



North Crawley Neighbourhood Plan

Summary of responses received to Regulation 16 publicity period

Milton Keynes Council (Housing)	<p>Overall we are supportive of the neighbourhood plan.</p> <p>With reference to site H3, we would support the proposed housing mix.</p> <p>With reference to site H4 we are happy to see that this site incorporates affordable housing in accordance with Policy HN2 of Plan:MK.</p> <p>However, with reference to site H5 we have not heard of <i>enhanced affordable housing</i>. It is not a recognised term and therefore meaningless in the context of planning policy. We have no way of understanding what it is and therefore will be unable to gauge whether any proposed tenure complies. We would therefore request that this term is removed or that greater clarity is provided on what is meant by it. With regards to the following statement <i>Proposals should include an enhanced affordable housing offer with tenures that are secured in perpetuity</i>, this is standard, but we must make it clear that council houses are subject to the Right to Buy and Registered Provider properties the Right to Acquire. This policy cannot deny tenants of their statutory rights. Furthermore, other forms of affordable housing, which cannot be precluded, include shared ownership and shared equity which are designed as affordable ways into home ownership.</p>
Canal & Rivers Trust	The Trust has no land within the plan boundary and therefore we have no comments to make.
Network Rail	No comments.
National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus.</p> <p><i>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</i></p>
Natural England	<p>Policies H3, H4, H5 Housing</p> <p>We would like to reiterate our comments made in the previous round of consultations. In our letter dated 15th June 2018, we stressed the importance of the requirement to conserve biodiversity and provide a net gain through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006, and paragraph 170 of the NPPF). Please ensure that all development policy in your plan includes wording to ensure "all development results in a biodiversity net gain for the parish". Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals.</p> <p>Policy L1 Local Green Space Designation</p>

	<p>We also reiterate advice given in the previous letter in regards to local green space designation. Please consider the creation of Green Infrastructure policies in your plan. Elements of GI such as open green space, wild green space, allotments and green walls and roofs, some of which you have already, can all be used to create connected habitats suitable for species adaptation to climate change.</p> <p>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.</p> <p>Priority Habitats</p> <p>The parish of North Crawley is fortunate to have patches of priority habitat within its area. Several areas of Ancient Woodlands exist e.g. Brandon’s Wood and Dollar’s Grove, alongside Deciduous Woodland and Traditional Orchards.</p> <p>The National Planning Policy Framework (NPPF) published in 2018 stresses the importance of preserving these habitats. Ancient Woodland is an irreplaceable habitat which has an extremely high level of protection. Paragraph 175 (c) states that development resulting in the loss or deterioration of these habitats should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy is in place. Paragraph 174 (b) of the NPPF details the requirement to “promote, conserve and enhance priority habitats; and identify and pursue opportunities for securing measurable net gains for biodiversity”.</p> <p>We recommend the plan acknowledges the existence of these habitats within the parish boundary, and affords them due protection within the policy wording.</p> <p>The recently produced Neighbourhood Plan for Benson, in South Oxfordshire provides an excellent example. 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.</p>
Ken Graham, resident	<p>I have previously commented to the earlier drafts and some comments have been incorporated in the current draft. However I still feel the current plan does not meet the medium term needs for the village and does not reflect the wishes of the community expressed in the survey carried out last year.</p> <p>I have attached my original letters in response to the previous drafts which explain my concerns.</p> <p>These basically come down to two linked issues:</p> <ol style="list-style-type: none"> 1. The draft does not provide for the number of new residences that survey identified for the planning period (30-35). This arises because of current planning consents, the restriction from the tree at H5 and the failure to include the land to the west of Folly Lane. 2. The draft revised draft ignores the scoring system presented to the community as the basis for the plan. When the survey was carried out a scoring system was arrived and presented to the community. This appeared very logical and there were no concerns expressed. The land to the west of Folly Lane scored highest but was discounted because the committee felt there were access issues. I number of respondents including myself and the landowner challenged this and identified possible means of access. In the revised draft the committee

	<p>still did not include this land but this time stated that this was due to “negative impacts in terms of coalescence along Folly Lane” This was never raised earlier in the process and appears to be a case of making the plan fit a predetermined outcome rather than an objective process. It also implies that Folly Lane is not part of the village, which it is, and always has been. In fact development of this land would provide an opportunity to improve safety for residents in Folly Lane when walking up to the High Street and to the school. It would also assist it meeting the total number of residential units identified in the survey of residents.</p> <p>The final plan will need to be agreed through a referendum of residents and therefore it needs to meet the majority of wishes expressed in the survey, and needs to be seen to be wholly objective.</p> <p>At the moment this is not the case and there is a very real possibility that it will not be supported.</p>
Derek Harpur, resident	<p>I would like to comment on one aspect of the above plan which is still causing me some concerns.</p> <p>It is with respect to the area allocated as H5. I have some reservations as to the suitability of this site due to its position on an important entrance to the village and to it being in a conservation area.</p> <p>The size of the site was originally less than half the final size shown and was allocated to have up to 15 houses built on it. The rationale behind increasing the area was so that the houses could be spaced further apart thus allowing them to have gardens but with no increase in the maximum to be built. If this whole area is built on I believe that it would be visually intrusive and overcrowd this site. It would appear as a small housing estate and departs from the original plan which would have seen houses being built as terraces which would have been in keeping with the existing terraces.</p> <p>A more pressing concern is how the site would be accessed from the main road. The visibility of traffic approaching from the east is restricted due to the bend approaching from downhill of the bend. Any major junction/roundabout would detract from the conservation value of this part of the village and would tend to urbanise what is a very rural village. There is also the issue of speeding traffic. Most traffic ignores both the 40mph and 30mph limits. As part of the community speed watch group I am only too aware of this speeding. As there are no driveways to most of the houses opposite the site, cars are a permanent feature parked on the road. I believe that this would cause difficulties if any properties had driveway access onto the main road.</p> <p>There is also the issue of a very prominent Horse Chestnut tree in the middle of this site. I believe that it would not be possible to develop this site without damage being caused to the tree’s root system. It has been allowed to grow naturally and stands as a prominent feature in an open field. Any pruning would spoil both its shape and take away its identity and it’s visual appeal would be lost if surrounded by housing. There is also a public footpath which runs across this field and passes close to this tree. It is a pleasant semi rural path which enables walkers to access the middle of the village thus avoiding walking on a tarmac footpath next to a busy main road. It is difficult to see how this public path could be kept as it is if houses and roads were built here.</p>
Christopher Flower,	I would just like to say that the 'North Crawley Neighbourhood Plan' has

resident	<p>involved a great number of the community coming together to bring their views to the meetings and contributing to the final document. Having been one of those involved it has been a good experience to find out more about the village, its history, the characters it has produced over the years and the many inhabitants who contribute in many ways to make it a pleasant environment to live in.</p> <p>The Parish Council got the project off the ground and called for villagers to take part. There was a good response and a team was soon in place with lots of diverse talents coming to the fore. Villagers were kept informed throughout the process and small things like delivering questionnaires manually to all dwellings was a great success, as shown by the high number of respondents.</p> <p>A planning consultant was engaged to provide advice and guidance in putting the final document together and ensure the more technical aspects were correctly dealt with, and all involved proof read the document to ensure accuracy. In my opinion the document represents the views of the village and a way forward for controlled development over the coming years.</p>
Gladman	<p><i>Evidence Base Documents – Housing Needs Assessment</i></p> <p>Gladman are concerned with the proposed quantum of housing in the plan and the robustness of the process in deriving at this figure through the Housing Needs Assessment. The emerging Local Plan does not require the NCNP, instead placing the emphasis on the plan itself to deliver development in the village. Whilst delivering no housing would be in general conformity with strategic policies, as the NCNP seeks to plan positively and determine a housing needs figure the basis for determining this figure is not robust.</p> <p>The Local Housing Needs Assessment fails to consider in sufficient detail affordable housing needs in the neighbourhood area. This should be an important consideration in determining the quantum of development the NCNP will plan for. Once the level of affordable need has been established mechanisms for delivering this should be considered, such as through the delivery of market housing schemes with a policy compliant level of affordable housing provision or support for rural exception schemes. It should then be determined if this could be delivered sustainably when considering environmental and infrastructure constraints.</p> <p>The Housing Needs Assessment instead identifies what level of household growth the parish could be expected to see based on the demographic projections. This only factors in the starting point of calculating Objectively Assessed Needs and does not consider further factors such as market signals or previous suppression of household formation. The Housing Needs Assessment in fact concludes on a figure around half of this projected level of growth.</p> <p>As this assessment is not robust the housing needs of the area are likely to be in excess of the figure that the NCNP is planning for. It will therefore be important that the plan has a flexible policy framework to ensure that sustainable housing delivery is not stifled or restricted.</p> <p><i>Policy H1 Settlement Boundary</i></p> <p>For the reasons set above regarding the Housing Needs Assessment, Gladman object to this policy as currently drafted. This policy seeks to update the settlement boundary to meet needs as established through</p>

	<p>the Housing Needs Assessment. This policy would set an arbitrary restriction on further sustainable development in locations in the parish based on an unreliable assessment of need. Wording should be added to this policy that would support demonstrably sustainable development in sustainable locations.</p> <p>Policy T2 Effects of cross-border growth</p> <p>Gladman welcome that this policy recognises and sets out support for development in the adjacent settlement of Cranfield but falling within the parish area. However, as drafted this policy reads more like supporting text and may be better placed elsewhere within the NCNP and not as a policy.</p> <p>Policy T3 Employment development</p> <p>Gladman strongly object to Policy T3 Employment Development which seeks to restrict proposals for employment uses to those that would not increase traffic movements and on-street parking. Whilst examined against the NPPF 2012, the Parish Council should have due regard to Paragraph 80 of the NPPF 2019 which states; “Planning policies and decisions should help create the conditions in which business can invest, expand and adapt. Significant weigh should be places on the need to support economic growth and productivity.”</p> <p>Demonstrating that traffic movements will not increase as a result of development is an overly onerous policy constraint. The NPPF 2012 only seeks to restrict development on transport grounds which would have a severe impact. This policy does not demonstrate positive planning to support strategic policies regarding employment development. As currently drafted, we consider that Policy T3 would act to prevent sustainable employment opportunities from coming forwards and as such do not consider it to be in conformity with either the Local Plan or National Policy.</p> <p>Conclusions</p> <p>Gladman recognises the role of Neighbourhood Plans as a tool for local people to shape the development of their local community. However, there is a need to ensure that a Neighbourhood Plan can first be found to be consistent with the basic conditions. Having reviewed the proposed policies of the NCNP, Gladman has significant concerns that the submission version does not meet basic condition (a), as the plan conflicts with national policy and guidance.</p>
<p>Roebuck Land & Planning on behalf of North Crawley Estate</p>	<p>General</p> <p>We welcome the identification of housing allocations as part of the Neighbourhood Plan. By allocating land for residential development, the Neighbourhood Plan Area – i.e. the parish - would be protected by the stipulations set out under paragraph 14 of the National Planning Policy Framework (NPPF), whereby, if a Neighbourhood Plan is less than 2 years old, contains policies and allocations to meet its identified housing requirement, the LPA can demonstrate a 3-year housing supply and the LPA’s housing delivery test was at least 45% of that required over the previous 3 years, North Crawley could resist development not in accordance with the Neighbourhood Plan.</p> <p>Our client land interests at Orchard Way (Policy H4) and part of the land South of High Street (Policy H5) are identified for housing allocations within the NCNP which principle is fully supported. We are pleased that</p>

the Estate's previous comments in respect of the specific site areas have been considered and acted upon. The Estate also welcomes the deletion of the Local Green Space designation from 'The Slype'.

Basic Condition D

We consider the proposed allocations meet Basic Condition D of neighbourhood planning as set out in para 8(2) Schedule 4b of the 1990 T&CP Act as applied by Section 38A of the 2004 P&CP Act, which requires a neighbourhood plan to seek to achieve sustainable development. Both the Estate's sites are available for development and there are no technical reasons to prevent delivery within the Neighbourhood Plan period to 2033.

They can provide a variety of housing to meet a range of identified needs, such as those for families and for the ageing population to help sustain the village. Our client would engage with the Parish Council on the detailed proposals for the sites as they emerge.

Basic Condition A

Overall, we are supportive of the vision, objectives and draft policies of the NCNP. However, we would recommend minor changes to the wording of the following policies to ensure that they are sufficiently flexible and sound.

Paragraph 11 of the NPPF states that *'plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change'*. (our emphasis underlined). In order to comply with national policy guidance and meet Basic Condition A, we comment as follows:

Policy H4 - Land North of Orchard Way

Policy H4 states that the site is allocated for *'residential development of between 11 and 15 dwellings'*. We consider this overly restrictive at this policy making stage. The evidence base does not include any methodology or detailed site assessment criteria to justify the density assumptions made. The policy expressly excludes 5-bedroom properties and to ensure that the land is developed efficiently, the policy should not set a specific range, but instead allow for detailed site assessment and layout considerations to dictate the overall number of units for the site.

Recommended change:

*"Site H4 as outlined on the Policy Map is allocated for residential development of ~~between 11 and 15~~ **approximately 15 dwellings**"*.

The fourth limb has the effect of controlling dwelling heights to 1-1.5 storeys. The first limb requires 3-4-bedroom family homes which makes this later criterion difficult to justify. Further, the existing separation gap between the existing properties along Orchard Way and the site boundary is significantly more than the widely accepted distances for determining planning applications. The wide verge along the site frontage creates a suitable separation gap. To overcome this issue, we recommend additional wording:

Recommended change:

*"The site layout should avoid overlooking of other properties on Orchard Way. Single-storey or 1.5 storey dwellings will be encouraged **if appropriate/necessary** to minimise **any identified** landscape impacts **and/or** harm to the outlooks of existing properties. Applications should be*

supported by a full landscaping strategy.

The final limb requires a 15m offset between the pumping station and the 'boundary of the curtilage of a dwelling' to provide a buffer. This is overly prescriptive. Whilst we would not expect a building to be located within 15m, a garden area/driveway associated with a dwelling is capable of being located within that zone without adverse harm to the occupier's amenity. We recommend a minor change in emphasis, as follows:

Recommended change:

"Consider the proximity of the foul pumping station in the design and layout of the scheme and allow for a distance of 15 metres from the boundary of the curtilage of the dwellings to reduce the risk of nuisance/loss of amenity associated with the operation of the pumping station".

Regarding the Site Assessment for this land parcel (reference NC4 in Appendix 1 of the Site Assessment Summary document) we offer the following comments:

- Proximity to village centre - This Site scored 'amber' on the basis that it was 'not particularly close to the village centre'. In terms of acceptable walking distances of 400m-1km, the site is within this zone and the existing path network around Orchard Way provides a safe and accessible route to the main village facilities. This criterion should be changed to green.
- Site Area – the site assessment concluded that this site should be 'part' allocated for development. In response to previous objections raised at the pre-submission stage, we support the proposed allocation covering the whole of the site. The proposed configuration follows defined field boundaries and it represents a logical rounding off for the built form of the village to this northern edge.

Policy H5 - Land South of High Street

Policy H5 allows for up to 15 new homes to be provided. As with the Orchard Way policy referred to above, the final dwelling number should not be artificially constrained in the NCNP. We recommend a similar change to that proposed for Policy H4 above, to state 'approximately'.

Recommended change:

*"Site H5 as outlined on the Policy Map is allocated for residential development of up to **approximately** 15 dwellings".*

The second limb of Policy H5 states that 'Proposals should include an enhanced affordable housing offer with tenures that are secured in perpetuity'. The housing policies of Plan:MK include a target of 31% affordable housing provision, subject to viability and other material considerations. We raise concern that this criterion is not in general conformity with the strategic policies of Plan:MK. The text does not give any clarity for decision-makers as to what the definition of 'enhanced' constitutes in this case.

Recommended change:

Deletion of text: *Proposals should include an enhanced affordable housing offer with tenures that are secured in perpetuity'*

The penultimate limb of Policy H5 reads 'Consideration should be given to

	<p><i>appropriate demarcation of this important entrance to the village. A mini-roundabout or other bespoke junction design may assist with this'. We consider this policy text confusing and difficult to apply to planning decisions. Any new or altered highway infrastructure will be designed to mitigate the transport impacts of a scheme will be borne out of the transport assessment for the site. If a gateway feature if desired, this should form part of a design-based policy requirement.</i></p> <p>Recommended change: The issue should be clarified and alternative wording should then be substituted.</p> <p>Conclusion Should this Neighbourhood Plan be made in its current form it will be seeking to unduly restrict the delivery of these two sites on the edge of the village.</p> <p>In summary, we consider that policies H4 and H5 of the Draft NCNP do not meet the requirements of Basic Condition A as is required to pass an examination. Basic Condition A stipulates that a Neighbourhood Plan must have regard to national policies and guidance. Minor changes are sought which would help to overcome the issues identified above and would be consistent with other policies of the plan.</p>
Elke Sadeghi, resident	<p>I write regarding the draft North Crawley Neighbourhood Plan ("NCNP"). The NCNP calls for the construction of up to 35 dwelling houses across two locations in the village:</p> <ul style="list-style-type: none"> • H3 and H4, which are immediately adjacent to each other, and situated along the northern edge of the Kilpin Green housing estate. • HS, which is at the eastern end of the High Street. <p>I wish to express my concerns regarding the latter aspect of the NCNP and to oppose the NCNP as failing to meet the Basic Conditions on this basis. My reasons are as follows:</p> <ol style="list-style-type: none"> 1. Inconsistent and unjustifiable resulting density of housing. 2. Disregard for and contravention of planning policies and constraints. 3. Detrimental impact on the village boundary. 4. Unmanageable increase of and disruption to road traffic. <p>1.Housing Density The proposed development at HS would significantly increase the housing density of the eastern end of the village. The equivalent area on the opposite (northern) side of the High Street contains only five dwelling houses. The construction of up to three times as many houses to the south of this part of the High Street, as the NCNP proposes, would radically alter the character of this part of the village.</p> <p>The NCNP calls for the proposed housing to be: 'in keeping with adjoining dwellings'. The dwellings referred to are a terraced row of six dwellings, closer to the centre of the village, and comprising the most densely housed part of the eastern High Street. Nevertheless, the proposed development at HS allows for the construction of nearly double the number of houses that exist within the adjacent area on the same side of the High Street.</p> <p>By contrast, the land immediately to the south of H3 and H4 (based on an equivalent area) is occupied by an approximately equal or even greater number of houses than that which the NCNP proposes in these areas.</p>

The insensitivity of the development at HS will be rendered still starker by the fact it will necessarily dissolve the only publicly accessible green space along this section of the High Street. Whilst the access in question consists of a public right of way, this is arguably contrary to the objectives of Policies L2 and/or L4 of Plan:MK.

Additionally, HS encompasses an area approximately 30 per cent of the size of that encompassed by H3 and H4. More than 10 per cent of the land within HS is effectively occupied by a horse chestnut tree, which has been subject to a tree preservation order since 1984 {see below}.

Despite this, the NCNP allows for more than 40 per cent of the proposed housing (up to 15 of a possible 35 dwellings) to be within the markedly smaller area of HS. This would result in a significantly greater housing density than is proposed in the combined area of H3 and H4. This entirely fails to account for the fact that existing housing density is far greater in the vicinity of H3 and H4 than it is in the vicinity of HS.

It is also a notable that the provision for sensitive development is far clearer within policies H3 and H4. They both expressly seek to avoid overlooking between the two sites and of the other properties on Orchard Way. H4 seeks to incorporate the existing hedgerow to the north and provide new screening on its eastern edge. H3 proposes to incorporate the existing right of way running through the site.

HS, by contrast, makes no provision to prevent overlooking of the existing properties on the same road. It merely affirms that it seeks to complement/accord with applicable policy, and to 'respect' -rather than incorporate -the existing right of way and protected tree. It is also silent on the subject of the establishing hedgerow -replacing that which had been unaccountably removed in recent years -that currently divides the proposed site of HS in two along its entire length {see below}.

For these reasons, I would argue that the proposed development at HS is contrary to the objectives of Policy D5 l(e) of Plan:MK2, amongst other policies, and is not in keeping with the village.

2.Planning Policies and Constraints

The proposed development at HS encompasses two plots:

- i. the Slupe, which is privately owned, has a public right of way across it, and contributes approximately 60 per cent of the land for the proposed H5 development; and
- ii. the land to the east of 46 High Street, which is privately owned, occupied by a number of allotments, and contributes approximately 40 per cent of the land for the proposed H5 development.

These are owned by two different parties. The consultation document states only that the Steering Group understands the two landowners to be: 'happy to work together to bring the site forward'. However, the NCNP itself neither explains what this means nor, indeed, acknowledges the fact that the land has multiple owners.

The two plots are subject to different environmental and planning constraints. The land to the east of 46 High Street falls within the North Crawley Conservation Area and Heritage Site. Meanwhile, the Slupe is occupied, in substantial part, by a protected horse chestnut tree of significant size, height, and age, which reaches almost entirely across that plot from north to south. There are also indications that the Slupe is a remnant of historic ridge and furrow pasture, remnants of which are an

acknowledged characteristic of the North Crawley plateau.

Any development of the land at HS would be liable to conflict with these critical protections: the construction of up to 15 new dwellings, with road access and on-plot parking, inevitably must be precluded on any sensible reading of these protections.

H5 is directly opposite the only listed building in this part of the village: an early 19th century estate cottage. The largely vacant land to the south of the High Street allows the distinctive front elevation of the building to be seen from public rights of way almost a quarter of a mile to the south. The conservation area in general, and its southern perimeter in particular, currently affords good views across the surrounding countryside.

Policy HE1 of Plan:MK states: 'Proposals will be supported where they sustain and, where possible, enhance the significance of heritage assets which are recognised as being of historic, archaeological, architectural, artistic, landscape or townscape significance'. This is consistent with Strategic Objective 15 of Plan:MK: 'To protect, maintain and enhance the natural, built and historic environment of the Borough ... and to protect and maintain the open countryside in the Borough.' In my opinion, the proposed development at H5 fails to accord with the protections imposed by the affected conservation area, heritage site, tree preservation order, and listed building.

The proposed development at H5 is unjustifiable in light of its location within, across, and in proximity to multiple protections. This aspect of the NCNP entirely fails to accord with established local policy for the protection of the countryside.

3. Development Boundary

Plan:MK, and the Core Strategy which preceded it, both recognise the importance of the development boundaries. These boundaries are intended to help identify: 'the interface between settlements and countryside for development management purposes'. The term 'open countryside' is a policy designation that applies to all land outside the development boundaries of settlements, as outlined in the Settlement Boundaries Review (2017). Policy DS5A provides:

'Planning permission within the open countryside will only be granted for development which is essential for agriculture, forestry, countryside recreation, highway infrastructure or other development, which is wholly appropriate to a rural area and cannot be located within a settlement, or where other policies within this plan indicate development would be appropriate'.

The map of the proposed developments within the NCNP appears to show HS as falling entirely within the settlement boundary: in fact, this would be the proposed future settlement boundary under the NCNP. H5, for the avoidance of doubt, is entirely outside of the boundary established by the Settlement Boundary Study.

Whilst the land to the east of 46 High Street falls within the village conservation area, it falls outside of the North Crawley development boundary. Taking into account the other areas where the development boundary does not accord with the conservation area, this means that HS, unlike H3 and H4, encompasses and proposes to dispense with one of only three areas of countryside within the North Crawley conservation area.

In this regard, the existing development boundary is consistent with preceding plans for the development of North Crawley. The consultation of April 1981 excluded both the Slipe and the land east of 46 High Street from the development boundary [or 'village envelope'] upon exclusion of: 'land in agricultural use ... [and] land whose inclusion would result in a loss of amenity ... or would detract from the character or appearance of the village'.

In so doing, it also maintained already existing policies regarding views of and from the village. On the subject of limitations on growth, the village appraisal of 1971 stated:

'Although the contours of the land surrounding the village would not inhibit expansion from the point of view of building or drainage, the preservation of the countryside and landscape impose severe limitation ... to the south, the edge of the village is clearly defined and exposed to view. Any new development in these parts would be visible from the surrounding countryside and would mask the outward views from the village ...

'Future development should, therefore, be restricted to small scale growth within the confines of the village, and to limited expansion on the flatter land immediately to the north.'

The village, including the Kilpin Green housing estate, has developed in accordance with this proposition. In consequence the views of and from the village across the countryside to the south have been deliberately - and successfully - maintained over the course of almost half a century of the village's planned development. Approval of any development of the Slipe or the land east of 46 High Street would be the first departure from this policy and obstruct the views in both directions between the historical eastern High Street and the open countryside. It would also be contrary to the objectives of Policy NES of Plan:MK:

'Where development in the open countryside is acceptable in principle under other policies in this plan, it will need to be undertaken in a manner that respects the particular character of the surrounding landscape. In particular, development proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- The locally distinctive natural and man-made features that contribute towards the landscape character and its quality
- The historic setting and structure of the villages and hamlets
- Important views e.g. of local landmarks Tranquillity and the need to protect against intrusion from light pollution, noise, and motion. '

As a resident of the northern High Street, living directly opposite the site of the proposed HS development, I can say that the views across the countryside from here are wonderful. For the said reasons, any development of the proposed site, particularly to the extent allowed for under the NCNP, will fail to conserve or enhance the landscape character.

4. Traffic

Access to the proposed development at H3 and H4 would be achievable via a road adjoining Orchard Way. The sole purpose of Orchard Way is to provide road access to the existing housing estate at Kilpin Green.

Residents also benefit from three routes into and out of the village

(Chicheley Road, North Crawley Road, and Cranfield Road via the High Street).

Traffic to and from any development of HS would only be able to enter and leave the village via the High Street (North Crawley Road/ Cranfield Road). This would be at a point on or near a bend in the road which already obscures traffic approaching the village from Cranfield. The main road through the village is also the most direct route between Newport Pagnell and Cranfield. The North Crawley Road / High Street already experiences high levels of traffic at peak times. This includes a large number of sizable industrial and agricultural vehicles. Traffic levels will continue to increase as a result of development on the Tickford Fields Estate in Newport Pagnell.

The increase in traffic arising from the proposed development would necessarily result in considerable congestion on the main road through the village, and an increased risk of accidents at the eastern entrance to the village. In consequence, HS would arguably conflict with the objectives of Policy CT2 A(vi) of Plan:MK8, and is not sustainable development.

Traffic flow problems within the village are already exacerbated by increasing levels of on-street parking. The problem is mostly localised in the heart of the village, consistent with the greater number of houses. However, it frequently causes bottlenecks in traffic flow during the day. The extent of the problem, both in frequency and geographical extent, is likely to be increased by the addition of up to 15 dwelling houses in the eastern part of the village. The NCNP arguably seeks to address this problem by means of on-plot parking (distinguishing HS from H3 and H4). For the reasons given under the heading of 'Housing Density', above, it is patently impossible to provide adequate parking for up to 15 new households within the boundaries of H5. In consequence, HS would arguably conflict with the objectives of Policy CT10 (ii) of Plan:MK. The H5 development suggests: 'Consideration should be given to appropriate demarcation of this important entrance to the village. A mini-roundabout or other bespoke junction design may assist with this'. This fails to account for the said road traffic issues, or to engage with the requirements of Policy INF1 (ii). A related point is the provision that would also need to be made to avoid exacerbating the surface water flooding from which the Slipe is known to already suffer as a result of its clay subsoil.

In my view, H5 policy as a whole fails to account for or address the significant road traffic issues that the development raises. These issues render this aspect of the NCNP impractical and ill-conceived.

Pre-submission Consultation

The above concerns were raised during the initial consultation period. Nevertheless, the only resulting amendments apparently made to the HS policy were the removal of the proposed local green space designation from the Slipe, and the addition of the Slipe to the proposed development area of H5. As such, the consultation process failed to address any of the said issues and arguably exacerbated them.

It was also put to the Steering Group that, whilst the site at H3 and H4, as well as other parts of the village, were suitable for development: the site at HS was not, for reasons similar to those raised in this letter. In

	<p>response, the Steering Group concluded: 'Noted. Site H5 considered sequentially preferable in site assessment'.</p> <p>The failure to identify more suitable locations for development clearly does nothing to address the unsuitability of H5. Indeed, to proceed on this basis arguably seeks to develop the land within H5 at any cost.</p> <p>Conclusion</p> <p>For these reasons, I personally oppose Policy H5 of the North Crawley Neighbourhood Plan, and submit that it fails to meet the basic conditions of national policy, sustainable development, strategic policies within the development plan for the area of the authority, and/or applicable EU obligations, including the obligation to strike a fair balance between the rights of those affected and the rights of the wider community.</p>
<p>Nicholas Sadeghi, resident</p>	<p>I write regarding the draft North Crawley Neighbourhood Plan ("NCNP"). The NCNP calls for the construction of up to 35 dwelling houses across two locations in the village:</p> <ul style="list-style-type: none"> • H3 and H4, which are immediately adjacent to each other, and situated along the northern edge of the Kilpin Green housing estate. • HS, which is at the eastern end of the High Street. <p>I wish to express my concerns regarding the latter aspect of the NCNP and to oppose the NCNP as failing to meet the Basic Conditions on this basis. My reasons are as follows:</p> <ol style="list-style-type: none"> 1. Inconsistent and unjustifiable resulting density of housing. 2. Disregard for and contravention of planning policies and constraints. 3. Detrimental impact on the village boundary. 4. Unmanageable increase of and disruption to road traffic. <p>1.Housing Density</p> <p>The proposed development at HS would significantly increase the housing density of the eastern end of the village. The equivalent area on the opposite (northern) side of the High Street contains only five dwelling houses. The construction of up to three times as many houses to the south of this part of the High Street, as the NCNP proposes, would radically alter the character of this part of the village.</p> <p>The NCNP calls for the proposed housing to be: 'in keeping with adjoining dwellings'. The dwellings referred to are a terraced row of six dwellings, closer to the centre of the village, and comprising the most densely housed part of the eastern High Street. Nevertheless, the proposed development at HS allows for the construction of nearly double the number of houses that exist within the adjacent area on the same side of the High Street.</p> <p>By contrast, the land immediately to the south of H3 and H4 (based on an equivalent area) is occupied by an approximately equal or even greater number of houses than that which the NCNP proposes in these areas. The insensitivity of the development at HS will be rendered still starker by the fact it will necessarily dissolve the only publicly accessible green space along this section of the High Street. Whilst the access in question consists of a public right of way, this is arguably contrary to the objectives of Policies L2 and/or L4 of Plan:MK.</p> <p>Additionally, HS encompasses an area approximately 30 per cent of the size of that encompassed by H3 and H4. More than 10 per cent of the land within HS is effectively occupied by a horse chestnut tree, which has been</p>

subject to a tree preservation order since 1984 {see below). Despite this, the NCNP allows for more than 40 per cent of the proposed housing (up to 15 of a possible 35 dwellings) to be within the markedly smaller area of HS. This would result in a significantly greater housing density than is proposed in the combined area of H3 and H4. This entirely fails to account for the fact that existing housing density is far greater in the vicinity of H3 and H4 than it is in the vicinity of HS.

It is also a notable that the provision for sensitive development is far clearer within policies H3 and H4. They both expressly seek to avoid overlooking between the two sites and of the other properties on Orchard Way. H4 seeks to incorporate the existing hedgerow to the north and provide new screening on its eastern edge. H3 proposes to incorporate the existing right of way running through the site.

HS, by contrast, makes no provision to prevent overlooking of the existing properties on the same road. It merely affirms that it seeks to complement/accord with applicable policy, and to 'respect' -rather than incorporate -the existing right of way and protected tree. It is also silent on the subject of the establishing hedgerow -replacing that which had been unaccountably removed in recent years -that currently divides the proposed site of HS in two along its entire length {see below).

For these reasons, I would argue that the proposed development at HS is contrary to the objectives of Policy D5 l(e) of Plan:MK2, amongst other policies, and is not in keeping with the village.

2.Planning Policies and Constraints

The proposed development at HS encompasses two plots:

- i. the Slupe, which is privately owned, has a public right of way across it, and contributes approximately 60 per cent of the land for the proposed H5 development; and
- ii. the land to the east of 46 High Street, which is privately owned, occupied by a number of allotments, and contributes approximately 40 per cent of the land for the proposed H5 development.

These are owned by two different parties. The consultation document states only that the Steering Group understands the two landowners to be: 'happy to work together to bring the site forward'. However, the NCNP itself neither explains what this means nor, indeed, acknowledges the fact that the land has multiple owners.

The two plots are subject to different environmental and planning constraints. The land to the east of 46 High Street falls within the North Crawley Conservation Area and Heritage Site. Meanwhile, the Slupe is occupied, in substantial part, by a protected horse chestnut tree of significant size, height, and age, which reaches almost entirely across that plot from north to south. There are also indications that the Slupe is a remnant of historic ridge and furrow pasture, remnants of which are an acknowledged characteristic of the North Crawley plateau.

Any development of the land at HS would be liable to conflict with these critical protections: the construction of up to 15 new dwellings, with road access and on-plot parking, inevitably must be precluded on any sensible reading of these protections.

H5 is directly opposite the only listed building in this part of the village: an early 19th century estate cottage. The largely vacant land to the south of the High Street allows the distinctive front elevation of the building to be

seen from public rights of way almost a quarter of a mile to the south. The conservation area in general, and its southern perimeter in particular, currently affords good views across the surrounding countryside.

Policy HE1 of Plan:MK states: 'Proposals will be supported where they sustain and, where possible, enhance the significance of heritage assets which are recognised as being of historic, archaeological, architectural, artistic, landscape or townscape significance'. This is consistent with Strategic Objective 15 of Plan:MK: 'To protect, maintain and enhance the natural, built and historic environment of the Borough ... and to protect and maintain the open countryside in the Borough.' In my opinion, the proposed development at H5 fails to accord with the protections imposed by the affected conservation area, heritage site, tree preservation order, and listed building.

The proposed development at H5 is unjustifiable in light of its location within, across, and in proximity to multiple protections. This aspect of the NCNP entirely fails to accord with established local policy for the protection of the countryside.

3. Development Boundary

Plan:MK, and the Core Strategy which preceded it, both recognise the importance of the development boundaries. These boundaries are intended to help identify: 'the interface between settlements and countryside for development management purposes'. The term 'open countryside' is a policy designation that applies to all land outside the development boundaries of settlements, as outlined in the Settlement Boundaries Review (2017). Policy DS5A provides:

'Planning permission within the open countryside will only be granted for development which is essential for agriculture, forestry, countryside recreation, highway infrastructure or other development, which is wholly appropriate to a rural area and cannot be located within a settlement, or where other policies within this plan indicate development would be appropriate'.

The map of the proposed developments within the NCNP appears to show HS as falling entirely within the settlement boundary: in fact, this would be the proposed future settlement boundary under the NCNP. H5, for the avoidance of doubt, is entirely outside of the boundary established by the Settlement Boundary Study.

Whilst the land to the east of 46 High Street falls within the village conservation area, it falls outside of the North Crawley development boundary. Taking into account the other areas where the development boundary does not accord with the conservation area, this means that HS, unlike H3 and H4, encompasses and proposes to dispense with one of only three areas of countryside within the North Crawley conservation area.

In this regard, the existing development boundary is consistent with preceding plans for the development of North Crawley. The consultation of April 1981 excluded both the Slipe and the land east of 46 High Street from the development boundary [or 'village envelope'] upon exclusion of: 'land in agricultural use ... [and] land whose inclusion would result in a loss of amenity ... or would detract from the character or appearance of the village'.

In so doing, it also maintained already existing policies regarding views of

and from the village. On the subject of limitations on growth, the village appraisal of 1971 stated:

'Although the contours of the land surrounding the village would not inhibit expansion from the point of view of building or drainage, the preservation of the countryside and landscape impose severe limitation ... to the south, the edge of the village is clearly defined and exposed to view. Any new development in these parts would be visible from the surrounding countryside and would mask the outward views from the village ...

'Future development should, therefore, be restricted to small scale growth within the confines of the village, and to limited expansion on the flatter land immediately to the north.'

The village, including the Kilpin Green housing estate, has developed in accordance with this proposition. In consequence the views of and from the village across the countryside to the south have been deliberately - and successfully - maintained over the course of almost half a century of the village's planned development. Approval of any development of the Slipe or the land east of 46 High Street would be the first departure from this policy and obstruct the views in both directions between the historical eastern High Street and the open countryside. It would also be contrary to the objectives of Policy NES of Plan:MK:

'Where development in the open countryside is acceptable in principle under other policies in this plan, it will need to be undertaken in a manner that respects the particular character of the surrounding landscape. In particular, development proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- The locally distinctive natural and man-made features that contribute towards the landscape character and its quality
- The historic setting and structure of the villages and hamlets
- Important views e.g. of local landmarks Tranquillity and the need to protect against intrusion from light pollution, noise, and motion. '

As a resident of the northern High Street, living directly opposite the site of the proposed HS development, I can say that the views across the countryside from here are wonderful. For the said reasons, any development of the proposed site, particularly to the extent allowed for under the NCNP, will fail to conserve or enhance the landscape character.

4. Traffic

Access to the proposed development at H3 and H4 would be achievable via a road adjoining Orchard Way. The sole purpose of Orchard Way is to provide road access to the existing housing estate at Kilpin Green.

Residents also benefit from three routes into and out of the village (Chicheley Road, North Crawley Road, and Cranfield Road via the High Street).

Traffic to and from any development of HS would only be able to enter and leave the village via the High Street (North Crawley Road/ Cranfield Road). This would be at a point on or near a bend in the road which already obscures traffic approaching the village from Cranfield. The main road through the village is also the most direct route between Newport Pagnell and Cranfield. The North Crawley Road / High Street already

experiences high levels of traffic at peak times. This includes a large number of sizable industrial and agricultural vehicles. Traffic levels will continue to increase as a result of development on the Tickford Fields Estate in Newport Pagnell.

The increase in traffic arising from the proposed development would necessarily result in considerable congestion on the main road through the village, and an increased risk of accidents at the eastern entrance to the village. In consequence, HS would arguably conflict with the objectives of Policy CT2 A(vi) of Plan:MK8, and is not sustainable development.

Traffic flow problems within the village are already exacerbated by increasing levels of on-street parking. The problem is mostly localised in the heart of the village, consistent with the greater number of houses. However, it frequently causes bottlenecks in traffic flow during the day. The extent of the problem, both in frequency and geographical extent, is likely to be increased by the addition of up to 15 dwelling houses in the eastern part of the village. The NCNP arguably seeks to address this problem by means of on-plot parking (distinguishing HS from H3 and H4). For the reasons given under the heading of 'Housing Density', above, it is patently impossible to provide adequate parking for up to 15 new households within the boundaries of H5. In consequence, HS would arguably conflict with the objectives of Policy CT10 (ii) of Plan:MK. The H5 development suggests: 'Consideration should be given to appropriate demarcation of this important entrance to the village. A mini-roundabout or other bespoke junction design may assist with this'. This fails to account for the said road traffic issues, or to engage with the requirements of Policy INF1 (ii). A related point is the provision that would also need to be made to avoid exacerbating the surface water flooding from which the Slipe is known to already suffer as a result of its clay subsoil.

In my view, H5 policy as a whole fails to account for or address the significant road traffic issues that the development raises. These issues render this aspect of the NCNP impractical and ill-conceived.

Pre-submission Consultation

The above concerns were raised during the initial consultation period. Nevertheless, the only resulting amendments apparently made to the HS policy were the removal of the proposed local green space designation from the Slipe, and the addition of the Slipe to the proposed development area of H5. As such, the consultation process failed to address any of the said issues and arguably exacerbated them.

It was also put to the Steering Group that, whilst the site at H3 and H4, as well as other parts of the village, were suitable for development: the site at HS was not, for reasons similar to those raised in this letter. In response, the Steering Group concluded: 'Noted. Site H5 considered sequentially preferable in site assessment'.

The failure to identify more suitable locations for development clearly does nothing to address the unsuitability of H5. Indeed, to proceed on this basis arguably seeks to develop the land within H5 at any cost.

Conclusion

For these reasons, I personally oppose Policy H5 of the North Crawley Neighbourhood Plan, and submit that it fails to meet the basic conditions

	<p>of national policy, sustainable development, strategic policies within the development plan for the area of the authority, and/or applicable EU obligations, including the obligation to strike a fair balance between the rights of those affected and the rights of the wider community.</p>
AAH Planning	<p>There are a number of policies within the Neighbourhood Plan that simply do not comply with the principles of the sustainable development and run contrary to the NPPF to such an extent that as currently drafted the Neighbourhood Plan cannot meet the first two basic conditions as follows:</p> <p>Policies</p> <p><i>Policy H1 Settlement Boundary</i> provides a list of development types that <i>'will only be granted'</i> outside of the settlement boundary this directly conflicts with paragraphs 77 and 78 of NPPF 2019 as well as the presumption itself. It also perpetuates the theme of protection of the open countryside for its own sake and its limitations are contrary to the balanced approach of the NPPF 2019. The NPPF has never and still does not provide for a restrictive approach to development outside settlements in this manner. It does not protect the countryside for its own sake or prescribe the types of development that might be acceptable. The policy as worded opposes the balancing exercise and precludes otherwise sustainable development by default and thereby defeats the presumption in its favour.</p> <p>Policy T3 specifically states that <i>'proposals for new employment uses in North Crawley will not generally be supported'</i> contrary to the NPPF, such a restrictive approach to development does not form part of the NPPF.</p> <p>Similarly, Policy HD3 Advertisements and signage specifically states that <i>'no new signage or advertisements will be supported'</i> contrary to the NPPF and again such a restrictive approach to development does not form part of the NPPF. In fact, Economic Development is central to the NPPF. Paragraph 80 of the NPPF states: <i>'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.'</i></p> <p>These policies as written are contrary to the paragraph 80 of the NPPF. We also consider that policies H1, T3 and HD3 are specifically contrary to the above stated paragraphs of the NPPF but also generally contrary to the spirit of paragraph 29 of the NPPF particularly with regard to promoting less development and undermining policies.</p> <p>Allocations</p> <p>Policies H3 to H5 cumulatively allocate housing sites for up to 35 dwellings. We have the following comments to make for each site:</p> <p>Site H3 already has planning permission for 2 dwellings under planning application reference numbers 18/01849/OUT and 18/01850/OUT. Application reference 18/01849/OUT for the erection of one dwelling and application reference 18/001850/OUT for a replacement dwelling. There is no evidence provided that the landowner is actively seeking to increase the overall scale of development here and even whether the site could</p>

accommodate 5 dwellings. We also question the suitability of the vehicular access to the site for the additional dwellings particularly when the above referenced planning permissions have been granted with individual accesses and there is no other road frontage included within the allocation.

Site H4 is further away from the village centre compared to other sites that have been discounted (particularly Site N1 Land at Moat Farm). This is hard to reconcile particularly when the Neighbourhood Plan promotes walkability to and from the village as a key component. The selection of sites for this allocation does not therefore take account of the key character of the village that the Plan seeks to retain i.e. 'walkability'.

We also question the level of infrastructure required in terms of highways particularly how the site would be accessed. Site H4 has no road frontage and therefore is reliant upon land assembly or access through site H3.

We are surprised that there is no mention of access or transport or land assembly in the policy. Particularly when considered in the context of the aforementioned planning permissions which do not allow access to H4 from H3. It is hard to foresee that this site can be delivered for between 11 and 15 dwellings without additional land assembly outside of the allocation to allow vehicular access it.

With regard to site H5 and heritage no conservation area statement or appraisal as to what the special character of North Crawley is and therefore what is its significance, has been carried out. There is also little reference to heritage assets in village. Whilst Historic England accept that H5 may contribute to the conservation area, or at least not harm it, they still state some form of appraisal should be key evidence to underpin the plan *"We still believe that a Character Appraisal for the Conservation Area should be an essential component of the evidence base underpinning the Plan, and that this could be a project undertaken by the local community."* (SEA). We therefore do not consider that the allocation of this site within the North Crawley Neighbourhood Plan complies with the NPPF with regard to the understanding and assessment of Heritage Assets.

With regard to the supporting documents we wish to comments as follows:

Site Assessment Document

We have concerns over how the sites have been considered and the consistency within the overall assessment of the sites and those that have been discounted.

The Site Assessment document does not provide specific evidence from landowners to establish that the sites are available for development. The Neighbourhood Plan states that only those who responded to a letter are included and highlights where they are available, but there is only a sample letter provided identifying the land potentially owned by the landowner, but no evidence on suitability, availability and deliverability of the sites at the scale that they are proposed to be allocated for.

Not all of the proposed sites (NC3, Maslins Property) (NC7, Land South of the Slipe) (NC9, Land West of Folly Land) were included in the questionnaire, so we therefore question whether they have they been properly consulted upon. The Settlement boundary has been altered to include the proposed allocations (H3, H4 and H5) however the proposed allocations and the alteration of the settlement boundary have not been

	<p>considered in the context of the Character Assessment.</p> <p>We do not consider that the Neighbourhood Plan provides sufficient evidence to establish that the proposed allocations are:</p> <ul style="list-style-type: none"> • available i.e. that the site owner is willing for their site to come forward at the proposed scale of development. • suitable i.e. – that constraints information has been considered and tested, e.g. flooding, archaeology, and that a detailed assessment of the infrastructure needed to support development and access it • deliverable – i.e. that the site is viable for development. <p>We do not consider that the Neighbourhood Plan has consistently considered all the reasonable alternative sites or the appropriate considerations for development being deemed suitable such as the character of conservation areas or landscape characters.</p> <p>We therefore consider the overall site assessments have not been carried out in accordance with the requirements of the NPPF.</p> <p>Green Space Assessment</p> <p>It is not clear why only three areas were considered for LGS designation and why the Slupe included in first draft as a LGS designation was not brought forward and now replaced by H5 allocation. The assessment seeks to identify what is present in terms of Green Infrastructure but does not seek to establish links to the Green Infrastructure and/or their enhancement and protection contrary to paragraph 28 of the NPPF.</p> <p>Conclusion</p> <p>We consider that policies H1, T3 and HD3 do not comply with the requirements of the NPPF or indeed the presumption in favour of sustainable development at least two of the allocation are not realistic or even achievable in their current form. Despite Historic England comments no conservation area statement or appraisal as to what the special character or significance of North Crawley and how this would relate to site H5 has been carried out. There are also series question makes over the ‘Site Assessment Document’, the site selection process and the ‘Green Space Assessment Document’.</p> <p>In the context of the above commentary we do not consider that North Crawley Neighbourhood Plan meets the basic conditions and we urge the Council and/or the Independent Examiner to reconsider the compliance with the NPPF and therefore the basic conditions test of the North Crawley Neighbourhood Plan.</p>
Anglian Water	<p>The following comments are submitted on behalf of Anglian Water.</p> <p>Policy 3 Former Maslin Property and Policy H4 Land north of Orchard Way</p> <p>There is an existing pumping station located on the boundary of the above sites which are allocated for residential development.</p> <p>Development located within 15m of the pumping station would be at risk of nuisance in the form of noise, odour or the general disruption from maintenance work caused by the normal operation of the pumping station.</p> <p>We note that changes have been made to the wording of these policies regarding this issue following the previous consultation which are welcomed.</p>
Chris Stavrinides, resident	<p>Reference to North Crawley Neighbourhood Plan, I would like to bring to your attention the following.</p>

I believe the assessment (please refer to the Site Assessment Summary document) of the key criteria between sites NC2 and NC4 (H4) are biased against the NC4 site.

Criteria 1- Walkability and relationship with existing village –

NC2 = The site would be distant from the village core and would potentially diminish the identity of Little Crawley as a separate hamlet.

“Red”

NC4 = The site would have a positive relationship with Kilpin Green, particularly if restricted to the area closest to Orchard Way. It is on the edge of the village and therefore not particularly close to the village centre although no less so than existing properties on Orchard Way. “Amber”

This is not valid. The NC2 site is adjacent to the village and not distant in any way, in effect is next to NC3(H3) (refer to SAS doc. fig 2) and less than 200 metres from NC4 hence no issue to walkability. There are properties in North Crawley further away from the centre than NC2.

Building around 10 dwellings in the area closest and to the village and next to NC3 will not impact Little Crawley in any way and will not diminish its identity the same manner NC4 site will impact the Orchard Way landscape and residents.

The NC2 site is closer to North Crawley than Little Crawley and will not affect or change the current relationship.

Criteria 3- Landscape –

NC2 = The site’s topography means development would be relatively discretely positioned, although views to and from Little Crawley may be harmed and development could lead to coalescence. “ Red”

NC4 (H4)= The topography of the site slopes down towards Orchard Way. However, there is a notable change towards more open countryside towards the north-east, which suggests the site should be restricted to the area closest to Orchard Way. There are a small number of dwellings here that overlook the site. This has been considered and it is understood no significant harm to amenity or privacy will result. “Amber”

The views to and from Little Crawley will not be impacted in any way compared to the NC4 impact to Orchard way residents. In effect, the NC2 development will not be facing or impact adversely on any of the residents of Little Crawley.

The NC2 development will be hardly seen, if at all from Little Crawley, but the NC4 development will be directly facing the Orchard Way residents, but this is not highlighted as a major issue in the NC4 criteria.

But the landscape facing Orchard Way will be adversely impacted and the development will be facing directly the Orchard Way residents. The views from Orchard Way have not been considered in the same way.

I do not believe proper consideration was given to the Orchard Way residents.

Criteria 9 – Ownership/availability –

NC2 = The site is understood to be available for development although not actively promoted. “Amber”

NC4 = The site is available for development. “Green”

The NC2 statement “not actively promoted” should not be taken into consideration.

This could mean that somebody is actively promoting the NC4 site and therefore could be interpreted that the assessment has been influenced.

Being available or not available should be the only consideration and therefore both sites receive the same rating.

Conclusion

NC2 = The site will potentially harm the separation between North Crawley and Little Crawley. Development, particularly towards the northern end, would also be located too far from the village centre. The site should not be allocated for development.

NC4 = The site is well-related to the existing village and would have no harmful impacts if developed along the section closest to Orchard Way. It should be part-allocated for development.

There will be harmful impacts to the NC4 landscape and Orchard Way residents.

The NC4 conclusion comment should apply to NC2 as well. Part-allocating the section closest to the village will ensure no harmful impacts. Will not be visible from Little Crawley, will not interfere with the landscape, will be attached to the village, not far in any way from the village centre, be walkable and will not harm the separation between North Crawley and Little Crawley.

To summarise,

The NC4 proposed development will have an unacceptably adverse impact on the amenities of the properties immediately opposite.

The NC4 development will be directly opposite Orchard Way which currently has views of the countryside, over open fields (see photo below); I have purchased my property based on its location.

NC2 development adverse impact will be minimal if at all. Will not interfere, affect existing residents, impact the identity of Little Crawley, impact the views or impact the landscape in any way.

In addition, I believe some of the reasons to decline APP/Y0435/W/17/3186814 - LPA Statement can be applied to the NC4 development as well.

My objection is not against building additional housing, indeed the opposite, but we should avoid detrimental impact upon existing residents when there are other obvious solutions.

I strongly believe that the NC4 (H4) site should be excluded and if a third site is required then NC2 to be included instead in the final proposal.

I understand that you are due to consider the draft NORTH CRAWLEY NEIGHBOURHOOD PLAN for inclusion in the Milton Keynes Plan.

I have previously commented to the earlier drafts and some comments have been incorporated in the current draft. However I still feel the current plan does not meet the medium term needs for the village and does not reflect the wishes of the community expressed in the survey carried out last year.

I have attached my original letters in response to the previous drafts which explain my concerns. These basically come down to two linked issues:

1. The draft does not provide for the number of new residences that survey identified for the planning period (30-35). This arises because of current planning consents, the restriction from the tree at H5 and the failure to include the land to the west of Folly Lane.

2. The draft revised draft ignores the scoring system presented to the

	<p>community as the basis for the plan. When the survey was carried out a scoring system was arrived and presented to the community. This appeared very logical and there were no concerns expressed. The land to the west of Folly Lane scored highest but was discounted because the committee felt there were access issues. A number of respondents including myself and the landowner challenged this and identified possible means of access. In the revised draft the committee still did not include this land but this time stated that this was due to “negative impacts in terms of coalescence along Folly Lane” This was never raised earlier in the process and appears to be a case of making the plan fit a predetermined outcome rather than an objective process. It also implies that Folly Lane is not part of the village, which it is, and always has been. In fact development of this land would provide an opportunity to improve safety for residents in Folly Lane when walking up to the High Street and to the school. It would also assist in meeting the total number of residential units identified in the survey of residents.</p> <p>The final plan will need to be agreed through a referendum of residents and therefore it needs to meet the majority of wishes expressed in the survey, and needs to be seen to be wholly objective. At the moment this is not the case and there is a very real possibility that it will not be supported.</p>
Kim Slater, resident	<p>H5 Land South of High Street</p> <p>We strongly object to the above, the density of housing will impact on the conservation area that we live in and impact on the countryside views that we currently enjoy.</p> <p>The traffic problems within our village with people using it as a rat run to and from work is already horrendous. We live on the Cranfield side of the village and we can only say it always seems like an accident waiting to happen with cars going past our house and we can foresee traffic problems being horrendous if you give access to the proposed dwellings opposite our house. I foresee a roundabout causing us more problems trying to get on and off our driveway and to suggest putting speed bumps in to calm the traffic would be an absolute nightmare constantly hearing cars and lorries going over the bumps and if rumours are true what we have heard living in an older property with the vibrations caused by these speed bumps could be detrimental to our property.</p> <p>We reiterate that we strongly disagree with the above application.</p>
Oliver Shaw, resident	<p>There has been no engagement at all on this plan since the initial discussions and meeting on March 2018. It appears it has taken a different route since these interactions. There was a mention in the October 2018 SCAN Magazine, but why was no action followed up on?</p> <p>I have been on the neighbourhoodplaning.org website which gives guidelines and I can't see how these have been met with specific reference to regulation 14. If you read the below and clearly consult I, as I have, with all the local residents impacted by the H4 site then not one was aware of such a change and submission. The actual local scan magazine has a misprint starting 18th March as the deadline for comments? Hence I write this after the date March 8th.</p> <p>Pre-submission consultation requirements include publicising the draft plan to people who live, work or run businesses in the area. The</p>

publicity must include details of the proposed neighbourhood plan, where and when it may be viewed, and how to make comments on the plan and by what date. In addition, the plan must be sent to the local planning authority. Certain statutory bodies must be consulted, including the county council (if applicable), the Environment Agency, Natural England and Historic England. The local planning authority should be asked to provide a list of contact details for the statutory consul-tees.

I have several points to make but my real issue is with the process in which this plan has been done. There seems too much influence by the landowner who would be the clear beneficiary rather than the community. My parents and I have been around the village and there is very limited understanding of what is going on? Why is this, if you look at the North Crawley neighbourhood website the communication stops after March 18? Any you can clearly see the site assessment is dramatically different then what has been submitted. You need to ask why was this the case and why no further community consultation after the change? How have the committee been consulting the community which is crucial. I suspect on my straw poll this will not pass referendum by why go so far without proper consultation?

There are far better places to add housing if needed which it is. But crucially it needs to benefit the whole community and not significantly impact one area more than another. In my mind the plan does not satisfy the basic **human rights** the people of Orchard Way have. As in the are impacted too much for the benefit of the community.

The plan highlights it will not impact the amenity of the area which would be impossible if you are building house in front of their properties. It also highlights it will have no impact on privacy. The proper 27 Orchard Way has a boundary of about 50 meters to H4 with 3 bedroom windows at ground level? Why were these people not consulted? Maybe the committee should have asked to view this property and others to help draw a conclusion and qualify their view.

It states also in the roadmap to neighbourhood planning, **Anyone on the neighbourhood plan database that has previously been involved should also be consulted.** As far as I am aware this did not happen? Why was a simple leaflet not distributed? Why did this not happen?

The demographic of North Crawley is older than the mean and not fully engaged in social media and the modern forms of communication. Why were these people not considered?

The Neighbourhood plan should be inclusive and the whole community should be part of the submission. I believe the committee may have started out with the best intentions but ultimately failed in engaging with the community as the plan entered the crucial submission stage.

Good communication helps create a sense of ownership and acceptance of the plan.

On many levels I see this plan has failed to deliver what the community as a whole wants or followed the guidelines set out by I am afraid has become divisive rather than cohesive to the community.

I also find it difficult to ascertain how North Crawley Parish Council before submission has satisfactorily met sections (a) of regulation 14 of the Neighbourhood Planning (General) Regulations 2012 a shown below.

	<p>I hope you take time to consider the submission and allow proper consultation with the wider community to take place.</p> <p>Many people would like to comment further but are able to and I am afraid that is a result of not following regulation 14.</p>
Keith Shaw, resident	<p>In all honesty it was a shock to find out from one of my neighbours that the plan had been submitted which advised that the Parish Council had designated land for development (H4) which is 8ft/2.4 metres from my bedroom windows. The key criteria reports that there would be no harm to privacy but this clearly would not be the case. If there was a development 8ft away from our property to maintain privacy i'd assume the developers would be looking to erect fencing which could also impact on the light into our bungalow. The other key criteria appears to be walkability and this argument appears very weak considering there is not much difference in distance of all the possible development sites. There is also a footpath running along the designated site which is a very popular walk used daily by villagers and others walking through the open field - this walk is the most used walk in the village. Walking through open countryside is a great benefit to both mind and body and with the latest focus on mental health, these amenities are very important to preseve; one of the reasons for living in a village and not in town. The plan mentions of access but in my mind the only possible access would be via H3 but if this were granted then i cannot see how the H3 development could have the houses suggested . It also highlights that the land H3 is not clear if it is available. Therefore, it would appear the only other access would be via the tree lined verge adjacent to Orchard Way. There is no doubt this would impact on the amenity of the area and character. If this was to take place there would be loss of green space and i can't currently see how this would be replaced.</p> <p>There have been several meetings earlier in the planning phase but there was no mention of the scope of the development in its present form and i have not received any notification of the changes to the plan despite wanting to be informed when going to the earlier meetings.</p> <p>I filled in the questionnaire in July 17 but at that point there was no indication of H4 in its submitted form therefore can't see how the questionnaire is a relevant criteria used to qualify the choosing of the land. The key criteria notes state "IF THE SITE IS REGARDED AS LAND BETWEEN KILPIN GREEN AND LITTLE CRAWLEY THEN 34% OF QUESTIONNAIRE RESPONDENTS DISAGREED OR STRONGLY DISAGREED WITH THE SITE AS A LOCATION FOR DEVELOPMENT. 42% AGREED OR STRONGLY AGREED." It clearly did not mention H4 and it could be easily interpreted as the other sites that are between Kilpin Green and Little Crawley ie H3 or NC2 (NC2 being somehow dismissed from the plan). The reasons given for targeting this site don't seem to make sense when you look at the criteria set and the other areas available. There has not been enough engagement with the local residents to make a proper assessment of privacy, loss of amenity and the clear impact of the character of the area by this proposed development.</p> <p>It seems clear to me that, judging by the lack of comments by villagers, very few were aware of the final plan for H4 and H5 had gone in to the Milton Keynes Borough Council. Speaking to many villagers I have found very few were aware of the final plan being submitted to MKBC and of the</p>

	consultation period. I hope you can see my argument and include my views in the independent examination process
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