

Response to the Initial Comments of the Independent  
Examiner- John Slater

Prepared by:

Hanslope Parish Council/Hanslope Neighbourhood  
Plan Working Group

MARCH 26, 2019

Hanslope Neighbourhood Plan Working Group met on Tuesday 19<sup>th</sup> March to discuss and agree on appropriate responses to the initial comments of the independent examiner- John Slater.

The following are our response to comments numbered 1 to 23, as set out in the document from John Slater:

1. Glad that you appreciated the bells, unfortunately, they will be silent for few months from July this year as they have to be re-hung. You may be interested to know that one of the guest ringers on the day you visited was the Mayor of Milton Keynes who is an avid bell ringer.
2. We were pleased that you hope to deal with the examination of the plan through the consideration of written material only. We will endeavour to provide all the assistance you need to achieve this as given the length of time we have been working to get the plan to this stage we are eager to conclude the process as soon as possible with a 'made plan'.

#### **Reg 16 Comments**

3. Thank you for the opportunity to do this, as you will see from the following responses there are a number of places where we believe that the current plan needs correcting /updating, and we would be grateful for any guidance you can give on how we can achieve this.
4. Notwithstanding what MKC position is on 'brownfield sites', we have always been unclear on the status of the 'Equestrian centre' in this context given that it was developed on the site of former farm buildings at what was previously 'Malt Mill Farm'. While we have been working on our plan the developers have put in two outline planning applications to develop this site with up to 50 residential dwellings. On both occasions Hanslope Parish Council have objected to these applications and both applications have been refused by MKDC on the principal reasons that it is not an appropriate or sustainable location for the development of such a number of residential dwellings on the edge of the village, particularly in view of the cumulative impact of the 300 houses for which planning permission was recently given at the sites at the top of Castlethorpe Rd and opposite Long Street Road.

#### **Plan MK**

5. As we understand it this question is for the LPA to answer. However, we would point out that while our plan was being developed, there was considerable confusion within MKC about the development contributions that the villages within the MK LPA area needed to make. This was further confused by the fact that the core strategy that MK was operating under, set out as we understand it in the MK Local Plan of 2005 and the MK Core Strategy 2013, was trumped from late 2015 by the view that MK did not have a five-year land supply. This gave 'open season' for developers to put forward plans for

residential development in 'open country' village locations which would otherwise have been protected. Such activity affected Hanslope from almost when we began work on our neighbourhood plan, and as we have set out in our plan, it has not been easy to cope within the context of the neighbourhood planning process as originally envisaged by legislatures.

### **Local Green Space**

6. The consultation policy and notification practice adopted by Hanslope Parish Council and the Neighbourhood Plan Working group is set out in detail in the Consultation Statement. As the Parish Council has since the start of the development of the Hanslope neighbourhood plan in late 2015, received no representations to the contrary from any of the landowners of the proposed green space sites, we have assumed that there are no issues to what we propose.

In practice seven of the of the nine sites – the recreation ground, land to the rear of the new Castlethorpe residential development, the allotments and the green area near Lincoln Court, the village green, village ponds and verges are either owned by the Parish Council or are in the process of being transferred to the Parish Council.

Of the remaining sites one of the public house gardens, that adjacent to the Cock has been the subject of a planning application for some time, which after much deliberation was after the submission of our plan subsequently granted, and **consequently** needs to be removed from the plan. We are not aware of any planning applications concerning the remaining green space sites.

7. The proposed green space to the rear of Church End that borders the churchyard, known on old village maps as Manor Field, has in living memory been a permanent meadow pasture used for grazing sheep and cattle. The pasture has a historic value, with the remains showing underneath the covering of grass of what is thought to be mediaeval ridge a furrow ploughing in one part and previous village dwellings and pathways in another. More recently there are also hard standing remains that it is believed date from the emplacement or intended emplacement of military equipment in WW11.

As a result, the site is believed to be rich in archaeology. With many rights of way from the recreation ground and the village that enter and cross the site, with at one entrance a historic 'kissing gate' opposite the church, the meadow is well used by dog owners and walkers throughout the year and in the summer by villagers for picnics as well as being an areas that children play in. Sitting as it does at the 'top of the ridge' that the village occupies, the meadow provides key landscape views both to the village and away to the Tove valley and beyond.

It is for these reasons why we have proposed that although there are many other fields surrounding the village, this one should have Local Green Space status.

### **Settlement Boundaries**

8. Points 8 and 9 quite rightly identify some mistakes in the Settlement Boundary plan which need to be corrected. The plan as presented in the Submission document was based on a previous settlement boundary plan that was amended following discussions with MKC, to take account of the new Castlethorpe Rd and Long Street Rd developments. Unfortunately as indicated the small areas off Kitelee Close and the small number of houses to the east Site E were omitted. In addition, it has since been pointed out by a resident that the houses bordering the edge of Newport Road from opposite the Village Hall to end of the allotments field were also omitted and this also needs to be corrected.
9. See the joint answer above.
10. To our knowledge to date, there are no other major planning applications that need to be reflected in the development boundary. The three major applications ( a. -51 Houses at the Equestrian Centre, b.-50 houses near Cuckoo Hill Farm and c. -200 houses at the rear of Eastfield Drive) and one minor application for a small number of houses to the field side of the recreation ground, that may have had to be taken into account in the development boundary, that were all resisted by the Parish Council, have all been refused outline planning permission by MKDC.

The principal reasons for these refusals was that all four locations were judged as being not appropriate and unsustainable, particularly in the light of the existing recent cumulative development of the 300 houses off Castlethorpe Rd ( Site A) and Long Street Rd ( Site E), that is already putting pressure on our village facilities (e.g. doctors surgery and school). In addition, the recent agreement that MK now has a five-year land supply meant that the related policies in the previous MK local plan to restrict development in 'open countryside' have been reinstated in Plan:MK and were also used as a reason to refuse outline planning permission.

We were obliged when outline planning permission was obtained on the proposed Castlethorpe Rd and Long Street Road developments to include them in our developing neighbourhood plan.

However, as far as we are aware the developers for the proposed sites at the Equestrian Centre, Cuckoo Hill Farm and the land to the field side of the recreation ground have appealed these decisions. At the time of writing it is not known if the developers of the proposed site at the rear of Eastfield Drive will also follow suit.

In addition the developer of Site C, on land that was part of the Globe public house car park, has also been trying to extend his planning application to include the development of more residential houses on the small field behind the car park, but to the best of our knowledge MKDC have not ruled on this.

## **Policy HAN 2. Housing Development Sites**

11. As we understand it the comments made here and the questions raised are in the main for MKC to answer.

However as we clearly set out in both the Foreword to our Neighbourhood Plan and in Section 4 Community Views on Planning Issues, during the development of the plan we struggled to come to terms as to how the proposals for Sites A and C and them subsequently obtaining outline planning permission could be incorporated in the neighbourhood plan in a way that negated the need to find even more sites for residential development that was clearly contrary to the wishes of the community as expressed in the Village Survey. Only late in the development of our plan in early 2018 did MKC Neighbourhood Planning advisers offer us a solution as a result of an inspector's decision as regards the plan for Sherington (what has been referred to as the Sherington protocol), that led to them being incorporated into the neighbourhood plan as outlined in Policy HAN 2.

It was hoped that the plan would be 'made' before the reserved matters with sites A and C were dealt with, but getting the plan to the 'submission stage' seems to have taken an inordinate amount of time and as you have observed with agreement on the reserved matters the development of both these sites is underway (although it is expected that they will take years to complete).

As far as Site B is concerned what are believed to be overseas-based developers seem to have put the project 'on hold' (there has been no activity on the site for a number of years) and as we understand it even the planning consent has lapsed.

12. Our view is that given the history of the development of our plan we believe that there is a value in Sites A and C continuing to be allocated for housing in the plan, even if they have to be referred to as planning commitments. This is because as described above, the view from the developers is that the development on these sites will take years to complete and as such should continue to be regarded within the terms of the 'Sherington protocol' and negate the need for the Parish have to find additional sites for incorporation in the plan. We believe that recent decisions on planning applications referred to in Question 10, support this view in that the village needs time to cope with the cumulative effect of the development that is already underway.

13. Our view is that the representations on this issue (from developers) are extremely disingenuous in this regard. The history of our consultation for this plan is clearly set out in detail in the Consultation Statement, which we were advised more than met the requirements for a call for sites.

The simple fact is that from the very start of our neighbourhood planning process the principal landowners (the owners of the farmland surrounding the village) had been enticed by developers, to push ahead with their own proposed plans for the three major sites of Castlethorpe Road, Long Street Road and the land to the rear of Eastfield Drive, without any regard for the development of a neighbourhood plan for the village and virtually no communication, until the first

two were obliged to present their reserved matters plans to the Parish Council and the village.

The developers clearly saw an opportunity to get plans for large scale residential development in open countryside approved while MK was judged not to have a 5-year land supply. Latterly until this 'loophole was closed' others also put plans forward on the same basis for proposals for significant developments at the Equestrian Centre, land to the side of Cuckoo Hill Farm, and the smaller development on land to the field side of the recreation ground and the attempt by the developer at the Globe to expand their development into an attached small field. Again these were done with no reference to the ongoing development of our neighbourhood plan.

14. The objective criteria are as set out in Section 5 of the plan – Vision, Objectives & Land Use Policies.
15. Site D which is at the rear of houses along Williams Close. The site and garages are owned by MKC but recent communication with them about it made it clear that the maintenance of it has no priority. Some of the garages are still rented but MKC records are poor and many have been seemingly abandoned. The suggestion that it may make a good site for a small number of older peoples care bungalows, is because the site is next to an existing number of such dwellings located at the bottom of Williams Close, for which access to the village facilities is not considered to be an issue and will improve in the future with improved pathways to the village as a result of the Long Street Rd development which is behind them.  
There has been no work carried out on indicative layouts for the site, but our observation is that it should be able to be appropriately accessed and serviced.

#### **Policy HAN 4: Design and Development Principles in the Parish**

16. Because of the slope of the land on Site A and the reserved matters layout of the site, it is our belief that two of the main views on the 'Key View Map' are still valid, although the third view arrow nearest Cuckoo Hill farm will be lost except for those living in the new houses to the rear of the site and from the proposed Parish Council managed 'green area' at the rear of the site.  
For Site E the reserved matters layout of the site may if anything improve the landscape view as the vista down the roads and the land to the rear of the site will open up views that previously from Long Street Rd were obscured by the high hedge and upward slope of the land.
17. The allocation of affordable housing is for the LPA to comment.  
As we understand it those on the housing list with 'connections to the parish' will be offered the first choice and any properties remaining unfilled will be offered to others from the MK area.

### **Policy HAN7: Community Facilities**

18. We would be happy to amend the plan to show the sites of the community facilities.

Lincoln Court (we will correct the spelling) is indeed a sheltered housing facility, entrance to which is controlled by a warden. The facility does have however a large common room with a small kitchen and this is often used for such as charity events e.g. tea parties/games to raise money, which are attended by non-residents from the village. It is for this reason that we have included it as a community facility.

### **Policy HAN: Green Infrastructure**

19. It is our view that a biodiversity mitigation strategy should apply to all new development from proposed new housing to house extensions. The latter is because the village comprises a large number of established properties often containing well-established gardens with mature plant features. Even the smallest development could threaten biodiversity, especially if it requires the removal of older hedgerows and mature trees, which the PC is keen to preserve, particularly in view of the well-known contribution that such can make to mitigating environmental air pollution. As a result, we believe that biodiversity mitigation strategies should be an essential component part of our neighbourhood plan.

### **Community Views on Planning Issues**

20. Points 20 and 21 refer as we understand it to Section 4 of the Neighbourhood Plan – Community Views on Planning Issues. The issues covered here are intended to give a background to the many issues that have made our neighbourhood planning process especially challenging. While they are also covered in detail in our existing Consultation Statement and we understand your view that perhaps they should be relegated to this part of the submission, we did have a good reason for putting a brief summary up front in the main document. This was because we thought it important that as anyone reading the main plan may not take the trouble to read the supporting documents, such a statement outlining the background to the development our the plan was important to show that despite the many issues that we faced we have tried as best we can to ‘plan positively’ for new development.
21. See the joint answer above.
22. The responses were completed by the beginning of the week commencing 25 March and sent by the deadline of 29 March 2019.
23. Copies of the comments made by John Slater and our responses will be placed on the Parish Councils website.