



Nigel McGurk
Examiner
Stantonbury Neighbourhood Plan

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Dear Nigel

STANTONBURY NEIGHBOURHOOD PLAN – EXAMINATION

I refer to your request for clarification on various matters in your letter dated 23 March 2019. The comments of Stantonbury Parish Council and Milton Keynes Council are attached.

Yours sincerely

A handwritten signature in black ink that reads 'D. J. Blandamer'.

David Blandamer
Neighbourhood Planning

Response to Examiner's Questions

1. European Obligations

Milton Keynes Council confirms that it is satisfied that the Neighbourhood Plan is compatible with European obligations.

2. Comments on Regulation 16 Representations

Some of the representations received have been addressed against the individual queries below. However, SPC have expanded further in the following text:

David Lock Associates: SPC agreed it was too late in the process to consider allocating the site formally within the plan and acknowledged that the site could be covered by the Housing Infill policy.

CMYK on behalf of Taylor Wimpey/MK Nominees: In addition to the points outlined below under SNP18, SPC also agree that the policy wording restricting the height of new residential units to 2-storey could be amended as suggested to be appropriate to surrounding building heights.

In addition the policy map for SNP1 (Figure 2) should be amended to remove the area currently identified as MKC amenity land as it is now confirmed as under the ownership of Taylor Wimpey and associated with the development proposals.

Naseby Court residents re SNP12: Further to the clarification outlined in the text below, it is evident that the residents remain confused about the difference between allocation within the SNP and an application/formal proposal for the development, despite attempts to clarify all aspects with the residents that attended the engagement event/s.

There have never been 'closed session' discussions in relation to this site or any element of the neighbourhood plan. Both the NP Committee and Steering Group minutes are publicised on the website and promoted through the usual statutory requirements.

No evidence has been provided with regard to a covenant on the land belonging to the school. Furthermore, the land to the rear of properties is understood to belong to Stanton School whilst the remaining area adjacent is all under the ownership of MKC and is maintained under their landscaping maintenance contract with Serco.

All comments received from residents during the engagement process have been recorded and considered by the steering group and committee. Under the direction of MKC the Consultation Statement only contains the detailed comments received during the formal draft plan consultation stages.

Residents of Bancroft Park: The provision of additional leisure/play facilities are intended to be for local people and would therefore not require additional parking or be intended to be of a nature to attract vehicular traffic.

MKC Housing: The housing type and numbers of bedrooms specified in the policy reflects the feedback from both consultation with residents and identified need, having also referred to the SHMA. The HiMO 'register' to be held by SPC would simply be a list of properties identified and would not contain any personal details of landowners/landlords etc.

3. Policy SNP1

Is the policy concerned with parking in open spaces only?

Essentially yes, this refers to parking development which will be supported to improve opportunities for accessing open space.

Is the policy concerned with (non TPO) trees in open spaces only?

Again, yes.

Explain evidence in relation to what "justified loss of trees" comprises and why justified loss would require replacement, as per the policy?

The intention is that where parking is being provided to improve access to open space, or the introduction of additional recreational facilities, this would be a justifiable reason for loss of trees to enable that development.

Is Figure 2 incorrect in light of Stantonbury Wharf?

Yes – it is incorrect and needs amending to remove the site referred to as Stantonbury Wharf.

Does SPC agree with the representation that Stantonbury Wharf is covered by SNP2?

No, this is incorrect. Stantonbury Wharf area is not designated as Local Green Space

4. Policy SNP3

Why does the policy list 5 areas (whilst the related figure refers to more than 5 areas)?

The 5 areas are referenced specifically within other policies with regards needs for enhanced parking. Following the Draft Plan consultation and comments received, we were advised by the MKC Planning Support Officer to list these specifically within the policy, to avoid any potential conflict. All of the other areas highlighted on the map have been identified as potential areas for provision of additional parking.

Direct to evidence in respect of how much additional parking is required; and in respect of what is unsatisfactory and unsafe, and why additional parking would address this?

All areas identified on the associated map were identified during the initial survey carried out with residents before the Plan policies were developed. Whilst no specific traffic surveys have been carried out, there is a long history of problems identified across the parish, including site visits across the parish involving the MKC Highways Officer acknowledging numerous problems relating to parking and road safety. The limited width of roads along with lack of allocated parking spaces in many locations, results in people either parking on the verges or in dangerous locations such as

junctions, bends and across footpaths. The creation of additional parking spaces, in conjunction with other traffic calming measures would have a major impact on improving safety and reducing anti-social parking.

At the time where any application is brought forward the specific need in that location would be assessed at that time.

Would this policy result in the loss of grass verges at Hadrians Drive to provide for car parking? If so, please can you point to evidence in support of this?

As outlined above, local residents highlighted Hadrian's Drive during the consultation and engagement phases of developing the plan and it was clear that there would be some loss of grass verges to create parking bays. The indicative locations on the associated plan were all assessed by MKC Highways Officer as potentially suitable and each location avoids the necessity to remove trees. Any scheme coming forward would be individually assessed in conjunction with other measures to reduce speeding and would need to meet the relevant planning requirements at that time. All phases of engagement and consultation events have displayed the maps and the policy fully explained to residents which on the whole was well received and supported in principle.

The representations received from residents raised concern over speeding. As outlined above, SPC would work with MKC to introduce other traffic calming measures to reduce speeding. This would include support for plans to restrict access off Monks Way to Octavian Drive. It is envisaged that there would be a combination of measures designed to both address parking and reduce speeding.

5. Policy SNP7

Milton Keynes Council confirms its support for Policy SNP7. The policy is consistent with policy CT8 of the adopted Plan:MK.

6. Policy SNP10

Why does the supporting text to the policy refer to the site being suitable for "council housing" when the policy places no restriction on the tenure of housing?

This reference simply relates to conversations with MKC officers during the Draft Plan consultation where they showed interest in this area for potential council housing and were using it in their bid to central govt. for funding. SPC would support any housing tenure at this location.

Can you point to evidence in support of changing the use of this site from designated Recreation & Open Space to housing?

Throughout development of the SNP we have applied a positive approach towards allocations despite no specific requirement for the parish identified by MKC. However, it should be noted that SPC were mindful of MKC's failure to meet the 5-year land supply and we were keen to co-operate with addressing the shortfall in a positive way. SPC were keen to control the allocation of housing in areas where residents were more supportive and to help shape future growth.

Once again, the early survey invited residents to identify areas of land where housing development would be supported, Mathiesen Road site SNP10 was identified in this way. All subsequent engagement and consultation with residents has clearly identified this site for that purpose and support was shown throughout development of the final draft.

With regards the representations received raising concern with regards additional traffic, particularly during construction of the site, MKC development control would impose restrictions in the usual way and a construction management plan would have to be approved by development control.

In response to the representations raising the issue of traffic management and parking, the policy acknowledges the existing problems with parking on the road and encourages the provision of additional parking.

7. Policy SNP12

Can you direct me to evidence of engagement with local residents, including those living at Naseby Court, adjacent to the site, in respect of the proposed allocation of Stanton School?

The Consultation Statement outlines all steps of engagement and consultation throughout the development of the SNP, from the first two surveys through to the draft plan, pre-submission plan and then finally to submission. Both the surveys, the draft plan consultation events and the submission plan were all advertised through door to door delivery of documentation and/or leaflets advertising events. These are all delivered by a company who provide supporting tracked evidence of delivery to all households within the parish. Similarly, the Parish magazine is delivered in the same way and each version has included an update on the development of the plan and where to find information etc. The SNP has been promoted as a whole and not specifically with regards individual policies.

Residents, including some of those who have made representations did attend an event and were spoken to directly. We attempted to fully explain the process of engagement, development of the policies etc, however the residents concerned did not accept any point made. I showed them an example of the leaflets which had been delivered and indeed it was a result of such a leaflet that they were in attendance.

Can you direct me to evidence in support of allocating this site for residential development?

Stanton School originally proposed housing development on the land which they own, constituting part of the allocated site. The school had developed their plans in conjunction with Milton Keynes Council and Your:MK who at that time were responsible for the delivery of the North Bradville Regeneration proposals. Subsequent presentations by Your:MK to SPC further re-iterated the support by MKC/Your:MK with the additional assertion that adjacent amenity land within the regeneration areas could be acquired without the usual planning consent to enable the regeneration process.

Subsequently SPC included the site for allocation with a view to ensuring the site is developed in a way which is in keeping with the surrounding area.

Was this site considered for inclusion as Local Green Space and if not, why not?

As this site had already been identified for housing and in line with the wider plans for regeneration, this site was not considered for Local Green Space Designation.

See separate comments regarding resident representations (section 2, above).

8. Policy SNP14

In plain English, what does Policy SNP14 c) seek to achieve?

Residents are keen to ensure the densities and green space are protected in the North Bradville area. However, as detailed consultation regarding regeneration proposals have yet to be held, SPC did not wish to pre-empt any options chosen by residents. Therefore, it was felt best not to include any of the green space within SNP1 & SNP 2 specifically. The intention of the policy is to ensure that any option to redevelop, or part redevelop the area encompassed within the policy, ensures an equivalent amount of usable open space, albeit not necessarily in its current exact location/s. The wording had been suggested by the MKC support officer as it had been used in the Western expansion area and the term encompassed all areas except that of the actual housing units.

The key issue is to ensure that open space should be protected at a percentage which to a minimum reflects the current provision.

9. Policy SNP16

Can you provide clarity in respect of the direct conflict between Policies SNP16 and SNP17 re potential new land uses?

SNP17 was re-written and on reflection we can now acknowledge the conflict. There are areas of the campus site, (currently the undeveloped corner) in which housing would be supported, otherwise the remainder of the hub should remain for community use. The issue could be addressed by removing the Stantonbury Campus site from this policy, although it could still be referred to within the context section as a community hub but explain that hub is addressed in SNP17.

10. Policy SNP17

The policy refers to a “masterplan” - The NP does not contain a masterplan – what is the policy referring to?

Whilst no formal masterplan exists, the aim of the policy was for all elements of the site to be considered as a whole.

Is the policy meant to provide guidelines, or is it meant to be prescriptive, as set out?

It is a policy, not guidelines. However, Section a) to i) are not necessarily all inter-related and some of them stand alone.

If the medical centre was not expanded, along with associated parking, would there be no support for other forms of development at the campus (as this is what the policy states)?

No, whilst expansion of the medical facility is encouraged and supported, this would not prevent other development which meets the needs of the community.

Is it the intention that every proposal be subject to all of the criteria set out? Would development be supported if it met 1, 2, 3 ... all but one of the criteria?

No, some of them standalone.

Can SPC respond to the concerns raised by Marshall Athletic?

It would be the intention that Marshall MK Athletic Club should be involved in any proposals as they come forward in relation to location 'D'. SPC would wish for any plans for a community building in location D would ensure ongoing access for MMKAC including controls for lights etc being planned into design.

Regarding parking issues raised, SPC contends that it is not the case that all parking spaces are occupied every week, and that many are often unoccupied - but that it is only on large scale events where additional spaces are required. In this scenario a management plan is already required to direct traffic elsewhere within the parish accordingly and this could continue in the future.

It has also been noted that the map contains an error – the location referred to as 'Location C' is actually incorrect. The area identified as Location B should in fact be Location C and vice versa. This is in line with previous iterations of the policy which had been displayed publicly during the draft plan consultation.

11. Policy SNP18

Why does the policy and supporting text only refer to garages, whilst the site areas include maisonettes?

SPC acknowledge this needs amending to reflect that the wider site includes maisonettes.

Refer to the amenity land identified for replacement parking.

Following the latest meeting with Taylor Wimpey/MK Nominees we agree that the site map should be amended to encompass the additional areas of amenity land required to achieve the full development. The new map encompasses all amenity land and will need to be reflected accordingly. We have attached the outline drawing which had been shared publicly during the consultation and engagement phase whilst developing the plan, showing areas of amenity land which would potentially be developed for parking.

Is it the intention of the NP for all existing amenity green space within the red line areas to be developed?

The new map will show all areas of amenity land but there are areas which will remain open space/amenity land as outlined on the attached map.

Refer me to the land available for a LEAP.

See attached map with area highlighted.

Is there any evidence of community support for example from neighbouring occupiers adjacent to, but outside the proposed allocations – for areas of open space to form part of the redevelopment area?

Throughout all engagement events and consultation phases, residents have been aware of the development including creating parking on the amenity land. At all

events the outline scheme drawings from the developers were displayed alongside the policy map and wording. This ensured transparency with regards the plans. In particular the two events held on Redbridge in October 2018 were also advertised by hand delivered letters to residents in the surrounding area as there had been amendments to the policy following representations. At these events dialogue was held with residents adjacent to the development who were in support of the proposals.



Notes:

- Approximately 66 new dwellings to be provided, flats and houses
- Existing trees to be retained where possible and enhanced with new soft landscaping
- Subject to Planning Permission and surveys



Key:

- Existing Dwellings
- Proposed Dwellings, in Areas Previously Utilised for Rear Parking
- New Hard and Soft Landscaping and new Frontage Parking for Existing Residents

Area for LEAP.

Additional area for development of garages/parking

Scale: 1:500 @ A1
 Job No: 1649/03
 Date: September 2016

**Proposed Residential Development :
 Land at - Rowle Close Stantonbury - Discussion Document**