage risk. However, the concern is that almost all of the supply is city-focused; villages are reliant on an unquantified NP contribution and a windfall allowance constrained by a threshold of fewer than 10 homes.</p> <p>3.4.2 Regarding the windfall allowance, given there is limited policy provision for any development at scale within the villages, the likelihood that development which meets the housing needs of the general population being delivered through this mechanism will be extremely limited.</p> <p>3.4.3 Consequently, it is clear that there is an absence of any specific strategy for the delivery of homes within Olney and the villages, essentially leaving it to local groups to determine whether they would like to deliver housing.</p> <p>3.4.4 Whilst we agree that local people should have a significant sway in the type and location of housing, leaving housing to be allocated through Neighbourhood Plans is a fundamentally flawed approach, given the complexities associated with establishing housing need and the preparation of Neighbourhood Plans.</p> <p>3.4.5 Furthermore, as quoted within the Sustainability Appraisal (Nov 2025), the national funding for neighbourhood planning has reduced, making the task even more challenging than it was before. As such, the likelihood will be that no development will be allocated in Sherington, nor any other villages for the next 25 years.</p> <p>3.4.6 As stated above, it is clear that a housing requirement for the villages needs to be outlined by the Council in-line with specific housing requirement. This could be based on the approach taken by the standard method, utilising existing housing stock and affordability calculations to determine and advise local people on the numbers that are required in order for an area to continue to meet demand over the plan period.</p> <p>3.4.7 The Housing Strategy as it currently stands relies very heavily on complex and aspirational housing numbers (circa 16,000) expected to be found within Central Milton Keynes (CMK). Whilst this is commendable, it is overly ambitious since the majority of homes are to be delivered on unidentified sites and will rely on the redevelopment of existing buildings / brownfield sites. These are not the same as site</p>		

specific allocations, which have been extensively tested to ensure capacity for delivery and there is no certainty that the number of houses slated for CMK can and will be delivered.

3.4.8 This mix risks delivery shortfalls, particularly in the first 10 years and also beyond as there is no certainty of supply. It is also opposed to Paragraphs 69 – 70 of the NPPF on setting (or providing) neighbourhood housing requirements / indicative figures. As such, it is suggested that a small, plan-led rural component (allocated or contingency) would make the plan more effective and resilient whilst maintaining consistent with its urban focus

3.4.9 In order to create room for these additional allocations, the overall housing requirement should be increased to cater for this. Or, alternatively, the numbers which are expected to be found within Central Milton Keynes could be reduced slightly in favour of a rural contingent, creating more balanced spread of development and ensuring the plan benefits the residents of both the City itself and the rural hinterland beyond.

3.4.10 Whilst we support managing scale in rural areas, the current approach to the Tier 2 settlements is unnecessarily restrictive and limits numerous sustainable village opportunities that can deliver early, address local needs and potentially address the lack or deterioration of the local infrastructure / services such as schools, shops etc.

3.4.11 These issues are compounded by a national ageing population and declining birth rate, therefore new homes are a vital component in the villages to support facilities, a vibrant housing market and village life in general. As such, the policy would be more effective and justified if it provided a clear route for non-strategic allocations in these areas.

Modification Comment

3.4.12 Amend Policy GS2 and supporting text to introduce a non-strategic allocations programme to identify a limited number of small / medium sites (e.g. 10 – 50 dwellings) within or adjoining Tier 2 settlements (including Sherington) to deliver in years 1–10, equivalent to c. 3 – 5 % of the total supply (1,800 – 3,000 homes) without reducing strategic allocations.

Appear at examination?	Yes
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Appear at examination reason?

SH wish to participate in the hearing sessions where the policy wording for GS2 is discussed. Our representations raise issues that would benefit from discussion.

Representor ID: RP-147

UI Representor ID: 34

UI Representation ID: 862

Representor Name: Hayden Seed

Representor Organisation: Storey Homes

Policy: Policy GS1		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	No	Yes
Paragraph		
Compliance Comment		
<p>3.3.1 Policy GS1 identifies Tier 2 settlements and states that development should focus on meeting local needs, including locations identified in relevant Neighbourhood Plans. Whilst we support the general direction of the policy, we feel that the language could be tightened to help ensure that this aspiration is actually achieved.</p> <p>3.3.2 Paragraph 69 of the NPPF (2024) requires strategic policies to set out a housing requirement for designated neighbourhood areas or provide indicative figures if a specific requirement cannot be set in order to guide neighbourhood planning. The draft MK City Plan does not currently attribute a neighbourhood area requirement or indicative figure for villages such as Sherington and therefore risks being ineffective.</p>		
Modification Comment		
<p>3.3.3 Policy GS1 should be modified to state that within Tier 2 settlements (Olney and the villages), the Council will publish indicative neighbourhood area housing figures to support plan making in-line with Paragraph 69 of the NPPF (2024).</p>		
Appear at examination?	Yes	
Appear at examination reason?		
SH wish to participate in the hearing sessions where the policy wording for GS1 is discussed. Our representations raise issues that would benefit from discussion.		

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Policy: Policy HQH8		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	No	Yes
Paragraph		
Compliance Comment		
<p>3.6.1 At Part A1 of Policy HQH8, it is set out that affordable homes on rural exceptions sites will only be supported where the site does not exceed 0.5 hectares or 10 homes, or in the case of community-led developments, 1ha or 5% of the size of the existing settlement.</p> <p>3.6.2 A fixed cap on development prevents the plan from responding to objectively assessed local needs over the plan period. The NPPF requires plans to meet as much needs as possible and to be flexible – a fixed cap is the opposite of this and reduces the ability of the plan to adapt and change to meet different circumstances.</p> <p>3.6.3 The Planning Practice Guidance is clear that a housing need should be established through empirical assessments, either through a Housing and Economic Development Needs Assessment (HEDNA) or a Housing Needs Survey. A numeric ceiling applied uniformly across villages is not a proportionate substitute for settlement-specific evidence on the quantity and type required to meet local needs.</p> <p>3.6.4 Furthermore, given the cost to build affordable developments are typically similar to a traditional private / affordable housing scheme, economies of scale are required to make certain schemes viable.</p> <p>3.6.5 As such, a 10-unit ceiling would perpetuate viability risks and could render most housing sought through this policy undeliverable and therefore any delivery of affordable housing would effectively default to Neighbourhood Plan routes only, further highlighting the issue that this is effectively the only mechanism for the delivery of any housing of a medium scale within the rural part of the plan area.</p>		
Modification Comment		
<p>3.6.6 It is suggested that HQH8 Part A1 is removed.</p> <p>3.6.7 Parts 2 – 5 are sufficient to control the delivery of suitable rural exception schemes alone, as Part 4 requires developments to be supported by an up-to-date housing needs assessment which is consistent with National Policy.</p>		
Appear at examination?	No	
Appear at examination reason?		

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Policy:		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	No	Yes
Paragraph		
<p>As identified in Policies GS1 and GS2 below, we still expect local communities to plan for growth that responds to their own local ambitions and needs through Neighbourhood Plans. This includes communities within the city as well as those beyond, in Olney</p>		
Compliance Comment		
<p>Whilst the Growth Strategy mentions Olney and the villages (including Sherington), the spatial strategy directs almost all growth to the city, with no strategic allocations in rural areas and an expectation that villages address growth “that responds to their own ambitions” through Neighbourhood Plans.</p> <p>We appreciate the encouragement provided for local groups within areas and villages around the administrative area to fully understand their specific local housing needs and plan accordingly. However, there is no prescribed way for these areas to determine the quantum of housing that is required.</p> <p>As such, the complete absence of a modest rural component and the reliance on an unquantified neighbourhood plan contribution (minimum of 1 unit) risks an absence of delivery in the villages, which will only continue to perpetuate the stagnation in services and facilities, such as local schools, shops etc. The policy position, as it stands, is likely to result in a steady and continued decline as there is no incentive to deliver housing at a rate which meets the needs of the villages.</p>		
Modification Comment		
<p>The proposed modifications are detailed further in relation to Policies GS1 and GS2 below, however, they can be consolidated to the following:</p> <ul style="list-style-type: none">- Insert a clear and quantified role for Tier 2 settlements (Olney & villages). To do this, the Council will need to publish indicative neighbourhood area housing figures to support plan-making in-line with Paragraph 69 of the NPPF (2024).- Add text confirming the principle of limited allocations or a criteria based policy for sites adjacent to defined settlement boundaries where sites demonstrably meet local need and pass other tests set out within the Local Plan on matters of design, landscape, sustainability etc.		
Appear at examination?	No	

Appear at examination reason?