Source	Summary of comments
Natural England	Natural England does not have any specific comments on the final draft of this neighbourhood plan.
	Generally welcomes the Neighbourhood Plan and considers that it will provide a valuable framework to guide the future sustainable development of the community.
	Particularly supportive of Policy 15 on Open Space including the plan to designate the greenspace at Cofferidge Close as Local Green Space.
Historic England	Neighbourhood Plan Policies
	Policy 2: We welcome the requirement for development at Cofferidge Close to be complementary to the conservation area and, more specifically, for the stipulation of a maximum height of three storeys to maintain the area's character. Guidance on the design of new development that is required to protect the established character of an area is justified within the advice provided at paragraphs 60 and 61 of the NPPF to protect local distinctiveness and to preserve and enhance the character or appearance of the conservation area. We also welcome the 'aim' to reinstate the original scheme for Cofferidge Close although we would suggest that to guide decision making to deliver sustainable development this would be better expressed with the following wording:
	"schemes that contribute to the reinstatement of the original design of Cofferidge Close will be supported".
	In order to provide a more unified approach to the management of the site within a single policy we consider that including paragraphs 1 and 2 of Policy 15 within Policy 2 would be appropriate as a clearer guide to decision making. The bullet points of paragraph 2 of Policy 15 would be appropriate to include in the supporting text.
	Policy 3: we support the requirement to protect the area's commercial character as an important element of its contribution to the historic interest and character and, therefore, significance of the conservation area. We support the requirement for development within the area surrounding the square defined on Map 5 to contribute to the enhancement of the public realm within the square if this is the intention.
	Policy 4: we support the requirement for development of the Plough Corner site to use a style of development that is sympathetic to the neighbouring listed building. However, we would suggest adding "locally distinctive and in a style sympathetic to and that sustains the significance of the adjacent listed building" to ensure the policy takes into account the needs for management of heritage assets set out in the NPPF.
	Policy 5: We support policy 5: Shopfronts as an appropriate response to the need to protect the character and appearance of the

conservation area. The policy provides guidance to decisions affecting a particular element of the conservation area's special historic or architectural interest the character or appearance of which is desirable to preserve or enhance in response to an identified risk. This provides implementation of national and local planning policy and legislation at the neighbourhood level.

Policy 9 Development Proposals: The map and list of sites allocated for development do not provide sufficient detail to determine what effect these proposals will have on the historic environment. The absence of any indication of the quantum of development proposed makes it particularly hard to determine what impact development of these sites would have and whether their allocation is appropriate. In particular the allocation of the St Giles residential home and 'part of' the adjoining playing fields is particularly vague and includes land both within and in the setting of the conservation area. Whilst the policy wording requires that the scale and design of development should reflect the quality of location and its heritage, this falls short of paying special attention to the desirability of preserving or enhancing the area's character or appearance as required by the Planning (Listed Buildings and Conservation Areas) Act 1990, or giving great weight to the conservation of a designated heritage asset as set out in the NPPF. Without a map clearly showing the allocation sites we would question whether the policy is sufficiently detailed to provide certainty and, were a map to be included in the plan retrospectively, whether the policy had been subject to appropriate consultation. Moreover it is unclear from the plan how these sites have been selected, what assessment of their impact on the historic environment has taken place and what alternatives have been considered. As such we do not consider that, at present, this policy would deliver sustainable development and neither is it clearly in conformity with the NPPF or strategic policies of the local plan.

Evidence Base

We have previously advised on the desirability of preparing a conservation area appraisal to inform the plan and this is an example of where an appraisal would help to determine what the contribution of this site is to the area, what the potential impact of development would be on the area's significance and what policy requirement would be necessary to avoid or minimise harm from potential development proposals, where an allocation is seen to be appropriate. This would also help to ensure the plan meets the requirements of the NPPF at Paragraphs 58 to 61 to prepare policies for the design of new development that are informed by understanding and evaluation of its defining characteristics, responds to local character and history, promote or reinforce local distinctiveness and that address the connections between people and places and the integration of new development into the built and historic environment. Without this piece of evidence we feel there is some uncertainty with regards to the sustainability of the developments proposed by Policy 9 in particular.

Given Stony Stratford's status as a settlement of, at least, medieval origin and its position on a Roman road, considering the archaeological potential of the proposed allocation sites should be a priority. This evidence is required to ensure that any allocation

	policy for sites identified as having a high potential for the presence of previously unidentified heritage assets includes sufficient requirement to undertake appropriate archaeological investigations to conserve any heritage assets that may be present in a manner appropriate to their significance. This is necessary to ensure the plan is in conformity with the National Planning Policy Framework.
	Strategic Environmental Assessment
	We note that, in response to the City Council's screening opinion of 17 th October 2013 we confirmed our agreement that the plan would not require the preparation of a strategic environmental assessment. However, this was based on the information presented at the time that the plan would not allocate sites for development. As the plan will now allocate sites for development that have not previously been assessed through an SEA, including assessment of the likely significant environments effects such as effects on the conservation area or the settings of listed buildings and reasonable alternatives, we would suggest the plan does need to be subject to SEA, and that without it there would be concern that the plan does not meet the basic conditions. I have appended our response of 18 th November 2013 for information.
Sport England	Policy 9 – Development Proposals: Sport England is concerned that <i>Policy 9 – Development Proposals</i> appears to advocate the loss of the playing field adjacent to St. Giles. Unless there is a robust evidence base to suggest otherwise and/or equivalent provision in terms of quantity, quality and accessibility would be provided, Sport England would object to any proposal resulting in the loss of playing field. Sport England therefore considers that at this stage <i>Policy 9 – Development Proposals</i> is contrary to the NPPF and Sport England's Playing Field Policy.
	In order to overcome this concern, Sport England strongly advises that the words 'plus part of adjoining play field' is omitted from Policy 9 – Development Proposals bullet point 4.
	Furthermore, in light of the above, Sport England recommends that the design brief for St. Giles Mews, mentioned in paragraph 15.2, ensures the playing field is protected unless robust evidence suggest otherwise.
Owner of Fullers Slade Local Centre	It should be remembered that Fullers Slade is a part of Stony Stratford and should not be used as a dumping ground for the wealthier parts of the town.

Policy 1 seems to be focussed on the High Street but I would point out that the Fullers Slade local centre equally provide commerce and employment and should be supported in the same way.

Section 9.1 page 18 refers to the local centre, as five units for retail and services, including a hairdresser, fish & chip shop and car repairs. It fails to mention the Chinese takeaway or the convenience store, but does stress its importance to the local community and that it is important to retain this mix.

Policy 6 Sustaining and enhancing Fullers Slade local centre. The Map 6 reference is confusing; Map 6 shows the Plough corner on page 15.

Map 7 places my property in the Cavendish package. I find my active, occupied commercial properties lumped in with the vacant site of the former public house, a site that is owned by the Council (?) and has been derelict for 16years. There is a planning gain on the local centre for 14 flats of which there is no mention. Note the council "does not own the local centre site".

Section 9.3 page 18 The Cavendish site could be developed. Housing is an obvious choice as it is a brownfield plot. The noted Christian centre /community/training/workshop facility seems a commendable aim but would not work as there is an industrial centre across the road at kiln farm, with lots of empty units, units on top of the galley hill centre and a sure start centre in moorfoot that are all under used.

In 2004 regeneration was put to the people of Fullers Slade, and they were given a choice of what development they wanted on Fullers Slade, we were given 5 different scales of development, and there was an overwhelming support that all that was wanted was the development of the Cavendish site for low density housing, I was told that £140,000 was spent on compiling all the reports and told that all the section 106 payments would be ring fenced for improvements on the estate. For this neighbourhood plan, there has been little direct engagement in Fullers Slade

The policy frequently states that the Plan (inc 9.5 page 19) supports engagement with the local community but nobody has bothered to contact me to discuss any plans for the Cavendish site which suddenly includes my land.

Policy 8 page 21 refers to the "Design Guide". It does not identify this document but I assume that it is the guide dated April 2009. This is a broad brush, well-meaning but limited document and cannot be considered to offer the depth of the "provisions" inferred.

The 15.7 Action Plan page 40 includes "Action - community training workshop facility Fullers Slade / Funding - grant funding / timetable - Short term". This is commendable for the Cavendish plot but should not include any reference to my premises. Policy 9 page 22, again, refers to the Cavendish site for a workshop facility. This relates to the earlier policy 6.

The plan should not breach the European Convention on Human Rights (ECHR). My rights as the landowner of 76-83 Shearmans appear to have been breached in the proposals stated in this Plan, for failing to take the basic courtesy and talk to me. I also believe the human rights of the people of Fullers Slade have been breached, as they have not had the basic decency of anybody coming to talk to them and discuss this plan with them.

Alderman Bartlett

The Neighbourhood Plan fails to deliver crucial guidance, there are few proposals and many aspirations. There are many views and very little evidence to support them.

The survey questionnaire that was used at the start of the plan's preparation did not ask the right questions in the right way to gain the necessary information.

Many 'views' and Plan content are set on private land. Land which neither Stony Stratford Town Council or Milton Keynes Council has any control of. In particular, Plough Corner, the Wellington Public House and the former tram sheds are prime examples. If private land and property owners wish to develop their investments then at that point and that point only can the SSNP, if adopted, come to the fore. Even Cofferidge Close, which is currently a wasted opportunity, is in private hands. If the owners' of any of these sites wished to develop them then of course the planning and social aspects of the SSNP if adopted would come into play.

Policy 2, Cofferidge Close. This location is and will remain in private hands. The owners have for some time sought to redevelop the building and surrounding area. These plans have been both supported and opposed. Supporters do not have any legal redress. Opponents do and this is reflected in the Policy contained within the Neighbourhood Plan eg in bullet points 4 and 7 which refer to reinstating the integrity of the original design and a new supermarket within the existing building envelope.

Both statements seek to influence future development proposals in an attempt to retain the existing building which is the subject of continuing lively public debate.

Further, in the paragraph which refers to any re-development, all of the possibilities listed are negated by the final one which refers to retaining the integrity of the original design (a definition of this is not given and one must thus assume it means no change to the existing building).

In addition, no discussions have been held for any medical facilities being included in Cofferidge Close now or in the future. The Plan demonstrates no desire to redevelop the site, point 5.6 states that the Town Council will seek national and local protection (ie some form of listing) to stop any changes to the existing structure.

The Plan fails to provide sufficient guidance and decision making on Cofferidge Close to warrant its inclusion in the Stony Stratford Neighbourhood Plan (in its current form). It is biased towards stopping the redevelopment of this important and ageing site, much of which has been empty and unused for a number of years. There is nothing that realistically encourages the delivery of improvement to Cofferidge Close.

Policy 3, Market Square: weak policy; supporting information overstates the commercial nature of Market Square and makes no specific proposals for the public realm. In essence, Market Square consists of some residential; some Health; some limited use commercial and some office space. There is no retail use other than a long established pharmacy (and two hairdressing salons). Options on delivery are not overly detailed and specific enough to warrant inclusion in Neighbourhood Plan as it currently stands.

Policy 7, Plough Corner: only the public footpaths and highways are within the direct remit of a local authority. The alterations to this location as given in the Plan are thus largely not possible without the agreement of private owners. Like so much of the NP, little real thought appears to have been given to this. The existing road lay out works very well. Traffic is managed safely and there is no record of accidents that would prompt a call for major change.

This location is dominated by listed buildings on three sides and the fourth, 8 London Road is over three hundred years old though not listed. It is difficult to see how, for example, one could remove the petrol station which serves the town well. On the northern side of Wolverton Road, the food businesses are located in listed or historic buildings. The suggestion of a internet shop is not something that falls within the remit of the NP. This is a commercial decision that would need to be taken by a business owner/lease holder.

Policy 12, Accessibility and Connectivity: there are few traffic management problems in Stony Stratford. In the past, High Street was a problem and now is not following the introduction of a one way system. Suggestions for a shared surface are ill considered. Stony Stratford High Street is a major thoroughfare for primarily local traffic. This includes delivery and service vehicles to various premises, a number of which only have front access. There are some very localised issues including the junction of New Street with

Vicarage Road/ Russell Street which are not addressed at all in the Plan. This is the town's most sensitive junction.

The road junction of Queen Eleanor Street and London Road works very well and provides a calm and attractive entrance from the south. There is no evidence to suggest the need for another roundabout at this location. Roundabouts are only needed where they serve a purpose and in an historic town such as Stony Stratford they serve to urbanise the environment. Including this proposal within the Policy without any analysis, environmental and statistical supporting information, is inappropriate.

The extension of Ridgeway to the west has long been mooted and each time it comes to the fore it is rejected. This is for very simple reasons. It is not needed; it would bring surrounding land into a potential development envelope; and it would bring enormous problems to surrounding hamlets including Passenham, Beachhampton and Nash. In addition, it would destroy the tranquil nature of Calverton and in particular, Middle and Lower Wealds. In effect, it would become a southern by-pass with nowhere to go. The existing road network serves the town and neighbouring parishes in Milton Keynes, Aylesbury Vale and South Northamptonshire, well.

An extension could encourage considerably more traffic along Horsefair Green, Silver Street and Calverton Road and in nearby villages as traffic travels to the junction of an extended Ridgeway and then east or west across what are now fields. In addition, there would be suggestions of a further extension through and beyond Passenham to Old Stratford which would decimate historic and nationally recognised meadows.

Policy 14, Review the Extent of the Conservation Area: The conservation of Stony Stratford is the core reason why so many residents live in the town, visit the town and work/run businesses in the town. Its buildings are of great importance and the Plan must protect against damage to buildings within the Conservation Area that are listed. Likewise, the Plan should not be used as a means to list and protect buildings that are better re developed and which are relatively new to Stony Stratford and in essence, do not contribute the historic townscape of Stony Stratford. For example, would Cofferidge Close and the Health Centre and Library meet the criteria of the Stony Stratford Design Guide if proposed today?

M O'Sullivan

MK Council's recently promoted the possibility of further development on the west edge of Tudor Gardens in the form of possible housing on what was designated as "Site U30". In the event, the Council has decided that U30 does not present itself as a suitable site. Viewing the 'creep' issue from a Latimer/Tudor Gardens more parochial standpoint, Stony Stratford would benefit from a sharp demarcation from the rural domain in this specific instance. In effect we would be talking of either a formal or an informal mini-

	green belt being established between Stony's development edge at Tudor Gardens and the Calverton hamlet. To make such a strip more useful I formally propose the following. "That, to the rear of Tudor Gardens, a landscaped parkway with footpath/redway routes be created to offer a recreational link between the emerging Area 11 and Mortimer Park cum the linear parkway along the river and, via Calverton Road, Stony Stratford generally".
Anglian Water	Policies 1 – 4 and 5 - It is noted that the above policies are intended to be used in the determination of planning applications within Stony Stratford Town Centre. At this stage the scale and type of use(s) proposed is unknown. Therefore we intend to comment further on any proposals in these areas as part of the planning process dependant upon the scale of the proposed development.
	Policy 8 Enhancing Residential Amenity Reference is made to development which will have a detrimental impact on flooding not being permitted. Anglian Water comment on planning applications to ensure that we understand the impact on the public sewer network and ensure that that there is available capacity or suitable mitigation measures can be put in place.
	Policy 9 Development Proposals Reference is made to residential development proposals which will have a detrimental impact on flooding not being permitted. Anglian Water comment on planning applications to ensure that we understand the impact on the public sewer network and ensure that that there is available capacity or suitable mitigation measures can be put in place.
D Tavener	I would like to raise a concern over the proposed blanket introduction of a 20 MPH limit as there is not conclusive evidence that this is any safer. Drivers could be concentrating more on their speedometers than looking on the road and pedestrians might think themselves safer and drop their guard and walk into the road assuming they are in a "safe" area. At times it is difficult to get drivers to adhere to a 30 MPH limit why is there an assumption that a 20 MPH one will be followed.
	The council should focus on ensuring the roads are uncluttered giving drivers and pedestrians the optimum chance to observe each other and take action to avoid an accident. Speeding by the minority of drivers should have penalties applied to them not the majority who do comply. Traffic calming does the reverse as frustrated drivers try to make up lost time and in the case of humps suffer damage to their vehicles and their health.
	Free movement of traffic is essential for our future and we should be expanding our road network to cater for growth. Public

transport does not suit individuals' needs and is very unlikely to be adopted by the masses, the only area where this would work is school busses which would eliminate a lot of early morning congestion. Compliance with national policies and advice M Moutrie It is generally expected that a Neighbourhood Plan (the Plan) should above all else be completed before it is submitted for examination. However the Plan is far from finished and much work, identified within the Plan, remains to be done, including reviews, assessments, discussions and consultations with others including the local community. For example, the Plan acknowledges that the following work is outstanding and is presumably necessary for the satisfactory completion of the Plan: · Consultation with residents of Fullers Slade on the Cavendish site (clause 9.3) and regeneration · Assessment of Galley Hill local centre · Assessment of housing need · Consultation with local residents about a skateboard park · Consultation with highway authorities and others to produce a traffic management plan · Review of car parking · Review of the Conservation Area including update of the Design Guide2005 and review of street furniture · Review of the open space in Fullers Slade and Galley Hill. All of this work should have been done within the Plan process and section 15 includes a list of future actions. It is not clear how this future work affects the Plan or whether the Plan is to be reviewed or updated on its eventual completion. The Plan does not include a Proposals Map which makes it difficult to interpret some of the policies and will confuse their application. Several of the maps in the Plan are erroneous. The parish has a significant and diverse local economy that is mainly, but not exclusively, in the town. It is not evident that the Plan understands or values sectors apart from retail (A1 use) and consequently has little or nothing to say about protecting or even developing them. Much of the actually existing local economy is therefore bereft of guidance. The Plan seems to say nothing about wildlife, biodiversity or ecosystems even though a significant amount of open space, including

a nature reserve, falls within its area.

Policy 15 seems mainly concerned with the landscaped areas associated with Cofferidge Close. It lists only five areas to be protected; and 11 other sites to be improved and enhanced. Two of the sites to be protected are erroneously omitted from map 12; there is no map for the other 11; there is no Proposals Map showing all the open spaces; and most of the open space in the parish, including the nature reserve, is therefore bereft of guidance and protection.

A Guide to the Historic Buildings of Milton Keynes by Paul Woodfield and Milton Keynes Development Corporation published in 1986 identifies 171 historic buildings in Stony Stratford. The Historic Town Assessment published in 2014 by English Heritage provides valuable information on the archaeological, topographical, historical and architectural evidence that should inform any consideration of conservation within the Plan. There is no evidence that either of these publications, or anything similar, has informed the Plan's policies on conservation and the historic environment. It could be argued that with so much built heritage in the parish this is the single most important issue for the Plan to address. However it actually says effectively nothing.

Policy 5 refers to guidance for shopfronts and signage in the Design Guide 2009 but the Guide actually provides no particular guidance for these features. Policy 13 commits to a future programme of street audits and policy 14 to a future review of the Conservation Area. Unfortunately map 11 erroneously omits the areas of new heritage to which it refers.

The Plan does not comply with either the Core Strategy 2013 or the Local Plan 2005. The Plan for Stony Stratford 1989 is old and is non statutory but nevertheless remains a useful guide and is an interesting comparison.

The Stony Stratford Design Guide 2009 appears to be included in this consultation and annex A of the Plan refers to Design Guide without elaboration. It is not clear whether it is now to be part of the Development Plan but its inclusion would be a departure from the pre submission version October 2104 which referred to it but did not include it. Its status should be clarified.

The Plan says in clause 3.6 that it takes precedence over any policy for specific local developments. This seems to be a broad power as by definition the Plan is concerned only with local developments. This appears to be a major departure from the pre submission version of October 2014 which merely noted that the Plan had the ability to update or replace existing specific local policies. Many policies in the Local Plan 2005 currently provide valuable guidance that would apply to any local development and if the Plan takes precedence then it would be detrimental to Stony Stratford as some of the Plan's policies are inferior versions of those in the Local

Plan 2005. The meaning and implications of clause 3.6 should be clarified.

Nevertheless several of the Plan's policies do not comply with the Local Plan 2005 as follows:

- · Policies 1 and 3: policies TC3, TC4, TC18
- · Policy 8: chapter 4 including policies D1, D2, D4, D5, D6, D7 and possibly D8
- · Policy 10: policies L2 and C2
- · Policy 11: chapter 7 including policies T2, T12 and T15
- · Policy 15: policies S10, S12, L1 and L2

Compatibility with the ECHR

The Plan must be compatible with the European Convention on Human Rights (ECHR) and consider, in a meaningful way through consultation, the interests of those affected by development. Regulation 14 of the Neighbourhood Planning Regulations (SI 637) requires that the Plan must be publicised in order to bring it to the attention of all those who live, work or carry on business in the area.

The town council sought advice from Locality, on how to comply with these requirements, and they produced in March 2013 the Communications and Community Engagement Programme. The C&CEP, approved by the town council, set out a comprehensive and systematic process of meaningful consultation in order to produce the Plan in accordance with the ECHR and SI 637. It comprised a four stage process with the necessary practical actions at each stage for developing

the Plan. Unfortunately the subsequent consultation process disregarded the C&CEP. Instead it appeared to be mainly a general survey in early 2013 and a yes/no questionnaire at the end of 2014. The questionnaire followed the publication of the pre submission version of the Plan, despite the advice of Locality that such a questionnaire was of little or no value.

The Engagement/Consultation Statement lists all responses and it appears that some, perhaps even many, residents were likely to be aware of the process even though it may have been difficult to constructively engage with. However there is no evidence of any publicity likely to bring it to the attention of those who worked or carried on business in the parish or of their involvement. The parish has a diverse local economy, mostly located in the town, including many small businesses, health, education, social care; and a relatively large night time sector. There is no evidence that there was meaningful engagement with any of these establishments or that they were made aware of the process.

	There is no evidence that any of the land owners of the sites identified for development, apart from Cofferidge Close, were ever contacted.
	The December 2015 submission version is noticeably different to the October 2014 pre submission. Some of the changes since October 2014 are improvements. Nevertheless, many of them are significant and altogether this version of the Plan appears to be materially different to the pre submission version of October 2014. There has been no public consultation on these changes and perhaps there should have been meaningful consultation on them before this submission?
	Conclusion
	It has taken over five years to reach this stage and it is evident that the Plan:
	· does not comply with national guidance
	· does not comply with the Development Plan
	· does not comply with the ECHR requirements
	The Plan should not be approved. However: it is not obvious as to what should happen next as it is doubtful that, after five years, there is now sufficient resource or commitment to complete it satisfactorily. Perhaps it would be best to suspend the Plan and use the work to date both to update the Stony Stratford Health Check 2004 and to contribute effectively to the production of Plan:MK, the Preferred Options of which is due to be published in September 2017.
MKC, Transport	The Neighbourhood Plan makes reference to, as part of the parking review, that it would seek a change to parking standards from
Development	needing 3 spaces rather than 2 for three bedroom houses. We would not be able to support this because all other urban areas in
Management	Milton Keynes which are outside of zone 2 (town centre) are zone 3 and have a 2 space requirement for 3 or more bedroom
	dwellings. This would put this type of development for Stony Stratford requiring a new zone and therefore a special case and in
NAVC III.	doing so would put it above the level required even in the rural areas of Milton Keynes (zone 4).
MKC Housing	Object to proposals in the draft Neighbourhood Plan to reserve affordable housing in your area solely for local people.
Service	We understand that the plan is trying to maximise the benefits of development for the local community. It is also gratifying to see
	that you understand the importance and the vital role of affordable housing in promoting mixed and sustainable
	communities. However, Milton Keynes Council currently has over 400 homeless households in temporary accommodation that
	require affordable housing. As a result, we are unable to agree to a policy that seeks to restrict affordable housing solely for local people. As I am sure that you will appreciate, this would have the effect of diminishing the amount of affordable housing available
	people. 75 fair sare that you will appreciate, this would have the effect of diffinishing the amount of anothable housing available

to the Council to enable it to discharge its statutory duties as a housing authority. You have however used a phrase elsewhere in your Plan which says that '...schemes within the parish should deliver housing which responds to local needs' and we feel that this would be a more appropriate form of wording.

We have also noted your aspiration about Milton Keynes Council "resourcing and undertaking a housing needs assessment in the parish within an acceptable timeframe. Subject to its outcome, the requirement for affordable housing and the size of site threshold could be amended from the current levels to ensure that schemes within the parish deliver housing which responds to local needs." However, given our budgetary constraints, we will not be able to assist as we do not have the resources to fund or undertake specific housing needs assessments in particular communities.