

Responses to Pre-Submission Consultation February to March 2018

Stantonbury Neighbourhood Plan Pre-Submission Consultation 2018		
No.	Summary of comments	How the Plan was amended
1.	<p>What a beautifully presented, clear & accessible document! I did have to give the maps some diligent thought but got my head around them eventually.</p> <p>Thank you so much to the team that have put this together-it really seems to have addressed all the concerns raised by residents, while coming up with appropriate responses to the needs of our Parish as we move into the next phase of its life.</p> <p>I saw nothing that I could object to and many great suggestions for enhancements of our neighbourhood.</p>	Thank you for your response, your comments have been noted.
2.	<p>With reference to SP10 Mathiesen Road whilst the building of properties on the spare land would seem sensible and appropriate our main concern is the reference to off street parking. The only people who park along the road are people visiting or working in the "Carers & Short Break Services Unit". We suggest they do this so they do not get blocked in in the unit's carpark. Rather than cutting into verges to provide parking which would spoil the appearance of what is a lovely tree lined entrance to the estate, we would suggest that some spaces in the Mathiesen Community Centre be put aside for parking by this unit. We have lived in Mathiesen Road for over 20 years and have yet to see what is a large carpark for the facility full.</p> <p>I would also suggest that parking restrictions along the road be enforced including allowing the parking on the grass verges.</p> <p>In conclusion with so much parking in the area available why spend money creating more with little benefit to the actual residents of the road.</p> <p>If you would like to discuss this more we would be pleased to meet with you or you could call me on the number below.</p>	Thank you for your response, your comments have been noted. A meeting was held with the Mathiesen Trust at which the parking issues were acknowledged. The Steering Group encouraged dialogue with the Short Break & Carers Centre to explore opportunities to share parking. The Trust agreed to this in the short term, however they have plans to extend and in future the car park may be fully utilised.
3.	<p>Very impressed with much of the neighbourhood plan which is well thought out and clearly explained in the draft document. It is difficult to comment on plans which affect areas I don't often frequent, so I will restrict my remarks to my local area, covered in SNP15 (page 36).</p> <p>The visitors centre for the villa next to the resident's club is an interesting proposal but would be rather superfluous if the nearby and newly refurbished Milton Keynes Museum includes any displays on Roman occupation of this area. Perhaps more appropriate would be improved information boards for the villa and surrounding landscape. A separate issue that should perhaps be addressed is the upkeep of the villa itself, which has seen quite a bit of damage to the walls over the past 5 years.</p>	Thank you for your response, your comments have been noted.

	<p>The supporting of leisure/neighbourhood play facilities on site B makes no mention of the community orchard on this site. Whilst lack of community facilities in Bancroft Park is something that needs addressing, it would be disappointing if this was at the detriment of the orchard.</p>	
4.	<p>I have read the draft Stantonbury Neighbourhood Plan and agree with the proposals on the whole. However, as a resident of Bancroft, I am wondering if the proposed extra allocation of parking in Bancroft will mean the removal of grass verges and trees? I am very interested to hear your response please,</p>	<p>Thank you for your response, your comments have been noted. There are no plans to remove trees in this location. At the time of any firm plans being brought forward, each location would be assessed individually through the current planning processes.</p>
5.	<p>Many thanks for forwarding of the above, of which I have a hard copy. Just to say I am happy on the whole with the contents, I think it has been well constructed and thought out. I shall make sure I attend one of the road shows to take a closer look.</p> <p>SNP2 Parking Enhancements: support - would need reassurance of impact if any to mature trees</p> <p>SNP4 Housing Infill: Not sure about this one - concerned the principle adopted might provide 'wriggle room' to side-step policy points</p> <p>SNP5 Houses in Multiple Occupation: Am generally NOT in agreement with HiMOs which occupy homes intended for family use and impact local community SNP19</p> <p>Stantonbury Community Facilities: Broadly in agreement as long as well-being of surrounding residents is protected e.g. 'anti-social behaviour' SNP23 Community</p> <p>Hubs: Providing same safeguards apply as SN19</p>	<p>Thank you for your response, your comments have been noted. SNP2-There are no plans to remove trees, any site brought forward would need to be individually assessed at the time; SNP4-All policies within the Plan will be adhered to and monitored through the development control processes of Milton Keynes Council; SNP5 The Neighbourhood Plan cannot ban HiMO's which can serve a valuable function in addressing housing need. The policy is designed to provide additional controls and to help minimise the impact where HiMO's do exist; SNP19 & 23 your comments have been noted.</p>
6.	<p>As you are aware Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order); in addition you are required to consult the Office of Rail and Road (ORR).</p> <p>With regards to the policy document Network Rail would comment: shares a boundary with the existing operational railway (including 25kv overhead power lines). Developments in the neighbourhood area should be notified to Network Rail to ensure that:</p>	<p>Thank you for your response, your comments have been noted.</p>

	<p>Access points / rights of way belonging to Network Rail are not impacted by developments within the area.</p> <p>That any proposal does not impact upon the railway infrastructure / Network Rail land e.g.</p> <ul style="list-style-type: none"> Drainage works / water features Encroachment of land or air-space Excavation works Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues Lighting impacting upon train drivers ability to perceive signals Landscaping that could impact upon overhead lines or Network Rail boundary treatments Any piling works Any scaffolding works Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949) Any use of crane or plant Any fencing works Any demolition works Any hard standing areas <p>For any proposal adjacent to the railway, Network Rail would request that a developer constructs (at their own expense) a suitable steel palisade trespass proof fence of at least 1.8m in height.</p> <p>All initial proposals and plans should be flagged up to the Network Rail Town Planning Team London North Western Route at the following address:</p> <p>Town Planning Team LNW Network Rail 1st Floor Square One 4 Travis Street Manchester M1 2NY</p>
7.	<p>I am writing to make comments on the Stantonbury Neighbourhood Plan. I am only responding to areas of concern, so please do not read this as too negative as I am not focussing on the good bits!</p> <p>SNP2 Parking Enhancements:</p>

<p>Object. The parking areas for Oakridge Park local centre are adequate, I would not want to see Asda use this policy as justification for future expansion.</p> <p>Improved parking for Stanton Low will only attract more visitors causing noise, disturbance and anti-social behaviour.</p> <p>It is also not fair to impose parking areas outside new residential properties who have bought their houses based on approved plans and a master plan.</p> <p>SNP3 Design Principles:</p> <p>You need to be careful stating no rear courtyard parking, as this is a well-established urban design approach and you may well end up with car dominated estates.</p> <p>I think you could have added something in about trying to minimise light pollution from advertisements e.g. restricted illuminated signs and illumination being turned off at night.</p> <p>SNP8 Infrastructure Delivery:</p> <p>There is no need to provide new leisure facilities at Stanton Low (as we already have them), spend the money on older estates that would benefit more. A community facility at Oakridge Park would be welcomed though.</p> <p>SNP9 Location of Facilities:</p> <p>Object re Stanton Low Park</p> <p>SNP20 Stanton Low Park:</p> <p>Object. Stanton Low Park was subject to extensive planning consultation within the last 5 years and it is unnecessary to be redesigning this area so soon.</p> <p>There was an approved development brief and master plan for Oakridge Park and the broad guidelines of this should be adhered to.</p> <p>Unfortunately, Milton Keynes Council decided to upgrade the park to something it was never meant to be, however ultimately a compromise approach was achieved with residents to get the right mix of facilities. It seems perverse to be providing more parking as MKC removed the former planned car park off Kerry Hill, as it was (and I quote an MKC employee) "a local park for local people".</p> <p>The park has been extremely popular with high visitor numbers in the summer. This causes noise and disturbance for local residents and a litter issue. I do not feel expanding facilities in the locations shown on plan SNP20 is appropriate and object strongly to this policy.</p> <p>The open amenity green can already be used as an informal cricket pitch if people wish, but a more formalised ground and gym equipment is unacceptable in this location and will detract from the sites natural beauty.</p> <p>Oakridge Park already has a toddler play area off Winchcombe Meadows designed for younger children (which was upgraded in the last 5 years) so why is another required? This surely is not in line with the Council's play standards which have been applied to the estate within the last 10</p>	<p>address the needs of visitors to the medical centre and would not allow for expansion of Asda. Any proposals brought forward for additional parking adjacent to Stanton Low Park would be subject to the current planning process and residents would be invited to respond as part of that process; The need for improved leisure facilities were also highlighted by residents during the consultation. The toddler play equipment was specifically highlighted as a need by residents so that families with children of all ages can play in the same location.</p>
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	<p>years and will just attract more people. The larger Stanton Low play park has play equipment suitable for younger children so it is just not necessary.</p> <p>If outdoor gym equipment is required this should be scattered across the park, probably on the lower footpath route down by the canal, this will mean that people have to run/walk between equipment.</p>	
8.	<p>I am writing to you as I am concerned that you are planning to build on the only piece of green space that is left in Redbridge, Stantonbury. The area in question is area C adjacent to Wood End School next to no.2 Redbridge. I moved from London to Milton Keynes 33 years ago as I was told that we would always have plenty of green spaces/areas for our children to grow and for us all to enjoy our lives and up until I agreed with that. Unfortunately, I am rapidly losing faith with Milton Keynes as there is virtually no green space left in Redbridge as you seem to be building on every bit of green space you can find.</p> <p>I am a single woman on my own aged 57 with medical condition that will only get worse as I get older. I take my dog to the area in question 3-4 x a day to play ball and get out in a safe environment. I take my dog there every morning at 6.30am, during the day when I am on lunch break and again anytime from 5pm onwards all year round. I am too scared to walk around the redways on my own when the light is failing as I had an incident where a man jumped out of the bushes and scared me to death. The kids play football in the drier months on this patch of grass too and the parents can see them from their houses on the opposite side of the road.</p> <p>There is an old people's home at the top of Redbridge and the residents walk their dogs around this area too as it is open and safe. I am sorry to have to moan to you but for once I would like to think that someone took notice of the little people here and considered their needs too.</p> <p>The piece of land next to Wood End School is the only piece of greenery left on Redbridge. We need somewhere to walk our dogs & for the young children to play safe. I moved from London to Milton Keynes because we were promised to always have green spaces & wild life. This is slowly disappearing & it's not safe for a woman to walk on her own round the redway in the dark.</p>	<p>Thank you for your response, your comments have been noted. This site is only one of three locations identified in this policy as a potential site for a community facility should funding be identified in the future, however there are no immediate plans in place. There are a number of other areas closely accessible for dog walking and other recreational activities and the Steering Group do not propose any amendments to the policy.</p>
9.	<p>I would like to take this opportunity to raise my household's concerns about the Stantonbury Parish Council neighbourhood plan. I am a resident of Bancroft and while I broadly support the proposals contained within the neighbourhood plan, I feel I must raise an objection to the plan for additional parking spaces to be created along Hadrians Drive.</p> <p>I would like to take this opportunity to raise my household's concerns about the Stantonbury Parish Council neighbourhood plan. I am a resident of Bancroft and while I broadly support the proposals contained within the neighbourhood plan, I feel I must raise an objection to the plan for additional parking spaces to be created along Hadrians Drive.</p>	<p>Thank you for your response, your comments have been noted. This area was highlighted during the residents' consultation in addition to concerns reported to Stantonbury Parish Council. The Steering Group therefore do not propose any amendments to the policy. If in the future any scheme is brought forward, residents would have</p>

		further opportunity to comment through the usual planning processes of Milton Keynes Council.
10.	Do not support proposal to add parking spaces where green verge currently situated - at end of Chesterholm alongside Hadrians Drive. Parked vehicles in these areas would impede line of sight on exiting Chesterholm - especially when fast moving traffic is speeding along during rush hours. It would also encourage a 'cut through' between Millers Way & Monks Way.	Thank you for your response, your comments have been noted. This area was highlighted during the residents' consultation in addition to concerns reported to Stantonbury Parish Council. If in the future any scheme is brought forward, sight lines and visibility would be assessed by the relevant highways /planning officers and residents would have further opportunity to comment through the usual planning processes of Milton Keynes Council.
11.	Don't know if support the Plan. I can see that parking although trying to be improved will still be an issue. For properties that will have one parking space will almost certainly have two cars so where does the other one go? Parking on the roads is already a problem and will only increase.	Thank you for your response, your comments have been noted. All proposed parking schemes will be required to comply with MKC Parking Standards.
12.	SNP143 Bradville Sports & Heritage area: How often are the existing facilities used? Will they be more heavily used in future? SNP18 Stantonbury Shops: Are the shops viable?	Thank you for your response, your comments have been noted. The Stantonbury Shops policy does not determine viability but highlights what would be supported at that location. A Neighbourhood Plan policy can only set out what we would like to see provided it does not assess viability. The Bradwell Sports & Recreation ground is currently well used. The policy seeks to protect the value of the site by restricting other types of development whilst also proposing measures which will increase the sustainability of future provision.
13.	Sorry, can only comment on Bancroft	Thank you for your response, your comment has been noted.
14.	Dog foul problem - suggest dog license. Well presented, very good layout. Pink sacks (white) should be available.	Thank you for your response, your comments have been noted. Dog licensing does not come under remit of the Plan; however, your suggestion has been shared with Stantonbury Parish Council.
15.	SNP2 Parking Enhancements: I do not see the need for additional parking at the Chesterholm end of Hadrians Drive. Especially as green areas would need to be removed which would result	Thank you for your response, your comments have been noted.

	<p>in less rainwater run off area. It would also mean more 'concrete' in the area. Also, removing any vehicles parked at the side of the road will inevitably lead to higher speed of vehicles using the road as a rat run! from Millers way to Monks Way. There is a strong probability drivers exiting Chesterholm would have a restricted view of approaching vehicles.</p>	<p>This area was highlighted during the residents' consultation in addition to concerns reported to Stantonbury Parish Council. If in the future any scheme is brought forward, sight lines, visibility and other concerns would be assessed by the relevant highways /planning officers and residents would have further opportunity to comment through the usual planning processes of Milton Keynes Council.</p>
16.	<p>1. Generally v. positive: evidence of a lot of work/thought/improvements</p> <p>2. SNP10 Mathiesen Road: Slight concern re possible development on Mathiesen Rod & increased traffic & parking. Opportunity to support care/respite centre as can be dangerous on that road with staff/visitor parking. Common sense says able to use formal youth club car park which is often empty.....BUT!</p> <p>3. SNP13 Bradville Sports & Heritage Area:</p> <p>Bradville 'Rec' - would be great to reinstate tennis courts + generally enhance facilities</p> <p>Facilities for children good but example of dev. In Wolverton 'Victoria' rec as example? Defines access for cars/people walking into the rec? (Section 106 money - if that still exists?!)</p>	<p>Thank you for your response, your comments have been noted.</p> <p>A meeting was held with the Mathiesen Trust at which the parking issues were acknowledged. The Steering Group encouraged dialogue with the Short Break & Carers Centre to explore opportunities to share parking. The Trust agreed to this in the short term, however they have plans to extend and in future the car park may be fully utilised.</p> <p>Your comments regarding S106 monies have been noted, the Parish Council seeks every opportunity to access developer contributions where applicable. Further policies within the Neighbourhood Plan seek to identify future priorities for both seeking and spending contributions.</p>
17.	<p>SNP13 Bradville Sports & Heritage Area:</p> <p>Would it be possible to include appropriate safety fencing to the north of the cricket ground to stop cricket balls hit in that direction to becoming a danger to visitor access to the windmill = more visitors = increased danger to visitors by cricket balls hit for 4 or 6?</p> <p>SNP15 North Loughton Valley Park:</p> <p>We object to SNP15 Part B. We feel that any facility away from the car parks on the estate would attract additional vehicle traffic (even though that is not intended) in the cul-de-sac on the southern edge of Bancroft Park causing danger and inconvenience to local children and</p>	<p>Thank you for your response, your comments have been noted. Your request regarding safety fencing has been shared with the sports association.</p> <p>Any proposals for leisure facilities at site B in North Loughton Valley Park will be designed for the use of local people. The policy has been amended to include a requirement to demonstrate it is compatible with existing uses and paying particular regard to traffic generation.</p>

	senior citizens. We also would not want to attract interest at night from off the estate if it was lit in any way. We also understand the area is prone to floods.	
18.	As a regular user of North Loughton Valley Park, I have yet to see more than a handful of people, who have specifically visited the park to look at the Roman Ruins and I therefore feel any money spent on providing a visitor centre would be a bad investment similarly in relation to any provision of refreshment facilities at this site. Surely a better and more appropriate place to provide visitor information etc. for the Roman villa would be within Milton Keynes museum less than 1/2 a mile from the site. Additionally, in relation to an additional leisure/neighbourhood play facility there is already one on Constantine Way and the proposed location of a new one has very little foot traffic and would be little used.	Thank you for your response, your comments have been noted.
19.	Don't support the Plan. As a regular user of North Loughton Valley Park, I have yet to see more than a handful of people, who have specifically visited the park to look at the Roman Ruins and I therefore feel any money spent on providing a visitor centre would be a bad investment similarly in relation to any provision of refreshment facilities at this site. Surely a better and more appropriate place to provide visitor information etc. for the Roman villa would be within Milton Keynes museum less than 1/2 a mile from the site. Additionally, in relation to an additional leisure/neighbourhood play facility there is already one on Constantine Way and the proposed location of a new one has very little foot traffic and would be little used.	Thank you for your response, your comments have been noted.
20.	SNP15: North Loughton Valley Park: Support. A visitor centre would be a good idea as it would increase awareness of the site SNP22: Linford Wood: Support. Linford Wood needs to be treated carefully as it has historical value – however it does need to keep the younger generations involved with its management.	Thank you for your response, your comments have been noted.
21.	SNP2: Parking Enhancements: Support. Bancroft – Hadrians Drive/Octavian drive I support some additional parking to be provided for visitors to Loughton valley Park (usually dog walkers). Some parking on the left-hand verges would be practical and make the area safer for cars and pedestrians	Thank you for your response, your comments have been noted.
22.	Landscaping really needs looking at between 28 & 29 Cawarden – apparently, it's no man's land – my fence needs repairing for the 3 rd time due to overgrowth.	Thank you for your response, your comments have been noted.
23.	SNP2 Parking Enhancements: Support. Parking bays should be provided on Ashfield on the opposite side of the road to the 3 storey houses: many are in multiple occupation and therefore have several cars to park. If possible, the bays should be wide enough so that cars are parked at 90 degrees to the road, rather than parallel parked.	Thank you for your response, your comments have been noted.

24.	<p>SNP19: Stantonbury Community Facilities:</p> <p>As a resident of Stantonbury (I have lived here for over 30 years) I would like to raise some objections to the proposal of putting a 2-storey building by the side of the housing. I have the following concerns:</p> <p>I don't think there is enough room to build the proposed building.</p> <p>I believe that the bushes on this particular piece of land is part of a protected.</p> <p>Traffic, the roads are busy enough without extra parking. We have issues with the Woodend School/Stantonbury Campus football teams parking at times.</p> <p>Noise pollution -Would this building be open at certain times or unsociable hours? We have elderly people living in this area.</p> <p>Would there be security for this building? If not, it gives the area a higher risk of vandalism, anti-social behaviour (as we all know how children, young adults behave.) I would appreciate some feedback to issues raised above</p>	<p>Thank you for your response, your comments have been noted. This site is only one of three locations identified in this policy as a potential site for a community facility should funding be identified in the future, however there are no immediate plans in place. If any proposals are brought forward in the future the scheme would need to comply with current Milton Keynes Council parking standards and would also need to take account of traffic management, noise pollution, hours of use etc. in line with the usual planning requirements.</p>
25.	<p>SNP19: Stantonbury Community Facilities:</p> <p>I would like to submit my objections to the proposed building of a 2-storey building next to my house at 2 Redbridge, Stantonbury. Although I could not attend the meeting on Friday due to family commitments. I have been given the specifics & some information regarding to what is going on. I have lived in Stantonbury on & off for about 28 years. I like living here & I am not opposed to a Parish Office/Community Centre. But I do think where you are proposing to put it is wrong. We have elderly & sick people (My Dad has Cancer) living in this area & need peace & quiet. It is busy enough with the school & bus route. But to put a building in between Woodend School & our house seems wrong. What would happen to the greenery?</p> <p>Where can the dog owners take their pets for a walk every day?</p> <p>The field has been closed off to us although to be fair the mess the school & the football team leave behind is bad enough. That will double if you put the building there. I am sure there are more suitable areas in Stantonbury for this building to go.</p> <p>There would be parking issues, noise pollution. I am also worried that this building could cause vandalism in the area. I also have a very big concern for children/young adults to be hanging around late night. Which I feel isn't safe. objections I have made if possible.</p>	<p>Thank you for your response, your comments have been noted. This site is only one of three locations identified in this policy as a potential site for a community facility should funding be identified in the future, however there are no immediate plans in place. There are a number of other areas closely accessible for dog walking and other recreational activities and the Steering Group do not propose any amendments to the policy. If any proposals are brought forward in the future the scheme would need to comply with current Milton Keynes Council parking standards and would also need to take account of traffic management, noise pollution, hours of use etc. in line with the usual planning requirements.</p>
26.	<p>SNP17 Rowle Close Garages:</p> <p>Don't support. I agree the garages are an eyesore but any residential development WOULD create an impossible parking situation.</p> <p>I rent my home in Ormonde and use my garage which is maintained. I have had to paint it after vandalism & graffiti.</p>	<p>Thank you for your response, your comments have been noted.</p>

	<p>Also my landlord has paid £2,000 to put a new roof on it. Despite this, I have to tolerate local school yobs climbing on it & potentially damaging it. I have counted around 21 of the garages being used & having secure doors. Despite this I have witnessed school yobs breaking into locked garages.</p> <p>On top of these problems, parking can be difficult, I have at least one neighbour, who lives in a maisonette, who has 3 vehicles (1 year ago he had 4).</p> <p>I would support parking permits as long as these were enforced. It is pointless paying for a permit if I come home and there are 3 cars parked without permits.</p> <p>Also posts in grass areas would prevent lazy neighbours parking on the grass creating deep muddy ruts.</p>	
27.	<p>SNP19: Stantonbury Community Facilities:</p> <p>I am writing to express my objection to the proposed building work on Redbridge, Stantonbury, next to Wood End School. The proposed site is the only bit of green that our children have left to play on since the field has been fenced off, there is nowhere left for them to play.</p> <p>Also, the same for dog walkers that's the only bit of green left the dogs have to play on. Also with the school being next door the level of traffic a new building will create will be dangerous for such a small street/space. It will be a huge danger to all the children walking to the school with heavy machinery in such close proximity.</p> <p>As it is the parking is already horrendous around here especially when they have football training/tournaments on the field. There has never been any additional parking added to allow for this.</p> <p>I think the level of disruption and distress a new building will cause within such a small space with houses next door and opposite and a key bus route along this road will be very damaging for our community and will become extremely dangerous.</p> <p>I would be grateful if you could forward my concerns to the relevant department as I know many Redbridge residents are not happy with the proposal.</p>	<p>Thank you for your response, your comments have been noted. This site is only one of three locations identified in this policy as a potential site for a community facility should funding be identified in the future, however there are no immediate plans in place. There are a number of other areas closely accessible for dog walking and other recreational activities and the Steering Group do not propose any amendments to the policy.</p>
28.	<p>Thank you for your consultation on the above dated 16 February 2018.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made.</p> <p>In our review of the Stantonbury Neighbourhood Plan we note that;</p> <ul style="list-style-type: none"> - there are no designated sites or protected landscapes within or near the Neighbourhood Plan 	<p>Thank you for your response, your comments have been noted. The SNP3 Design Principles policy has been amended to include the recommended wording to '<i>ensure all development results in a biodiversity net gain for the parish</i>'.</p>

area and there are less than 500 additional dwelling sites or 1000sqm of commercial sites proposed.

As a result, we have no specific comment to make.

However, we would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework).

Please ensure that any development policy in your plan includes wording to ensure "all development results in a biodiversity net gain for the parish".

The recently produced Neighbourhood Plan for Benson, in South Oxfordshire provides an excellent example. Although the Plan has not been to referendum yet, we are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplar. We would recommend you considering this document, when reviewing yours.

Further Recommendations Natural England would also like to highlight that removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change.

We recommend that the final local plan include:

- Policies around connected Green Infrastructure (GI) within the parish. Elements of GI such as open green space, wild green space, allotments, and green walls and roofs can all be used to create connected habitats suitable for species adaptation to climate change. Green infrastructure also provides multiple benefits for people including recreation, health and well-being, access to nature, opportunities for food growing, and resilience to climate change. Annex A provides examples of Green Infrastructure;

- Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A;

Strategic Environmental Assessment and Habitats Regulation Assessment Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance. Where a neighbourhood plan could potentially affect a European protected site, for example a Special Protection Area or Special Area of Conservation, it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2010), as amended (the 'Habitats Regulations'). One of the basic conditions that will be tested at Examination is whether the making of the plan is

	<p>compatible with European obligations and this includes requirements relating to the Habitats Directive, which is transposed into the Habitats Regulations.</p> <p>Annex A provides information on the natural environment and issues and opportunities for your neighbourhood planning.</p> <p>Yours sincerely, Pierre Fleet, Adviser, Sustainable Development, Thames Team</p>	
29.	<p>MKDP (Milton Keynes Development Partnership) would like to make the following reps/consultation responses on policies within the SPC Consultation/Draft Plan neighbourhood (attached).</p> <p>SNP10: Mathiesen Road: What/how much additional parking is required for the ‘Mathiesen Road Parking Issue’? What is the issue? What attempts have been made with users/occupiers of nearby buildings to resolve it? Bradwell Road junction widening works – is the junction currently non-compliant of the technical highway requirements regards turning radius, visibility splays etc.? Have MKC’s highways team been consulted on the current layout?</p> <p>SNP11 Wylie/Harrowden: What need is there for a LEAP/NEAP – have MKC confirmed a requirement for such a facility? Will SPC own and maintain it?</p> <p>SNP21 Linford Wood Employment Land: Development of sites in close proximity to the woodland is a matter for MKC’s countryside officer to consider against standing advice from Natural England. Circumstantial distance from the wood and appropriate buffers are considered via that established statutory consultation planning process. Physically screening buildings from the woodland does not form part of that advice. The policy bullet should be re-worded: “Standing advice from Natural England (or similar) for the screening, buffering and distances of buildings from the Historic Wood (to minimise disturbance of employment use near the wood) should be followed”. Hedgerows being retained within employment sites is unrealistic due to employment development/building footprints. The Linford Wood sites are intended/ideal for SME HQ style buildings or terraces of offices/small production units – employment accommodation could not realistically be arranged to avoid the hedges unlike housing. Underground car parking in business park settings renders low rise employment development, the types of which Linford Wood will appeal, unviable. Any reference to underground car parking being encouraged does not reflect commercial reality. Parking standards that accord with MKC’s Parking SPD or similar documents should only be referenced.</p>	<p>Thank you for your response, your comments have been noted. Regarding SNP10 Mathiesen Road: The issue is the number of cars parking on the road causing safety concerns for users of the buildings as well as road users in terms of access. Contact was made with both MK carers and Short Breaks Centre and Mathiesen Trust to discuss the current concerns. Shared use of existing parking at the Mathiesen centre was encouraged, however in the long term the Trust have expansion plans which would involve some of this space. No change proposed to the policy.</p> <p>SNP11 Wylie/Harrowden: There is no current Local area of play in the vicinity of the development. The increased housing associated with the proposed development will lead to an increased demand for local play facilities.</p> <p>SNP21: The policy has been amended to reflect the standing advice from Natural England in relation to screening etc.</p> <p>No further changes are proposed to the policy, the reference to underground parking is just encouraged although we recognise it is not likely to be viable.</p>

<p>30. Please find attached our comments in relation to the submission version of the Stantonbury Local plan. Unfortunately, as the Canal & River Trust is only an 'other consultee' for local plan consultations this is the first time we have viewed the plan.</p> <p>We would welcome the opportunity to become involved at a much earlier stage if the plan is reviewed in the future and I have included an electronic version of our guide to planning for waterways in Neighbourhood plans for your information.</p> <p>SNP20 Stanton Low Park:</p> <p>Thank you for consulting the Canal & River Trust (the Trust) on the Stantonbury Neighbourhood Plan. The Trust is the charity that cares for 2,000 miles of canals and rivers across England and Wales. We are passionate believers in using the power of local waterways to transform places and enrich lives. We want to support local communities to secure and build on the multiple benefits that waterways bring, now and in the future. We believe that by working together we can deliver living waterways that transform places and enrich the lives of local communities.</p> <p>We want to encourage and support local communities and town and parish councils to champion their waterways in the planning process. We only own around 4% of the land adjacent to our waterways, therefore influencing developments on this land is essential to develop and protect the places that local communities value and to create the types of places that can allow us to achieve our vision.</p> <p>In speaking up for waterways local communities can complement our role as statutory consultee in the planning process.</p> <p>Unfortunately, the Trust were not aware that this neighbourhood plan was in preparation until the submission consultation and so our opportunity to become involved is limited. If we had involvement earlier we would have made suggestions relating to the Grand Union Canal which forms an important multi-functional asset at the parish boundary. We note that the canal is included within the neighbourhood plan area but that there are no policies or text to positively support it which we feel is a missed opportunity.</p> <p>The Trust wish to draw attention to our e-planning toolkit and in particular the section here. The Trust has recently sent our document 'Planning for waterways in neighbourhood-plans' to all Parish Councils to help encourage early engagement and suggest issues which may be of relevance in the neighbourhood plan making process.</p> <p>The Trust promotes waterway Proofing for Neighbourhood Plans and suggest that the designated neighbourhood area boundary should positively include the canal, rather than using it as a boundary.</p> <p>Policy SNP20 Stanton Low Park should include an aspiration to improve the canal corridor as well as provide improved parking and play space. The policy should encourage new</p>	<p>Thank you for your response, your comments have been noted.</p> <p>Amendments have been made to the context and policy sections of SNP20 Stanton Low Park to recognise the importance and value of the waterway to the parish.</p>
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	<p>developments to integrate land and water, open up access to, from and along the waterway, explore the added value and use of water space and view the waterway, towpath and environs as part of the public realm.</p> <p>The Canal & River Trust would welcome further discussions with the Parish Council, if the plan is reviewed at a later date, to better recognise and integrate the canal and benefits it brings to the area into the plan.</p>	
31.	<p>Dear Sir/Madam,</p> <p>Thank you for giving Anglian Water the opportunity to comment on the Draft Stantonbury Parish Neighbourhood Plan. I would be grateful if you could confirm that you have received this response. It is noted that the Neighbourhood Plan includes a number of criteria-based policies which are intended to be used in the determination of planning applications within the parish. The emerging Milton Keynes Local Plan includes a policy relating to water recycling infrastructure (Policy FR1). As the development plan will be read as whole it is not considered necessary to include a similar policy in the Neighbourhood Plan.</p> <p>Therefore, we have no comments to make relating to the Draft Neighbourhood Plan. Should you have any queries relating to this consultation response please let me know.</p>	<p>Thank you for your response, your comments have been noted.</p>
32.	<p>Stantonbury Neighbourhood Plan, pre-submission draft consultation, February- March 2018</p> <p>Overall, the plan is clearly presented, with the effective use of maps and a clear approach to delivery.</p> <p>As a general point, we recommend that you add the policy number and title to the blue policy box – i.e. to read: “Policy SNP1 Open Space”. This ensures that if people copy and paste the policy into a report or similar document, the policy reference goes with it.</p> <p>SNP1 Open Space & Leisure:</p> <p>Comments from Urban Design and Landscape Architecture</p> <p>Policy SNP1 may prejudice the wider regeneration of North Bradville (Policy SNP14) because SNP1 states all open space within the North Bradville Regeneration must be protected from development. In order to enable the regeneration of this area there should be flexibility about where open space is provided.</p> <p>Similarly, SNP14 states a minimum 50% of the area to remain undeveloped, other than for open space, roads and paths ancillary to development – this could also prejudice the viability of the regeneration of North Bradville</p> <ul style="list-style-type: none"> • Policy SNP1 – question why the 2 pieces of grass on Redbridge are seen as valuable pieces of open space as amenity land and hence protected from development. The southern open space along Redbridge is in fact allocated as a development site in the current local plan • SNP 1 	<p>Thank you for your response, your comments have been noted. The following amendments have been made; The policy number has been added to each policy box;</p> <p>Policy SNP1 is being reviewed to consider Local Green Space Designation which will define the importance of all areas identified. All areas currently highlighted as important areas came from consultation with residents throughout the development of the Plan. The southern open space on Redbridge, which was allocated for housing in the 2005 Local Plan, has not been brought forward as a policy in the draft Plan: MK. However, both SNP1 and SNP16 have been amended which addresses this issue.</p> <p>The open space to the East of Melton has been amended to exclude the area of car park; SNP3 The policy has been amended to reflect the requirements of site specific policies elsewhere in</p>

	<p>– the open space to be protected to the north of Spencer (to the east of Melton) includes a car park – the open space allocation should exclude this</p> <ul style="list-style-type: none"> • SNP1 – Not hugely important but curious to know the difference between Amenity Land and Important Amenity Land – should the policy be applied differently to each ‘category’? <p>• SNP3 - Design Principles: it should be noted that where apartments occur then rear court parking is acceptable because there is an entrance at the rear so strictly speaking it is not a rear</p> <p>SNP 10 – Development at Mathiesen Road – this is also identified as Amenity Land which according to SNP1 is to be protected from development? Contradiction??</p> <p>SNP 14 – Does a max of 35dph prejudice potential viable regeneration of North Bradville. Same comment for SNP11.</p> <p>SNP 16 – The land identified for the relocation of the school is ‘buried’ in the middle of the estate. Secondary School in particular are normally located close to grid roads for ease of access. The first point in the policy states a lot of streets that can’t be used to access the new school site. What is the proposed vehicular access to the new school. The policy states that a new secondary school can’t be more than 2 storeys – is this viable??</p> <p>The above comments on Policy SNP16 are echoed by the Education Sufficiency and Access team who add that the policy seems to give no indication on how the new site will be accessed. Whilst new school builds don’t tend to be over 2 storeys it seems an unnecessary restriction to place on any new build and could limit the capacity – which in turn will be an issue if further housing is to be introduced into the area and require more school places. The question is asked whether the new site will have adequate outdoor space to meet minimum DfE regulations, especially once a segment of the site has been released for housing – it is unclear from the plan provided.</p> <p>SNP21 – Retention of all hedgerows may render sites unviable to develop</p> <ul style="list-style-type: none"> • SNP 21- What does it mean when it says “Frontages must be screened to protect the woodland feel and in keeping with the surrounding area”. • SNP 21 – Not sure underground parking is viable 	<p>the plan which addresses the concern re SNP10; SNP14 no change proposed; Regarding SNP16, the Policy has been amended to remove the area for redevelopment of the education facility. Further amendments protect the sports facilities and playing fields from development, whilst the location identified in support of housing development, has been extended and changed to mixed-use; SNP21 has been amended as follows “<i>Existing hedgerows should be retained where possible and consideration given to provision of new low level landscaping in new/re-developed areas</i>”; <i>The reference to screening has been amended to reflect the standing advice from Natural England; underground parking is just encouraged and we acknowledge this may not be viable.</i></p>
33.	<p>The following note sets out a brief review of the policies contained within the Stantonbury Neighbourhood Plan in relation to the implications for the proposed development at the North Bradville Estate. The neighbourhood plan and its policies are divided into two parts, the first part sets out general policies, and the second part sets out the site-specific policies. All relevant general policies have been reviewed, and commented on this note. Only site-specific policies relating to the estate, or site-specific policies of adjacent sites have been commented on.</p> <p>Site Based Policy Comments</p>	<p>Thank you for your comments, which have been noted. The following amendments have been made;</p> <p>SNP1 has been amended to reflect the requirements of site specific policies elsewhere in the plan; SNP3 no change proposed; SNP8 in-kind</p>

It is proposed that 'Applications will be expected to meet each of the policy criteria" for site based policies. Policies will need to (see SNP14, SNP11 & SNP12)

SNP1 Open Space & Leisure:

This policy sets out that all open space and areas of landscaping as set out on the plan will be protected for development. The policy specifically states that no development other than for enhancement of community facilities or additional car parking will be supported. This would seek to prohibit residential development on these spaces, even if it could assist delivery of other objectives of the plan.

This could severely impede any future aspirations for the North Bradville Estate. Wording could be added to this policy to state 'unless site specific policies suggest would support limited development' or similar. The site-specific policy could clarify where development of housing on existing open space may be considered acceptable, if it is able to deliver improvements to the existing open space.

SNP3 Design Principles:

This policy suggests the 'density' of development in the immediate vicinity should be respected. It is queried whether the 'scale and massing' may be a more appropriate term to include here. To measure of the extent to which proposed developments are integrated into the surroundings.

SNP8 Infrastructure Delivery:

The neighbourhood plan may wish to consider whether 'in-kind' funding would be supported where the items specified in the policy could be delivered on-site.

SNP11 Wylie/Harrowden:

The policies for these sites set out criteria including maximum proposed densities and maximum heights. If the sites are to be delivered the viability of this, and the implications on the range of housing choice this can offer should be considered, particularly with respect to objectives 1 and 3.

The Parish Council could consider whether any increased densities may help delivery of a wider range of homes, in line with objective 3, or enable additional land to be retained as open space, to contribute towards objective 1.

As referenced in the policy the proposals would benefit from integrating into proposals for the regeneration of the North Bradville estate, particularly with regards to the connection of green spaces and routes.

For Wylie/Harrowden the encouragement of underground car parking may not be appropriate, both with regards to the impact on surface water and drainage considerations, particularly given

funding is currently covered within the existing policy wording;

SNP11 no change proposed; SNP14 no change proposed, the type of housing proposed has come directly from the residents' consultation and also cross referenced with the Strategic Housing Market assessment 2017 (SHMA); "affordable Rent" has been added to the policy; All other points have been carefully considered by the NP Committee and Steering Group, however they feel strongly that the principles outlined remain at this time.

the proximity to the canal, as well as the impact on air quality due to increased reliance on private transport, as well as the impact on viability and potential affordability.

The site is in a relatively sustainable location, within walking distance of bus stops on Bradville Road, as well as the Pepper Hill First School and New Bradwell School. The high street with shops and other community facilities is also a short walk away, and therefore consideration could be given to whether the site could support increased numbers of homes, with carefully considered design and massing.

SNP14 North Bradville Regeneration:

The proposed policy covering the site is comprehensive, however, there are parts of the criteria set out that may prove to be overly prescriptive.

- The policy makes reference

to the safeguarding the biodiversity of the area. Further detail or clarity could be provided on this to assist Your:MK and the design team to take this into consideration.

- The policy sets a minimum of 50% of the total area to remain undeveloped other than for open space, roads and paths. The feasibility of this should be tested to ensure the policy is sound and can be achieved. Consideration could be given to under what circumstances limited flexibility could be applied to this site.

- The proposed maximum density of 35dph may be too restrictive and impede other objectives of the plan, such as delivery of a mix of homes, and enhancement of open space.

- The policy suggests the provision of open space should ensure the current nature of provision should be retained, provided or improved. the policy is not clear on what is meant by the 'current nature', further guidance or commentary on this could be added to ascertain whether the team could deliver this, or explicit reference should be made to where this is defined in the Plan.

- The policy prescribes the majority of homes should be 2 or 3 bedroom homes. The mix of house sizes needed in the local area in different tenures will need to be supported by up to date evidence.

- The proposed maximum four storey height is likely to be deliverable, however, consideration could be given to whether any flexibility is allowed on this, to aid with the overall legibility of the local area, through creation of slightly taller buildings that assist with wayfinding, if appropriate.

- The aspiration of up to 5% new homes to be single storey may not be achievable, but consideration should be given as to whether alternative forms of accommodation standards, for example, HAPPI standard accommodation would be acceptable as an alternative.

- The policy prescribes that "All new affordable homes will be either social rented, intermediate housing or Starter Homes" the omission of "affordable rent" within this could be overly prescriptive.

	<p>- The policy suggests that individual plots should include at least one off-street car parking space per dwelling. This may not be achievable or desirable in line with other objectives such as making best use of land. Consideration could be given to whether flexibility could be introduced to this policy.</p>	
34.	<p>I am writing to voice my objection to the proposed plan by the parish council to build either flats or new parish council offices in Redbridge Stantonbury. I moved to Redbridge in 1976 at which time was a lovely area, then the council decided to send buses into the estate thus causing more traffic for such a small estate, then came two more lots of housing in Redbridge causing more traffic in an already busy area. I now see the experts at the Parish Council have decided to build on one of the small green spaces we have left on the estate, not only that the space in question is right next to the local infant school causing more traffic in an already congested area. I urge the Parish council to go back and rethink these ludicrous plans.</p>	<p>Thank you for your response, your comments have been noted. This site is only one of three locations identified in this policy as a potential site for a community facility should funding be identified in the future, however there are no immediate plans in place.</p>
35.	<p>I'm a resident on Redbridge, Stantonbury and have been for over thirty years. I was informed by other local residence of your proposals for a community centre on one or more sites, one of which is directly in front of my home. We were not informed well enough regarding a meeting about the proposed sites in the beginning and many subsequent residents know nothing of the proposals. I'm writing to oppose the planning permission of the community centre on site C. The reasons being as here on Redbridge there are enough issues with parking, the busses and emergency services have trouble getting past the parked cars and this happened recently when a house on Redbridge went up in flames and the emergency services were delayed getting to the property to put the fire out.</p> <p>We don't want youths hanging around outside of the community centre, due to security to our properties and cars, we want to prevent crime not encourage it.</p> <p>I fear that by going forward with the community centre being located here it will encourage people hanging about drinking, drug taking and socially unacceptable behaviour.</p> <p>We want to encourage a crime free area, safe environment for ourselves, children/grandchildren to feel safe.</p> <p>I certainly would not feel safe or our families to feel safe to be here if this was to go ahead.</p> <p>I also oppose this as despite being on a bus route, it is no excuse to plonk a community centre on a small patch of land.</p> <p>We have never wanted a community centre as we have this at Christchurch at the campus, so feel there is no reason to have it so close to the back end of Stantonbury campus field as this could also be seen as a safeguarding issue for the children students who attend the campus.</p> <p>I feel like this will be more beneficial to build the community centre elsewhere in Stantonbury as</p>	<p>Thank you for your response, your comments have been noted.</p> <p>This site is only one of three locations identified in this policy as a potential site for a community facility should funding be identified in the future, however there are no immediate plans in place.</p> <p>All households within the parish were written to and informed of the Draft Neighbourhood Plan Consultation period along with the opportunity to attend events to view the Plan documents.</p> <p>If any proposals are brought forward in the future the scheme would need to comply with current Milton Keynes Council parking standards and would also need to take account of traffic management, noise pollution, security, hours of use etc. in line with the usual planning requirements.</p>

	it will completely ruin the atmosphere for residents locally, encourage more crime and allow those with dogs not to have their run-around 'field' time.	
36.	Hello, I have been told by a neighbour that there is a plan to build a community centre between house number 2 Redbridge and Woodend county first school Redbridge. If this is correct, I would like to see a picture of the allocated space on your website. Please give me an idea where I can find the info and picture and how I can object to this development.	Thank you for your response, your comments have been noted. This site is only one of three locations identified in this policy as a potential site for a community facility should funding be identified in the future, however there are no immediate plans in place.
37.	I am writing to express my objection to the proposed building work on Redbridge, Stantonbury, next to Wood End School. The proposed site is the only little bit of green that our children have left to play on since the field has been fenced off, there is nowhere left for them to play. Also, the same for dog walkers that's the only bit of green left the dogs have to play on. Also with the school only being next door the level of traffic a new building will create will be dangerous for such a small street/ space. It will be a huge danger to all the children walking to school with heavy machinery in such close proximity. As it is the parking is already horrendous around here especially when they have football training/ tournaments on the field. There has never been any additional parking added to allow for this. I think the level of disruption and distress a new building will cause within such a small space with houses next door and opposite and a key bus route along this road will be very damaging for our community and will become extremely dangerous. I would be grateful if you could forward my concerns to the relevant department as I know many Redbridge residents are not happy with the proposal.	Thank you for your response, your comments have been noted. This site is only one of three locations identified in this policy as a potential site for a community facility should funding be identified in the future, however there are no immediate plans in place. There are a number of other areas closely accessible for dog walking and other recreational activities and the Steering Group do not propose any amendments to the policy. If any proposals are brought forward in the future the scheme would need to comply with current Milton Keynes Council parking standards and would also need to take account of traffic management, noise pollution, hours of use etc. in line with the usual planning requirements.
38.	Generally ok with most things - please keep the big slide!!! And change the safety bar that goes across the top, bashed head on it!! SNP18 Stantonbury Shops: Support - The mural at the shops could be re-located to MK Museum as it is an important part of the MK heritage.	Thank you for your response, your comments have been noted.
39.	SNP17 Rowle Close Garages: Support policy-existing plan is too dense and does not acknowledge existing problem of access and parking. I would also like to know about possible provision of charging points for electric vehicle. Plan looks to be too crowded and insufficient access to new and existing houses. Note existing dwellings per hectare is in excess of recommended 35per hectare (approx. 55 per hectare) Access for emergency services also looks inadequate.	Thank you for your response, your comments have been noted. Electric charging points will be provided in line with the Milton Keynes Council requirements. Please note the policy has been further amended and further consultation is being carried out in light of these changes.

40.	SNP18 Stantonbury Shops: Don't support - I would have preferred to have had a variety of shops at Stantonbury to encourage the community and campus staff and pupils to make the area a thriving hub.	Thank you for your response, your comments have been noted.
41.	<p>SNP6 Grid Road Corridors: Support - I am also concerned about the state of the roads and paths within Stantonbury and hope this will be addressed too. I feel that double yellow lines are a requirement to stop parking in dangerous places such as opposite junctions and corners. Also, signs or barriers are needed to discourage parking on the grass verges.</p> <p>SNP16 Stantonbury Campus: Support - the drop-off point at Stantonbury Campus does not work now, so extending it may not, it really needs a separate entrance to the local amenities</p> <p>SNP18 Stantonbury Shops: Support -it is lovely to see there are plans to redevelop the shops at Stantonbury, it is long overdue</p> <p>SNP19 Stantonbury Community Facilities: Support - if extra housing is being proposed, then surely extra amenities such as doctor's surgeries and schools should be considered to accommodate the extra population that comes with these.</p> <p>SNP20 Stanton Low Park: Support - I enjoy living in Stantonbury and feel we are lucky to have so many green areas, parks and links to fantastic walks such as Stanton Low and the canal. I just hope this is maintained, and improved where required.</p>	<p>Thank you for your response, your comments have been noted. SNP6 Grid Road Corridors: The Plan policies do not cover maintenance issues however; the Action Plan contains pledges from SPC to continue to work in partnership with the relevant stakeholders to address key areas of concern.</p> <p>SNP19 Stantonbury Community Facilities: Any new development when it comes forward are required through the current Planning processes to contribute towards education and health provision in the area.</p>
42.	When or if this programme begins, as pensioners, we would like to know what help will the Council provide.	Thank you for your response, your comments have been noted.
43.	SNP10 Mathiesen Road: Mathiesen Road needs widening at both ends re: bus route 11.	Thank you for your response, your comments have been noted.
44.	SNP 14 Bradville North Regeneration: I would like to know what is going on - whether or not the housing is coming down or not.	Thank you for your response, your comments have been noted.
45.	SNP5 Houses in Multiple Occupation: Don't know - although I stated Don't Know I would be in agreement with the Policy providing there was strict control and monitoring of potential HMOs.	Thank you for your response, your comments have been noted.
46.	<p>SNP3 Design Principles: The provision of charging points in residential areas would be beneficial for communal parking areas.</p> <p>SNP14 Bradville North Regeneration:</p>	<p>Thank you for your response, your comments have been noted. Regarding the Visitor Centre at North Loughton Valley Park, the policy seeks to identify</p>

	<p>The whole area should be regenerated as it was built and laid out with a design that has not withstood time, and needs refreshing to either its former glory, or re-built to fit the rest of the estate. Removal of the car ports is needed as it makes the area an eyesore and dumping ground.</p> <p>SNP15 North Loughton Valley Park: Is there sufficient need for a visitor centre?</p>	<p>land use should the need and funding be identified in the future.</p>
47.	<p>SNP7 Key Links & Connectivity: No public transport to pass through housing areas</p> <p>SNP14 Bradville North Regeneration: Refers more to re-development than re-generation</p>	<p>Thank you for your response, your comments have been noted.</p>
48.	<p>Thank you for your e-mail of 28th February advising Historic England of the consultation on your Neighbourhood Plan. We are pleased to make the following general and detailed comments.</p> <p>The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance - the appendix to this letter contains links to this website and to a range of potentially useful other websites.</p> <p>We welcome the references to "rich heritage" in the Vision but are disappointed, however, that there is no reference to the conservation and enhancement of that heritage in the Vision nor any objective for the conservation and enhancement of the heritage assets in the Plan area.</p> <p>We do welcome, though, the brief history of the parish in paragraph 4, although would welcome reference to the listed buildings in the parish. We note that there is no reference in the Plan to archaeological remains. Although there are no scheduled monuments within the parish, the National Planning Practice Guidance states "<i>..... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions</i>".</p> <p>Has the local Historic Environment Record been consulted for non-scheduled archaeological sites? Is there a list of locally important buildings? (We note the reference to the artwork on the south gable of the shops being of local heritage value).</p> <p>We welcome, in principle, Policy SNP3. Paragraph 58 of the National Planning Policy Framework states "<i>.....neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on</i></p>	<p>Thank you for your response, your comments have been noted.</p> <p>Milton Keynes Council are currently reviewing the heritage register, the Parish Council will consider the register and look to nominate any additional heritage assets of note as part of this process.</p> <p>A new Plan Objective has been added '<i>To conserve and enhance the heritage assets of the parish.</i>'</p> <p>Policy SNP 13 has been amended as recommended.</p> <p>References to heritage and archaeological interest have been added to the '<i>About the Area</i>' section.</p>

	<p><i>stated objectives for the future of the area and an understanding and evaluation of its defining characteristics'.</i></p> <p>However, although the policy is underpinned by the Milton Keynes Residential Design Guide, is there a real "<i>understanding and evaluation</i>" of the Plan area's "<i>defining characteristics</i>"?</p> <p>Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.</p> <p>Has there been any character appraisal of the Plan area as a whole to provide that understanding and evaluation of the area's defining characteristics? The appendix to this letter contains links to characterisation toolkits, and we would be pleased to advise further on this subject.</p> <p>We note that SNP 13 supports a limited amount of additional built leisure-related development adjacent to the pavilion at the Recreation Ground on Bradville Road. As noted in paragraph 104 of the Plan, Bradwell Windmill lies to the north of the Recreation ground. The windmill is listed as Grade II, and therefore any development should have regard to the special desirability of preserving the setting of the windmill in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>In addition, the National Planning Policy Framework recognises that development within the setting of a heritage asset can harm its significance. Clearly the setting of the windmill is already compromised, but we would like to see an additional criterion in the policy "<i>Do not detract from the significance of the grade II listed buildings to see if any are at risk from neglect, decay or other threats</i>"</p> <p>We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Stantonbury, please do not hesitate to contact us.</p> <p>Thank you again for consulting Historic England.</p>	
49.	<p>On behalf of our clients, MK Nominees Ltd & Taylor Wimpey (South Midlands) Ltd. We have pleasure in providing representations to the consultation draft Stantonbury Neighbourhood Plan (SNP).</p> <p>The following representations follow our client's meeting with Stantonbury Parish Council (19 March 2018), during which SPC confirmed their support for our clients' proposals. It was intended SPC would consequently amend and re-consult on SNP Policy SNP17 which is at the core of the regeneration proposals for this area. We understand that this process is underway but as yet the formal amendment has not taken place. The following representations are</p>	<p style="color: red;">Thank you for your response, your comments have been noted. Following the meeting held with your clients' on 19th March 2018, amendments to policy SNP17 have been made, in line with discussions, which address many of your comments; No amendments are proposed to the foreword or background sections as this sets the context for the Plan; the numbers of dwellings referred to as</p>

<p>therefore reflective of the current SNP context, but we will revisit them once amendments to policy SNP17 are forthcoming.</p> <p>MK Nominees Ltd & Taylor Wimpey (South Midlands) Ltd</p> <p>As you correctly ascertain in your correspondence of 2 March 2018, MK Nominees Ltd and Taylor Wimpey (South Midlands) Ltd own the freeholds of land within the Stantonbury area, most notably that associated with Site Specific Policy Allocation SNP17 ('Rowle Close Garages') in the consultation draft Stantonbury Neighbourhood Plan (SNP).</p> <p>Our clients Initial Development Proposals</p> <p>Our clients entirely occur with SPC's assertion that the garage land identified in SNP 17 is in a poor, dilapidated state, leading to anti-social behaviour and incidental problems such as excessive on-street parking in the vicinity.</p> <p>As you will be aware, our clients have already engaged in initial consultation with the local community (April 2017 and June 2017), following which they have devised a strategy for the redevelopment of the land which reflect residents' almost overwhelming support and desire for a solution comprising the removal of the dilapidated and unsightly garages as well as improvements to their local environment. Not only will this redevelopment dramatically improve the extremely poor conditions on the garage sites, but it will enhance the living conditions of existing residents through the provision of new housing, enhanced landscaping, cohesive parking solutions, improved streetscapes and increased natural surveillance.</p> <p>More recently (19 March 2018) our clients have met with Members of SPC to initially discuss their proposals and the associated SNP allocation. At this meeting, all parties gained a greater understanding of community aspirations and the development limitations. All, parties acknowledge that SNP17 is at the core of regeneration policies for this area.</p> <p>Our clients are in the process of progressing these plans to a formal request to MKC for pre-application advice. It is anticipated that this request will be submitted in April 2018.</p> <p>Representations to the existing Consultation Draft Stantonbury Neighbourhood Plan made on Behalf of MK Nominees Ltd & Taylor Wimpey (South Midlands) Ltd.</p> <p>The following representations are made on behalf of our clients and must be seen within the context of national and local planning policy as well as, where appropriate, other material considerations.</p> <p>Foreword (Page 4)</p> <p>Object: Whilst it is acknowledged that the SNP will cover a 15-year period, the issues associated with Site SNP17 are such that its redevelopment, and consequently the immediate area's rejuvenation, must be prioritised towards the beginning of this timeframe.</p> <p>Background: Paragraph 2 (Page 5)</p>	<p>potentially being delivered is not limited and therefore no change is required; Policy SNP4 Housing Infill does not apply to other specific sites identified in this plan; the requirement to clearly set out "<i>how their proposals satisfy each of the policy criteria</i>" is standard practice and would be expected to be covered in any planning and delivery statement accompanying an application; Building For Life and Secured by Design standards are still in force and it is the Steering Group's wish to ensure they are referenced and applied in addition to any requirements of Plan:MK.</p>
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Support: it is acknowledged that the SNP will form an integral part of MKC's planning policy when considering development in this area. As such, it is essential that SNP is as robust and realistic as possible for it to secure the community advantages it seeks.

Background: Paragraphs 4 & 5 (Page 5)

Support: The use of aspirational, general policies and site-specific policies is supported. It is essential that the aspirations are effectively carried through to site specific policy to ensure continuity, achievement and delivery.

Background: Paragraph 6 (Page 6)

Object: The text dramatically underestimates the numbers of dwellings that could realistically be accommodated within the SNP17 area. Existing development densities in the surrounding area (calculated to be approximately between 55.9 and 64.5 dwellings per hectare) suggest that Site SNP17 alone is reasonably capable of delivering 66 units (at a density of approximately 61 dwellings per hectare). Such a level of development would secure sustainable development (NPPF Paragraph 49), remain reflective of surrounding development patterns, increase patronage for local facilities and deliver a range of other SNP aspirations, such as quality open space provision (NPPF Paragraph 58). Furthermore, the repetition of higher density levels to match those already in existence would make the scheme's development viable and thus ensure the deliverability of housing and associated community benefits (NPPF Paragraph 173 plus draft NPPF Paragraph 122). There is no justification (planning policy or otherwise) for lower densities than already exist.

Object: Policy SNP17 housing delivery levels should be revisited based on site context and the desire to deliver other SNP aspirations.

Background: General Policy – Open Space and Leisure (Page 6)

Object: Open space should only be protected where it is of intrinsic value to its surroundings. There are cases, such as Site SNP17, 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 benefits, such as regeneration, the ability to provide purposeful open space and, most importantly, enhancing the area's quality and functionality.

Background: General Policy – Parking Enhancements (Page 6)

Support: it is acknowledged that there is a serious on-street parking issue around the Redbridge, Ormonde, Rowle Close and Crosslands quadrant. In part, this can be attributed to the poor standard of parking areas to the rear of the properties caused by their inappropriate location and decline in leaseholder maintenance (a large number of garages no longer existing and the

remaining majority are in unusable condition). Consequently, faced with no other suitable alternative, residents park on landscaping areas in an unplanned, unmanaged and hazardous manner. Were this matter to be addressed as part of a comprehensive regeneration package for the area (as per NPPF Paragraph 58), parking and its impact upon its surroundings could be positively resolved.

Support: Our clients' proposals for Site SNP17, seeks to enhance parking provision through the removal of the dysfunctional rear parking areas, whilst creating parking opportunities that are more orderly, more integrated and offer greater natural surveillance (and therefore security) opportunities. To this end our clients agree with SNP's stance that parking enhancements which will "... both increase available parking and improve existing areas...." Will be supported. Our clients note the condition that such works should not "*[impact] negatively on amenity space.*" and have ensured their proposal will accord with this.

Object: At the present time, there are anomalies in the SNP's parking strategies which contradict this general policy approach. For example, the use of underground parking in the redevelopment of Site SNP17 will create unsupervised, sheltered parking areas which will attract further anti-social behaviour (contrary to NPPF Paragraph 58 and Core Strategy Policy CAS 12(7)), could have negative property effects during excavation/construction and would insignificantly increase development costs thereby affecting viability to the extent that it would prevent development along with its associated beneficial and regenerative effects. Underground parking is not in keeping with the locality nor the overall aspirations for it and thus this development requirement should be deleted from Policy SNP17 and repowered to ensure parking provision will improve and enhance parking provision (as per General Policy Parking Enhancements (SNP Page 6)).

Background: General Policy – Design Principles (Page 6)

Object: Design guidance must, of course, contain design aspirations but should not be so overly prescriptive so as to prohibit development schemes coming forward (as per NPPF Paragraph 58). There may be instances, such as land at Rowle Close (SNP Policy SNP17), where partnership working negates the need for design guides.

Background: General Policy – Design Principles (Page 6) and Housing Infill (Page 6).

Object: The diversity of Stantonbury's character is acknowledged but is such that it may not necessarily be desirable nor essential to protect it. Where development proposals emerge that seek to build on the character of an area or enhance design (as per NPPF Paragraphs 17, 56, 58, 59 and 60 plus draft NPPF Paragraph 122), these should be embraced rather than the status quo

protected: our clients' proposals will achieve such improvements. The need for adequate parking is acknowledged but this must be calculated with regard to the area's characteristics, for example, levels of car ownership, ability to promote more sustainable transport choices (and thus reduce parking requirements) and so forth.

Neighbourhood Plan Vision (Page 8)

Support: Stantonbury must “..... be an area where residents are proud to live, work and play....”. The regeneration of areas such as Site SNP17 will play an important role in delivering this vision.

Support: The need to effectively manage traffic and parking is a key consideration in enhancing the Stantonbury area. Schemes, such as our clients' proposals for Site SNP17, which positively seek to address parking management matters must be given serious and positive consideration.

Neighbourhood Plan Objective 1 (Page 8)

Support: It is right to seek to promote land use and development where it can ensure the needs of the community are met and living conditions enhanced.

Neighbourhood Plan Objective 2 (Page 8)

Support: It is correct to ensure that, where appropriate, green space is enhanced and becomes an asset for the community. It is essential to note that such an approach must be applied on a site-specific basis: open space should only be protected where it is of intrinsic value to its surroundings. There are cases (for example the unauthorised use of verges within Site SNP17 for informal parking) where open space detracts from the quality of the area and thus its purpose should be revisited so it becomes a greater community asset, for example through regeneration, thereby delivering purposeful open space and perhaps most importantly, enhancing the area's overall quality and functionality.

Neighbourhood Plan Objective 3 (Page 8)

Support: It is right to seek to improve housing stock quality and diversity for the benefit of existing communities and to attract new residents. The full potential of identified development sites, such as Site SNP17, must therefore be realised in order to achieve them.

Neighbourhood Plan Objective 5 (Page 8)

Support: There are serious traffic congestion and on street parking issues around the Redbridge, Ormonde, Rowle Close and Crosslands quadrant which must be addressed. In part this can be attributed to the poor standard of parking areas to the rear of the properties caused by their inappropriate location and decline in leaseholder maintenance. Were this matter to be addressed as part of a comprehensive regeneration package for the area (as per NPPF Paragraph 58), parking and its impact upon its surroundings could be positively resolved.

Support: Our clients' strategy for Site SNP17 seeks to enhance parking provision through the removal of the rear parking areas which have detracted from the area, whilst creating parking opportunities that are more orderly, better integrated and offer greater natural surveillance (and therefore security) opportunities. To this end we support the SNP's stance that parking enhancements which will "... Both increase the available parking and improve existing areas...." will be supported. Our clients' proposals respect the condition that such works should not "[impact] negatively on amenity space".

Object: At the present time, there are anomalies in the SNP's parking strategies which contradicts this general policy approach. For example, the use of underground parking in the redevelopment of Site SNP17 will create unsupervised, sheltered parking areas which will attract further anti-social behaviour (contrary to NPPF Paragraph 58 Core Strategy Policy CS 12 (7)), could have negative property effects during excavation/construction and would significantly increase development costs thereby affecting viability to the extent that it would prevent development being progressed.

Consultation: Paragraph 24 (Page 9)

Support: Community consultation is essential to understanding community needs and aspirations. Community consultation undertaken by our clients in relation to the potential redevelopment of Site SNP17 has demonstrated support for Site SNP17's regeneration.

Surveys: Paragraph 25 (Page 9)

Support: Our clients concur with the importance attached by the local community to maintaining opportunities for health enhancement, crime reduction, road management, cleanliness conduct and purposeful open space. Through the provision of high quality dwellings, environmental enhancements, the removal of an anti-social hotspot, organised parking provision and enhanced open space, our clients' proposal for the redevelopment of Site SNP17 will help meet these priorities (in accordance with NPPF Paragraph 58).

Surveys – Open Spaces, Heritage & Access to Nature: Paragraph 28 (Page 10)

Support: Our clients acknowledge the need to diversify open space/area opportunities whilst enhancing maintenance and landscaping provision (in accordance with Core Strategy Policy CS13 (10)). The regeneration of Site SNP17 provides a prime opportunity to do this, for example through the rationalisation and, where appropriate, enhancements of existing provision in this area as well as by securing formal management requirements by way of the planning system.

Surveys - Housing: Paragraph 28 (Page 10)

Support: Our clients acknowledge the need to reflect the housing mix within the SNP17 but also diversifies to ensure community continuity (as per NPFF Paragraphs 17 & 50, plus Core Strategy Policies CS12 (8) and CS 21).

Surveys – Future Needs: Paragraph 28 (Page 10)

Support: Our clients acknowledge the need to improve key play areas. The regeneration of Site SNP17 provides a prime opportunity to do this, for example through rationalisation and, where appropriate, enhancement of existing provision in this area as well as securing formal management requirements by way of the planning system.

Surveys: Paragraph 29 (Page 10)

Object: The diversity of Stantonbury's character is acknowledged but is such that it may not necessarily be desirable nor essential to protect it. Where development proposals emerge that seek to build on the character of an area or enhance design (as per NPPF Paragraphs 17, 56, 58, 59 and 60 plus draft NPPF Paragraph 122), these should be embraced and supported rather than the status quo protected: our clients' proposal will achieve such improvements.

Delivery of Site Based Policies: Paragraph 55 (Page 14)

Support: The site-specific policies have been devised in consultation with principal stakeholders, such as landowners and thus are realistic in their objectives. An example of this is Site SNP17 wherein partnership dialogue has now occurred leading to the policy content being revised.

Object: Now that dialogue has occurred, it is essential that the requirements of these policies are revised to ensure they are realistic and therefore deliverable. To omit to acknowledge informed policy revisions would prevent the delivery of community aspirations (as per NPPF Paragraph 58).

Support: The use of "should" rather than "must" as it offers a degree of flexibility and this should be confirmed by way of additional wording such as "*....subject to site context, opportunities and constraints at the time of a proposal's progression*".

Delivery of Site Based Policies: Paragraph 56 (Page 14)

Support: The draft site-specific policies have been devised in consultation with principal stakeholders, such as landowners and are realistic in their objectives.

Object: Now that dialogue has occurred, it is essential that the requirements of these policies are revised to ensure they are realistic and therefore deliverable. To omit to acknowledge collaboratively informed policy revisions would blight developments and ultimately the delivery of community aspirations as per NPPF Paragraph 58). The requirement that "*.... Applications will*

be expected to meet each of the policy criteria." Is unnecessarily draconian and should be reworded to read "...wherever possible applications will be expected to meet the majority of the policy criteria subject to site context, opportunities and constraints at the time of a proposal's progression." if important projects, such as the regeneration of Site SNP17 are to be promoted and secured.

Delivery of Site Based Policies: Paragraph 57 (Page 14)

Support: The draft site-specific policies have been devised in consultation with principal stakeholders, such as landowners and are realistic in their objectives.

Object: to require applicants to clearly set out "*how their proposals satisfy each of the policy criteria*" may be draconian, could blight development, ignores the other benefits a scheme may offer and ultimately will negatively impact upon the delivery of community aspirations (as per NPPF Paragraph 58).

Support: The opportunity afforded to applicants to justify why deviations from the stated policy are acceptable; where reasonable, justified explanations are given, these must be treated fairly. Paragraph 57 must acknowledge the reasonable treatment of justified variations if development and thus community aspirations are to be realised (for example in the case of Site SNP17).

Policy SNP1 – Open Space & Leisure: Policy (Page 17)

Support: The recognition that some development may be necessary within open spaces (for example the extensive verges around Site SNP17) to ensure the delivery of additional parking spaces.

Object: As is the case with Site SNP17, the redevelopment of low quality open space which detracts from an area must be seriously considered where it meets other SNP objectives/policies and can bring other community benefits.

Support: Provided it is viable, development can enable the increased use of functionality of open space.

Object: The criteria applied to the phrase "*an appropriate scale and design for the local area*" requires clarification and should be expanded to include reference to the need to secure the viability of proposals.

Support: The acknowledgement that it may be necessary to provide increased parking in areas of existing open space is welcomed. Each proposal must be considered on its own merits given the needs of the immediate area (i.e. especially where there is existing parking problems). Its current and its potential functionality.

Policy SNP1 – Open Space & Leisure: Key commitments (Page 17)

Support: the acknowledgement that it may be necessary to provide increased parking in areas of existing open space. Each proposal must be considered on its own merits given the needs of the immediate area, its current and potential functionality. 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 SNP17.

Policy SNP1 – Open Space & Leisure: Map (Page 18)

Support: The allocation of land to the south of Crosslands amenity space, however our client's proposals seek to enhance its functionality and appeal.

Policy SNP2 – Parking Enhancements: Paragraph 65 (Page 19)

Support: Parking on verges is a particular issue in Stantonbury, none more so than around Site SNP17. The design of future development proposals could help formalise parking arrangements and thus schemes which, wherever possible, seek to address on-street parking concerns should be supported: Site SNP17 offers the potential to do this.

Policy SNP2 – Parking Enhancements: Policy (Page 19)

Support: Policy-compliant developments that address parking provision in the Rowle Close area should be supported. However, these must not be seen solely in terms of policy compliance but also in terms of material benefits that can be achieved: the policy must be interpreted as a guide only and any proposal considered on its individual merits and ability to secure community aspirations.

Object: It is unclear how surface treatments will mitigate the loss of open space. Favourable consideration should also be given to functional enhancement proposals which can mitigate open space loss, for example better quality equipped areas of play. Design should be viewed in relation to its context and the development proposals associated with it. In its current form this design policy is unnecessarily and overly prescriptive (Contrary to NPPF Paragraphs 17 and 59).

Policy SNP3 – Design Principles: Paragraph 67 (Page 21)

Object: The diversity of Stantonbury's character is acknowledged but is such that it may not necessarily be desirable nor essential to protect it. Where development proposals emerge that seek to build on this diversity for example through increased densities or enhanced design (in accordance with NPPF Paragraphs 17, 56, 58, 59 plus draft NPPF Paragraph 122) these should

be embraced rather than the status quo protected. Our clients' proposals will achieve such improvements.

Policy SNP3 – Design Principles: Paragraph 68 (Page 21)

Support: The use of "should" in the text rather than "must" indicates that development criteria do not necessarily have to be followed slavishly, but rather can be interpreted according to a site's individual circumstances. Such flexibility will ensure more place-appropriate design is pursued, thereby resulting in better site-specific development outcomes in accordance with NPPF Paragraphs 17, 56, 59 and 60).

Policy SNP3 – Design Principles: Policy (Page 21)

Support: having clear criteria is useful but each site's potential must also be considered on its own merits and individual circumstance: therefore, we advocate the use of 'should' rather than 'must' in the first sentence (as per SNP paragraph 68).

Policy SNP4 – Housing Infill: Paragraph 71 (Page 22)

Object: The diversity of Stantonbury's character is acknowledged but is such that it may not necessarily be desirable nor essential to protect it. Where development proposals emerge that seek to build on this diversity or enhance design, these should be embraced rather than the status quo protected (as per NPPF Paragraphs 17, 56, 58, 58 and 60 plus draft NPPF Paragraph 122): our clients' proposals will achieve such improvements.

Policy SNP4 – Housing Infill: Paragraph 72 (Page 22)

Support: It is acknowledged there is a need for housing delivery across Milton Keynes. The delivery of housing within Stantonbury will assist and sustain the local community not only in terms of promoting housing choice (as per NPPF Paragraphs 17 and 50, plus Core Strategy Policies CS12(8) and CS21) but also delivering other community aspirations.

Policy SNP4 – Housing Infill: Paragraph 73 (Page 22)

Support: It is important to acknowledge that areas do evolve, and community needs and aspirations change. Infill development combined with the regeneration of redundant or dysfunctional sites must be supported and their delivery assisted.

Policy SNP4 – Housing Infill: Policy (Page 22)

Object: Reference to specific standards only duplicates Milton Keynes Council requirements which already evolve in response to government policy. To replicate requirements within the SNP is not only unnecessary but could also result in the SNP becoming outdated if it fails to regularly respond to central government policy changes and will lead to the creation of irresolvable inconsistencies for those trying to deliver development and SNP's aspirations.

Object: Building for Life standards have been superseded by an optional requirement for Local Plan policy to require national space standards are met in new development. It is noted adopted Local Plan Policy H9 considered this matter and that Plan:MK Policy HN4 (anticipated to be adopted Spring 2019) addresses such issues. The glossary should therefore be amended to reflect this. Our clients' proposals will address the aforementioned requirements as appropriate.

Policy SNP17 – Rowle Close Garages: Paragraph 117 (Page 39)

Support: The redevelopment of this site 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 providing other community aspirations (as per NPPF Paragraph 58).

Support: The description of the site is generally accurate.

Policy SNP17 – Rowle Close Garages: Paragraph 118 (Page 39)

Support: The emphasis placed on the poor state of the garages, the anti-social behaviour associated with them and the consequential negative effect this has on the area.

Policy SNP17 – Rowle Close Garages: Paragraph 119 (Page 39)

Support: The recognition that the poor state of the site causes residents to park in an unmanaged manner on amenity green space. Not only does this lead to congestion but also environmental degradation. The redevelopment provides an opportunity not only to formalise parking arrangements (thus alleviating congestion) but also to secure landscape enhancements (in accordance with Core Strategy Policy CS13(10)), such as the provision of quality landscaping around formal parking areas.

Policy SNP17 – Rowle Close Garages: Paragraph 120 (Page 39)

Support: the land is allocated for residential purposes in the adopted Local Plan (December 2005 and July 2013) and for residential development in the emerging Local Plan documents (October 2015 and October 2017).

Policy SNP17 – Rowle Close Garages: Policy (Page 39)

Whilst acknowledging the broad development aspirations of Policy SNP17 as it currently exists, we make the following comments to ensure that those aspirations are viable and therefore deliverable.

Object: Existing development density in the area immediately around the site is between 55.9 and 64.5 dwellings per hectare. To insist development on site SNP17 progresses at a density lower than this will not only prevent any scheme from respecting existing built form but also constitutes an ineffective use of land (contrary to NPPF Paragraphs 11, 49, 55, 64 and 111, plus draft NPPF Paragraph 122 as well as Core Strategy Policy CS13).

Furthermore, the use of arbitrary density standards fails to accommodate any innovative design solutions (contrary to Core Strategy Policy CS13(2)) that come forward over the 35dph density standard. Development should be undertaken to a density reflective of that in its surroundings not only to constitute a consistent, efficient and beneficial use of land (thereby making a significant contribution to new housing delivery in the area) but also to afford the delivery of other community aspirations detailed in the SNP.

It is considered the 35 dwelling per hectare standard derives from Milton Keynes Council's adopted Local Plan (Policy H8) and emerging Site Allocations Plan, both of which state that policy densities are standardised/indicative only and must take into account site contexts when being progressed. Site SNP17's context only must be the determining factor when establishing appropriate development densities for its redevelopment and thus the density specification contained within Policy SNP17 must be revisited to secure sustainable, efficient and deliverable development (in accordance with emerging Plan:MK Policy HN1).

We understand that Stantonbury parish Council members acknowledge that higher densities would be appropriate on Site SNP17 and are working to amend the wording of Policy SNP17 accordingly.

Support: Development should be consistent with the prevailing pattern of development within an area.

Object: Such is the configuration of the land parcels, on plot parking may not be possible without compromising garden space, development configuration and, ultimately, an efficient use of land (NPPF Paragraph 64). The need for adequate parking is acknowledged but this must be calculated with regard to the area's characteristics, for example levels of car ownership, ability to promote more sustainable transport choices (and thus reduce parking requirements) and so forth: such an approach is consistent with Milton Keynes Council's Parking Standards SPG Paragraph 1.19 (January 2016).

Object: The proposed use of underground parking in the redevelopment of Site SNP17 is simply unviable. Insistence upon its provision will mean that Site SNP 17's development could not take place and the associated environmental enhancements will be prevented from being delivered. Furthermore, it will create provision which remains disconnected from its users, will result in unsupervised, sheltered parking areas which will further attract anti-social behaviour (contrary

to NPPF Paragraph 58 and Core Strategy Policy CS12(7)), could have negative property effects during excavation/construction. We cannot overstate that any insistence on underground parking would significantly increase development costs thereby affecting viability to the extent that it would prevent development, and its associated positive regenerative effects, being realised.

We understand that Stantonbury Parish Council members acknowledge that underground parking would be inappropriate on Site SNP17 and are working to amend the wording of Policy SNP17 accordingly.

Support: It is only proper that replacement parking provision should be made for garage owners displace by the redevelopment of the site. Opportunities that offer the potential for more appropriate, better located parking provision should be supported. For example, subject to securing an appropriate design, landscape and management solution, it is possible to formalise parking on the existing verges in the area immediately surrounding Site SNP17.

Object: The immediate area's character is acknowledged but is such that it may not necessarily be desirable nor essential to protect it. Where development proposals emerge that seek to build on the character of the area and enhance design (in accordance with NPPF Paragraphs 17, 56, 58, 59 and 60), these should be embraced rather than the status quo protected; our clients' proposals will achieve such improvements.

Support: The functionality and appeal of the amenity space and LEAP south of Crosslands could be enhanced: development of land at Rowle Close has the potential to formally secure this (through the planning system). Alternatively, it may be possible to secure provision on MK Parks Trust land to the South of Site SNP17. The existing play area land is owned by our clients who intend to provide new play equipment as part of Site SNP17 development proposals.

Support: Considered planting can be used to enhance and define areas to the benefit of the social, economic and natural elements of the local area (as per NPPF Paragraph 7 and draft NPPF Paragraph 94).

Support: Landscaping can be utilised not only to enhance an area's visual appearance but also for functional reasons, for example to deter parking on green areas. The key to any regeneration project, such as that proposed as Site SNP17, is to employ a comprehensive approach to address

issues on the area (as per NPPF Paragraph 58), for example providing sufficient parking at the outset and ensuring its management thereafter. The proactive and supportive treatment of development proposals must be pursued for regeneration aspirations to be secured (as per NPPF Paragraph 58).

Action Plan, Delivery & Monitoring: Paragraph 141 (Page 47)

Object: The status of the SNP (once adopted) is not contested but, in its current, potentially prescriptive form, with particular reference to Site SNP17, it is considered the document may blight development proposals to the extent it prevents them coming forward, and as a consequence prevents regeneration and community aspirations being realised (contrary to NPPF Paragraph 17). Accordingly, policy phrasing should be revisited to ensure flexibility reflective of development, viability, market conditions, site ownership and aspirational context at the time a proposal comes forward.

Object: Stantonbury Parish Council's assertion that they will “....apply all the policies....” Is overly restrictive and will prevent the timely consideration of local circumstances, such as development potential, viability, market conditions, site ownership and aspirational contexts at the time a proposal comes forward.

Action Plan, Highways (Page 48)

Support: Sources of traffic congestion must be positively addressed if community aspirations are to be met. Site SNP17 offers opportunities to reduce traffic congestion through the creation of allocated parking areas plus enhanced walking routes and thus must be approached in a holistic manner, i.e. considering the diversity of all the benefits it can offer.

Support: Parking limitations must be positively addressed if community aspirations are to be met. Site SNP17 offers opportunities to reduce improve parking provision and thus must be approached in a holistic manner, i.e. considering the diversity of all the benefits it can offer.

Action Plan, Crime & Community Safety (Page 49)

Support: Encourage community aspirations to ‘*Design out Crime*’. Existing design within Site SNP17 attracts and facilitates crime. Crime in the immediate area is not just restricted to road conditions (as suggested at SNP Page 49) but, as evidenced by police records, extends to burglary, vehicle crime, anti-social behaviour plus violent and sexual offences.

Action Plan, Cleanliness of Area (Pages 50 & 51)

Object: All opportunities for improving cleanliness in the area (not simply infrastructure provision) must be positively considered if community aspirations are to be met. Site SNP17

offers opportunities to regenerate an area which, at the present time, is subject to high levels of litter, fly tipping and other anti-social behaviour. As such, this site can permanently resolve those issues, if an enabling development can be delivered of the type proposed by our clients.

Object: All opportunities for enhancing landscaping (in accordance with Core Strategy Policy CS13(10)) and its maintenance must be positively considered if community aspirations are to be met. Site SNP17 offers opportunities to redevelop an area of low environmental quality for positive community use whilst formalising (through the planning system) the provision, enhancement and maintenance of landscaping.

Action Plan, Parks, Open Spaces, heritage and Access to Nature (Pages 52)

Support: All opportunities for refurbishing or replacing play equipment must be positively considered if community aspirations are to be met. Site SNP17 offers opportunities to rationalise and thereby formally (through the planning system) enhance the quality of play equipment in the immediate area. The play area land is owned by our clients who intend to provide new play equipment as part of the Site SNP17 proposals.

Glossary, Building for Life (Pages 53)

Object: Building for Life standards have been superseded by an optional requirement for Local Plan policy to require national space standards are met in new development. It is noted adopted Local Plan Policy H9 considered this matter and that Plan:MK Policy HN4 (anticipated to be adopted Spring 2019) addresses such issues. The glossary should therefore be amended to reflect this. Our clients' proposal will address the aforementioned requirements as appropriate.

Glossary, Secured by Design (Pages 56)

Object: Secured by Design standards have been superseded through the application of revised building regulations in new development. It is noted the Plan:MK Policy HN4 (anticipated to be adopted Spring 2019) addresses such matters. The glossary should therefore be amended to reflect this. Our clients' proposal will address the aforementioned requirements as appropriate.

Concluding Remarks

As you will be aware and as demonstrated through your recent meeting, MK Nominees Ltd and Taylor Wimpey (South Midlands) Ltd, are keen to work with Stantonbury Parish Council to successfully progress the redevelopment and regeneration of Site SNP17 as well as the associated delivery of SNP aspirations. As such, we trust you will find the above representations of interest and that you will afford them fair consideration.

	<p>We would be grateful if you could keep us updated in the progress of the SNP. In the meantime, should you have any queries, or we can be of further assistance, please do not hesitate to contact the undersigned.</p>	
50.	<p>General comments on General Policy SNP2: provision of extra on-street parking in the Stantonbury Neighbourhood Plan.</p> <p>I am making comments/objections to the proposed additional parking along Hadrians Drive and Octavian Drive Bancroft, as indicated in red on the map, figure 3, in the document.</p> <p>Placing of parking bays within 5 metres (either side of the road) of either a road junction or a resident's driveway presents serious visibility safety issues, and must be avoided. There are many high-sided vans and SUV's owned and parked by residents in the parish and many of these (and possibly HGV's) will inevitably be parked in these extra parking bays.</p> <p>Specifically regarding Octavian Drive and Hadrians Drive, Bancroft, the map contains areas for parking along much of Hadrians Drive, and whilst there is a clear urgent need for parking near the Meeting Place and at the north end of Hadrians Drive, there is little need for additional parking at the westerly end. Two of the areas on the south side – outside number 4 Hadrians Drive, and immediately adjacent to Chesterholme, Rudchesters and opposite Castlesteads are marked in thick red pens immediately adjoining residents' drives or road junctions. Any impairment of visibility by parked vehicles is a potentially serious safety issue, and must be avoided, as vehicles are frequently travelling at 30-50 mph along Hadrians Drive. Please ensure that no parking bays are provided near junctions or residents drives.</p> <p>The map also has a parking area parked at the end of Octavian Drive immediately on the corner of the junction of Hadrians Drive. It should be noted that this junction is problematic because it is a 90 degree turn and up to 90% of vehicles turning from Octavian Drive into Hadrians Drive are being driven on the wrong side of the road. It is imperative therefore that any parking bay near to this junction is NOT within at least 5 metres of the junction otherwise lack of visibility could easily cause serious accidents.</p> <p>Additionally, it would be desirable to provide 1 parking bay each side of Octavian Drive near (but not too near to) the junction with Monks way, as there is frequently at least 1 vehicle parked on the road in such a way as to endanger a head-on collision with vehicles turning into Octavian drive from Monks Way eastbound. I and both of my immediate neighbours have recently had this issue. This may involve moving short stretches of pathways 60-90cms from the road. Please consider this, or put double yellow lines on both sides of Octavian Drive near the Monks Way junction.</p>	<p>Thank you for your response, your comments have been noted.</p> <p>This area was highlighted during the residents' consultation in addition to concerns reported to Stantonbury Parish Council. If in the future any scheme is brought forward, sight lines, visibility and other safety concerns would be assessed by the relevant highways /planning officers and residents would have further opportunity to comment through the usual planning processes of Milton Keynes Council.</p> <p>Your comments regarding the implementation of double-yellow lines have been shared with SPC.</p>