

Newport Pagnell Neighbourhood Plan Examination

Publicity Responses

Agenda Item	Company	Response	Summary
2	Barton Willmore (Redrow Homes)	<p>Redrow Homes are generally supportive of the emerging Neighbourhood Plan. The emerging Neighbourhood Plan acknowledges that the adopted Milton Keynes Core Strategy identifies Newport Pagnell as the largest Key Settlement in the rural area, and it is therefore expected to contribute towards providing housing land over the life of the Core Strategy to 2026. Land for 613 dwellings still need to be identified within the rural area. On this basis, the emerging Neighbourhood Plan Policy NP1 identifies six sites for development, with a combined capacity of 1,400 dwellings. This aspiration to identify land for 1,400 new dwellings is supported, in accordance with Paragraph 47 of the National Planning Policy Framework, which seeks to 'boost significantly the supply of housing'.</p> <p>Policy NP1 identifies the 'Tesco Site' as being suitable for mixed employment and housing development (Site e)). The identification of this site for a residential-led mixed use development is preferred and supported by Redrow Homes.</p> <p>Emerging Neighbourhood Plan Policy NP3 identifies specific policies in respect of the Tesco Site. The Policy acknowledges the presence of three 'historical buildings' located within the Site, which should be retained. Part (a) of the draft Policy seeks to secure B1 business floorspace on the Site, and suggests that the historical buildings could accommodate such uses. Redrow Homes are seeking for flexibility within draft Policy NP3 to include the potential for community, leisure or heritage uses to be permitted within the historical buildings. Whilst we understand that the Town Council are keen to secure an element of employment on the Site, it is considered that community, leisure or heritage uses would also present employment opportunities, whilst also allowing additional flexibility to ensure that the aspirations for the site, and indeed the restoration of these historical buildings, can be delivered.</p> <p>Part (b) of the draft Neighbourhood Plan Policy NP3 requires that the three historical buildings on Site are retained and fully restored for occupation prior to the completion of 50% of any dwellings permitted on the Site. Amendments to this part of the policy are requested to ensure that the deliverability of new homes on the site is not unduly impacted upon. It is suggested that the historical buildings should be restored for occupation prior to the completion of 75% of any dwellings permitted on Site. It is also suggested that the policy makes it clear that any internal works or 'fit out' of these historical buildings, which would be undertaken by their future occupier in accordance with their needs (which would be outside of the developers' control), is not required as part of this restoration. It is therefore suggested that part (b) of emerging Policy NP3 be amended as follows:</p> <p><i>"(b) The three historical buildings shall be retained and fully restored ready for and occupation prior to the completion of 75% of any housing permitted on site. This does not include any internal works associated with preparing the buildings for their intended use."</i></p> <p>Emerging Neighbourhood Plan Policy NP5 considers affordable housing and tenure standards. The supporting text to the draft policy confirms that <i>"Where issues of viability on social housing provision arise, developers will be expected to provide an open book appraisal of their scheme."</i></p> <p>Milton Keynes Council are currently in the process of preparing a new Local Plan and the adopted Core Strategy confirms that until the new Local Plan is adopted, affordable housing provision will be considered in accordance with the relevant saved policies of the Local Plan</p>	<p>Redrow Homes are fully supportive of and commend the Newport Pagnell Neighbourhood Plan's aspirations for growth during the period to 2031. They are also supportive of the identification of the Tesco Site for residential development.</p> <p>Redrow Homes would however like to request the amendment of part (a) of emerging Policy NP3 to allow community, leisure or heritage uses within the locally listed buildings, as opposed to restricting these to B1 floorspace. The flexibility to allow such uses would ensure the generation of employment on the Site through these uses, whilst also ensuring that their future use can be secured. In addition, further flexibility is requested in respect of part (b) of the policy to ensure that the delivery of housing on the site is not unduly delayed by factors outside of the developers control in respect of the historical buildings and their future occupiers.</p> <p>Redrow Homes would also request that the supporting text to emerging Policy NP5 in respect of viability is included within the Policy itself, in accordance with both the existing policy position at Milton Keynes and in accordance with Paragraphs 47 and 50 of the NPPF, as well as amendments to the policy to reflect the adopted Affordable Housing SPD to allow reductions in affordable housing provision where historic assets are being enhanced.</p>

		<p>2005. Saved Policy H5 of the 2005 Local Plan identifies that affordable housing provision should take account of site and market conditions. Milton Keynes Council's Local Plan 2005 and NPPF Conformity Assessment (July 2015) confirms that Saved Policy H5 is considered to be fully consistent with Paragraph's 47 and 50 of the NPPF. As such, it is considered that, in accordance with this, emerging Neighbourhood Plan Policy NP5 should make provision within the policy itself, as opposed to the supporting text, for flexibility regarding affordable housing provision where viability constraints arise.</p> <p>In addition, it is also noted that Milton Keynes Council's Affordable Housing Supplementary Planning Document (March 2013) allows for reductions in affordable housing provision where there is <i>"enhancement of historic assets on a development site, which may be in the public interest"</i> (Paragraph 2.19). It is requested that emerging Neighbourhood Plan Policy NP5 be updated to reflect this adopted policy position thus ensuring a robust and consistent approach.</p>	
2	Bidwells (MKDP)	<p>At the time of writing, MKDP acts as strategic adviser to Milton Keynes Council ("MKC") in relation to its property holdings, including land within the Tickford Fields Farm Strategic Reserve Site (part ownership) and Tickford Fields Farm East (whole ownership). The NP allocates both sites for development as part of the wider Tickford Fields Estate development.</p> <p>The comments are made to the submission version of the NP dated 29th July 2015 on behalf of Milton Keynes Council in their capacity as landowners only.</p> <p>MKC/MKDP are largely very supportive of the plan and the work undertaken by the Steering Group. Moreover, the objective of a comprehensive, cohesive and well-planned development at Tickford Fields Farm Estate is fully supported. On further consideration of the detail of the plan, we wish to highlight some concern in terms of ensuring that the plan is deliverable to support Newport Pagnell's needs.</p> <p>Planning Practice Guidance para 41-005-20140306 requires that:  <i>"If the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable. The National Planning Policy Framework requires that the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."</i></p> <p>Some of the requirements do not allow for sufficient flexibility for the deliverability of the Tickford Fields Farm Estate development. In this respect, it is considered that minor modifications to the plan are necessary in order to meet the Basic Conditions (limb a) as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).</p> <p>Furthermore, it is vital that the policies recognise the different land ownerships of the Tickford Fields Farm Estate and do not prejudice the delivery of any one part of the site. The policies need to reflect that the site may be delivered by different parties within separate planning applications (part of the site identified as Site A is currently subject to a pending planning application).</p> <p>We have set out our main concerns, and recommended amendments to the NP, below:</p> <p><b>Section 7: The Neighbourhood Plan Strategy</b></p> <p>Overall, the development strategy of the Neighbourhood Plan is supported. It reflects the presumption in favour of sustainable development and seeks to promote housing supply. We welcome the inclusion of the Tickford Fields Farm East site, which lies beyond the Strategic Reserve Site in the adopted MK Local Plan (2005) and the MK Core Strategy (2013). We support its inclusion in order to help deliver the supporting infrastructure required for growth.</p> <p><b>Paragraph 7.1:</b> We offer broad support for the indicative capacity for each site.</p> <p><b>Paragraph 7.3 Infrastructure Requirements to Support Housing:</b> The principle of the infrastructure requirements to support housing is supported. However, the requirements</p>	<p><b>Summary</b></p> <p>Overall, we support the positive preparation of the Neighbourhood Plan for Newport Pagnell and the allocation of the Tickford Fields Estate for housing development. However, we propose that some of the requirements as set out within Policy NP2 and the associated Development Brief are amended. We have suggested some changes to ensure that the policy is sufficiently flexible in order to prevent any prejudice to the viability and deliverability of the site/sites coming forward for development.</p>

identified should be seen as a 'potential items list' as the exact contributions would need to be worked through in future planning applications. Therefore, the text should be amended to reflect this. We advise the following re-wording:

"For the primary development site comprising of 1280 new homes the requirements could include:"

Furthermore, any planning obligations need to conform to the 2010 Community Infrastructure Regulations, as amended ("CIL Regs"). This should be noted alongside the reference to Supplementary Planning Documents.

**Paragraph 7.4 New Major Housing Development:** We support the objective of ensuring that the cumulative impact of the wider site is accounted for in terms of transport impacts. However, the text should be broadened out in order to reflect the different land ownerships and the potential for separate planning applications coming forward, particularly as part of the Tickford Fields Site (Site A as identified in the NP) is currently subject to a pending planning application.

**Paragraph 7.7.1 Playing Fields:** The preference for off-site improvements to the town's existing recreational facilities is recognised. The mechanism for delivery will need to conform to the CIL Regs in force at the time of a planning application.

#### **Section 8: The Policies of the Neighbourhood Plan**

##### **Policy NP1: Preferred sites for housing development and Figure 10**

We support the inclusion of Tickford Fields Farm Strategic Reserve Site (identified as Site B) and the Tickford Fields Farm East Site (identified as Site C) as the preferred sites for housing development within Policy NP1. However, it may be beneficial for the separate landownerships of Site B to be recognised.

In several places, the development is referred to as an 'estate'. We would recommend that the reference to the site as an "estate" is omitted. The word 'estate' underplays what is a high quality urban extension.

##### **Policy NP2: Tickford Fields Estate Site Specific Policies**

We fully support the overall objective of Policy NP2, but wish to express concern over the prescriptive nature of some of the supporting infrastructure requirements and the lack of sufficient justification/evidence in the published documentation to demonstrate that the policy can be complied with. Some items may potentially adversely affect viability and stifle creative design solutions leading to insufficient flexibility. If Policy NP2 is to form part of the adopted Development Plan for Milton Keynes once made, the policy should be capable of delivering a successful development.

**NP2 Opening paragraph:** The wording of "jointly developed" is not suitable text and should be amended. Due to the pending planning application on Site A, it is not possible for the whole of the Tickford Fields Estate to be jointly developed. However, the text could reflect the possibility for the remainder of the site to be "**comprehensively masterplanned**".

**Limb (a):** We support the principle of seeking a comprehensive, well-planned development. However, there should be recognition within the text that a phased delivery of the site is likely due to reflect the separate land ownerships. Again, we would recommend that the reference to the site as an "estate" is omitted.

Furthermore, we do not support the inclusion of a detailed Development Brief as part of the Neighbourhood Plan document. Development Briefs should not form part of the statutory development plan and are material considerations. Development Guidance is a better approach and a summary of the key objectives that reflect the National Planning Policy Framework and local characteristics could be provided as explanatory text to the policy. There is insufficient background and technical studies in existence at the present time to support a detailed

	<p>Development Brief. The requirement for the development to be <i>"in accordance with the development brief"</i> should be deleted from the text. The Appendix number is incorrect and should be amended to Appendix 5.</p> <p><b>Limb (d):</b> A requirement for a Comprehensive Transport Assessment should not be contained within policy. It is more suitable to include it within the sub-text, rather than within the policy itself. Instead, the policy could recognise the need for satisfactory resolution of any traffic impacts having regard to a transport assessment and travel plan. Although, it is vital that the cumulative impact of the development of the whole site is considered, and the possibility that the development may come forward as separate planning applications with separate Transport Assessments.</p> <p><b>Limb (e):</b> The wording <i>"through a minimum of three junctions"</i> should be deleted as there is no evidence to support it at the current time without a detailed transport assessment having been undertaken. The requirement is too specific in the absence of such an exercise.</p> <p><b>Limb (f):</b> Whilst we support the promotion of sustainable development and future residents' accessibility to sustainable transport modes, we object to the requirement for <i>"all dwellings shall be located within 400 metres of a bus stop"</i>. The requirement is considered prescriptive and there is no certainty in its deliverability. Although, it may be a recognised industry standard, it should not be a specific requirement within a Development Plan policy. Therefore, the wording should be amended to provide sufficient flexibility to allow for the specific site. We would recommend the alternative wording of:  <b>"all dwellings should be accessible to local bus services"</b></p> <p><b>Limb (h):</b> Overall, we support the provision of a serviced school site. However, the wording is considered inflexible. For instance, the word "central" is considered too ambiguous. There is no evidence at this stage to confirm that this is the most viable and deliverable location. We would recommend that <i>"central location"</i> is amended to <b>"an accessible location"</b>.  Furthermore, we object to the inclusion of the trigger for transfer prior to the occupation of the 1st dwelling as this is too prescriptive at this policy making stage. A reference to "the provision of primary and early years education facilities and phasing of the development to ensure provision of infrastructure and services coincides with the occupation of properties" could be more appropriate.  Furthermore, we object to the inclusion of the trigger for transfer prior to the occupation of the 1st dwelling as this is too prescriptive at this policy making stage. A reference to <b>"the provision of primary and early years education facilities and phasing of the development to ensure provision of infrastructure and services coincides with the occupation of properties"</b> could be more appropriate.  There is also a lack of consideration of individual sites being brought forward. For example, Site A is currently subject to a pending planning application, with proposals to provide an education contribution only.  We would also recommend that additional wording is added to the last sentence to allow for flexibility:  <i>"The development shall provide a financial contribution to off-site secondary and post 16 education, as required/determined by future planning applications"</i></p> <p><b>Limb (i):</b> The requirement of <i>"at least three unit shops"</i> is too prescriptive and wording more akin to "up to XXsqm floorspace" should be used in order to ensure flexibility in its deliverability. Furthermore, the inclusion of a trigger <i>"prior to the completion of the 600th dwelling"</i> for completion is not appropriate at this stage as its implication on viability and deliverability has not been fully demonstrated.</p>	
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	Brian Salter	<p>I think I am talking at cross purposes about consultation. I do not doubt all the statutory and early consultation that has occurred in the writing of the plan. It is the synthesis of all that into a whole and the opportunity to engage in a public dialogue to be party to that synthesis that I am on about. The fact that the Marsh End Road site and land to the east of Willen Road (particularly the flood risk areas) have been labelled Agricultural rather than open space development has scuppered any notions of achieving connectivity between Newport and MK City for pedestrians, mobility scooters and cyclists and linear park users which is what I'm on about.</p> <p>Newport is not an island. It is a part of a large city and to continue its isolation does not serve its residents well unless they drive or are happy with public transport. The residents of Tickford</p>	

fields developments will not use Railway walk and Tongwell Lane to access MK. They will need better options to get across the A421 and along Willen road south of the A421 and along the A509. I would hope that the parks and leisure routes of MK City could ultimately be continuous with those of Newport. Indeed, perhaps that should be a strategic objective of the plan as a whole.

Best wishes  
Brian Salter

From: Shar Roselman  
Good afternoon Mr Salter,  
Thank you once again for your email. Two public open consultations were held earlier in the process. I attach the consultation statement, which demonstrates the number of consultations that have been held.  
Kind regards,  
Shar Roselman  
Town Clerk Newport Pagnell Town Council

Dear Shar Roselman  
Thank you for your prompt response. I acknowledge that I did receive Town Talk 75 and I was not sufficiently diligent to note the invitation to comment at the end of the article on the Town Plan. I would have expected a, or a series of, public meetings at which some dialogue with the plan authors would have been possible. Some public exposure and explanation involving a presentation and Q & A was expected. Although I again acknowledge that wasn't promised! The 2014 questionnaire I really cannot comment on because my memory is not triggered by anything. I may have well completed something but no bells are ringing at the moment. I look forward to hearing the response of the steering group to my comments.  
Best wishes  
Brian Salter

Good evening Mr Salter,  
Thank you for your comments. I can confirm that the summer edition of Town Talk was hand delivered to 6000 homes in Newport Pagnell, and that roads delivered to were mapped electronically by our delivery service. I will check whether your address in Lakes lane was delivered to. This summer edition contained full details of how to reach our website to both read the plan and to comment on it, either in writing, by email or electronically. Earlier in 2014 questionnaires were sent out whilst the plan was being drafted on housing, infrastructure and a variety of other subjects. Again this was delivered to 6000 homes. I attach a copy of the Summer 2015 edition of Town Talk for your reference.  
Your comments are very welcome and will be discussed further by the steering group.

Dear Shar Roselman  
I have read Town Talk Issue 76 to discover that I have missed the opportunity to comment on the Draft that has been submitted to MK Council. I have now perused the document on the Web Site to discover that a house to house questionnaire/invitation to comment was made. Whenever this occurred, I have to report that it didn't reach our doormat, for my interest would have been sparked immediately. Talking around I find plenty of others who are as ignorant of this most laudable initiative.

		<p>I note that 144 responses were received which certainly demonstrates some consultation happened. However, this is not many given the number of dwellings in the area. Given the quality of what has been produced, it would be a tragedy if, at a later date, a claim of “lack of consultation” could be demonstrated, thereby undermining the democratic integrity of the plan. I appreciate that a vote has yet to occur but saying yes or no is too blunt an instrument to wield on a project that is 99% OK.</p> <p>The type of comments I would have made include:-</p> <p>Connectivity with the MK Parks and Redway system. The A422 is a barrier to pedestrian and cycle and elderly mobility scooters getting into the MK City system. It has to be addressed with alternatives to the tortuous route through Tongwell lane and Blakelands. This is going to be even more pressing if the Tickford Fields developments are to proceed. I am also concerned that the Plan as a whole grudgingly acknowledges the presence of MK City but does not embrace it as an opportunity. I would have thought that a further public airing of this draft plan would have been valuable</p>	
2	Carter Jonas (IMG)	<p><b>Background</b></p> <p>This representation has been prepared by Carter Jonas on behalf of Welbeck Strategic Land (Welbeck) and Mrs Frances Parry, in respect of the proposed Tickford Fields Estate housing allocation, and in particular the Tickford Fields Farm Strategic Reserve Site.</p> <p>Mrs Parry and her family own the northern part of the Tickford Fields Farm Strategic Reserve Site – see enclosed site Location Plan. Carter Jonas has responded to previous Neighbourhood Plan and Local Plan consultations on behalf of Mrs Parry and her family, confirming that the subject land is available for development, and committing to working with adjoining landowners, Newport Pagnell Town Council, Milton Keynes Council, the local community and other stakeholders to help ensure that development to the east of Newport Pagnell can come forward comprehensively, alongside necessary supporting infrastructure.</p> <p>A promotion agreement is in the process of being agreed between Welbeck and Mrs Parry and her family, which will bring Welbeck’s significant experience and expertise to the development project. Welbeck have been a leading specialist in the field of strategic land for some 20 years, with an expert Team of master planners, planners and development professionals. The Team has a high rate of success in delivering projects, including a 2,500-home sustainable extension to a West Midland town, designed and agreed in conjunction with the local council. In all projects, Welbeck maintain an open and transparent approach.</p> <p>Through a process of continuous engagement and dialogue with the Town Council, local planning authority, local community and other stakeholders, Welbeck will play their part in seeking to ensure that a comprehensive scheme to the east of Newport Pagnell is delivered.</p> <p><b>Draft Newport Pagnell Neighbourhood Plan</b></p> <p>Having carefully considered the content of the submission draft Neighbourhood Plan and related process, it is considered that in overall terms the Plan meets with the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004. The proposed allocation is in general conformity with the adopted and emerging Milton Keynes Local Plan, generally has regard to national policies and guidance (see further comments below) and is compatible with EU obligations.</p> <p>In more detail, the Newport Pagnell Neighbourhood Plan has been prepared in the context of an</p>	<p>To conclude, we consider the Plan appropriately addresses the 4 tests against which neighbourhood plans are examined.</p> <p>We fully support the proposed allocation of land to the east of Newport Pagnell for residential development alongside necessary supporting infrastructure. Whilst further technical work is required, we are confident that the Tickford Fields Estate allocation is deliverable, broadly in accordance with the objective and aspirations set out in draft Policy NP2.</p>

		<p>adopted Core Strategy (which covers the period to 2026) and the emerging Plan MK (which will cover the period to 2031).</p> <p>We fully endorse the Neighbourhood Plan proposal to plan for a level of housing growth at Newport Pagnell that exceeds the minimum level of further housing development needed to address the adopted Core Strategy requirements. The Draft Neighbourhood Plan explains that the main driver for planning to deliver some 1,400 new homes (sections 3.2.3 and 7.1 of the submission Neighbourhood Plan) is to ensure that appropriate levels of new infrastructure can be delivered – both to support the planned new homes and to benefit existing town residents. We would further add that the proposal to plan for a greater number of new homes at Newport Pagnell in the Neighbourhood Plan is prudent, given that Plan MK will roll forward the housing requirement for the area to 2031. By planning for a greater number of new homes in the draft Neighbourhood Plan, the Town Council should be able to avoid the need to accommodate additional piecemeal development during the lifetime of the Neighbourhood Plan.</p> <p>In terms of the delivery of sustainable development, we refer below to the key issues raised by local residents at the issues consultation stage – and how these will be addressed through development at Tickford Fields:</p> <p><b>The ability of local schools to cope with the additional placements that would result from new housing.</b></p> <p>As required by draft Policy NP2, development on the Tickford Fields Estate is required to provide, as a minimum, a 2.6 hectare serviced site, along with financial contributions towards a two form entry primary school, with early years provision. Further, contributions are required to off-site secondary and post 16 education facilities. The allocation (and future development) of the Tickford Fields Estate will help ensure that there is sufficient capacity in local schools to accommodate the education needs of existing and new residents.</p> <p><b>Existing difficulties in getting prompt appointments with GPs at local surgeries.</b></p> <p>Draft Policy NP2 requires development on the Tickford Fields Estate to provide a health/wellbeing facility, which could include, amongst other services, a GP surgery. Such a facility would help serve existing residents, as well as new residents on the Tickford Fields Estate.</p> <p><b>Protection and enhancement of Open Spaces</b></p> <p>The strategy set out in the draft Neighbourhood Plan, in particular the proposal to accommodate the majority of the Town’s future housing needs on the Tickford Fields Estate allocation, will serve to significantly reduce the pressure for development on existing areas of open space around the Town. Indeed, draft Policy NP2 proposes that development on the Tickford Fields Estate will make a financial contribution towards the enhancement of existing green spaces in the town.</p> <p>Further, within the Tickford Fields Estate development, draft Policy NP2 requires provision of an onsite neighbourhood play area, a local park, wildlife area and incidental open space. These areas will be accessible to both new and existing residents.</p> <p><b>Enhancement of the High Street to encourage more shopping locally, and provide more opportunities both for parking and cycling to town</b></p> <p>The planned scale of new housing development at Newport Pagnell will increase available local expenditure and footfall within Newport Pagnell town centre. Further, draft Policy NP2 proposes that development on the Tickford Fields Estate will make a financial contribution towards the enhancement of Newport Pagnell town centre, parking provision and sustainable transport initiatives to reach the town centre.</p>	
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**Concerns about an increase in flooding brought about by new development**

In preparing a comprehensive master plan for the Tickford Fields Estate allocation, flood risk and drainage matters will be a key consideration (see further comment below). Indeed, as part of any future planning application, a Flood Risk Assessment and Drainage Strategy will need to be prepared and submitted. This work will need to demonstrate that proposed development will not be at risk from flooding, and that as a result of the proposed development, the risk of flooding elsewhere will be reduced.

**Amendments Sought**

**Draft Policy NP2**

We support the amendments made to the Neighbourhood Plan in respect of criteria e) and k) of draft Policy NP2 (Tickford Fields Estate Site Specific Policy) and Figure 13 of the Plan, following suggestions made by Carter Jonas (on behalf of Welbeck Land and Mrs Parry and family) in responding to the pre-submission

Plan. However, it is felt that Policy NP2 could be further improved, helping to ensure it meets the 'basic conditions', by making the following amendments (note, the bullet letter referencing refers to the referencing used in Draft Policy NP2):

a) Sites a, b and c are collectively known as the 'Tickford Fields Estate'. Whilst a minor point, we do feel that use of the word 'estate' underplays the opportunity to deliver a high quality, sustainable, urban extension. Our clients are fully committed to working with the owners of the other land that makes up the Tickford Fields Estate allocation, to ensure a comprehensively planned and delivered sustainable urban extension.

b) We support the proposed average density of 35 dwellings per hectare – but recommend insertion of the word 'about' or 'around' (so that criterion 'b' refers to an average development density of around 35 dwellings per hectare). Paragraph 59 of the NPPF confirms that 'design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.' We draw particular attention to use of the word 'guiding'. We believe that the actual average development density on the Tickford Fields land should be an outcome of the master planning process, rather than being a rigid policy requirement.

We fully support the need for a range of development densities across the site, to assist in creating a sense of place and to ensure that the edges of the development sensitively address the landscape setting.

f) We support the drive for a comprehensive scheme that delivers excellent access to sustainable transport modes, including the bus. However, at this stage in the planning process, in advance of any detailed master planning work, we believe the Neighbourhood Plan should look to retain some flexibility - rather than seek to impose a rigid requirement for all dwellings to be located within 400m of a bus stop. To accord with paragraph 59 of the NPPF (in terms of avoiding 'unnecessary prescription') we believe Draft Policy NP2 should be amended as follows - "The main estate distributor roads should be designed to accommodate a bus route, with shelters and level bus access, and the aim that all dwellings shall be located within 400 metres of a bus stop."

k) The provision of on-site areas of open space and play areas will help create a sense of community within the proposed development site. We can see merit in the neighbourhood play area being located adjacent to the proposed school, but would suggest that further master planning work is needed, before its positioning in relation to the school is determined.

l) We support the aspiration of this criterion, but would comment that not all trees and hedgerows

		<p>on the site will be of high quality, and that there may be instances where some trees or short sections of existing hedgerows will need to be removed to accommodate roads, footpaths, cycle ways and development. Reference should be made to the need for development proposals to minimise the loss of existing trees and hedgerows, with additional planting and other measures ensuring a net gain in biodiversity. This pragmatic proposed amendment will still ensure the delivery of sustainable development.</p> <p><b>Draft Policy NP5</b>  With regard to draft Policy NP5 (Affordable Housing and Tenure), we support the provision of 30% affordable housing on the Tickford Fields Estate site. To ensure consistency with earlier sections of the Neighbourhood Plan, and to respond to the comments received from local residents at the issues consultation stage (see Section 7.2) – criterion (b) of draft Policy NP5 should be amended to refer to the provision of 35% shared ownership housing and 65% <b>affordable rent housing</b>.</p> <p><b>Development Brief</b>  It is felt that The Tickford Fields Estate Development Brief, at Appendix 5, could also be amended as follows,  to maintain flexibility and avoid unnecessary prescription:</p> <p><b>Access and Movement</b>  In advance of discussions with the highways authority on the most appropriate street hierarchy for the Estate, we question whether the whole of the Estate should be designed to be a 20mph zone.</p> <p><b>Design</b>  Further work is required at the Design Brief and master planning stage before committing to building heights. However, we would certainly agree that all buildings on the Estate should be of high design quality.</p> <p><b>Community Facilities and Developer Contributions</b>  The proposal that Sites C, D and E set aside land in proportion to their gross development areas (for provision of a school) provides one option for delivering the land needed to deliver a new primary school. This option does, however, constrain the location of the school within the wider allocation, and it may be that alternative delivery models could be explored that will provide greater flexibility in the master planning options.</p> <p><b>Archaeology</b>  Rather than instructing trial trenching from the outset, a desk-based archaeological assessment and geophysical survey will be instructed. Depending on the findings and recommendations of the Council, archaeologist, trial trenching will be instructed as necessary.</p>	
1	Future Planning & Development (Heyford Homes)	<p>Future Planning and Development provide planning advice to our client Heyford Homes. Heyford Homes represent the landowners on two sites within the Neighbourhood Plan area comprising the site known as Marsh End Road/Tongwell Lane and part of the site known as Land East of Willen Road. On behalf of our client, we hereby submit representations to the draft Newport Pagnell Neighbourhood Plan (NPNP) pre-examination consultation.</p> <p>In accordance with Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended), the examiner must consider whether the draft Order (the NPNP) meets with the 'basic conditions':</p> <p>a) The NP must have regard to national policies and advice contained in guidance issued by the Secretary of State</p>	<p><b>Summary</b>  The draft NPNP fails to meet the basic conditions as required by Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). The NPNP is not compliant with the NPPF or the Development Plan; nor does it uphold the principles of sustainable development. For these reasons, we believe that the independent examiner has no choice but to recommend that the plan be</p>

	<p>b) The NP must contribute to the achievement of sustainable development;</p> <p>c) The NP must be in general conformity with the strategic policies contained in the Development Plan for Milton Keynes;</p> <p>d) The plan should not breach, and should otherwise be compatible with EU Regulations</p> <p><b>Our Position</b></p> <p>The NPNP is not considered to be sound. National Planning Policy requires local policies for the supply of housing to be based upon objectively assessed housing need. Milton Keynes does not have a 5 year housing land supply (5YHLS) and therefore Development Plan policies pertaining to housing supply are considered to be out-of-date. The NPNP contains site allocation policies which are based upon out-of-date housing supply policies from the Development Plan; and settlement boundary policies which restrict housing supply. The NPNP is therefore considered to fail the basic conditions set out in Schedule 4B of Town and Country Planning Act 1990 (as amended) as they do not have regard to national policies and advice contained in guidance issued by the Secretary of State and do not contribute to sustainable development.</p> <p>1. Housing Supply</p> <p>The draft NPNP is not in conformity with the guidance of the NPPF with regard to policies relating to housing supply; specifically the allocation of housing sites and defining of settlement boundaries. Notwithstanding the amount of land which is allocated for housing through the NPNP, the basis for allocating this land for housing is not in accordance with national planning policy.</p> <p>The figures used in the formulation of the NPNP policies with regard to housing supply are taken from the Milton Keynes Core Strategy (MKCS) (adopted in 2013).</p> <p>The housing figures in the MKCS are 'interim' figures; this is acknowledged throughout the Core Strategy, paragraph 5.18 states:</p> <p><i>"The level of new housing for the Borough during the period 2006-2026 in strict accordance with the revoked South East Plan was 41,360 homes (an average of 2,068 per annum) and within the MK growth area overall is 52,350 (2,617.5 per annum). The Council has concerns about the deliverability of this number of homes and therefore proposes to make an interim provision at this stage for the delivery of 1,750 homes per annum (a minimum of 28,000 in total by 2026) which represents an increase in the average housing completion rate over the last 5 (1,660), 10 (1,560) and 20 (1,610) years. <u>The interim housing target will be used for the purpose of monitoring housing land supply until such a time that a new housing target is adopted in Plan:MK. It is to be regarded as a minimum figure</u>"</i></p> <p>The reason why the housing figure is an 'interim' figure is due to uncertainties relating to population and economic growth projections at the time of the plan's preparation. One of the principle reasons being that the Core Strategy was prepared during the recession and this cast doubt on the delivery of a number of large strategic sites.</p> <p>This uncertainty was the reason why the Examiner insisted upon an early review (within two years of publication) of the Core Strategy. The requirement for review is set out in Policy CSAD1 of the Core Strategy Review of the Core Strategy which states:</p> <p><i>"The Council will undertake an early review of the Core Strategy in the form of Plan:MK, to 2031 or such longer period as the Council chooses, with the aim of having an adopted plan in place in 2015. This will be led by the NPPF approach of objective assessment of housing, employment and other needs and the requirements of the duty to co-operate with adjoining authorities"</i></p>	<p>withdrawn.</p>
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	<p>The interim housing supply figures provide the basis for the housing supply in the borough until it is superseded by Plan:MK (Plan:MK – Strategic Development Options was published for consultation in November 2015).</p> <p>Turning to the interim housing figures, Policy CS2 of the Core Strategy Housing Land Supply and table 5.2 Housing Land Supply Position 2010-26 identifies that the overall target of 28,000 is split into the Urban Housing Target of 26,240 (1,640 homes per year) and Rural Housing Target 1,760 (110 homes per year).</p> <p>Paragraph 47 of the NPPF requires that local authorities demonstrate a 5YHLS. Where an authority cannot demonstrate a 5YHLS other policies in the plan relating to housing supply cannot be considered up-to-date (paragraph 49) and a presumption in favour of sustainable development applies (paragraph 14).</p> <p>MKC publicised their annual Assessment of Five Year Land Supply 2015 – 2020 in June 2015 (Appendix A). The findings of this stated that the overall housing land supply position at April 2015 is 5.02 years supply; this includes previous years Under supply and a 20% buffer (as a result of persistent under delivery).</p> <p>MKC adopted the Liverpool approach to deal with previous undersupply. The Liverpool approach evenly spreads the past undersupply over the remainder of the plan period, as opposed to the Sedgefield approach which apportions the past undersupply to the first five years of the plan period. MKC adopted the Liverpool approach mindful of the conclusions of the Inspector on the Core Strategy who was of the view that there was little evidence to suggest that the delivery rates in excess of those set out in the Core Strategy are actually achievable. It is important to make clear that the market conditions that informed this view (in 2013) have changed significantly. Clearly MKC adopt the Liverpool approach because this enables them to get close to demonstrating a 5YHLS. However, contrary to MKC’s stated position, recent evidence suggests Milton Keynes does not have a demonstrable 5YHLS.</p> <p>A recent planning Appeal relating to a site at Newport Road, Woburn Sands, Milton Keynes (APP/Y0435/A/14/2224004 Frosts Family LLP against Milton Keynes Council) was allowed by the Sectary of State on 1 October 2015 (Appendix B). The Appeal Decision established that MKC does not have a 5YHLS and in accordance with the NPPF confirmed that the housing supply policies of the Development Plan are therefore out-of-date and a presumption in favour of sustainable development should apply. This was agreed by all parties The Appeal Decision also established that in the absence of a 5YHLS the policies of the Development Plan relating to housing supply are out-of-date and cannot be applied in the determination of applications for sustainable development. This includes policies which define settlement boundaries. The Inspector concluded that the settlement boundary policies are a constraint on housing supply and thus are relevant policies for the supply of housing as per the meaning set out in Paragraph 49 of the NPPF. Fundamentally, the inability to demonstrate a 5YHLS concludes that MKC does not have enough deliverable land for housing. The NPNP does not support the aim of the Development Plan to provide suitable and deliverable land for housing in accordance with the requirements of national planning policy.</p> <p><i>2. Disaggregated Approach</i></p> <p>The Core Strategy adopts an unsound approach of disaggregating the housing supply requirements for ‘Urban Area’ and ‘Rural Area’. Recent Planning Appeals have established that a disaggregated approach is not appropriate for considering land availability in an authority area (see para 41 of APP/T2405/A/1/2198620</p>	
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Westleigh Developments against Blaby District Council) (Appendix C).

*3. Sustainable Development*

The Core Strategy identifies a Rural Housing target of 1,760 (110 homes per year) over the plan period. Taking account of existing permission, commitments, and deliverable sites, the Core Strategy identifies a residual requirement for the Rural Areas of 613 units over the plan period. Again, it must be noted that these figures are from the Core Strategy and they have not been updated for the NPNP. The Council's own assessment of housing land supply and the recent Woburn Sands Appeal Decision demonstrate that the actual housing need to be greater than this due to previous undersupply.

As the largest Key Settlement, the NPNP proposes sites to accommodate around 1,400 units in Newport Pagnell over the plan period to 2031. Importantly, however, the majority of this housing supply, some 1,280 units, is to be provided at the Tickford Fields Estate comprising three neighbouring sites of North Crawley Road Industrial Estate, Tickford Fields Farm Strategic Reserve and Tickford Fields Farm East.

The assembled site is not deliverable in the short-term (0-5 years) due to there being a number of site specific constraints. It is not clear whether the site is deliverable in the medium term (6-10 years).

The draft allocation of the Tickford Estate is therefore at odds with national planning guidance because the allocation of this site does not plan positively to support the strategic policies of the development plan with regards to housing supply and the need to have a 5YHLS. Paragraph 184 of the NPPF, with specific regard to Neighbourhood Plans, states "*Local Planning Authorities should set out clearly their strategic policies for area and ensure that an up-to-date Local Plan is in place quickly as possible. Neighbourhood Plans should reflect these policies and plan positively to support them. Neighbourhood plans should not promote less development than set out in the Local Plan or undermine its strategic policies*"

Notwithstanding deliverability and housing supply issues, the NPNP only seeks to allocate sites large enough to deliver supporting infrastructure. This again undermines the guidance in the NPPF and the strategic policies of the Development Plan relating to housing supply. The NPNP has effectively precluded other sustainable development sites as it believes that it only large strategic sites cannot deliver appropriate levels of infrastructure required to support new homes. This method for site selection is plainly wrong and at odds with national planning guidance whereby there is a presumption in favour of sustainable development, i.e. sustainable sites should be granted permission without delay.

Where a resolution to grant planning permission is made, planning obligations through Section 106 agreements may be sought. Such obligations can be sought where they are necessary to make it acceptable in planning terms; where they are directly related to the development and where they are fairly and reasonably related in scale and kind to the development. The belief that smaller sites will not deliver these infrastructure improvements is incorrect. There is no critical threshold for infrastructure delivery as implied in the NPNP. This policy justification for the allocation of large sites is further discredited when we consider CIL which, upon adoption, will apply a levy on all development proposals to provide infrastructure necessary to support development.

This conflict is particularly pertinent with regard to our client's site Marsh End Road/Tongwell Lane. Through previous rounds of consultation, this site was identified as being sustainable and scored higher (27) than the Tickford East site (25) and the Tickford Reserve site (26) however

was discounted because it was not of a scale deemed to support infrastructure requirements. The assessment also made some very spurious assumptions regarding our site in relation to other sites brought forward for allocation. For example, it was considered that the site had problems to overcome with regards to economic viability (denoted amber) whereas the Tickfield sites were all considered to have no problems with this regard (denoted green). Our site is already owned by parties in partnership with Heyford Homes the developer. If the site was allocated for housing there would be no issue with viability. Furthermore, it is a Greenfield site with no associated remediation costs associated with it. If allocated, there would be absolutely no constraints on the site's viability. Conversely, the Tickfield sites would need to be acquired by developers from the landowners with each party taking their respective margins. The remediation costs would be significantly higher than the Marsh End Road/Tongwell Lane site due to the current building on site and previous land uses. Perhaps, most significantly, the Tickford Site will need to provide planning obligations to provide the supporting infrastructure in accordance with the policies of the draft NPNP (this will be in addition to any CIL payments). There is no evidence to suggest that the Tickford Site is not viable, however, we expect that the developer will have a significantly increased cost burden in comparison with the Marsh End Road/Tongwell Lane site. This additional cost burden may impact on the ability of the site to provide the requisite percentage of affordable housing or make it more sensitive to market fluctuations and therefore affect the timeframes for delivery. Whatever the implications might be, it is clear that the Marsh End Road/Tongwell Lane site is more economically viable despite the fact it was assessed to be less viable.

The above example goes to show that the site assessment which formed the basis for the Site Assessment was flawed. We also direct you to our client's previous consultation response which considered this in more detail (Appendix D). The assessment does not present any clear or reasonable grounds for the allocation of sites and for this reason cannot be said to be sustainable development.

*4. Monitoring and Review*

Should the NPNP proceed on the basis of the figures set out in the MKCS, it will be out-of-date upon the adoption of Plan:MK and therefore inconsistent with the Development Plan.

Section 38 (5) of the Planning & Compulsory Purchase Act 2004 states that decisions on planning applications should favour policies of the most recent development plan document. Any guidance set out in subsequent Development Plan Documents such as Plan:MK and the SAP will supersede the guidance in the NPNP. This will move the NPNP to the bottom of the pile with respect to the most up-to-date development plan documents.

To be considered up-to-date, the NPNP will need to be reviewed upon adoption of Plan:MK. The draft NPNP suggests that a review will take place in five years; the first review being in 2020. If the NPNP is not reviewed following the adoption of Plan:MK, it will effectively be out-of-date and its policies will hold limited weight in determining applications; particularly because applications will be assessed against more up to date development plan document such as the Core Strategy and the Site Allocations Plan, both of which will be formulated upon a more up-to-date and sound evidence base.

*5. Policy Assessment*

a) Policy NP1 – Preferred Sites for Housing Development

The allocation of the housing sites in Policy NP1 does not support the objectives of the Development Plan or the NPPF in terms of housing supply.

The policy wording in NP1 states "*Any application for new housing development*

		<p><i>outside the revised settlement boundary as shown on figure 4 on page 25 will be refused”</i></p> <p>The settlement boundary is to be revised through the SAP and Plan:MK process, both of which will be informed by a more up-to-date evidence base. This is made clear in Core Strategy Policy CS9 which states “Development will be focused on the Key Settlements of Newport Pagnell, Olney and Woburn Sands as the most sustainable rural settlements, taking into account the population, constraints, transport links and the capacity of services in these towns. Any changes to the boundaries of these settlements will be considered through the Site Allocations Plan and Plan:MK.”</p> <p>NP1 is clearly a housing supply policy, MKC do not have a 5YHLS and this policy therefore cannot be considered up-to-date. The settlement boundaries will be updated through the preparation of subsequent development plan documents based on an up-to-date evidence base.</p> <p><i>b) Policy NP8 - Playing Fields and Associated Development</i></p> <p>Policy NP8 proposes to allocate Land East of Willen Road as a linear park extension where development for enhanced recreation and sporting facilities will be supported. A parcel of the land allocated for a linear park extension is owned by the Saunders / Morgan families who are not willing to sell this land. This element of the plan is not deliverable and its allocation is not compliant with Secretary of State’s guidance as set out in the NPPF. This allocation is in direct conflict with advice set out in the NPPF which states that a land owner must be willing to enable a deliverable development.</p>	
	Highways England	<p>Dear Sir,</p> <p>Publicity for the submitted Neighbourhood Plan for Newport Pagnell</p> <ol style="list-style-type: none"> <li>1. Thank you for your email received 6 October 2015 to the Secretary of the State for Transport inviting comments on the Publicity for the submitted Neighbourhood Plan for Newport Pagnell .</li> <li>2. Highways England is responsible for the operation, maintenance and improvement of the Strategic Road Network in England on behalf of the Secretary of the State. In the local area Highways England has responsibility for the M1 and A5.</li> <li>3. Highways England is a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of future development.</li> <li>4. Highways England is aware of the relationship between development and the transport network, and we are mindful of the effects that decisions may have on the operation of the Strategic Road Network and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which encourage more sustainable travel behaviour.</li> <li>5. My comments in this letter focus specifically on the Strategic Road Network, in particular the M1 Junction 1.</li> <li>7. Policy NP2: Tickford Fields Estate Site Specific Policy The sites of North Crawley Road Industrial Estate, Tickford Fields Farm Strategic Reserve Site And Tickford Fields Farm East shall be jointly developed for a residential led extension to the town, with a capacity of around 1280 homes. Highways England would require a Transport Assessment supporting an application to address development traffic impact on M1 Junction 14 in line with DfT Circular 02/2013 or standards applicable at the time of application and provide mitigation where identified.</li> <li>8. Policy NP3: Tesco (former Aston Martin Works) Site Specific Policy Highways England would require a Transport Assessment supporting an application to address</li> </ol>	

		<p>development traffic impact on M1 Junction 14 in line with DfT Circular 02/2013 or standards applicable at the time of application and provide mitigation where identified.</p> <p>9. Highways England welcomes the emphasis placed upon the encouragement of sustainable transport modes and linkages to the surrounding area.</p> <p>10. I welcome the opportunity to respond to the Publicity for the submitted Neighbourhood Plan for Newport.</p> <p>11. In the meantime, if you have any questions with regards to the comments made in my letter, please do not hesitate to contact me.</p>	
	<p>Jill Dewick – leisure and community officer</p>	<p>Newport Pagnell Neighbourhood Plan          Consultation Responses Community Facilities          Community Facilities welcome the plan and recognise the level of work put into it. We would like to make the following comments.</p> <p>Leisure &amp; Community</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> We support the Town Councils aspiration to extend and improve the Willen Road Sports Ground. This is a Priority 1 Project in the Playing Pitch Strategy Action Plan for 2016/17. This site is an important sporting site and is in great need of additional playing field space, new changing facilities and pavilion. We are actively supporting them with a bid for grant funding from Sport England. We are content for financial contributions from new developments in the area to be directed towards this project.</li> <li><input type="checkbox"/> There is no mention in the plan for community centre/meeting place space with regards to new development. We understand that this is something that the Town Council are thinking of combining within the new Health and Wellbeing Centre, although this is not clear in the plan. If this is the case we suggest that the plan include how the Centre will operate and address any community meeting space requirements for the additional residents.</li> </ul> <p>Arts, Heritage &amp; Public Art</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Demonstrate a commitment to continuing the work of Justin Neil around public art enhancement for the locality which will then offer the justification to require S106 contributions for public arts, social and cultural</li> <li><input type="checkbox"/> Over the past 10-years there have been several attempts by local residents and artists to create an arts centre or artists' studios in Newport Pagnell. This demonstrates a local desire and demand which has not yielded due to lack of appropriate spaces by including this desire in the plan Newport Pagnell could better encourage any large developer to support these initiative.</li> </ul> <p>Libraries</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Our short-term plan under sharing libraries is for an internal refurbishment providing new furnishings. We</li> </ul>	

		<p>plan to remain in the present building</p> <p><input type="checkbox"/> The aspiration is to keep the Library open through the Open+ Technologies which will maintain opening hours and potentially offer expanded opening.</p>	
	National Grid	<p><b>Milton Keynes Council: Newport Pagnell Neighbourhood Plan publicity period SUBMISSION ON BEHALF OF NATIONAL GRID</b></p> <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p><b>About National Grid</b></p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p><b>Specific Comments</b></p> <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. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p><i>Gas Distribution – Low / Medium Pressure</i></p> <p>Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact <a href="mailto:plantprotection@nationalgrid.com">plantprotection@nationalgrid.com</a></p> <p><b>Key resources / contacts</b></p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link:  <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></p> <p>The electricity distribution operator in Milton Keynes Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at:  <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure.</p>	
	Stewart Watt	<p>I have two issues with the proposed plans.</p> <ol style="list-style-type: none"> <li>1. They don't explain how Ousedale and Olney secondary schools are going to cope with the extra housing demand, if there is no plan to expand them.</li> <li>2. There is no point in voting if we are to be told that we have to except the expansion and have no say on the subject.</li> </ol>	