

Campbell Park Neighbourhood Plan, Summary of responses to the Regulation 16 Publicity Stage

Source	Summary of Response
<p>Anglian Water</p>	<p>It is noted that the Neighbourhood Plan includes a number of criteria based policies which are intended to be used in the determination of planning applications within the parish.</p> <p>The emerging Milton Keynes Local Plan includes a policy relating to water recycling infrastructure (Policy FR1). As the development plan will be read as whole it is not considered necessary to include a similar policy in the Neighbourhood Plan. Therefore we have no comments to make relating to the Draft Neighbourhood Plan.</p>
<p>The Canal and Rivers Trust</p>	<p>Unfortunately, the Canal & River Trust were not aware that this neighbourhood plan was in preparation until the most recent consultation and so our opportunity to become involved is limited.</p> <p>We wish to draw attention to our e- planning toolkit and the section on what your local waterway can do for your community. In addition, the Trust has recently sent our documents ‘Planning for waterways in neighbourhood-plans’ to all Parish Councils to help encourage early engagement and suggest issues which may be of interest or relevance in a particular location.</p> <p>Community Policy CP1</p> <p>The Trust is pleased to note support within the plan for the Bedford & Milton Keynes Waterway. Community Policy CP1 states a) The planned route of the Milton Keynes and Bedford waterway canal will be protected from any long-term development which might inhibit or prevent the implementation of the proposed new canal link. We have suggested to Milton Keynes Council that any development alongside the route of the canal should do more than just protect the route, but should actively deliver a section of route to some degree where feasible.</p> <p>Connectivity Policy CP1</p> <p>With regard to Connectivity Policy CP1 we note that new development should b) They include appropriate provisions for pedestrian and cycle access, including linking to the existing ‘Redway network’, footways and the Grand Union Canal. Whilst we fully support this policy we consider that this has not been fully achieved by the recent Campbell Park development proposal which treated the canal towpath as effectively redundant in favour of the Redway. It should also be recognised that new linkages and development can place financial burdens on those who maintain these assets as a result of increased usage. Whilst this is in part covered by Policy CP3 this policy only relates to the redway. Perhaps Developer Contributions should be sought to provide improvements to all such affected assets and mitigate against additional maintenance costs as a result of increased usage as result of development?</p>

	<p>We are also note that at 7.37.6 The Parish Council will work with relevant partners to seek: Repairs and maintenance to the highways, the Redway network, footpaths, bridleways, canal towpath and other public areas. The Canal & River Trust would welcome further discussions on this with the Parish Council and will seek where possible, and if funding is available, to work together to achieve this.</p>
<p>Gladman Developments Ltd</p>	<p>The response starts by setting out the basic conditions against which all neighbourhood plans are tested and confirming the relevant local development plan for the Campbell Park Neighbourhood Plan. Comments are made on the following policies from the Campbell Park Neighbourhood Plan:</p> <p>7.45 Design Policy 1</p> <p>Design Policy 1 sets out a list of 13 design principles that all proposals for residential development are required to adhere to. Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles.</p> <p>Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 60 of the NPPF which states that: <i>"Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles"</i>. Gladman are also concerned that a number of the criterion set out in the policy do not relate to ‘Design’ and as such feel that their inclusion should be reviewed.</p> <p>7.47 Heritage Policy</p> <p>The Framework requires a distinction to be made between designated and non-designated assets and different policy tests should then be applied to each.</p> <p>Paragraph 132 of the Framework makes it clear that great weight should be given to a heritage asset’s conservation and that ‘the more important the asset, the greater the weight should be’.</p> <p>With reference to designated heritage assets, the Policy should refer specifically to paragraphs 133 and 134 of the Framework which sets out that Councils should assess the significance of the designated heritage asset and where there is less than substantial harm, this should be weighed in the planning balance against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm. For non-designated heritage assets, the policy must reflect the guidance set out within paragraph 135 of the Framework. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard</p>

	<p>to the scale of any harm and the significance of the heritage asset.</p> <p>Conclusions</p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the CPNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area. Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development.</p>
<p>Historic England</p>	<p>Welcome paragraphs 3.27 and 3.28 on the history of the parish, and paragraph 3.40. However, we consider that it would be more logical for the further information on the listed buildings and scheduled monuments of the parish to either be with the two paragraphs under the heading of “History” or in sub-section 7.46 rather than on its own.</p> <p>We would also welcome more information about the conservation area in either the section on History or sub-section 7.46 e.g. when it was designated, whether or not there has been a review of the designation, what its special interest (the reason for designation) is and whether or not there is a character appraisal and/or a management plan for the area.</p> <p>We welcome the additional information on the scheduled monuments in the parish in sub-section 7.46. However, the National Planning Practice Guidance states “... <i>where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions</i>”.</p> <p>We would therefore welcome more information on non-designated heritage assets in the parish. Are there any records of non-scheduled archaeological sites in the parish on the local Historic Environment Record ? Are there any buildings or features in the parish on the list of locally important heritage assets compiled by Milton Keynes Council ? (Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity).</p> <p>We welcome the references to “heritage” in the Vision and Aim 4.5.2 but are disappointed that there is no reference to the conservation and enhancement of that heritage in the Vision nor any aim or objective for the conservation and enhancement of the heritage assets in the Plan area. Although none of the heritage assets in the parish are currently on the Historic</p>

England Heritage at Risk Register the Register does not include grade II listed secular buildings outside London. Has a survey of the condition of grade II buildings in the Plan area been undertaken ? Has there been any or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc ?

We welcome Design Policy 1. Paragraph 58 of the National Planning Policy Framework states “...*neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.*” However, although we are aware of the Milton Keynes Residential Design Guide, is there a real “*understanding and evaluation*” of the Plan area’s “*defining characteristics*”?

Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change. Has there been any character appraisal of the Plan area as a whole to provide that understanding and evaluation of the area’s defining characteristics ? The appendix to this letter contains links to characterisation toolkits, and we would be pleased to advise further on this subject.

We welcome, in principle, Heritage Policies 1, 2 and 3. However, we think that Heritage Policy 1 may be missing some wording; we suggest that it should say “*New developments must demonstrate that the proposal has paid due regard to the need to conserve and enhance the significance, special interest, character and appearance of heritage assets, their setting and any special architectural, archaeological or other historic features*”.

Heritage policies 2 and 3 are not planning policies for the development and use of land but rather non-planning projects or other aspirations. Whilst we welcome their inclusion in the Plan, they should be distinguished from the planning policies (the National Planning Practice Guidance states “*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications*”). Community Policies 6, 7 and 8 also do not appear to be planning policies or, at least, are not written as such, and should therefore also be identified differently.

Finally, the preparation of the Neighbourhood Plan offers the opportunity to harness a community’s interest in the historic environment by getting the community to help add to the evidence base, perhaps by the characterisation of the Plan area, the preparation of a comprehensive list of locally important buildings and features, or a survey of grade II listed buildings to see if

	any are at risk from neglect, decay or other threats.
M Davidge, local resident	Supports the general approach of the plan and the policies set out in it. Particularly welcomes the proposal to encourage Milton Keynes Council to designate Woolstone as a conservation area (7.48 Heritage Policy 2) - or at least sufficient areas within Woolstone to protect the historic setting of the former two villages between the Ouzel and the canal.
Milton Keynes Council, Development Plans team	<p>Overall the plan has come together very well, and we are pleased to see that a number of the comments we made at the pre-submission stage have been taken into account. There are, however, a number of policies which would be better included as Community Aspirations as they are not addressing land use planning issues. Additionally, in a few places, additional clarity is needed, especially with regard to what standards are being applied.</p> <p>The purpose and status of the list of sites on page 21 could be further clarified, eg by giving the Table a number and a title ie Table 1, New Housing Sites. Make reference to Maps 2 and 3 where the location of the sites can be seen.</p> <p>Current para 7.10.9 in Housing policy 5 - Clarify what is meant by an “appropriate” level of car parking – ie: is it in accordance with the Council’s adopted Parking Standards SPD?</p> <p>Community Policy 4- As it stands, this isn’t really a policy but an aspiration. If you were to identify a site for a new post office then that could be a policy, but that would require background work to establish the deliverability of a new post office in a certain location and consideration of alternative sites.</p> <p>Community Policy 6 - Again, not really a policy as it is primarily dealing with the improvement of facilities rather than location of new ones.</p> <p>Community Policy 7 - Again, not really a policy as it is primarily dealing with the improvement of facilities rather than location of new ones. A policy could identify a site for the location of new changing facilities but you would need to consider how those could be delivered (ie who would pay for them etc)</p> <p>Community Policy 8 Again, not really a policy.</p> <p>Connectivity Policy 3 - This is not really a land use policy. Ideally the plan would identify on a map, locations where specific improvement or new links in the redway network are planned in order to improve connectivity. Once identified, then there would be a potential opportunity to seek contributions from relevant new development, subject to viability and meeting the tests for planning obligations (ie that they are that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and</p>

	<p>kind).</p> <p>Connectivity Policies 4, 6,7,8 - These are not policies – move to Community Aspirations section</p> <p>Environment Policy 4 This is not a policy – move to Community Aspirations section</p> <p>Heritage Policies 2 and 3. These are not policies – move to Community Aspirations section</p>
National Grid	<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.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area</p>
P McDonald Milton Keynes Conservatives	<p>For the avoidance of doubt the green spaces in Woolstone and Springfield should be referenced on a map so the areas and the extent of each green space is clear rather than just a description.</p>
B Steadman, local resident	<p>An extensive email trail of correspondence between the respondent, Campbell Park Parish Council and Milton Keynes Council on a range of issues was submitted. With regard to the Neighbourhood Plan, a key concern related to the protection of green and open spaces in the parish in light of the publication by Milton Keynes council of its Urban Capacity Study, Site Allocations Plan and Plan:Mk and the implications of these documents on the open spaces.</p>