

7 March 2019

Neighbourhood Planning
c/o UDLA
Milton Keynes Council
Civic Offices
1 Saxon Gate East
Milton Keynes
MK9 3EJ

By Post & Email (neighbourhoodplanning@milton-keynes.gov.uk)

Dear Sir/Madam

**STANTONBURY NEIGHBOURHOOD PLAN: 2019-2031 SUBMISSION PLAN (DECEMBER 2018)
REPRESENTATIONS ON BEHALF OF MK NOMINEES LTD & TAYLOR WIMPEY (SOUTH MIDLANDS)
LTD**

On behalf of our clients, MK Nominees Ltd and Taylor Wimpey (South Midlands) Ltd, we have pleasure in providing representations to the Stantonbury Neighbourhood Plan: 2019-2031 Submission Plan (December 2018) ('SNP').

MK Nominees Ltd and Taylor Wimpey (South Midlands) Ltd own the freeholds of the land within the Stantonbury area, most notably that associated with SNP Site Specific Allocation SNP18 (Rowle Close Garages). They have actively engaged with Stantonbury Parish Council to progress development on Site SNP18.

The following representations are made on behalf of our clients and must be seen within the context of national land local planning policy as well as, where appropriate, other material considerations.

Neighbourhood Plan Vision (Page 8)

Support: the vision outlined will enhance Stantonbury to the benefit of its residents and the wider community.

Neighbourhood Plan Objectives (Page 8)

Support: the objectives outlined will enhance Stantonbury to the benefit of its residents and the wider community.

Site Specific Policies (Paragraph 52)

Support: Stantonbury Parish Council's positive approach to development will enhance the area to the benefit of its residents and the wider community.

Site Specific Policies (Paragraph 53)

Support: Stantonbury Parish Council's ongoing engagement with landowners will ensure sites' deliverability and effectiveness in achieving the SNP's objectives.

Site Specific Policies (Paragraph 56)

Support: SNP's identification of sites where change is likely and the introduction of strategies to positively manage these provides certainty and direction to all parties.

Site Specific Policies (Paragraph 58)

Support: SNP's use of site specific policies provides certainty and direction to all parties. However each proposal must be considered on its own merits and thus the policies should be applied in the context of other material considerations.

Delivery of Site Based Policies (Paragraph 59)

Support: SNP's use of site specific policies provides certainty and direction to all parties. However each proposal must be considered on its own merits and thus the policies should be applied in the context of other material considerations.

Delivery of Site Based Policies (Paragraph 60)

Suggested Modification: Each proposal must be considered on its own merits and thus the policies should be applied in the context of other material considerations. Suggest the wording of this paragraph be modified to:

"Applications should meet each of the policy criteria..."

NB CMYK underlining

Delivery of Site Based Policies (Paragraph 61)

Support: SNP's use of site specific policies provides certainty and direction to all parties. However each proposal must be considered on its own merits and thus the policies should be applied in the context of other material considerations.

Policy SNP1: Open Space & Leisure

Suggested Modification: Each proposal must be considered on its own merits and thus the policies should be applied in the context of other material considerations. Open space should only be protected where it is of intrinsic value to its surroundings. There are cases, such as the land associated with Site SNP18, where neglected open space detracts from the quality of the area (for example by encouraging fly tipping and anti-social behaviour) and thus its purpose should be revisited to secure greater community benefit, such as regeneration, the ability to provide maintained, purposeful open space and, most importantly, enhancing the area's quality and functionality. A careful balance must be achieved between the value of less important landscape areas and the detrimental landscape impact uncontrolled parking and other anti-social behaviour can have. Furthermore, Stantonbury Parish Council have recognised that in some instances, such as the regeneration of Rowle Close, it may be appropriate to replace trees with low level planting to secure social as well as environmental benefit.

Accordingly, suggest the wording of Policy SNP1 be modified as follows:

- *“Subject to other material considerations, within the open space areas identified on Figure 2 (page 19) only development that supports the increased use or functionality of the open space will be encouraged and permitted.”*
- *“Proposals which involve justified loss of trees must include for their replacement with planting of similar species or low-level planting as appropriate.”*

NB CMYK underlining

Figure 2: Open Space & Leisure

Suggested Modification: Each proposal must be considered on its own merits and thus the policies should be applied in the context of other material considerations. Open space should only be protected where it is of intrinsic value to its surroundings. There are cases, such as the land associated with Site SNP18, where neglected open space detracts from the quality of the area (for example by encouraging fly tipping and anti-social behaviour) and thus its purpose should be revisited to secure greater community benefit, such as regeneration, the ability to provide maintained, purposeful open space and, most importantly, enhancing the area’s quality and functionality. As such the small area of open space located within Site SNP18 should not be identified as amenity land on Figure 2: in its current form it offers no amenity value; however, its purpose should be revisited as part of the Site SNP18 regeneration proposals (NPPF Paragraph 99).

Policy SNP3: Parking Enhancements (Paragraph 76)

Support: Parking inadequacies could be managed though development proposals considered on their own merits given the needs of the immediate area. For example, subject to securing an appropriate design, landscape and management solution it would be possible to formalise parking on the existing verges in the area immediately surrounding Site SNP18.

Policy SNP3: Parking Enhancements (Figure 17)

Support: The identification of land at Rowle Close for parking enhancements is supported.

Policy SNP4: Design Principles

Support: To a large extent the policy detail is appropriately worded, providing both flexibility and certainty.

Suggested Modification: The policy’s insistence (i.e. ‘must’) does not accommodate innovative design solutions nor material considerations which may cause slight but appropriate deviation from the design principles. The wording of the introductory sentence must therefore be changed to ‘should’. The last sentence should also be omitted from the policy. Such flexibility will ensure more place-appropriate design is pursued, thereby resulting in better site specific development outcomes.

Policy SNP18 Rowle Close Garages

Support: The regeneration of Site SNP18 provides a key catalyst for the regeneration of the area as a whole and has the potential not only to secure significant housing delivery but also provide for other community aspirations (NPPF Paragraph 69).

Policy SNP18 Rowle Close Garages (Paragraph 139)

Support: The description of the site is generally accurate.

Policy SNP18 Rowle Close Garages (Paragraph 140)

Support: The description of the site is generally accurate.

Policy SNP18 Rowle Close Garages (Paragraph 141)

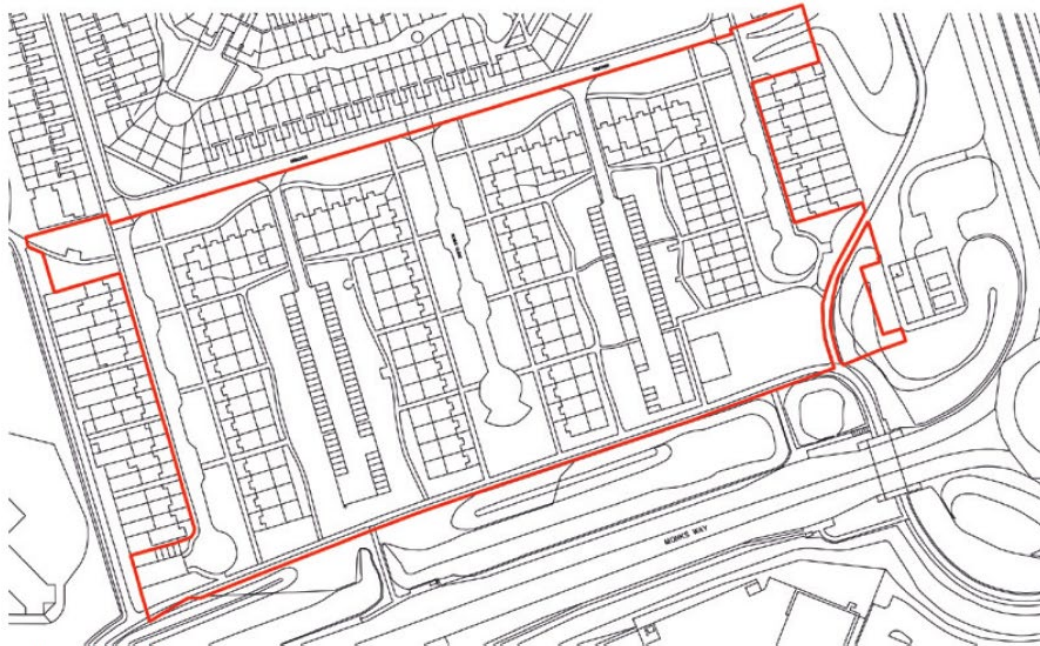
Support: The poor state of Site SNP18 does result in parking on local amenity space, to the detriment of the local environment. The regeneration potential of this site can alleviate this issue and will result in environmental enhancements.

Policy SNP18 Rowle Close Garages (Paragraph 143)

Support: The description of engagement is generally accurate.

Policy SNP18 Rowle Close Garages (Site Location Plan)

Suggested Modification: the land required (and under control) to deliver the Rowle Close regeneration extends further than that shown on the SNP Policy SNP18 site location plan. The red line plan below shows the extent of land associated with this regeneration opportunity. The SNP Policy SNP18 site location plan red line should be extended to reflect this.



Red Line Plan of Site

Policy SNP18 Rowle Close Garages

Suggested Modification: Whilst acknowledging the broad development aspirations of Policy SNP18 (NPPF Paragraph 125), we make the following comments to ensure that the associated aspirations are viable and therefore deliverable:

- Density (a): existing development density in the area immediately around Site SNP18 is between 55.9 and 64.5 dwellings per hectare. Proposals should be considered on their own merits, for example innovative design may result in increased development density yet could also bring enhancements. Development must be appropriate to its context and in relation to overall objectives. Suggest Part (a) of the policy be modified to read “Housing density through the redevelopment of the red edged areas must respect and be appropriate to the density of the surrounding area.”,
- Height (b): Proposals should be considered on their own merits, for example innovative design may result in increased development height yet could also bring enhancements. Development must be appropriate to its context and in relation to overall objectives. Suggest Part (b) of the policy be modified to read “Housing height through the redevelopment of the red edged areas must respect and be appropriate to surrounding building heights.”

Support: Whilst acknowledging the broad development aspirations of Policy SNP18 (NPPF Paragraph 125), we make the following comments to ensure that the associated aspirations are viable and therefore deliverable:

- Replacement Parking (d): it is only proper that replacement parking provision should be secured for garage owners displaced by the regeneration of Site SNP18. Opportunities that offer the potential for more appropriate, better landscaped parking provision should be supported, for example through the use of the amenity land identified.
- LEAP (f): Acknowledge the need for LEAP provision in the locality and consider the wording of this element of Policy SNP18 allows for appropriate flexibility, thereby ensuring the most beneficial, viable development outcome.
- Landscaping Provision (g and h): landscaping can be used not only to enhance an area but also alleviate problems (such as parking).

We trust you will find the above representations of interest and that you will be able to afford them fair consideration.

We would be grateful if you could confirm receipt of these representations and keep us updated as to the progress of SNP. In the meantime, should you have any queries please do not hesitate to contact us.

Yours faithfully

Clare Buddle BSc(hons) DipTP MRTPI MSc
Town Planner
On behalf of CMYK (Planning and Design) Ltd

Cc Councillor Graham Davidson, Stantonbury Parish Council