

Hanslope Parish Neighbourhood Plan 2016 - 2031

Initial Comments of the Independent Examiner

Prepared by

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Introduction

1. As you will be aware I have been appointed to carry out the examination of the Hanslope Neighbourhood Plan. I have carried out my initial review of the Plan and most of the accompanying documents that I have been sent. I carried out my site visit to the parish on Sunday 10th March 2019 when I spent an enjoyable couple of hours in the village, and I was accompanied, for some of the time, by the glorious sounds produced by the bell ringers of St James Church.
2. My initial view is that I should be able to deal with the examination of this Plan by the consideration of the written material only, although I do reserve the right to call for a public hearing, if I consider that it will assist my examination. That may depend on the responses to this note. Based on my preliminary consideration of the plan, there are a number of matters upon which I would wish to receive further representations or comments, from either or both the Parish Council and Milton Keynes Council.

Reg 16 Comments

3. The Parish Council will not have had an opportunity to comment on any of the representations received as part of the Regulation 16 Consultation. If the Parish Council would wish to put forward suggestions, for amendments to the plan document, having considered the comments, then this is an opportunity to ask me to recommend them. I would be happy to consider any revisions etc., albeit that my remit is restricted to matters of the basic conditions.
4. I would be particularly interested in the Parish Council's views on the representation for the inclusion of the Equestrian Centre on the basis that it constitutes the redevelopment of a brownfield site. I would also wish to know Milton Keynes Council's approach to the redevelopment of brownfield sites for residential development in locations that are not isolated from other development and whether it considers that would constitute "sustainable development". Are there any relevant Local Plan policies?

Plan: MK

5. I understand that the new Local Plan is to be adopted on 20th March 2019. I see that some of the sites that the neighbourhood plan is proposing for allocation, are now recognised in the Local Plan as *commitments*. I need to fully understand the Local Plan's approach to development in villages and have noted that the spatial strategy policy refers to development taking place within settlement boundaries where there is a neighbourhood plan. Has a housing figure been set for the total amount of the contributions expected to be made by villages to the overall housing total? Is there a separate figure or are they expected to contribute to the windfall figure? Does the LPA have a

methodology of calculating housing numbers to be allocated to neighbourhood plan areas under the recent NPPF (Para 66)? I appreciate that this version of the NPPF is not the version I am examining this plan against, but I am just wishing to understand how the LPA is looking at the development contributions of the villages, who are preparing neighbourhood plans.

Local Green Space

6. The Planning Practice Guidance states that the landowners of sites that are proposed for designation as Local Green Space should be notified. Can the Parish Council confirm to me that this notification has taken place?
7. I would also seek clarification from the Parish Council as to the reasons why the Manor Farm permanent meadow, to the rear of Church End, is considered to be demonstrably special to the local community to warrant LGS status. What is its particular significance?

Policy HAN1: Settlement Boundaries

8. I would like to hear the Parish Council's criteria that has been used to define the proposed settlement boundary as in Policy HAN 1. Why has the cul de sac at the end of Kitelees Close been omitted?
9. I note that development is taking place on the east side of Long Street Road opposite Site E. The logic behind the other allocation sites seems that their sites should be included inside the development boundary. In view of that, I would like to know whether I should be recommending that this land should be included, as well as the houses which also are opposite Site E?
10. Are there any other planning applications which need to be reflected in the development boundary? The fifth paragraph of the Plan's Foreword refers to two major and one smaller developments being submitted. Can I be given details including whether these applications have been determined?

Policy HAN2: Housing Development Sites

11. I understand that 4 of the 5 allocation sites have planning permission and I saw on my site visit that work has commenced on Sites A, C and E. I read from Para 5.9 of the neighbourhood plan that the purpose of including these sites as allocations is to guide the reserved matters or to provide policy context should the consents lapsed. Can MKC confirm that all the reserved matters have been dealt with on these allocation sites? Can it also confirm what the current position is regarding Site B with regard to reserved matters?
12. As the consents have been implemented I would like to hear the views of both parties whether there is still any value in the neighbourhood plan continuing to allocate them for housing and should they not now be referred to as planning commitments, which has been used as justification for the development boundaries in Policy HAN1?

13. I have received representations that the Parish Council when allocating land for development, it did not issue a call for sites when it was dealing with the issue of site allocations. I attach the relevant section of the Planning Practice Guidance.

Should plan makers issue a call for potential sites and broad locations for development?

Plan makers should issue a call for potential sites and broad locations for development, which should be aimed at as wide an audience as is practicable so that those not normally involved in property development have the opportunity to contribute. This should include parish councils and neighbourhood forums, landowners, developers, businesses and relevant local interest groups, and local notification/publicity. It may be possible to include notification of a call for sites in other local authority documentation (such as notification of local elections) to minimise costs.

Plan makers should also set out key information sought from respondents. This could include:

- site location;
- suggested potential type of development (eg economic development uses – retail, leisure, cultural, office, warehousing etc; residential – by different tenures, types and needs of different groups such as older people housing, private rented housing and people wishing to build or commission their own homes);
- the scale of development;
- constraints to development.

14. I would be interested in understanding how it went about site allocation and whether any objective criteria were used, beyond the site having planning permission.

15. I have received Regulation 16 representations about the deliverability of Site D. Can the Parish council clarify whether the site is in a single ownership and there are no leasehold impediments to its developments? I note that the allocation is being proposed for 8 care bungalows. What is the basis for considering the suitability of that type of accommodation bearing in mind the distance from village services? Would the site be appropriate for family accommodation? Has there been any work carried out on indicative layouts that confirm that the site can be appropriately accessed and serviced for that number of units?

Policy HAN4: Design and Development Principles in the Parish

16. Now that development is underway on Sites A and E, does the Parish Council believe that the approved layouts will allow the key views identified in the Plan 3 / 4 to be protected or should the arrows be removed from the plan?
17. Can the LPA confirm whether the allocation of affordable housing is restricted to “those with local connections to the parish”?

Policy HAN7: Community Facilities

18. I would like to see that the sites of the community facilities covered by this policy, shown on a plan. I assume that “Lincoln Cour” is a typo and should be “Lincoln Court”. This looked to me to be a care/ home elderly person’s accommodation, which is a residential rather than community use. Could the Parish Council set out its reasoning for including it as a community facility?

Policy HAN 9: Green Infrastructure

19. The policy requirement to require biodiversity mitigation strategies appears to apply to **all** “new development”. Is there a type of development that the Parish has in mind or should the trigger for the need for an applicant to have to produce such a strategy be whether the proposal results in the loss of wildlife habitat?

Community Views of Planning issues

20. The requirements for neighbourhood planning is set out in the first two bullet points of para 16 of the NPPF (2012) is to “develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development.” and “plan positively to support local development, shaping and directing development in their area, that is outside the strategic elements of the Local Plan.”
21. I do have concerns regarding whether this chapter has a role in the development plan. As a statement of what the community’s views were during the preparation of the plan, it may have been more appropriate to include it as part of the Consultation Statement. The other option would be to make it clear that this chapter is not included with the neighbourhood plan itself, but included as Community Aspirations in an appendix. I would welcome the Parish Council’s views as to whether its retention would be consistent with the role of neighbourhood planning to be seen as “planning positively” for new development as set out in the NPPF.

Final Matters

22. In order, not to unnecessarily delay progress on this examination, I would welcome responses to these questions, **by 5pm on 29th March 2019**, if possible.
23. Please can both parties place a copy of this document and their responses on both the District Council's and the Parish Council's respective websites.