

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

Examiner's recommendations		MKC comments	Recommended changes
Para 1.9	During the examination the Parish Council pointed out an error to me: On page 21 of the Plan, Site 10 is listed as 'Allocated land to the rear of the Public House at Springfield'. However, Housing Policy 2 – opportunities for housing development – explains that the land is an opportunity for a 'small community facility – use class D. The Parish Council in fact intended that the land be used for housing as Springfield already has a suitable Community Centre with access available for all. I recommend that this error be corrected.	Agreed – the error was identified as a result of a query from the MKC Housing Strategy team during the publicity period.	Amend Housing Policy 2 section B to reflect Site 10's allocation as a site for housing by deleting reference to the community facility: HOUSING POLICY 2 B. SPRINGFIELD: Allocated land behind the Springfield public house. —opportunity for small community facility— use class D
Para 2.3	There are three appendices and a glossary. In my view the first two appendices may not be necessary in the final plan.	Noted	
Housing Policies			
Policy 1, Para 4.3	The drafting ... lacks the clarity required to meet the Basic Conditions. I recommend that the policy be modified to read: <i>a) result in a concentration that would adversely affect the character of the area</i>	Agreed	Amend policy as follows: HOUSING POLICY 1 Change of use to Houses in Multiple Occupation (HiMO) and student accommodation must not: a) result in an over a concentration in any one area that would change adversely affect the character of the area.
Policy 2, para 4.4	To be clear and unambiguous the policy needs to link to the list of sites on page 21. I therefore recommend that the policy be	Agreed	Provide a title for the list of sites on Page 21 – Table 1.

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

	modified to include, after the reference to maps 2 and 3, the list of sites (and to be crossreferenced with a title, say Table 1). I also recommend that for clarity of application, that maps 2 and 3 be replaced by more detailed mapping that is on a scalable OS base with clearly defined boundaries.		<p>Replace Maps 2 and 3 with maps on a scalable OS base with clearly defined boundaries.</p> <p>Amend Housing Policy 2 to read:</p> <p>HOUSING POLICY 2 Opportunities for new residential development will be supported on identified sites at the following locations on Fishermead, Springfield, and Oldbrook - see maps 2 and 3 and the list of sites in Table 1.</p>
Policy 3, Para 4.5	Policy 3 supports the re-use of brownfield land. As no definition of this is given in the glossary I recommend that the words “an existing “brownfield” site” are replaced with the expression “previously development land” which has a national definition.	Agreed	<p>Amend Policy 3 as follows:</p> <p>HOUSING POLICY 3 a) Proposals that utilise previously developed land an existing “brownfield” site, proven redundant or surplus employment site or</p>
Policy 5, para 4.7	Policy 5 seeks to secure a viability assessment for all new housing developments. The very brief supporting text (para 7.9.1) simply says that affordable housing which fits in is important. But no robust, proportionate evidence is presented to justify this policy. I therefore recommend that it be deleted.	Agreed	Delete Housing Policy 5
Employment Policies			
Para 5.1	Section 7.11 of the plan deals with three different land uses, often within the same paragraph: employment, leisure and local centres. The plan would be far clearer and less confusing, as well as being more useable	Agreed	New sub-section title to be included in the plan – these are explained at the appropriate points below.

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

	as a development management tool, if these three uses were separated. I recommend that the policies in section 7.11 and their supporting text be separated into three distinct sub-sections (or sections);		
Policy 1, para 5.2	The Mapping to support Policy 1 - Map 5 – is inadequate and the location is not clear and unambiguous. The location should be identified on a scalable OS map base with clearly defined boundaries and cross-referenced in the policy itself.	Agreed.	<p>Replace Map 5 with map on a scalable OS base with clearly defined boundaries for Winterhill.</p> <p>Amend Policy 1 as follows:</p> <p>EMPLOYMENT POLICY 1 Non-food retail or B1 and B2 use-class (adjacent to the mainline railway west of Snowdon Drive – as shown on Map 5) will be supported.</p>
Policy 2, para 5.3	Employment Policy 2 is a leisure policy – dealt with in my next section – and so should be moved to the appropriate section	Agreed	Relocate Employment Policy 2 to the next section for Leisure policies.
Policy 3, para 5.3	Policy 3 supports small business and I recommend should be renumbered 2	Agreed	Renumber Employment Policy 3 as Employment Policy 2
Policy 4, para 5.3	Policy 4 - For clarity I recommend that the words “that require planning permission” be deleted. It should also be re-numbered/named to follow the sequence.	Agreed	<p>Renumber Employment Policy 4 as Employment Policy 3</p> <p>Amend policy as follows:</p> <p>EMPLOYMENT POLICY 4 New developments involving the loss of existing employment sites that require planning permission will not be supported unless it can be demonstrated that...</p>

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

Policies 5 & 6, para 5.4	Policies 5 and 6 concern local centres – see below - and I recommend they be moved to the appropriate section	Agreed	Relocate Policies 5 and 6 to a new section for Local Centres (see below)
Policy 7, para 5.4	Employment Policy 7 seeks to restrict commercial development outside local centres. It has no supporting text, no evidence base and I therefore recommend it be deleted.	Agreed	Delete Policy 7
Local Centres Policies			
Para 5.5	Employment Policy 5 supports retail facilities in the local centres. In terms of achieving clarity I recommend that a new sub-heading before para 7.15.1 is inserted: “Local Centres”; and the polices be re-named Local Centre Policy 1, 2 etc.	Agreed	Add a new sub-heading before para 7.15.1 called “Local Centres”; rename polices Local Centre Policy 1, 2 etc.
	Policy 5 (as is) needs to include Fishermead – identifiable on the ground and in para 7.30 (as well as in the photos on page 28).		Amend Employment Policy 5 (as is) and supporting text at para 7.30 as follows: 7.15.1 The main local facilities at Oldbrook, Springfield, and Willen and Fishermead will remain important centres. They should remain protected to ensure that a range of facilities are provided locally but reflect the changing needs and demands of the local community - see maps 6, 7 and 8 and 9. EMPLOYMENT LOCAL CENTRES POLICY 5-1 The main local centres for Oldbrook, Springfield, Willen and Fishermead are identified where retail facilities will be supported..
	The mapping – maps 6,7 and 8 - is relatively poor and I again recommend that the locations – which should also include	Agreed	Prepare new maps for the local centres on a scalable OS map base. Add a new map for Fishermead.

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

	Fishermead – be identified on a scalable OS base with clearly defined boundaries and cross-referenced in the policy itself		
Para 5.6	Employment Policy 6 should be re-named Local Centre Policy 2, as above	Agreed	Rename Employment Policy 6 as <u>Local Centre Policy 2</u>
Leisure, well-being and community facilities policies			
Para 6.1	Section 7.19 has supporting text for leisure but does not contain all the policies – all the relevant policies now need to be imported from section 7.11, as recommended earlier, and consolidated with the supporting text from that section, notably 7.11.2 (first two bullets) and 7.12.1-2 as well as the relevant photos. I recommend that for clarity the distinction in leisure and community policies be highlighted with suitable sub-headings.	Agreed	Introduce a subheading for “Leisure” after para 7.19.10
Leisure			
Para 6.2	Employment Policy 2 – which I recommend is re-named Leisure Policy 1 – supports leisure-related development at Willen Lake and Newlands. However, it is not crossreferenced to Map 4 which itself does not make the boundary sufficiently clear. I recommend that the locations be identified on a scalable OS base with clearly defined boundaries and cross-referenced in the policy itself.	Agreed	Amend Employment Policy 2 (as currently) to read: <u>EMPLOYMENT POLICY 2-LEISURE POLICY 1</u> Leisure-related employment on Newlands and Willen (south lake) <u>as shown on Map 4</u> will be supported. Prepare a new version of Map 4 on scalable OS base
Para 6.3	Community Policy 1 is in fact three leisure policies. I recommend that each part be separated into a distinct policy and re-named Leisure Policy 2,3 and 4. For clarity, I recommend that the route of the Milton	Agreed	Prepare a new Map 10 showing the route of the B toMK waterway. Divide Community Policy 1 into three separate Leisure policies as follows:

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

	<p>Keynes and Bedford Waterway be crossreferenced to an appropriate map. The Canal & River Trust felt the policy should go further and actively pursue the delivery of sections; however, I saw no evidence to justify such an obligation.</p>	<p><u>LEISURE POLICY 2</u> The planned route of the Milton Keynes and Bedford waterway canal, <u>as shown on Map 10</u>, will be protected from any long-term development which might inhibit or prevent the implementation of the proposed new canal link.</p> <p><u>LEISURE POLICY 3</u> Development proposals involving the loss of existing sport, formal or informal recreation facility, will not be supported unless it can be demonstrated that there is no longer a genuine need for such facilities or that alternative facilities are provided which are accessible to the local community and are equivalent to or better than the existing facilities.</p> <p><u>LEISURE POLICY 4</u> Proposals for leisure related development, including leisure related accommodation and associated facilities on Newlands and Willen lakes would be supported providing the following criteria <u>are</u> met:</p> <ul style="list-style-type: none"><u>i.</u> That any proposal does not have an adverse effect on the amenities of surrounding residential properties and Willen Hospice particularly as a result from noise or as a result of external lighting.<u>ii.</u> That there is adequate parking, vehicular access and transport links including
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Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

			<p>cycling facilities.</p> <p>iii. There is no adverse effect of the landscape character or appearance of the area.</p> <p>iv. Achieve a high standard of sustainable and low carbon design and,</p> <p>v. That any proposal does not have either a direct or indirect adverse impact upon areas of local biodiversity importance and that sufficient mitigation or compensation measures are provided.</p>
Community Facilities			
Para 6.4	The community policy sub-section contains a mix of land use policy and advocacy for community actions. In my view and that of MK Council, Community Policies 4-7 are not concerned with the use or development of land but are actions advocated by the Parish Council. I recommend that they be deleted from the main body of the plan; though they can be removed to a separate appendix if they are clearly identified as Community Actions, or similar, and not described as policies.	Agreed	Delete Community Policies 4, 5, 6 and 7
Para 6.5	Community Policy 2 should be re-numbered 1, to be consistent with changes already recommended. This is concerned with avoiding the loss of facilities. I find no evidence for the marketing period in part b) and so I recommend that the words after "... no longer viable (and that the premises ...)" be deleted.	Agreed	<p>Amend Community Policy 2 (as currently) to read:</p> <p>COMMUNITY POLICY 2-1 New developments including small local retail facilities, public houses and local services such as health and community facilities that result in the loss of existing</p>

**Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018**

			<p>facilities will be refused unless it has been demonstrated that:</p> <p>a) The service or facility is no longer needed, or</p> <p>b) It can be demonstrated that the use is no longer viable and that the premises have been actively marketed for at least 6 months for the existing use, or</p> <p>c) Where</p>
	Community Policy 3 then needs to be re-numbered 2.	Agreed	Renumber Community Policy 3 to read Policy <u>2</u>
Connectivity Policies			
Para 7.1	The policies seek to enhance movement to and through the plan area. The majority of this is expressed not through policies that are concerned with the use or development of land but with Parish Council actions. I therefore recommend that Policies 3,4 and 5-8 be deleted from the main body of the plan; though they can be removed to a separate appendix if they are clearly identified as Community Actions, or similar, and not described as policies.	Agreed	Delete Connectivity Policies 3,4,5,6,7,8.
Para 7.2	Connectivity Policy 1 is concerned with appropriate provision alongside development. For clarity I recommend some minor drafting changes: <ul style="list-style-type: none"> • At the end of b) add: "... where appropriate." • Delete c) as this duplicates the development plan • In e) replace "ensure" with "maximise". 	Agreed	<p>Amend Policy 1 as follows:</p> <p>CONNECTIVITY POLICY 1</p> <p>New developments must ensure that:</p> <p>a) They include appropriate and safe provisions for the car, service vehicles, transport and emergency vehicles, and movement through the site.</p> <p>b) They include appropriate provisions for</p>

**Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018**

			<p>pedestrian and cycle access, including linking to the existing 'Redway network', footways and the Grand Union Canal, where appropriate.</p> <p>c) They include appropriate provisions for parking in line with Milton Keynes Council's Parking Standards SPD.</p> <p>c)-d) The development site is well connected to existing or any proposed local transport routes, and</p> <p>d) e) They maximise ensure appropriate accessibility to all sectors of the community including the elderly, the disabled and infant buggies/ prams.</p>
Para 7.3	<p>Policy 2 can be retained as a policy if re-phased as I recommend as follows: "The development of relevant sites that enable or facilitate improved facilities for bus users and specifically enhanced stops at the Fishermead and Springfield local centres and which include facilities will be supported."</p>	Agreed	<p>Rephrase Policy 2 as follows:</p> <p>CONNECTIVITY POLICY 2 <u>The development of relevant sites that enable or facilitate improved facilities for bus users and specifically enhanced stops at the Fishermead and Springfield local centres and which include</u> facilities to enable low-carbon bus transport e.g. electric or hybrid-powered, and an extension of the proposed Central Milton Keynes shuttle to include Oldbrook and Fishermead <u>will be supported.</u> Any redevelopment of relevant sites will be expected to facilitate the delivery of these improvements.</p>
Para 7.4	<p>Policy 5 needs to be renumbered 3. It is concerned with securing adequate parking. The first and third sentences are concerned with the use and development of land in</p>	Agreed	<p>Renumber Policy 5 as <u>Policy 3.</u></p> <p>Delete the second sentence (" The current quality of parking provision shall be improved</p>

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

	my view. The middle sentence (“The current quality”) is not and I recommend that it be removed to a separate appendix and are clearly identified as additional Community Actions, or similar, and not described as part of any policies.		over time in partnership with the relevant landowners and this Plan seeks improvements to existing parking and provision of additional spaces where appropriate.”)
Environment Policies			
Para 8.1	The policies in this section are primarily aimed at protecting green and open spaces. Again, much of the sub-section is concerned with advocating actions by the Parish Council. Therefore I recommend that those policies that do this, and the supporting text, such as 7.3.7.2-10 be removed to a separate appendix, and are clearly identified as Community Actions, or similar, and not described as policies. In particular I recommend that Environment Policies 4,5 and 6 be so removed.	Agreed	Delete Policies 4, 5 and 6 and the associated supporting text at paras 7.3.7.2 -10
Para 8.3	The drafting of Environment Policy 1 lacks clarity. I recommend the following modifications: <ul style="list-style-type: none"> • Delete the word <i>potential</i> in the opening sentence • Delete the word <i>any</i> in a) • Re-phrase c) to read: “It can be demonstrated that the loss will be mitigated by significant social, economic or environmental benefits” 	Agreed	Amend Policy 1 as follows: ENVIRONMENT POLICY 1 New development which will result in the potential loss of green/open spaces will not be supported unless: a) It can be demonstrated that the proposal does not result in any harm to the character of the area, or that the continual maintenance is unduly onerous or impractical or b) The community would gain equivalent or enhanced benefit from the proposed development such as the provision of suitable

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

			replacement green spaces, and c) <u>It can be demonstrated that the loss will be mitigated by significant social, economic or environmental benefits.</u>
Para 8.4	Environment Policy 2 is concerned with impacts on private gardens. While this issue is revealed in the public consultation feedback there is very little evidence to support a new policy; certainly not robust and proportionate evidence. I recommend this policy be deleted.	Agreed	Delete Policy 2
Para 8.5	Environment Policy 3 seeks to protect local trees. No definition of <i>important</i> is indicated, so that it lacks clarity. I recommend that the word be replaced with <i>significant</i> .	Agreed	Amend Policy 3 (as currently) as follows: ENVIRONMENT POLICY 3-2 New developments shall include the protection and retention of significant important trees and hedgerows and also provide for suitable additional planting and protect local amenity where appropriate to protect or enhance biodiversity.
Design Quality Policies			
Para 9.4	The drafting of Policy 1 lacks clarity in places and so I recommend the following modifications: <ul style="list-style-type: none"> • Re-draft the opening sentence to read: All new development shall have regard to the following criteria: • In b) replace "it is close" with "Proximity" • In c) delete "it has" • In j) delete "are defined" 	Agreed	Amend Policy 1 as follows: DESIGN POLICY 1 All new development shall have regard to the following criteria : a) It integrates into surroundings in terms of scale, density and design including landscaping. b) It is close Proximity to community facilities.

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

			<p>c) It has good accessibility to public transport.</p> <p>d) It meets local housing needs reflected in local updated surveys by the Parish Council or Milton Keynes Council.</p> <p>e) It respects the character of the area.</p> <p>f) It reflects the topography of the site and protects open spaces and habitats.</p> <p>g) It is designed to encourage low vehicle speed.</p> <p>h) Parking is sufficient and is well integrated.</p> <p>i) It maximises connectivity to the Redway network or other footpath connections.</p> <p>j) Public and private spaces are defined.</p> <p>k) Adequate provision has been made for external storage including recycling facilities.</p> <p>l) The design, including landscaping reduces the fear of crime (Secure by Design).</p> <p>m) It ensures appropriate accessibility to all sectors of the community including the elderly and disabled. (including consideration of developing to 'Life Time Home Standards')</p> <p>n) It achieves high standards of sustainable and low carbon design proportionate to the scale of the development including electric car charging points/mobility scooter charging points, bicycle racks, renewable energy and infrastructure to support super fast broadband connection.</p>
Heritage Policies			
Para 10.2	Both Heritage Policies 2 and 3 are, however, not concerned with the use or	Agreed	Delete Policies 2 and 3

Campbell Park Neighbourhood Plan
Milton Keynes Council's decision on the Examiner's Report, June 2018

	development of land, as also argued by Historic England and MK Council; and so I recommend be removed to a separate appendix, and are clearly identified as Community Actions, or similar, and not described as policies. Policy 1 can remain		
Referendum Area			
Para 11.2	There are no formal development site allocations in this plan and in my view the nature and scale of what it proposes would not <i>have a substantial, direct and demonstrable impact beyond the neighbourhood area</i> . I therefore recommend that the Referendum Area be the same as the designated neighbourhood area.	Agreed	