



NEWPORT PAGNELL TOWN COUNCIL
80 High Street, Newport Pagnell, Buckinghamshire, MK16 8AQ

Sam Dix
Milton Keynes Council,
Civic Offices,
1 Saxon Gate East,
Central Milton Keynes
MK9 3EJ

14th December 2015.

Dear Sam,

NEIGHBOURHOOD PLAN MILTON KEYNES CONSULTATION

Thank you for sharing with the Newport Pagnell Neighbourhood Plan Steering Group the responses you had received on our Neighbourhood Plan.

Whilst we recognise that no amendments can be made to the Plan prior to examination, we would be grateful if you could forward our comments to this consultation (shown below) to the examiner. Our responses to issues raised during the consultation are coloured red.

Barton Willmore letter 18 November 2015 re Redrow Homes (Tesco Site)

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.

NPTC response: This is already addressed in policy NP3 which identifies B1 and/or D1 usage:

NP3(a) - *Development proposals for employment use, or a mixed used scheme comprising of a mix of residential or non-residential institutional use (D1) and business use (B1) will be permitted on this site. The employment element shall be a significant component of no less than the floor space of the existing three historical buildings on site. Employment or institutional use of the three historical building would be encouraged.*



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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:

"(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."

NPTC response: Not agreed – the wording of NP3(b) should remain:

NP3(b) - The three historical buildings shall be retained and fully restored ready for occupation prior to the completion of 50% of any housing permitted on site

Bidwells letter 18th November 2015 re Milton Keynes Council / Milton Keynes Development Partnership (TFE Site)

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).

NPTC has always expressed the wish that the landowners involved meet around the table and talk to each other. NPTC's response is that the Tickford Fields site, although in separate land ownership, is one key development and should not be segregated although it is recognised that following master planning for the site, there may be different developers.

Paragraph 7.3 Infrastructure Requirements to Support Housing: *The principle of the infrastructure requirements to support housing is supported. However, the requirements 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 are **could include:**"



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NPTC response: The infrastructure requirements have been carefully thought through with advice taken from Milton Keynes Council, and consultation with the relevant bodies. It is not clear at this stage who Bidwell's represent and whether this is Milton Keynes Council or simply Milton Keynes Development Corporation. The Head of Planning at MKC was unaware of the Bidwell's response, so it should be assumed they are representing only the Development Corporation and not the Council itself.

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.

NPTC response: Agree to the word 'Estate' being replaced by 'Development', i.e. Tickford Fields Development.

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.

NPTC response: Not agreed – wording to remain. There has been evidence provided in the Neighbourhood Plan for the supporting infrastructure requirements.

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



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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 Development Brief. The requirement for the development to be "in accordance with the development brief" should be deleted from the text. The Appendix number is incorrect and should be amended to Appendix 5.

NPTC response: We believe it is important that a Development Brief outlining the implications of the development on the Neighbourhood Plan policies is included in the Neighbourhood Plan. This does not preclude a further, more enhanced Development Brief/Master Plan being undertaken by Milton Keynes Development Corporation later in the planning process providing it builds upon the existing Development Brief.

NP2 will be amended to read Appendix 5

Limb (d): *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.*

NPTC response: Not agreed – needs to be a ‘Comprehensive’ Transport Assessment and needs to include an assessment of traffic impact on Junction 14 of M1, in accordance with Highways England requirement, and the Junction between Tickford Street and the A509.

Limb (e): *The wording "through a minimum of three junctions" 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.*

NPTC response: Not agreed. A junction through the North Crawley Road Industrial site planning application has already been agreed, and a further two junctions will be needed to ensure traffic does not back up when exiting the development.

Limb (f): *Whilst we support the promotion of sustainable development and future residents' accessibility to sustainable transport modes, we object to the requirement for "all dwellings shall be located within 400 metres of a bus stop". 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:*



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*"all dwellings should be **accessible to local bus services**"*

NPTC response: Not agreed. Section 7.16 of the MK Local Plan states 400m as the furthest walk to a bus stop, and a distance between 250-400m may be appropriate.

***Limb (h):** 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 "central location" is amended to **"an accessible location"**.*

NPTC response: Not agreed. 'Central' location is the most accessible location particularly from a sustainable transport perspective.

*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. 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:

*"The development shall provide a financial contribution to off-site secondary and post 16 education, **as required/determined by future planning applications**"*

NPTC response: Agree to 100th dwelling being the trigger. It should be noted that this is just for handover of the land with connective utilities. The school building itself is likely to take a further two years before becoming available to resident's children. There is a very practical problem that planning approval has been granted for 73 dwellings, to a landowner that does not control the site for a school, so in principle he would breach this policy as soon as the first dwelling is occupied, which is why the Town Council will amend the trigger to the 100th dwelling.

***Limb (i):** The requirement of "at least three unit shops" 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 "prior to the completion of the 600th dwelling" for completion is not appropriate at this stage as its implication on viability and deliverability has not been fully demonstrated.*

NPTC response: Not agreed – wording allows for a small supermarket to provide general convenience goods, but the additional three unit shops will allow for some diversity, e.g. fast food outlet or hairdresser, which a single larger unit will not provide.



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Limb (j): *The provision of a health/wellbeing facility is supported in principle if justified. However, the wording should be sufficiently flexible to allow for "land to be provided for social and community facilities to meet the needs of the development". Furthermore, there should be some flexibility so that other services are not marginalised through policy.*

NPTC response: 'land to be provided' is not acceptable – the facility itself in the form of a health/well-being facility must be provided. Newport Pagnell steering group has consulted with existing medical practitioners regarding their comments on lack of physical space for medical provision. There have also been direct comments to MKC on their site allocation consultation, regarding how they assess the footage for medical provision, commenting that this needs to be adjusted to consider GP provision separately from other medical service provision.

Limb (k): *The deliverability of the Neighbourhood Play Area being located adjacent to the school towards the eastern side of the site is not supported by evidence. This level of detail should be determined at the master planning stage, not outlined within policy. More flexibility could be created through a change to the text "green and open spaces including a Neighbourhood Play Area will be provided within the development"*

NPTC response: Not agreed – wording is 'preferably located next to school' which is not prescriptive.

Limb (l): *This requirement is too broad and inflexible as it seeks to preserve all the existing trees and hedgerows regardless of their quality or condition, which is not considered appropriate. We would recommend the following re-wording: "The development shall preserve existing trees and hedges on site, **where appropriate...**"*

NPTC response: This wording not agreed – but Neighbourhood Plan to be altered to read as per Carter Jonas' comments on Draft Policy NP2 re: trees and hedgerows i.e.

Development proposals should 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'.

Limb (m): *There is no evidence that the contribution meets the test of the CIL Regulations or NPPF, and therefore, it is uncertain whether the policy meets the Basic Conditions test.*

NPTC response: No need to address either of these points – evidence has been provided in the Neighbourhood Plan as to the need for these requirements.

Policy NP5: Affordable Housing and tenure



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We recognise that affordable housing tenure should meet local needs. However, there also needs to be some flexibility included within the text so that specific site circumstances and changing circumstances are taken into account.

NPTC response: The Town Council will adhere to MKC Local Plan policy H5, i.e. 'subject to market viability tests', which is flexible.
Local Plan policy H5 states "The proportion of affordable housing that the Council will seek on individual sites may vary, depending on the site and market conditions."

Policy NP7: Developer Contribution Policy

This policy should recognise successor documents to the current MKC SPDs.

NPTC response: The wording allows for future changes that supersede existing documents.

Appendix 5 Tickford Fields Estate Development Brief

We do not support the inclusion of a Development Brief with a Neighbourhood Plan document, especially when there is no clear evidence base to support its proposals. Some of the detail provided within the brief cannot be substantiated until a detailed master-planning of the site has been undertaken including baseline environmental studies and technical assessments which will inform the developable area and key development principles.

NPTC response: The Development Brief sets out what the community expects in terms of the extent of development and infrastructure required. Future master-planning will determine the precise details of the development.

We highlight a couple of the concerns with the development brief below:

Para 4.28: *It is not appropriate to set out building heights until detailed assessments have been undertaken.*

Para 4.37: *The trigger for the provision of the school site is in conflict with the trigger set out in policy NP2. There is no evidence that this requirement is viable or deliverable.*

NPTC response: Not agreed - the Town Council has agreed as above to the 100th dwelling being the trigger for the transfer of land for a new school. The school is needed at an early stage in the development, not at the end.

Para 4.38: *As per our comments above in regards to Limb (i) of Policy NP2.*

Para 4.43: *The reference to Code for Sustainable Homes should be removed as it is now defunct, apart from on legacy cases.*

NPTC response: Not known – let the examiner decide.



Carter Jonas letter 18 November 2015 re Welbeck Strategic Land and Mrs Frances Parry (TFE Site)

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.

NPTC response: As with Bidwells, agree to the word 'Estate' being replaced by 'Development', i.e., Tickford Fields Development.

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."

NPTC response: As per response to Bidwells, Section 7.16 of the MK Local Plan states 400m as the furthest walk to a bus stop.

Draft Policy NP5

*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% **affordable rent housing**.*

NPTC response: Amendment agreed.



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Development Brief

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:

Access and Movement

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.

NPTC response: 20mph limit should remain around the roads leading to the school. The Neighbourhood Plan will delete— *this is the speed limit at the Portfields and Green Park estates, as these speed limits do not cover the whole estate.*

Design

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.

Community Facilities and Developer Contributions

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.

NPTC response: The Neighbourhood Plan is qualified by the statement ‘..or other apportionment as may be agreed..’. A pro-rata approach is the fairest method of determining developer contributions.

Archaeology

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.

NPTC response: Agree to this wording.

Future Planning and Development letter 18 November 2015 re Heyford Homes (Marsh End Road/Tongwell Lane Site)

NPTC response: It was agreed not to respond in detail to this letter given that the main point in their letter, housing land supply, was not an issue relevant to the Neighbourhood Plan. In any case, the Neighbourhood Plan was putting forward a substantial amount of land being thrice the requirements of the Core Strategy.



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During pre-submission consultation, residents expressed strong opposition to the development of the Marsh End Road/Tongwell Lane site, principally for issues around peak traffic in Marsh End Road, which is why the site is not allocated for housing in the Neighbourhood Plan.

NPTC response: 'NPTC notes the comments made but points out that the Neighbourhood Plan offers far more housing than the Core Strategy requires for the rural areas. The allocation of Tickford Fields for housing will create a sustainable development, supported by its own pre and first schools, local centre, bus and cycle routes and open space network, in a planned and deliverable way. It is not correct to say that the Marsh End Road site can be delivered more quickly. Planning application 14/02799/FUL was approved as the first phase for 73 dwellings on 3 December 2015 on the North Crawley Road Industrial site, and the buildings have been demolished and the site cleared ready for development. For a full response as to why the Marsh End Rd/Tongwell Lane was not selected, refer to the Consultation Statement response to the Regulation 14 pre-submission consultation by Leybourne Estates.

Highways England email dated 9th November 2015

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.

NPTC response: Agree to a Transport Assessment to include an assessment of the impact on Junction 14 of the M1 and the junction of Tickford Street and the A509.

Jill Dewick (MKC Leisure and Community Officer) email dated 20 November 2015

Leisure & Community

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.

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



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include how the Centre will operate and address any community meeting space requirements for the additional residents.

NPTC response: Not agreed – NP2(j) is clear that the development shall provide a facility for health/wellbeing and associated services and it should not double as a community centre.

Arts, Heritage & Public Art

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.

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 initiatives.

NPTC response: Not agreed – NP3(a) allows for the D1 use of the historic buildings on the Tesco site, which would be a suitable location for this.

Libraries

Our short-term plan under sharing libraries is for an internal refurbishment providing new furnishings. We plan to remain in the present building

The aspiration is to keep the Library open through the Open+ Technologies which will maintain opening hours and potentially offer expanded opening.

NPTC response: The Town Council supports this aspiration.

Amec Foster Wheeler letter dated 20 October 2015 on behalf of the National Grid

NPTC response: No comments

Email to MKC from Stuart Watt dated 7 October 2015

- 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.*
- 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.*

NPTC response: Policy NP7(a) on Developer Contribution Policy gives priority to financial contributions for the provision of education. Ousedale Olney Campus has the capacity for expansion, and discussions have been held with the steering group for the Olney Neighbourhood Plan on this matter. It is envisaged that students from



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the villages will move to Olney Campus where this is practicable, thus freeing up spaces for additional local students

Yours sincerely,

Shar Roselman

Shar Roselman
Town Clerk Newport Pagnell Town Council