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Dear Sir/Madam,

## North Crawley Neighbourhood Plan Regulation 16 Consultation

### Introduction

This letter provides Gladman's representations to the submission version of the North Crawley Neighbourhood Plan (NCNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues within the NCNP as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in Neighbourhood Planning, having been involved in the process across the country. It is from this experience that this representation has been prepared.

### Legal Requirements

Before a Neighbourhood Plan can proceed to referendum, it must be tested against a set of basic conditions defined in Paragraph 8(2) schedule 4b of the Town and Country Planning Act 1990 (as amended) by way of independent examination. The basic conditions that the NCNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

### National Planning Policy

On the 24<sup>th</sup> July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework (NPPF). The first revision since 2012, it implemented 85 reforms announced through the Housing White Paper. This version of the NPPF was itself superseded on the 19<sup>th</sup> February 2019, with the latest version, largely only making alterations to the Government's approach for the Appropriate Assessment as set out in Paragraph 177 of the NPPF.

Paragraph 214 of the 2019 NPPF sets out the transitional arrangements for the implementation of revised national planning policy. Paragraph 214 confirms that development plan documents submitted on or after the 24<sup>th</sup> January 2019 will be examined against the latest version of the NPPF. Given that the NCNP was submitted to Milton Keynes Council for Examination before the 24<sup>th</sup> January 2019, the

comments provided within this representation reflect the national policy requirements as previously defined by the 2012 version of the NPPF.

At the heart of the NPPF is the presumption in favour of sustainable development which is seen as the golden thread running through both plan-making and decision-taking. Paragraph 16 sets out that the presumption has implications for how communities engage in Neighbourhood Planning, including the need for Neighbourhood Plans to support strategic development needs, and positively support local development.

Paragraph 17 of the NPPF sets out that Neighbourhood Plans should set out a clear and positive vision for the future of the area, and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood Plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to wider opportunities for growth.

Paragraph 184 of the NPPF makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance (PPG) is published alongside the NPPF by the Government to provide further guidance on how policies of the NPPF are to be interpreted and implemented by plan-makers. Section 41 of the PPG relates to Neighbourhood Planning. The PPG adds further clarity on the content, timing and role of Neighbourhood Plans. PPG further reiterates the need to ensure that Neighbourhood Plans provide for a positive planning strategy and do not seek to curtail the amount of development planned at the strategic level.

#### Relationship to the Local Plan

To be found in accordance with the Basic Conditions, Neighbourhood Plans should be prepared to conform to the strategic policy requirements set out within the adopted Development Plan. In the case of the NCNP, the relevant development plan is currently provided by the Milton Keynes Core Strategy and Site Allocations DPD adopted by Milton Keynes Council in July 2013 and July 2018 respectively. Policies from the 2005 Local Plan have also been saved.

The Council has been progressing work with a new Local Plan, Plan:MK. The examination of this plan has now included following publication of the Inspectors Report. This plan will now go to Cabinet and Council in March for approval and to be formally adopted. It is expected that this will become part of the development plan that the NCNP will be formally tested against.

Plan:MK removes the Selected Villages tier from the Settlement Hierarchy instead altering this approach to supporting neighbourhood plans and placing the emphasis on them to deliver new development in villages.

#### Neighbourhood Plan Policies

##### ***Evidence Base Documents – Housing Needs Assessment***

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.

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.

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.

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.

### ***Policy H1 Settlement Boundary***

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 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.

### ***Policy T2 Effects of cross-border growth***

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.

### ***Policy T3 Employment development***

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 weight should be placed on the need to support economic growth and productivity."

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.

### **Conclusions**

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.

Gladman hope that the comments made within this representation have been found to be helpful and constructive. Should you wish to discuss any of the comments made any further please do not hesitate to contact one of the Gladman team.

Kind regards

Richard Agnew  
Planner  
Gladman