

Modifications to Castlethorpe Neighbourhood Plan 2020

CONSULTATION STATEMENT

1. Introduction

This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Castlethorpe Neighbourhood Plan (CNP). The legal basis of this Statement is provided by Section 15 (2) of part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should: -

- i. Contain details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan
- ii. Explain how they were consulted
- iii. Summarise the main issues and concerns raised by the persons consulted
- iv. Describe how those issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

2. Dateline of Events

June 2018 – Chairman’s article in quarterly Newsletter, ‘Castlethorpe News’, tells villagers that we are likely to have to update our Neighbourhood Plan.

1st October 2018 – Castlethorpe Parish Council formally resolves to modify its Neighbourhood Plan and notifies MKC that the Plan Area will be unchanged, that is, the whole of the parish. It also requested an indicative housing requirement.

13th November 2018 – Kick off meeting between Steering Group, Mrs Diane Webber (MKC) and Mr Neil Homer (O’Neil Homer)

December 2018 - Chairman’s article in quarterly Newsletter, ‘Castlethorpe News’, tells villagers that the parish council has decided to update our Neighbourhood Plan

11th December 2018 – MKC Cabinet Member Mick Legg approves paper on Indicative Housing Requirement of one dwelling for Castlethorpe. Paper is published on MKC Neighbourhood Planning webpage.

March 2019 - Chairman's article in quarterly Newsletter, 'Castlethorpe News', tells villagers that work is proceeding on updating our Neighbourhood Plan but are waiting for advice from MKC on allocating further land for housing.

1st March 2019 – MKC advise that it has received a legal opinion that no new allocation of land for housing is needed. (above article was written in February but published in March)

June 2019 - Chairman's article in quarterly Newsletter, 'Castlethorpe News', tells villagers that work on Neighbourhood Plan includes designation of Gobbey's Field as an LGS and also possible new boundary on Conservation Area.

September 2019 - Chairman's article in quarterly Newsletter, 'Castlethorpe News', has just a passing reference to the NP.

December 2019 – Front page on Castlethorpe News gives full description of modifications to NP.

27th January 2020 – Start of Reg 14 Consultation. Every household in village leafleted with description of changes, invitation to submit comments by 11th March and announcement of Open Day on 29th February. Notification sent to all Landowners and Statutory Consultees as per regulation and listed in Appendix. Publication of pre-submission draft NP and Modification Proposal on village website and accompanying announcement on village FaceBook page.

14th February 2020 – MKC completes consultation on SEA and advises that none is needed.

29th February 2020 – Open Day at Village Hall with Parish Councillors present throughout the day and display boards showing changes. 25 residents visited. There were no adverse comments or objections.

11th March 2020 – Reg 14 Consultation ends. The responses from Landowners and Statutory Consultees are given in Section 3 below.

March 2020 – Amendments made to draft Neighbourhood Plan.

5th April 2020 – Submission Neighbourhood Plan passed to MKC.

3. Responses to Pre-Submission Consultation from Landowners and Statutory Consultees

As described in the Dateline above and detailed in the Appendix below, all Landowners and Statutory Consultees, were contacted directly to invite them to respond to the Regulation 14 Consultation. Similarly, all households were leafleted and announcements made on the village Facebook page and website inviting responses.

Their responses are summarised in the table below.

Pre-submission Consultation Responses from Landowners and Statutory Consultees

	Name	Comments	Respondent's Opinion	Action in NP
L1	Mrs J Markham	Proposes inclusion of her land running from Bullington End Road up to Thrupp Close for additional housing.	No comment	See Note 1 below
L2	C Sawbridge	(a) CAS 9 - access to Cosgrove Park should not be allowed over railway bridge (b) 6.1. Gobbey's Field should be considered in list of community assets (c) Annex C Carrington Arms should be re-opened	Agree with NP	(a) No action as access permitted on public highway and across private land (b) Field would be expensive to acquire as Community Asset. LGS designation gives protection to this area. (c) Agree but beyond scope of NP
L3	Mrs A Bouch	No comments	Agree with NP	None
L4	Nula Stanesby	Supports protection of the stone walls around the South Street paddock	Agree with NP	None
L5	Mrs K Filby	Supports designation of Gobbey's field as a Local Green Space	Agree with NP	None
L6	R Forgham	No comments	Agree with NP	None
L7	Nicola Luff	Querying why 11 Bullington End Road not included as 'of special interest' next door is.	Agree with NP	Mistake. No 11 will be added to list.

L8	Sheilagh Loomes	No comments	Agree with NP	None
L9	Joe Kingston	Improvements needed to Sustrans track - keen to be involved Supports climate change policy	Agree with NP	Agree but Sustrans improvement is not a matter for the NP. Will continue to be progressed with MKC.
L10	Michael Shyrane	No comments	Agree with NP	None
L11	Dominic Adatia	More evidence for Gobbey's field LGS allocation than in other Plans	Agree with NP	None
L12	Philip Ayles	No comments	Agree with NP	None
L13	Christine Ayles	No comments	Agree with NP	None
L14	Stephen Bradbury	No comments	Agree with NP	None
L15	Emma Pearson	No comments	Undecided	None
L16	Phillips Planning Services	Objection to Gobbey's Field as Green Space	Disagree with NP	See Note 2 below
L17	Smith Jenkins	On behalf of landowner, proposes inclusion of two plots of land off Hanslope Rd for additional housing.	No comment	See Note 1 below
S1	Natural England	No comments	No comment	None
S2	Anglian Water	No comments	No comment	None
S3	National Grid	No comments	No comment	None
S4	MK Council	(1) Include usage observations in new document to be provided to Examiner (2) 4.2.2 change MKCS to Plan:MK (3) Typo in 6.5	No comment	(1) 'Observations Summary' created. (2) Done (3) Corrected
S5	MK Council	Propose new Policy on Housing Need following comments from Examiner at Lavendon.	No comment	'CAS3 Housing Need' included in NP

Note 1: Three landowners have asked for their land to be allocated for housing. (One was informally requested by phone). All have been advised that no allocation is being made in this Modification.

Note 2: Follows below.

Note 2: Parish Council Response to Objection by Phillip's Planning Services to the Proposed Designation Gobbey's Field as a Local Green Space

1. Previous Examinations.

1.1. The Castlethorpe Neighbourhood Plan was examined by Mr Peter Biggers. In his report dated 30 July 2016, he said, relating to Gobbey's Field in 6.4.26, that Annex B 'does not present any evidence for the statement that Gobbey's Field is "*without doubt the most utilised Green Space in the Parish*" and no evidence to substantiate the range of recreational activities reported to take place on it. I have therefore given no weight to these statements'.

He said that he accepted that it provides a tranquil, green backdrop to the southern end of the village but is not persuaded that this is any different to other areas of countryside bordering the village.

He further added in 6.4.27 that because the village is not identified for development, the need to protect it from development by designating it as an LGS was not justified. This is an incorrect statement because, if NPPF para 11d footnote 7 is engaged, then, unless all conditions in para 14 are fulfilled, there would be a presumption in favour of sustainable development as has happened in nearby Hanslope. This is the reason that the parish council has sought designation to protect this green space in perpetuity.

Despite that the Parish Council disagreed with Mr Biggers's view on need for LGS designation, it realised it had misunderstood the need for evidence rather than assertion. It then undertook a written survey of residents and asked MKC for a second examination of the Gobbey's Field designation only.

1.2. A second examination of the Gobbey's Field LGS designation was undertaken by Ms Rosemary Kidd and she reported in May 2017.

Unfortunately, Ms Kidd said, in her draft report, that she considered 'that the findings of the survey are anecdotal only and do not constitute robust evidence to demonstrate that the whole of Gobbey's Field is used and valued for recreational purposes'.

The Parish Council was shocked that the survey was dismissed and immediately commissioned an actual visual survey of field usage over a full bank holiday weekend. However, Ms Kidd also refused to accept this input.

1.3. As Modifications were being made to the Plan, it was decided to review the LGS status of Gobbey's. A resident offered the Parish Council summary data of usage from his security CCTV which faces the field and incidentally records activity in the field. It should be stressed that the video is at a distance where no individuals can be identified so there is no breach of GDPR. The relevant guidance is "Where the image is of a crowd and does not focus on one individual or a group of individuals, it is unlikely to be personal data as the individuals will not be identifiable. Data

protection law will not therefore apply.” In any case, only the people count and type of use of the field has been made available to the Parish Council in the form of Excel tables which will be submitted in a separate document.

The tables show that there is significant usage of the whole field, about half of recorded usages being outside the public right of way, the path, and therefore the Parish Council decided to submit Gobbey’s Field for designation as an LGS this time with robust empirical evidence.

2. The second condition in NPPF para 100 requires that an LGS is “demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife”

The field is adjacent to and includes part of a SAM, has a rich ecology and its tranquillity was accepted by Mr Biggers. The main thrust of the Parish Council’s position is that the whole of Gobbey’s Field has been used for recreational purposes for many decades and continues to be extensively used today as evidenced by the CCTV counts. Shepperton Close was built in the 1970s and provided very easy access to the field via two easily climbable gates. Not until December 2016 did the owners make any attempt to discourage public access by placing a notice on only one of the gates.

Although only summary data was included in the Annex at Reg14 because of the sheer size of the data, in the light of the objection, the full Excel tables are now submitted as a separate document.

3. The third condition of NPPF para 100 is that an LGS should be “local in character and is not an extensive tract of land.”

The Parish Council recognises that this is a matter of judgement by the Examiner. The field is certainly adjacent to the Fishponds play area, The Chequers, Shepperton Close and, on the east side, Prospect Place. The residents of these traverse Gobbey’s for recreation and access.

On the ‘extensive tract of land’, the Parish Council simply points out that there is precedent in other ‘made’ NPs for larger areas to be designated.

4. Whilst not an NPPF condition, the NP made the point that ‘the Field is substantially different to other fields around the village which could be considered “open countryside”.’ This is disputed by Phillips.

All the other fields are bounded only on one side, rolling away to open countryside. Gobbey’s, by contrast, has the railway line to the north, the play area and two estates to its full western boundary and Prospect Place to its east. It is only completely open to the south running down to the river Tove and for the eastern boundary below Prospect Place. Furthermore, Gobbey’s has never been used for arable unlike other fields to the north and east but only for occasional grazing and, of course, recreational use!

Appendix: List of Landowners and Statutory Consultees

<p>1 Land owners, tenants and interested developers</p>	<p>Mrs J Frost</p> <p>Mrs R Sawbridge</p> <p>Mr & Mrs J Richie</p> <p>The Owners, Gordon’s Lodge Farm</p> <p>Gobbeys Field: KEYNES INVESTMENTS LIMITED and KEYNES INVESTMENTS LIMITED (incorporated in Isle of Man)</p> <p>Mill Farm</p> <p>Simon Hill</p> <p>Land to south east of Station Road: RUPERT FRANCIS JOHN CARINGTON and JEFFREY ALAN CLOKE of Carington Estates</p> <p>Mr Luke Stacey, AR Stacey & Sons</p> <p>Glenmore Farm: Ian Markham</p> <p>Field beyond Shepperton: THE HONOURABLE RUPERT FRANCIS JOHN CARINGTON and JEFFREY ALAN CLOKE of Carington Estates</p> <p>John Holes</p>
<p>2 Milton Keynes Council Planning</p> <p>3 Milton Keynes Council Highways</p> <p>4 Milton Keynes Council Schools Liaison Team</p> <p>5 Milton Keynes Council Infrastructure Coordination & Delivery Team</p> <p>6 Milton Keynes Council Housing Policy & Development</p> <p>7 Milton Keynes Council Planning Obligations</p> <p>8 Milton Keynes Council’s employment consultants – Bilfinger GVA</p>	
<p>9 Milton Keynes Clinical Commissioning Group</p> <p>10 NHS Nene Clinical Commissioning Group</p> <p>10 NHS England - Area Team</p>	
<p>11 Councillors of Unitary Authority</p>	

	representing the area	
1 2	Adjoining Parish Councils	Cosgrove Old Stratford Gayhurst Grafton Regis Great Linford Hanslope Haversham Potterspury Sherington Stoke Goldington Stony Stratford Tyringham & Filgrave Wolverton Yardley Gobion
1 3	Housing Associations in the area	Guiness Hastoe
1 4	Affected Utility Companies and water and sewerage organisations	eOn Anglian Water
1 5 1 6 1 7 1 8 1 9 2 0 2 1	The Environment Agency Thames Valley Police Buckinghamshire Fire Service. Natural England English Heritage The Coal Authority The Homes and Communities Agency Homes England	
2 2	Businesses in the parish	Businesses at Lodge Farm Business Centre and Lincoln Lodge Business Centre c/o Philip Sawbridge: Rentakeeper/The Shooting Clinic Charles Sawbridge Manor Farm b&b Cosgrove Park caravan site
2 3 2	Tele-communications agencies including the Mobile Phone Operators Association British Telecom	

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2 5	The National Grid	
2 6	Religious bodies in the community	Castlethorpe church
2 7	Public transport providers operating within the area	MK Bus Users Group
2 8	Local schools	Castlethorpe First School Hanslope Primary Stantonbury Radcliffe St Pauls
2 9	Medical centres	Hanslope Medical Centre c/o practice manager: Northampton Hospital Milton Keynes Hospital
3 0 3 1 3 2 3 3 3 4 3 5 3 6	Network Rail The Highways Agency Community Foundation Community Action MK Equality Councils MK Council of Faiths - SACRE Disability Action Group	Milton Keynes Centre for Integrated Living
3 7 3 8	Member of Parliament for MK North Member of Parliament for MK South	
3 9	Local Green Spaces	Gobbeys Field: c/o James Painter Village Green: MKC Public Realm Services Castlethorpe Sports Committee Allotments Association c/o Tim Flach South Street Paddock: Carington Estates:
4 0	Marine Management Organisation	

4	Canal and Rivers Trust	
1		
4	Bedford Group of Drainage Boards	
2		
4	MK Chamber of Commerce	
3		-