

Emberton Neighbourhood Plan 2019 - 2031 (Regulation 16 Submission)

Consultation Response for and on behalf of Acorn (MK) Nurseries and Francis Jackson Homes Ltd.

1.0 Introduction

- 1.1 This document and the representations within it have been prepared by Paul Johnson MA (Cantab) MA TP MRTPI, Land and Planning Director at Francis Jackson Homes Ltd.
- 1.2 Francis Jackson Homes (FJH) secured an Option Agreement on the site known as Acorn (MK) Nurseries, Newton Road, Emberton, MK46 5JW, located within the Parish (and Neighbourhood Area) of Emberton (Milton Keynes City Council (MKCC) Planning Authority area) in March 2021. A site location plan of same is attached as **Appendix 1**.
- 1.3 These representations are submitted jointly for and on behalf of Ian Pretty and Steve Burchmore of Acorn (MK) Nurseries, and Francis Jackson Homes Ltd.
- 1.4 Acorn (MK) Nurseries is a retail garden centre use – as confirmed by the Certificate of Lawfulness Existing, reference 22/00539/CLUE, dated 1st November 2022, and attached as **Appendix 2**.
- 1.5 Before FJH's involvement, the Acorn (MK) Nurseries site was promoted by the landowners directly via an independent planning consultant. As a result, the Acorn (MK) Nurseries site was identified as the preferred housing site in the emerging Emberton Neighbourhood Plan (ENP) 2019 to 2031, Regulation 14 Submission version, dated February 2020. A copy of that version of the ENP is attached in full as **Appendix 3**.
- 1.6 We are aware that Emberton Parish Council (EPC) has since submitted the Emberton Neighbourhood Plan (ENP) to MKCC under Regulation 15, and under Regulation 16

of the Neighbourhood Planning (General) Regulations 2021, MKCC are now publicising the submitted ENP.

1.7 Our objections and comments concerning the Regulation 15 submission process, and Regulation 16 version of the ENP are set out in detail below, but are summarised thus:

- **Proper legal process has not been followed with regards to the consultation of the ENP and as such, the legal Regulation 15 requirements have not been addressed or met**

Legal Opinion has been sought regarding the legality of the consultation process undertaken to date, and is provided by Satnam Choongh (Barrister) of No5. Chambers (copy attached in full as **Appendix 4**).

This confirms that legally, MKCC must refuse the proposal put forward by the qualifying body, and that it would thus be unlawful for MKCC to submit the draft plan for independent examination.

If MKCC have already advised the qualifying body that it is satisfied, it must reconsider and reverse its decision in light of the evidence provided herein and the attached Legal Opinion, and instead issue a decision under Schedule 4B(6)(4)(b).

Further, as a result of this we seek an undertaking that MKCC will not submit the plan for examination under Schedule 4B(7) accordingly.

If these steps are not undertaken promptly by MKCC, we reserve the right to challenge these steps by way of an application for Judicial Review.

- **Failure of the submitted ENP to comply with the Basic Conditions**

Detailed responses are set out in full below, but can be summarised as: -

- Contrary to paragraph 71 of the NPPF, the ENP through its small housing allocation and revised settlement boundary policies, prioritises the residential development of back land (not infill), greenfield, garden land over previously

developed land, also contrary to paragraphs 119 and 120 of the NPPF, as well as the results of the Village Survey Questionnaire;

- The development strategy and windfall policy are not genuinely positively prepared (and thus conflict with paragraph 35 of the NPPF), nor does it accurately support housing development that reflects genuine local need (contrary to paragraph 78 of the NPPF) and thus fails to help the community to grow and thrive (contrary to NPPF paragraph 79) – such tightly framed and restrictive policies are in fact likely to restrict, not boost (contrary to NPPF paragraph 60), the supply of housing land within the Plan Area;

- Contrary to paragraphs 66 and 67 of the NPPF, we consider the housing needs evidence to be silent and not based on evidence. The evidence base is significantly flawed in this regard and the lack of any record held by MKCC of those in housing need in villages does not mean that there is no need - which has not been critically quantified or assessed based on any normal measure of same (census data, recent Housing Need Assessment undertaken by an independent 3rd party, population and demographic analysis, etc.). The Housing Needs Assessment is fundamentally flawed and does not actually ask those locally about their need;

- The evidence base Village Questionnaire, housing market data, and assessments in the Potential Housing Sites are out of date and thus do not provide a robust, up to date basis on which to base the ENP.

2.0 Failure of the ENP to follow proper legal process

Matters of Legality concerning the Regulation 15 Consultation Statement – February 2023

- 2.1 The ENP is being publicised by MKCC from Friday 10th March 2023 to 5pm on Friday 21st April 2023.
- 2.2 A Consultation Statement dated February 2023 is provided to purportedly address the requirements of The Neighbourhood Planning (General) Regulations 2012, Part 5, Regulation 15.
- 2.3 Regulation 15 (2) c) requires such a document to summarise the main issues and concerns raised by persons consulted and, d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 2.4 The Emberton Parish Council website states that the submitted document fulfils these requirements.
- 2.5 Representations were made to the 2022 Regulation 14 Consultation of the ENP jointly on behalf of Francis Jackson Homes Ltd., and Ian Pretty and Steve Burchmore of Acorn (MK) Nurseries – the retail garden centre use (and former housing allocation) located and operating within the designated Neighbourhood Area on Friday 10th June 2022 (see **Appendix 5.**)
- 2.6 These representations were receipted as received by the Parish Clerk on 13th June 2022 (see **Appendix 6.**) within the consultation deadline.
- 2.7 Notwithstanding the above acknowledgment of receipt, there is no reference whatsoever in the February 2023 Consultation Statement to these representations, nor any specific comment on, or response to any of the points raised. They are simply not recorded. The document is silent with regards to their existence, content and submission.

- 2.8 Representations (again jointly made) were submitted to the 'Call for potential housing sites' 2021 (as described in paragraph 1.19 of the Consultation Statement). These are set out in **Appendix 7.**, comprising a covering e-mail, Site Location Plan, Call for Sites Form and Supporting Document.
- 2.9 This was receipted by the Parish Clerk via e-mail dated 19th November 2021 (see **Appendix 8.**)
- 2.10 Nowhere in the 2023 Consultation Statement nor Assessment of Potential Housing Sites documents is the submitted supporting information summarised, nor are any site specific representations listed, assessed or addressed.
- 2.11 How is anyone to know what has been said, by whom and by what process this information been discounted, considered or taken on board by the ENP Steering Group? The documents are totally silent on this and the process is not thusly transparent, empirical or evidence based.
- 2.12 The Publicity Statement Summary on the Emberton Parish Council Website - see www.embertonparishcouncil.co.uk/neighbourhood-plan states: -

I have previously made comments on the draft plan to Emberton Parish Council on their Neighbourhood Plan, do I need to repeat those comments?

All of the issues raised in response to the pre-submission consultation are included in the Consultation Statement that Emberton Parish Council has submitted with the Plan. As a result, the Examiner will be aware of those comments, so you do not need to repeat comments previously made. However, if any changes have been made to the draft Plan that you previously commented on that raise new issues or affect the points you made last time, or if no changes were made to the Neighbourhood Plan following your comments, then you might want to send in some further comments now. All comments made at this stage will be sent on to the Examiner by Milton Keynes City Council.

- 2.13 We are gravely concerned that due process has not been followed in this instance, and the notable, receipted representations made to date at both the final Regulation 14 stage, and the most recent 'call for sites' stage have not, for some reason, been recorded or responded to, and as required, fed into the development of the emergent ENP in an open, transparent and democratic manner.
- 2.14 As these representations are not recorded in any way, they will not make it to MKCC or the Inspector of the ENP, who will be unaware of the views and contents therein. Clearly, not "all of the issues raised...", as stated above, will be considered by MKCC nor the Inspector as drafted, because it is as if they do not exist.

2.15 Given the above concerns are of a fundamental nature to the legality of the ENP, Legal Opinion has been sought from Satnam Choongh, Barrister of No. 5 Chambers. This is attached in full as **Appendix 4**.

2.16 Paragraph 13 of that Legal Opinion confirms,

“There has been, on the basis of the evidence set out above, a clear breach of Reg. 15(1)(b) in that a consultation statement, as defined, has not been submitted to MKCC. What has been submitted does not do what the regulations expressly require a consultation statement to do.”

2.17 Paragraph 19 goes on to clearly state: -

“In this case MKCC cannot be satisfied the requirements of the Regulations have been met, because the consultation statement clearly has not done what it is supposed to do. The LPA is duty bound to refuse the proposal submitted to it, and explain to the NP SG why it has refused it. It has no power under Schedule 4B(7) to submit the plan for examination because it cannot be satisfied the matters mentioned in para. 6(2) have been met or complied with.

On the basis of my instructions, and what I have read in the Consultation Statement, it is wrong for MKCC to state (as it does on its website) that

‘All of the issue raised in response to the pre-submission consultation are included in the Consultation Statement that Emberton Parish Council has submitted with the Plan.’

2.18 The Legal Opinion confirms MKCC must refuse the proposal put forward by the qualifying body, and for the same reasons as explained within the Legal Opinion, MKCC cannot legally put the ENP plan forward for Examination.

2.19 If MKCC has already advised the qualifying body under Schedule 4B (6)(4)(a) that it is satisfied that the matters mentioned in subparagraph (2) have been complied with, MKCC must reconsider and reverse this decision, and instead issue a decision under Schedule 4B(6)(4)(b).

2.20 We hereby seek an undertaking from MKCC that it will not submit the ENP for Examination under Schedule 4B(7) accordingly.

- 2.21 If MKCC decline to take these steps in a prompt manner, we reserve our right to challenge the legality of the ENP and flawed processes that have led up to its production, by way of an application for judicial review.

Other Matters concerning the Regulation 15 Consultation Statement – February 2023 and preceding engagement

- 2.22 Paragraph 6.1 of the Consultation Statement states,

“The publicity, engagement and consultation undertaken to support the preparation of the Emberton Neighbourhood Plan has been open and transparent, with many opportunities provided for those that live, work and do business within the Neighbourhood Area to contribute to the process, make comment, and to raise issues, priorities and concerns.”

- 2.23 We wrote to the Parish Clerk on 21st January 2022 seeking to arrange a meeting with the ENP Steering Group. This e-mail was receipted on the same day.
- 2.24 A reply was chased on 1st April 2022, there having been no response to the original e-mail bar the acknowledgement of receipt.
- 2.25 On 5th May 2022 a response was received (**Appendix 9**. sets out this entire e-mail string).
- 2.26 The response states that the Regulation 14 consultation started on 2nd May 2022 and will run for 6 weeks and confirms the PC are aware of the Certificate of Lawfulness application.
- 2.27 No meeting was offered nor forthcoming, nor was our request for one ever formally responded to. It was ignored until a response was chased.
- 2.28 The PC Meeting Minutes of Tuesday 5th April 2022 state: -

- 3.74 **Emberton Neighbourhood Plan** – Cllr Markland reported that there wasn't an update other than to say that it had been circulated for comment. Cllr Duncan asked Ward Cllr Geary whether the Ward Councillors had any comments on the plan. Ward Cllr Geary responded that it looked fine. Cllr Duncan asked if the parish council could now approve it. It was proposed by Cllr White, seconded by Cllr Palmer and unanimously agreed that the Neighbourhood Plan be **approved**. The clerk to notify Town Planning Services that the plan had been approved. **Action: KG.** Cllr White made reference to the email from Francis Jackson Homes. Cllr Markland commented that there was little point in entering into any communication as the plan was where it was and there was also a Certificate of Lawfulness for Acorn Nurseries (MK) in the process. The clerk to respond on this basis. **Action: KG.**

Chairman's signature Date 19

- 2.29 Having raised the request for a meeting several months previous to this date, it appears that the lack of response was all but a *fait accompli* in terms of avoiding any real engagement with the parties and negating the potential benefits resulting from a meeting. The phrasing used, stating there was "little point" given the plan, "was where it was" more than indicates this to be the case. However, the meeting had been requested in January well in advance of this time, yet oddly not responded to then when the plan progression was less advanced. We consider this to represent a closed attitude to the development of the ENP and a lack of genuine engagement.

3.0 Failure of the submitted ENP to comply with the Basic Conditions

General Conformity with Strategic Policies

- 3.1 Paragraph 2.6 of the ENP Regulation 15 Submission (February 2023) states, “*Any proposals made within this neighbourhood plan need to comply with the strategic policies specified in Plan:MK*”.
- 3.2 We feel there is a significant misunderstanding in this – the ENP must be in “general conformity” with the strategic policies contained in the development plan for MKCC to pass one of the tests of compliance with the Basic Conditions. As drafted, it implies it must fully comply with such policies.
- 3.3 The point of this is that there remains flexibility for communities to revise a development boundary for example, or allocate additional land for housing outside of current boundaries.
- 3.4 As such, statements such as those made in the Assessment of Potential Housing Sites (May 2022) in relation to site 003/2021 that state, “*Contrary to Plan:MK DS5 & CT2*” and “*is defined as countryside by Plan:MK. Development would be contrary to Policy DS5*” are disingenuous and somewhat ‘closed’ in their consideration, when ENP has within its power and behest, the ability to allocate land and/or extend settlement boundaries – such changes, as proposed elsewhere such as policies H1 and H3 of the current draft, demonstrate that is in fact entirely possible.
- 3.5 Indeed, Plan:MK also confirms in Policy DS2 the expectation that small to medium scale development within rural and key settlements, appropriate to the size, function and role of each settlement will be delivered through allocations in neighbourhood plans.
- 3.6 As such, stating there is policy conflict with a higher tier development plan in this manner cannot legitimately be used in the counter position when it suits, as a reason not to either consider the allocation of a site or area in such an overt manner, when the Regulation 16 plan seeks to do this itself anyway with the Harvey Drive site (see Policy H3).

- 3.7 These current higher tier Development Plan policies do not provide a blanket restriction, and thus a reason to rule out a site, because as noted, ENP has within its power the ability to provide flexibility at a sub-strategic level on matters such as this. We consider therefore that the text of the ENP and Assessment of Potential Housing Sites misrepresents this position and thus the evidence base and assessment is flawed.
- 3.8 Indeed, various Regulation 14 versions of the ENP have been produced and the 2020 Regulation 14 consultation version included the dwellings that in reality are, and always have been, part of Emberton village, but are located east of the A509 within a revised settlement boundary – see plan extract below taken from that version of the ENP.
- 3.9 This demonstrates that it is entirely possible to extend the settlement boundary in this manner so such sites would not be contrary to a higher tier policy. As such, it is unreasonable to use this against such sites as part of any assessment given the ENP can take a different approach (as it is not a strategic policy), and thus it is not a valid basis to discount sites such as the Acorn (MK) Nurseries site.

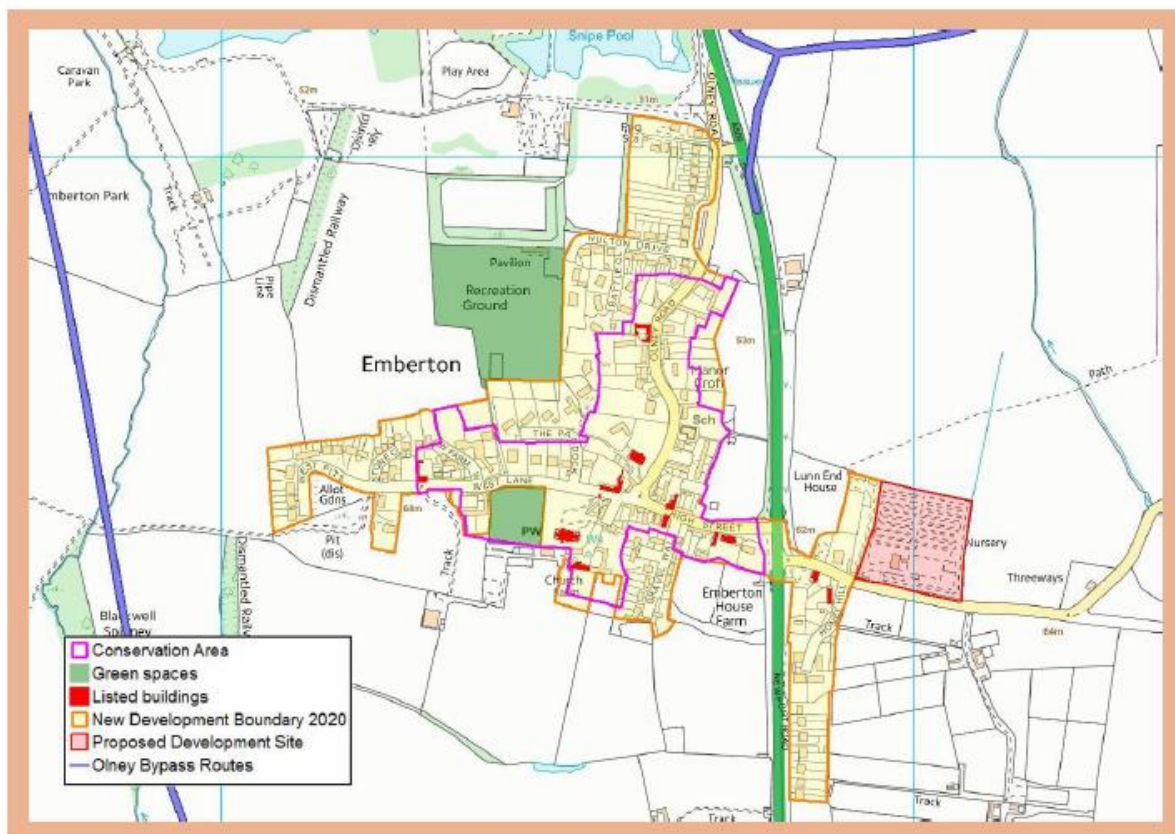


Figure 8: Map of proposed development site

Policy H3: Land at Harvey Drive

- 3.10 We consider the proposed housing allocation as set out in Policy H3, fails to pass the Basic Conditions Tests on the basis it fails to have regard to national policies and advice on both resisting the development of garden land for housing and the priority that should alongside that also be given to previously developed land.
- 3.11 Paragraph 71 of the NPPF states, “*Plans should consider the case for setting out policies to resist inappropriate development of residential gardens”.*
- 3.12 Oddly, the ENP seeks to take a completely counter approach to this, and via Policy H3, seeks to revise the development boundary and include a housing allocation for 2 houses.
- 3.13 Emberton Neighbourhood Plan therefore fails to accord with national planning policy by prioritising a greenfield, back land, garden site over previously developed land. This is highly pertinent in this instance given the presence of a deliverable previously developed land site (Acorn (MK) Nurseries) adjacent to the eastern edge of the village within the Neighbourhood Area.
- 3.14 Rather than seeking to resist development of residential gardens, the ENP seeks to deliver some ‘back land’ housing on land which is currently residential garden, and whose primary access is via land at risk of Pluvial Flooding (as per Figure 15 of the Regulation 16 ENP). We consider this fails to have regard to national planning policy as set out above which sets out a completely counter stance to this, and is contrary to Government statements on ‘garden grabbing’, and siting development in areas at the lowest risk of flooding first.
- 3.15 Furthermore, we do not consider this to be the best or most suitable land that is available in the village for housing in terms of the hierarchy of land uses, as set out below.
- 3.16 The Annex 2: Glossary of the NPPF confirms that residential gardens do not fall within the definition of Previously Developed Land. They are greenfield sites.
- 3.17 As such, the housing allocation proposed as part of policy H3 is a greenfield site. Not only is the development of such land not encouraged within the NPPF, it also fails to have proper regard to making the best use of previously developed land.

- 3.18 This is especially pertinent in this instance as the village contains the Acorn (MK) Nurseries site – allocated for circa 40 dwellings in the 2020 Regulation 14 Consultation Version of the ENP – and which as a retail garden centre use (confirmed by the Certificate of Lawfulness Existing, reference 22/00539/CLUE dated 1st November 2022) is previously developed land. Government Policy has a strong presumption in favour of such sites coming forward (as per NPPF paragraphs 119 and 120).
- 3.19 The ENP does not therefore accord, as drafted, with national planning guidance on this basis, nor explain why it seeks to prioritise back-land, greenfield garden land over previously developed land.
- 3.20 As such, we consider this contrary to national planning policy and thus to fail the basic conditions test as the plan fails to give preference to previously developed land, and instead prioritises the use of back land greenfield garden land for housing.
- 3.21 It is also noted that as part of the Village Survey Questionnaire (see page 11 of the February 2023 Consultation Statement), that 70% of respondents were against “*greenfield/agricultural land made available for new development*”. This is reiterated in paragraph 4.5 of the Regulation 16 version of the ENP.
- 3.22 Indeed, the Site selection methodology section of the Assessment of Potential Housing Sites (May 2022) even goes so far as to state in reference to site selection criteria the assessment of the sites has been undertaken, “*applying a clear preference in accordance with the National Planning Policy Framework (NPPF) and the wishes of the community, for new housing to be location on previously developed land (Brownfield sites), over and above greenfield development*”.
- 3.23 As such, not only is this greenfield allocation contrary to national policy, but it is not supported by the evidence base either.
- 3.24 Finally, whilst not a Basic Condition matter, we consider the quantum of housing proposed is at best token. This is not ‘in-filling’ but back-land development of a type not found locally, and thus fails to positively respond to the local form and character.
- 3.25 Infilling is exactly that, filling in an otherwise open gap on a frontage. This allocation is not that – there is no clear frontage to a highway or street, it is located to the rear.
- 3.26 The proposed housing allocation represents piecemeal back land development, where no development of this nature has occurred before. The proposal is served by a very

limited access, and the scheme is poorly related in form, layout and character to the existing dwellings in the immediate proximity of the proposed allocation. We do not consider this to be good planning. It is unclear from the document how this site has been selected and ranked and what criteria have been used for this assessment.

- 3.27 There is no reference to Affordable Housing or local housing needs in this policy.
- 3.28 It seems completely illogical to the landowners and ourselves, as well as contrary to national planning policy and guidance, that any greenfield site such as this could be deemed preferential in the above context over a brownfield site which has existing hard standings, structures and development already upon it, such as the Acorn (MK) Nurseries site.

Policy H1: Development Strategy and Policy H2: Windfall Infill Development

- 3.29 These policies purport to set out a strategy for providing development opportunities within the village confines as redrawn as part of this version ENP.
- 3.30 There is no reference to Affordable Housing or local housing needs in these policies whatsoever.
- 3.31 We consider Policy H1 as drafted is a backward looking policy that is based on historic building trends. It fails to meet the basic condition tests as it is not genuinely positively prepared (NPPF paragraph 35), nor does it seek to support housing developments that reflect local needs (NPPF paragraph 78), and enhance and maintain the vitality of communities (paragraph 79 of the NPPF) so they can “grow and thrive”.
- 3.32 The allocation and infill policy purport to be positively prepared, but in reality there is no guarantee that such an approach will deliver any housing whatsoever. As such, is the plan genuinely positively prepared and will the stated aspiration of the plan to deliver around 10 dwellings over the plan period ever be met?
- 3.33 Indeed, the February 2020 Regulation 14 Consultation Version of the ENP stated very clearly: -

5.14 It is notable that Emberton has grown by 12 net additional dwellings in approximately 10 years, through infilling and small-scale development. There are few infilling opportunities left in the village which would not have significant adverse effects on either the character of the village, the setting of a listed building, or an important gap view.

3.34 As such, what has changed since 2020 to indicate that the currently advocated approach will deliver any housing whatsoever, given the previous version of the very same plan confirms there are few infilling opportunities that would not have significant adverse impacts on the character of the village, setting of listed buildings, or important gaps.

3.35 We also consider that the small revisions to the development boundary (all greenfield, garden land in a back land location – as discussed above) is not NPPF compliant, and fails the basic tests on these grounds too as whilst we also note that the proposed development boundary is proposed to be revised in a number of locations, they are all generally: -

- Garden land (so again not Previously Developed Land as above);
- Land locked with extremely limited or no direct highway access opportunity (as such, what is the benefit of doing this if suitable access cannot be afforded to the area as it will never deliver housing, and thus is not genuinely positively prepared);
- Back-land development (so potentially out of keeping with the prevailing form and character of the settlement), plus back land development by its very nature is not “infill” (see above);
- Would have an impact on the openness of the Conservation Area and/or its setting.

3.36 As such, whilst purporting to be positively prepared, this approach is questionable as to whether it will in fact deliver any housing whatsoever.

3.37 It is also noteworthy that this strategy completely fails to make any reference to Affordable Housing or Local Needs provision. It is thus directly contrary to NPPF paragraphs 78 and 79 as it does not in any way support housing development that reflect local needs. We consider local housing need further below.

3.38 We consider this lack of affordable housing for those associated with the Parish and in the most housing need is a seriously missed opportunity, unless it is in fact the view

of the PC that Affordable Housing is not wanted. Why has there been such a substantial U-turn on this point in only 2 years, when this was identified as the number one priority previously in the 2020 Regulation Version of the EMP?

- 3.39 Finally, bullet point 4 on page 10 of the ENP states, "*Housing should ideally be located within the existing settlement on infill sites or brownfield land*".
- 3.40 The proposed allocation and adjusted development boundary fail to meet these criteria as the land and allocated site all represent garden land (and thus fall outside of the definition of Previously Developed Land, as defined within the NPPF) and also extend the village outward, having existing housing immediately located on only one side, thus not representing 'infill' *between* existing dwellings and being back land development. Thus not only are the basic conditions not met, but the plan fails to act on its evidence base.
- 3.41 Previous Regulation 14 versions of the ENP set out the key aspiration to deliver local needs housing and in particular Affordable Housing. The current plan is totally silent on this matter yet purports to utilise the same evidence base. The February 2020 Regulation 14 Consultation Version of the NP stated at paragraphs 5.10 to 5.13 and in its Objectives,

"Objectives

- ***To ensure that any development provides Affordable Housing as our number one priority***

- *To ensure that new housing proposals within the parish show general accord with the wishes and needs of the community in relation to scale, location and mix of dwellings.*

- *To require new housing to be carefully integrated into the built form of the village and not cause harm to existing important views or heritage assets.*

- *To secure commitment that any new housing will be highly sustainable, both in construction and operation to reduce the building's carbon footprint.*

- *New housing should use high quality materials and include measures to enhance the biodiversity of its setting."*

- 3.42 We query therefore, how Affordable Housing goes from being “our number one priority” to being totally silent in the current version of the plan, when the same evidence base is employed.
- 3.43 Additionally, the plan provides an incredible opportunity to secure Affordable Housing for those with a local connection and who otherwise cannot access the housing market – be that connection by family, relative, job or other tangible connection to the Parish. The failure to utilise this key tool perpetuates a barrier to all those with genuine local need and connection from accessing housing in the village, and it is disappointing that this is the case.

Housing Needs data and Housing Needs Assessment

- 3.44 Paragraphs 66 and 67 of the NPPF state;

“Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”

- 3.45 We believe as drafted the ENP fails the Basic Conditions test of compliance with national planning policy (as above) as it is currently unclear if MKC have provided either a housing requirement figure or an indicative figure for the ENP, utilising *tangible and transparent up to date evidence* of “local housing need” and demographic analysis, census data, population growth data, etc.

- 3.46 Reference is made at paragraph 4.6 of the ENP, but the MKC figure is stated as being “set a nominal” number of 1 dwelling per village by MKCC.
- 3.47 Setting a blanket 1 dwelling figure across each village in MKCC’s administration area is not positive planning. There is no reflection of local circumstances, the relationship of settlements to each other (as per paragraph 79 of the NPPF) or specific local requirements.
- 3.48 In light of the national housing crisis, to suggest that each village in MKC only has a local housing need arising of 1 dwelling each over the remainder of the plan period is both unbelievable and indefensible. Where is the evidence to support this?
- 3.49 Where is the consideration of population growth, demographics, census data, up to date housing market data, Parish level data, local needs assessments and genuine, transparent research into showing how this figure has been derived? We consider the basic conditions tests are not met with regard to the failure to comply with national planning policy and higher tier Development Plan policy on this basis.
- 3.50 Currently, this appears to base its housing need figures on an overly simplified blanket nominal figure that has no regard whatsoever to local need, local demographics, local connections, the spatial relationship of each Parish to other settlements, etc. Can such a simplistic approach stand up to scrutiny?
- 3.51 The Plan itself confirms at paragraph 43 of the Regulation 16 ENP that,
- “Plan:MK does not outline a housing requirement for each neighbourhood area. However, Milton Keynes City Council has published a briefing note as an interim position to provide an indicative housing figure for those preparing new neighbourhood plans, in accordance with paragraph 67 of the National Planning Policy Framework, 2021 (NPPF).”*
- 3.52 By admission then, no figure is given, and the data is an interim position at best, set at 1 dwelling per village. Can a Parish with over 720 residents really only have local housing need for 1 house for the remainder of the plan period?
- 3.53 By comparison, and in a similar position in terms of housing completions in the rural area, the East Northants Part 2 Local Plan is currently passing through the final stages of Examination. In it is a policy which states: -

Setting Village Housing Requirements

- 8.15** The rural housing requirement is already delivered (513 dwellings), committed (261 dwellings); or allocations in Neighbourhood Plans “made” since 1 April 2019 (35 dwellings) and other emerging rural sites (54 dwellings). Nevertheless, Neighbourhood Planning groups have sought indicative Ward or Parish level housing “targets”, to provide a basis for allocating future housing sites in a Neighbourhood Plan. This issue is addressed in the updated (2019) NPPF, which states that strategic policies should also set out a housing requirement for designated neighbourhood areas (paragraph 65) or, at the very least, provide an indicative figure if requested by the neighbourhood planning body (paragraph 66).
- 8.16** On the basis of this recent national policy change, it is necessary for the Plan to provide further local direction, in addition to the requirements stated in Table 5 of the Joint Core Strategy. This Plan will therefore set additional local direction in identifying an appropriate quantum of development for each village to meet a locally arising need, in accordance with policies 11(2)(a) and 29 of the Joint Core Strategy.
- 8.17** Using the total district rural population (20,260¹³³), a methodology of rural population apportionment may be applied to estimate indicative growth figures for individual parishes/ villages for the Plan period (Table 18, below). By this process (applying the 2011 Census i.e. population at the start of the Plan period), supported by local housing needs assessments, indicative quanta of development over the plan period are identified. It is emphasised that these are derived from the overall rural housing requirement (820 dwellings) and are not minima or set targets; rather, this is strategic guidance to support the preparation of Neighbourhood Plans. Table 18 sets out indicative figures for each rural Parish over the Plan period.

¹³² https://www.east-northamptonshire.gov.uk/downloads/file/12111/background_paper_10_-_housing_requirements_-_rural

¹³³ 2011 Census

Population 2011 Census ¹³⁴	Step increase in no of dwellings over 20 years	Range	Parishes/ Villages
<100	5	1-5	Blatherwycke, Deene, Lilford cum Wigsthorpe, Luddington, Newton Bromswold, Pilton, Stoke Doyle, Thurning, Wakerley
100-249	10	6-10	Fotheringhay, Deenethorpe, Cotterstock, Apethorpe, Bulwick, Tansor, Twywell, Southwick, Lutton, Sudborough, Ashton, Laxton, Harringworth, Hargrave, Wadenhoe
250-499	20	11-20	Hemington, Glapthorn, Duddington-with-Finshade, Denford, Yarwell, Lowick & Slipton, Aldwinckle, Great Addington, Little Addington, Benefield, Barnwell, Thorpe Achurch (with Clopton), Woodnewton, Polebrook
500-749	30	21-30	Collyweston, Chelveston cum Caldecott, Titchmarsh
750-999	40	31-40	Nassington, Islip, Warmington
1000-1249	50	41-50	Easton on the Hill, King's Cliffe
1250-1499	60	51-60	Brigstock, Ringstead, Woodford
1500-1749	70	61-70	n/a
1750-1999	80	71-80	Stanwick

- 8.18** In many cases (in particular, King's Cliffe), these step increase/ range figures have been exceeded. In other cases (e.g. Chelveston cum Caldecott and Glapthorn), Neighbourhood Plans seek to deliver more housing than is set out in the indicative rural figures.
- 8.19** Notwithstanding, it is emphasised that the rural housing requirement (820 dwellings) has already been met; either by way of completions, existing commitments or Neighbourhood Plan site allocations. The role of these indicative figures is to inform the preparation of Neighbourhood Plans by setting out what would constitute an appropriate level of development for individual villages and/ or wards.

- 3.54 The above indicates the sort of data we would expect to see – as opposed to a “nominal figure” under such circumstances, even where the rural housing figure of a higher tier development plan has been met, having regard to empirical data, and other local evidence, etc. and is a forward looking, positively prepared approach, with robust and challengeable figures.
- 3.55 Instead, the ENP looks back at past build trends, *“to determine the level of housing that has sustained the village in the past, with a view to projecting this forward to maintain that level of organic, sustainable growth.”*
- 3.56 We consider this fundamentally flawed, not positively prepared and backward looking, thus failing to have full and proper regard to the NPPF.
- 3.57 Turning now to the Housing Needs Assessment (Updated July 2020) document, which forms part of the evidence base, whilst titled a Housing Needs Assessment, it reads more as summary document of past build trends and attitude to development based on the questionnaire noted above.
- 3.58 The document is now nearly 3 years old (and is only an update anyway of an older document). All of the stated housing market data is now significantly out of date, and the Land Registry data is demonstrably out of date too, in particular the post-COVID data and trends discussed do not in any way reflect what has happened in the 3 years since this survey was last refreshed.
- 3.59 I attach a recent, evidence based Housing Needs Survey from the Daventry Parish of Flore as an example of the sort of recent empirical evidence we are used to seeing in such circumstances – please see **Appendix 10**.
- 3.60 Further, the statement in paragraphs 6.8 and 6.9 regarding Local Affordable Housing Registered Need are troubling. A lack of records or data/evidence is not a justification or basis to assume a lack of “need”, it is purely a lack of reporting.
- 3.61 Any usage of that as a basis for a low or nominal housing figure could have significant negative implications for planning positively for local housing needs and boosting the supply of housing land, contrary to the NPPF (paragraphs 15, 33, 60, 61 and 62) and thus failing to meet the basic conditions.
- 3.62 We therefore query whether a genuinely robust, independent assessment of future demographics and Objectively Assessed Housing Need has been undertaken for the Parish by MKCC to guide need based housing numbers within this specific Parish and

Neighbourhood Area, with a genuine level of provision that can stand up to scrutiny – one that is not based solely on past building in-fill trends which are naturally diminishing.

Consultation Statement/Village Survey Questionnaire

- 3.63 Notwithstanding the legality of the Consultation Statement set out above, the following points regarding its context are also considered relevant to the basic conditions and flawed evidence base of the ENP.
- 3.64 The original questionnaires form the main evidential basis of the consultation process as set out in paragraph 1.11 and Section 3 of the Consultation Statement.
- 3.65 These questionnaires are now 5 years old, dating from March 2018.
- 3.66 However, the global, national and local context has significantly altered as a result of the COVID-19 Pandemic, war in Ukraine, pressure on the cost of living, and the ongoing energy crisis leading to issues of household affordability and fuel poverty since the initial 'fact finding' exercise was undertaken in 2018. Additionally, at that time the village had a different range of services, many of which have now altered due to one or more of the above.
- 3.67 We therefore query therefore whether the results remain relevant and valid as an evidential basis for producing policy from, given i) the notable passage of time since the evidence was collected, and ii) the significant change in context at all scales set out above. It would seem the time when the questionnaires were devised, and indeed the answers given, may not be reflective of the views of the residents of the Parish any more, and/or that their priorities may well have changed given these momentous societal shifts and issues.
- 3.68 During that period there have been 54 property transactions within the Neighbourhood Area (source: - Land Insight, 2023), representing 18% of the circa 300 questionnaires that were issued (as per para 3.3 of the Consultation Statement). This is a statistically significant number in terms of household changes within the Parish within this period.

- 3.69 Given the notable passage time, reliance on these initial questionnaire and turnover in population, can it be said that the evidence on which the ENP is now based is suitably sound and up to date? We consider this to not be the case.

Assessment of Potential Housing Sites – May 2022

- 3.70 Representations were made to the most Recent Call for Sites (November 2021) – but as noted in preceding sections, have not been summarised or recorded in a transparent manner in either the Consultation Statement nor Assessment of Potential Housing Sites, so are not available for MKCC or the Inspector to scrutinise.
- 3.71 In those representations, we previously stated our concerns that the criteria as set out on the PC website were pre-determinative and without a clear, objective or policy basis of assessment. We do not repeat those comments again as they are attached in full as **Appendix 7**. (attached hereto).
- 3.72 The Site Selection Methodology acknowledges the clear preference in terms of both national planning policy and the questionnaire findings for new housing to be located on previously developed land (brownfield land), over and above greenfield development.
- 3.73 This would indicate clear support in both planning policy and local support for the previously developed land that is the Acorn (MK) Nurseries site – given the Certificate of Lawful Existing Use which exists (see **Appendix 2.**) – however, this is not carried through into the Regulation 16 ENP. As such, there seems to be an inexplicable jump between the evidence and the proposed policy.
- 3.74 The site assessment criteria are not clear within the document – who has made the assessment? On what basis? Have the sites been independently and objectively assessed?
- 3.75 Some brief explanations are given at the back of the document, however, we consider these fail to meet the Basic Conditions as: -
- Land off Harvey Drive is garden land – set to the rear of existing houses. It is back-land development, not infill and contrary to the prevailing form and character of development found locally;

- Land off Harvev Drive is sequentially less preferable for development as per the NPPF (see above) and not what the local consultation sought;
- Land east of the A509 includes 22 properties that are part of Emberton village already. These residents clearly cross the A509 to access the village and services there – we do not see this as a notable barrier to development that should preclude this eastern part of the built form of the village being considered part of it. MKCC have permitted houses to the east of the A509 in recent years – it thus clearly forms part of the settlement.

3.76 As covered above, with regards to the relationship of any site to the existing village, it is wholly at the behest of the Neighbourhood Plan process itself to set a new/revised/appropriate development boundary for the village and preceding versions of the draft ENP have indeed shown the flexibility and variety of options that can result in.

3.77 As such, any criteria or assessment that states development adjacent to existing housing would be in open countryside (or similar) is in effect a self-defeating criteria, as the Steering Group and community have the power to revise this as part of the NP process.

3.78 With regards to the Acorn (MK) Nurseries site (005/2018 and 003/2021), the assessment is factually incorrect on various counts and this would undoubtedly reflect the scoring of same. We consider the site has not been fairly or properly assessed on this basis.

3.79 We ask MKCC and the Inspector to consider these points please: -

- The land is not a Greenfield site as stated but previously developed land – the Certificate of Lawful Existing Use establishes this;
- The site is not detached or remote from the village – it is immediately adjacent to housing and has existing development and structures on it;
- The settlement boundary could be revised as it was in the 2020 Regulation 14 consultation plan to include the site and houses on the east side of the A509 with no conflict to Plan:MK or the NPPF;
- The site is not a horticultural nursery as stated, but a wholesale garden centre with a retail use class (as established by the Certificate of Lawful Existing Use);
- The document states “MKC Highways have objected, unsustainable location”. Where as part of this ENP process have MKC Highways “objected”? There is no evidence to support this – in particular, the comments in relation to access and Highways contradict

those of the previous assessment of this site via 005/2018 as set out in the same document where points were flagged, but highlighted areas where improvements can be made – there is no objection, and the site is not deemed unsafe or unsustainable accordingly;

- “Strong opposition” is cited, but this is not quantified or qualified – by whom and on what basis?;
- Comments regarding traffic generation fail to acknowledge the traffic generation and sustainability of the existing lawful use of the site – this is not an undeveloped site or garden, but a site with an existing use, existing movements to and from it and so the baseline level of movement and sustainability is already substantially higher.

3.80 Regarding the Acorn (MK) Nurseries site, the Highway to the front of the site is a signed cycle route.

3.81 It thus demonstrates MKCC consider the site is accessible to/by this sustainable transport mode, and as part of a package of improvements facilitated by any development of the site, works could be undertaken to upgrade the pedestrian crossing point on the A509. This will ensure the site is also safely accessible to and by pedestrians to the centre of the village.

3.82 There are therefore wider community benefits to the numerous existing residents on the east side of the A509 (22 no. dwellings) that nevertheless live within the village of Emberton. Development on the Acorn Nurseries site would actually have wider benefits to not only future occupiers, but existing ones, in terms of a betterment to the “access to the facilities and centre of the village”.

3.83 In the context of the recent purchase of the village pub by the local community, and new children’s day nursery, the additional footfall and support this development could generate would surely be welcomed?

3.84 Is it not better and ultimately more sustainable to have local residents accessing and supporting these local services by foot or cycle, than those travelling in from further afield?

3.85 The site is also the only one we are aware of capable of delivering a meaningful amount of affordable housing. The ENP has within its power the ability to ensure this is genuine Affordable Housing for local people, thus helping the community to thrive and grow sustainably, through the adoption of a local connection criteria policy – which we would strongly support. At present, we feel this significant opportunity is not being utilised.

3.86 The February 2020 Regulation 14 Consultation Version of the ENP stated,

- 5.17 In order to meet the future housing needs of Emberton and deliver a 'step-change' in housing provision an allocation of new housing has been made at Acorn Nurseries. This site represents the only large 'brownfield' land in the Parish that can provide sufficient housing numbers to enable the delivery of affordable housing, that will benefit those wishing to stay in village or join our community. The integration of the new housing allocation into the village is essential, so it is expected that improvements to the A509 will be necessary to provide an upgraded pedestrian crossing.

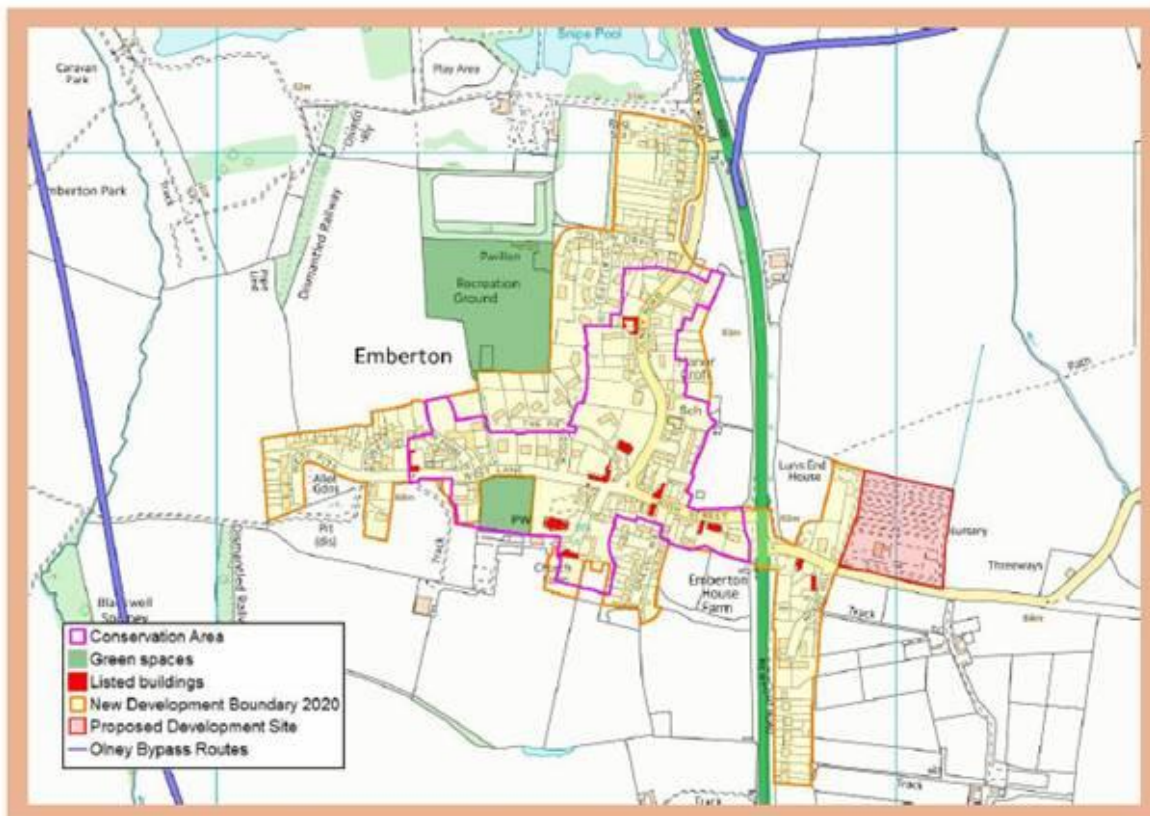


Figure 8: Map of proposed development site

- 3.87 The Acorn (MK) Nurseries site identified above remains available, deliverable and achievable for housing development – as well as providing significant opportunities for biodiversity net gain enhancement, local needs Affordable Housing and to enhance the crossing provision on the A590 for both existing and future residents of Emberton on the east side of the A590.
- 3.88 Bizarrely, since the 2020 Regulation 14 consultation version of the plan, all of the existing houses in Emberton on the east of the A509 have been excluded from the

revised Development Boundary for the village. Are the residents there not considered to be part of the village, or has this area been consciously excluded for some reason that has not been set out or justified? It is unclear why in this version of the plan, circa 22 properties have been removed from the proposed settlement boundary just 2 years after being proposed to be included within it.

- 3.89 As Previously Developed Land (PDL) containing a range of buildings and extensive areas of hard standing, is it not far better and sequentially preferential to develop such land comprehensively, as opposed to small, piecemeal garden sites with no wider community benefit, nor affordable housing and no S106 monies?
- 3.90 As noted, the site was the proposed village housing allocation in the 2020 Regulation 14 version of the ENP.
- 3.91 We consider that the proposed allocation in 2020 demonstrates the site can be supported, and offers significant advantages over both the current allocation and development strategy, especially when the site scoring and selection process has been unclear, and the errors noted above rectified. They would then more fully enable an accurate picture to be gleaned of how the site responds positively to the comments of the Parishioners about the development of previously developed land.
- 3.92 It is wholly in the behest of the Neighbourhood Plan process to include the site as part of the Development Boundary, thus any perceived or stated 'policy conflict' or non-compliance with Plan:MK advanced to suggest the site cannot come forward in principle on that basis, is wholly flawed, as it in fact at the behest of the NP to make it part of the development boundary or allocate it accordingly.
- 3.93 Exceptionally and uniquely the site provides the opportunity for a genuinely mixed tenure market/affordable housing scheme to deliver a step change in Affordable Housing Provision within the Parish with a range of housing sizes, types and tenures to help deliver a thriving, inclusive, mixed and balanced community. Why should historic build trends perpetuate future growth and continue to restrict access to housing in the village, especially when the Housing Needs Assessment indicated that there was generally support for a higher number of dwellings than the current version of the Plan is proposing, and this site can be capable of providing Affordable Housing, which in the previous iteration of the NDP was considered a priority.
- 3.94 The site is available and deliverable with known developer involvement.

- 3.95 The 2020 Regulation 14 NP Consultation document accepted the location, scale, nature and broad number of houses as being acceptable on the Acorn (MK) Nurseries site.
- 3.96 Development of the scale proposed would support existing village services (including the bus service) and could be decisive in securing the ongoing vitality and viability of the recently re-opened Community Pub and the new Children's Nursery.
- 3.97 Development of this scale will help support the vitality of the village as a whole and help support the 'one community' stance advocated in 2020 Regulation 14 version of the Neighbourhood Plan.
- 3.98 This is a sustainable site accessible by a range of transport modes, including foot and cycle, being located off a signed Cycle Route. It is closer to Olney Market Square than some parts of the new housing being built in Olney at the northern end of the Town.
- 3.99 It makes the best use of land that has previous development, buildings and hard-standing upon it, and a new, safe highway access will be provided mitigating any concerns flagged in this regard.
- 3.100 There is sufficient place for proper placemaking – well planned, in keeping streets, with suitable car parking provision (visually mitigated), amenity areas, and suitable turning and parking spaces.
- 3.101 There are no adverse heritage, ecological, landscape, flood risk, amenity or landscape impacts associated with the proposed re-development of the site. The site is not designated open space, important open land or similar nor does it impact on the setting of any Listed Building nor the Conservation Area.
- 3.102 Opportunities for biodiversity and landscape enhancement will be taken to provide a significant bio-diversity net gain.
- 3.102 The site is visually enclosed by mature landscaping thus minimising any wider visual impact on surrounding countryside and the abutting residential development, and it is better related to the adjacent housing development than the genuine open countryside to the north and east.
- 3.103 The current owners of the site are nearing retirement age, after operating from the site since 1986 – the allocation of this site for housing will secure the future of the site and ensure an attractive enhancement to the village into the future, with potentially

significant infrastructure, community benefits and local needs Affordable Housing, that may otherwise be lost.

3.104 We respectfully ask you to reconsider the considerable opportunities presented by this land for the village and community as a whole and allocate it for housing for the reasons set out above as part of the ENP.

3.105 Should you require further information, please do not hesitate to contact:

Paul Johnson – Land and Planning Director

paul@francisjackson.co.uk

T: (01234) 717703 / 07508 884039

SITE LOCATION PLAN

1: 2,500 @ A4.



TOWN AND COUNTRY PLANNING ACT 1990
(AS AMENDED)
TOWN AND COUNTRY PLANNING (GENERAL
PERMITTED DEVELOPMENT) (ENGLAND)
ORDER 2015 (AS AMENDED)



CERTIFICATE OF LAWFULNESS EXISTING - APPROVED

To: Mr Jonathan Robinson
15 Shenley Pavilions
Chalkdell Drive
Shenley Wood
Milton Keynes
MK5 6LB
United Kingdom

Application no: 22/00539/CLUE
Applicant: Mr Jonathan Robinson
Acorn Mk Nurseries Newton
Road
Emberton
Olney
Milton Keynes
MK46 5JW
United Kingdom

The Milton Keynes City Council hereby certify that on 4th March 2022 the existing use or development described in the First Schedule hereto in respect of the land specified in the Second Schedule hereto (and where a plan is attached to this Certificate, the area edged in red) is lawful within the meaning of section 191 of the Town and Country Planning Act 1990 (as amended), for the following reason(s)

(1) On the basis of the evidence submitted, there is adequate reason in this case to approve the application under Section 191 of the Town and Country Planning Act (1990) (as amended). On the balance of probabilities, it is considered that the site has been used as a primary retail function akin to a garden centre for a period of over 10 years, and would not therefore fall within the classification of a growing plant nursery.

First Schedule

Certificate of Lawfulness for the existing use as a wholesale garden centre - class (E(a))

Second Schedule

Acorn Mk Nurseries Newton Road Emberton, Olney MK46 5JW

TOWN AND COUNTRY PLANNING ACT 1990
(AS AMENDED)
TOWN AND COUNTRY PLANNING (GENERAL
PERMITTED DEVELOPMENT) (ENGLAND)
ORDER 2015 (AS AMENDED)



Your attention is drawn to the attached notes

A handwritten signature in blue ink, appearing to be 'JP', with a horizontal line extending to the right.

1st November 2022

Jon Palmer MRTPI – Head of Planning
For and on behalf of the Council

NOTES

- (1) This certificate is issued solely for the purpose of section 191 of the Town and Country Planning Act 1990 (as amended).
- (2) It certifies that the use or development specified in the First Schedule proposed to take place on the land described in the Second Schedule would have been lawful, on the specified date and, thus, would not have been liable to enforcement action under section 172 of the 1990 Act of that date.
- (3) This certificate applies only to the extent of the use or development described in the First Schedule and to the land specified in the Second Schedule and identified on the attached plan. Any use or development which is materially different from that described or which relates to other land may render the owner or occupier liable to enforcement action.
- (4) The effect of the certificate is also qualified by the provision in section 191(4) of the 1990 Act, as amended, which states that the lawfulness of a described use or operation is only conclusively presumed where there has been no material change, before the use is instituted or the operations begun, in any of the matters relevant to determining such lawfulness.
- (5) If you are aggrieved by the decision of the Council to refuse your application in whole or in part (including a case in which the Council modify the description of the use, operations or other matter in the application or substitute an alternative description for that description) then you can appeal to the Secretary of State for the Environment under Section 195 of the Town and Country Planning Act 1990 (as amended). If you want to appeal, then you must do so using a form which you can get from The Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN or Customer Support Unit Tel: 0117 372 6372. Appeal forms and guidance can also be downloaded from the Planning Inspectorate's website www.planning-inspectorate.gov.uk.

TOWN AND COUNTRY PLANNING ACT 1990
(AS AMENDED)
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PERMITTED DEVELOPMENT) (ENGLAND)
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Alternatively, the Planning Inspectorate have introduced an online appeals service which you can use to make your appeal online. You can find the service through the Appeals area of the Planning Portal – <https://www.planningportal.co.uk/info/200207/appeals>. The Inspectorate will publish details of your appeal on the internet (on the Appeals area of the Planning Portal). This may include a copy of the original planning application form and relevant supporting documents supplied to the local planning authority by you or your agent, together with the completed appeal form and information you submit to the Planning Inspectorate. Please ensure that you only provide information, including personal information, that you are happy will be made available to others in this way. If you supply personal information belonging to a third party please ensure have their permission to do so. More detailed information about data protection and privacy matters is available on the Planning Portal.



Emberton Neighbourhood Plan

2019 to 2031

Regulation 14 Submission, February 2020

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Foreword

The Localism Act of 2011 introduced Neighbourhood Planning into the hierarchy of planning in England, giving communities the right to shape their future development at a local level. The aim of the legislation is to empower local communities to use the planning system to promote appropriate and sustainable development in their area. Neighbourhood Development Plans (NDPs) must be in general conformity with the strategic policies of the development plan and have regard to national policy and advice.

Milton Keynes Council determined that the Parish boundary would be used as the boundary for the Neighbourhood Plan and that the Parish Council would be the body responsible for creating the document. The Parish Council held a number of public meetings in February 2017 and formed the Steering Group as a subcommittee of the council.

The Steering Group has been led by residents (volunteers), with the aim of preparing a plan that will deliver the long-term goals of a balanced and vibrant community. The document takes account of various views, comments and ideas you have provided us with over the last few years. We have held several public meetings, published the plan online and in paper form to seek the views of residents and other stakeholders, groups and businesses who share an interest in our neighbourhood area.

The Parish Council wanted residents to have a say in all aspects of the future of our community including where any new housing should go, rather than leaving this decision to Milton Keynes Council. However, whilst residential development is a key aspect of the plan, it is not the only component of this comprehensive document.

The Neighbourhood Plan sets objectives on key themes such as moving around, housing, employment, green space and community facilities. It builds on current and planned activity and says what the Parish Council and its partners will work towards.

Based on the responses to this consultation, the Neighbourhood Plan will then be lodged with Milton Keynes Council and will be subject to independent examination. The Neighbourhood Plan may then be modified to account for any recommendations that the Examiner makes, before being put to a referendum involving those registered to vote within Emberton Parish.

If the outcome of the referendum is a 'Yes' from more than 50% of those voting, the Emberton Parish Neighbourhood Plan will be 'made' (or brought into effect) by Milton Keynes Council as soon as possible. This means it will then be part of the development plan for Milton Keynes and will be used when determining planning applications within the parish of Emberton.

Victoria McLean
Chair, Emberton Parish Council



1. Introduction

- 1.1 Emberton is a village and civil parish in the Borough of Milton Keynes, ceremonial county of Buckinghamshire in England. The village is near the border with Northamptonshire, just to the south of Olney and four miles north of Newport Pagnell.

Historical Context

- 1.2 The parish of Emberton was formed from three villages that were annexed together for ecclesiastical purposes in 1650: Petsoe, Ekeney and Emberton. Today nothing remains of Ekeney and Petsoe only exists as a hamlet called Petsoe End.
- 1.3 The village name is an Old English word and means Eanbeorht's Farm. In the Domesday Book of 1086 the village was called Ambretone; in manorial records of 1227 it was Emberdestone.



Figure 1: Emberton historical context, Ordnance Survey map c1888

- 1.4 The manor which was previously owned by the Pagnell family of Newport Pagnell. The parish church is dedicated to All Saints. At the heart of the village is a clock tower, which has been renovated recently with the help of a grant from the Heritage Lottery Fund.
- 1.5 Although there are no shops in the village, there is a village pub and restaurant called the Bell and Bear on the site of the old Bell Inn. The former Bear Inn was previously situated where the A509 now runs.

Setting

- 1.6 The parish is situated within the River Ouse Valley, to the south of Olney. The A509 bypasses Emberton on its eastern side, bisecting parts of the village and separating Emberton from Newport Road and Petsoe. North of the village is Emberton Country Park, where former gravel pits form a series of lakes used for sailing and recreation.
- 1.7 The village is centred around the historic core of the High Street and clock tower, leading into West Lane. Olney Road branches to the north and includes more modern development.

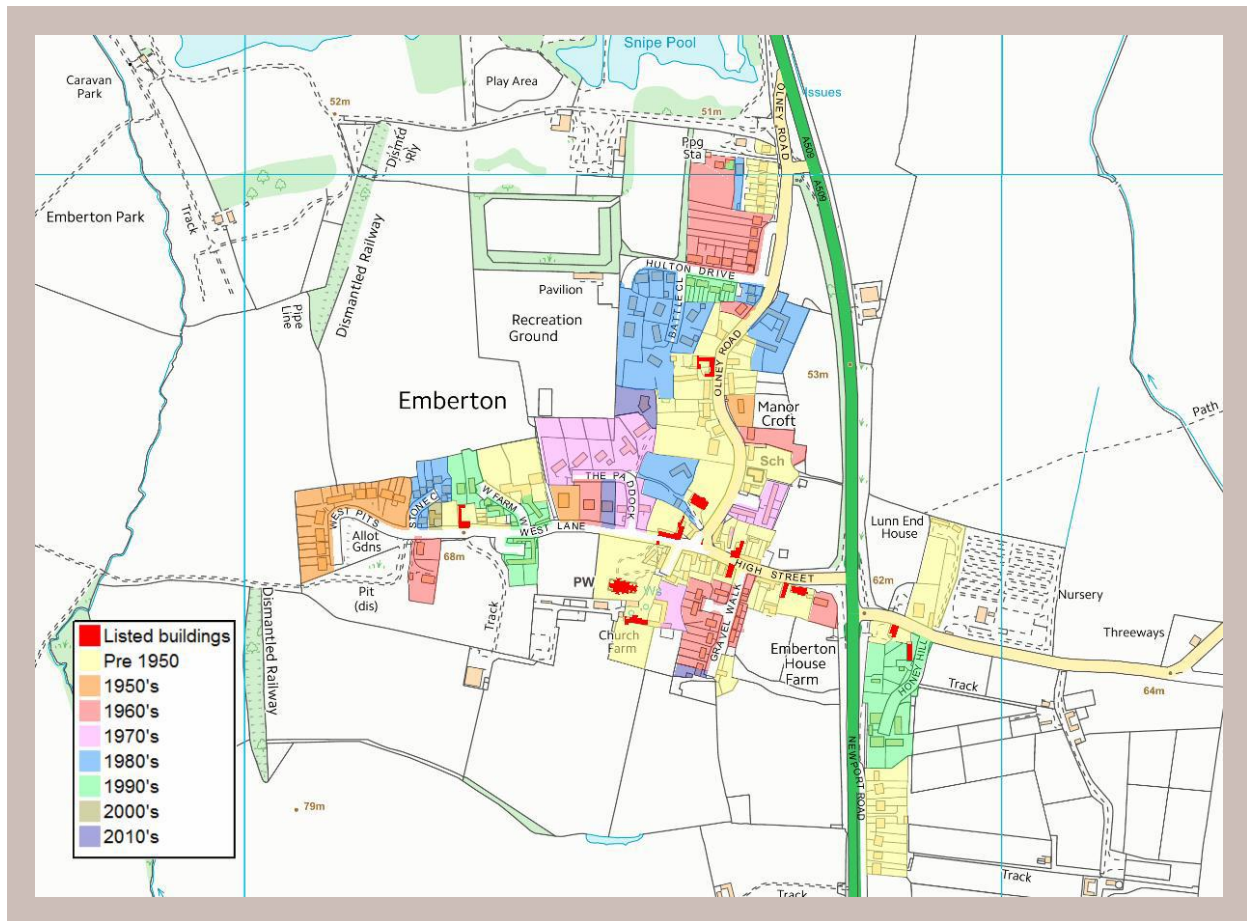


Figure 2: Housing development over time

Character

- 1.8 Emberton exhibits a predominately linear form built around the old Newport Pagnell to Olney Road. The village centre features the stone clock tower, surrounded by housing built close to the edges of the street and many with high, stone boundary walls. Many of the houses are stone and brick, two-storey with some featuring dormer roof windows.
- 1.9 The northern parts of the village have a more modern character, with housing fronted with wide verges along Olney Road. The village has large expanses of green spaces, with the school playing fields off the High Street and the playing fields off Hulton Drive.

Heritage assets

- 1.10 There are a number of Listed Buildings throughout Emberton, with several focused upon the junction of the High Street and West Lane, reflecting the historic core of the village. A full list and details of these buildings can be found at Annex B.
- 1.11 The parish Church of All Saints is the building of greatest architectural and historic interest and is listed Grade II*. The original building probably dates from the 13th century. The west tower was added in the 15th Century, with later additions made in the mid to late 18th century. The clock tower was constructed in 1846 in the memory of Margaret, wife of the Rector, Thomas Fry. War memorial tablets have been attached to the lower stages of the tower.

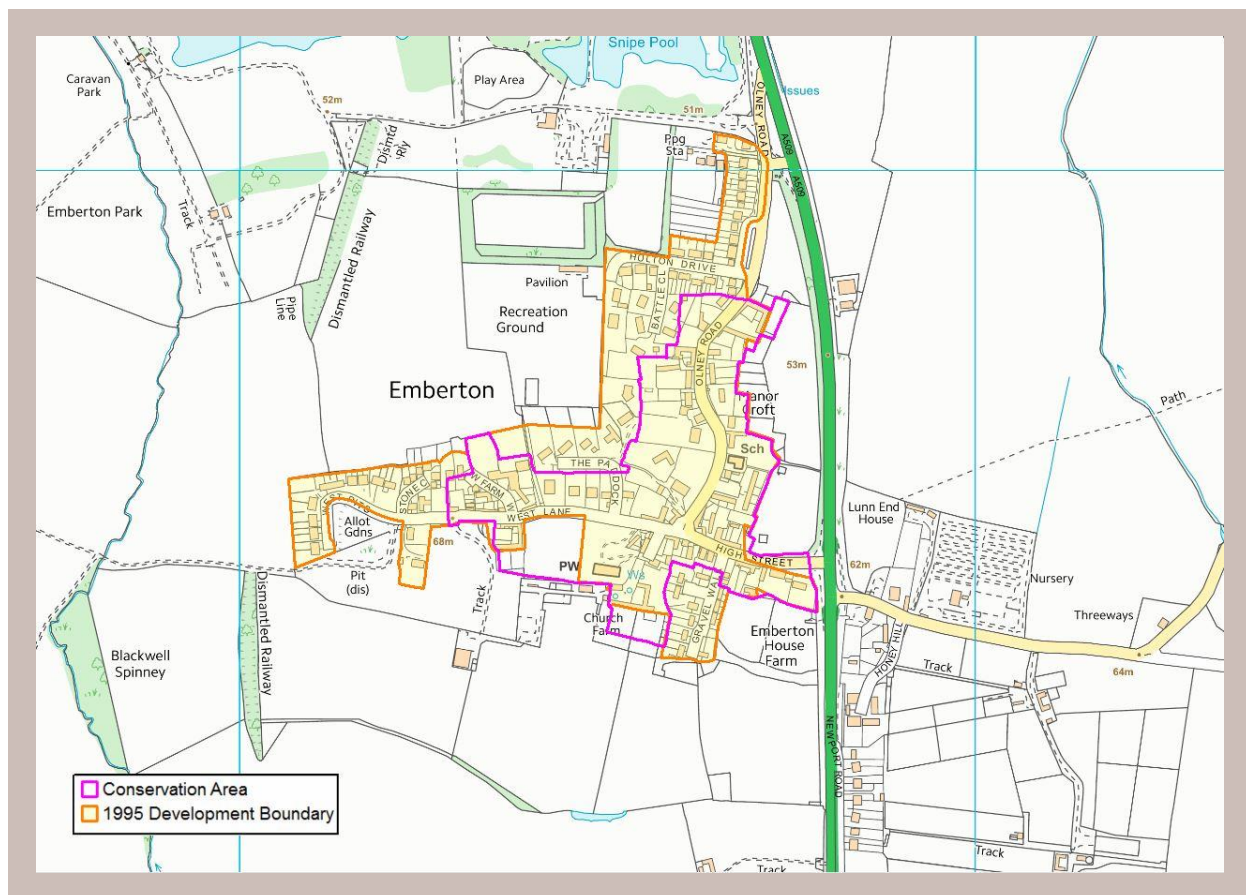


Figure 3: Emberton Conservation Area and the original development boundary

- 1.12 The Emberton Conservation Area was designated in September 1971 and covers a large part of the village, recognising that the character of the village should be protected.

Emberton today

- 1.13 The village faces a number of challenges for the future, which this Neighbourhood Plan acknowledges and seeks to address where possible within the limitations of land use policy.
- 1.14 There has been comparatively little housing growth in more recent times (as shown on Figure 2) which has restricted new incomers to support the community.

- 1.15 The village has an aging population, who are faced with limited housing choices should they wish to stay in Emberton but move to meet changing needs. the future of the school is currently under review, but the community is keen to keep the school at the heart of the village and the development proposals made in this Neighbourhood Plan should help to ensure a future supply of pupils to attend the school.
- 1.16 Traffic on the A509 continues to be an issue, creating noise and at times congestion, exacerbating the divide between the east and west parts of the village.
- 1.17 Property prices in the village are high, for both owner occupiers and the rental sectors, making it difficult for younger people in particular to either stay in the community or move into Emberton.
- 1.18 Emberton is in a superb location, close to the market town of Olney and the facilities and opportunities presented by Milton Keynes. The village has wonderful recreation facilities and an expansive country park on its doorstep.
- 1.19 Making the most of these opportunities and addressing the challenges is an opportunity for this Neighbourhood Plan.



2. Process

- 2.1 Preparation of the Neighbourhood Plan commenced in May 2017 and has involved an extensive amount of consultation and engagement with the local community, landowners and interested parties.
- 2.2 A consultation statement has been prepared alongside the Neighbourhood Plan detailing each stage of consultation tabling responses received and the actions taken by the Neighbourhood Plan Steering Group (NPSG) to shape the next iteration of the Neighbourhood Plan.

Planning Policy Context

- 2.3 The updated National Planning Policy Framework (NPPF) was published in 2019. The Neighbourhood Plan must demonstrate that it is consistent with the approach suggested by the NPPF. Paragraphs 29 and 30 concern neighbourhood plan production and highlight the benefits that neighbourhood plans offer communities to develop a shared vision for their area.
- 2.4 Neighbourhood Plans can shape, direct and help to deliver sustainable development, by influencing local decisions as part of the statutory development plan.
- 2.5 A neighbourhood plan should not promote less development than set out in the strategic polices for the area or undermine those strategic polices.

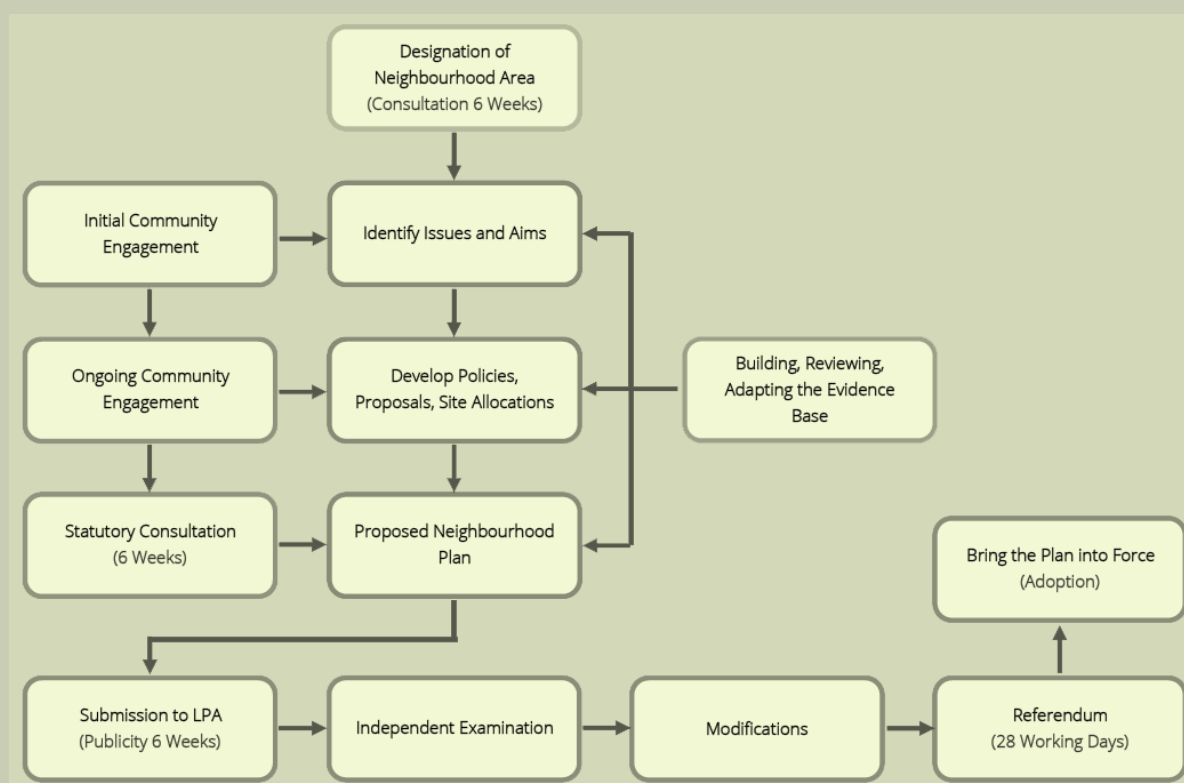


Figure 4: The Neighbourhood Plan Process

- 2.6 The Milton Keynes district plan, Plan:MK 2016 – 2031, was adopted in March 2019. Any proposals made within this neighbourhood plan need to comply with the strategies specified in Plan:MK. The particular strategies that impact a neighbourhood plan are specified in Appendix J of Plan:MK.
- 2.7 Once a neighbourhood plan has shown that it generally conforms with the Local Plan’s strategic policies and is brought into force, its policies take priority over non-strategic policies in the local plan where they are in conflict.

Purpose of the Neighbourhood Plan

- 2.8 In April 2012, the Localism Act 2011 amended the Town and Country Planning Act 1990 introducing new rights and powers to allow local communities to shape new development in their community by preparing a neighbourhood plan.
- 2.9 The Neighbourhood Plan will shape the future growth of the parish setting out design criteria for new development, necessary to protect the distinctive character of Emberton. It will also protect important spaces from development and will ensure that the necessary infrastructure can be delivered to support the future needs of the village.

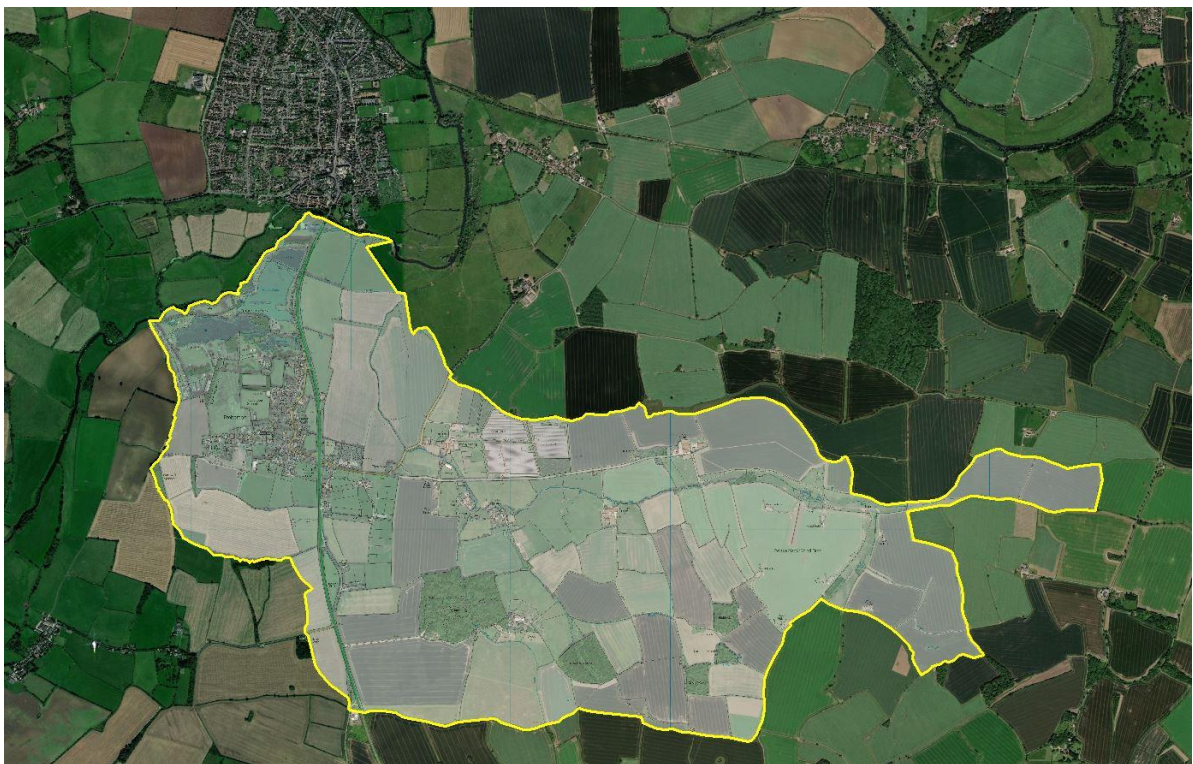


Figure 5: The Neighbourhood Plan covers the whole of the parish of Emberton.

The Submitting Body and the Designated Area

- 2.10 This Neighbourhood Plan is submitted by Emberton Parish Council, which is a qualifying body as defined by the Localism Act 2011.

- 2.11 In accordance with Part 2 of the Regulations, Emberton Parish Council applied to Milton Keynes Council to designate the parish as a neighbourhood area for the purposes of producing the Neighbourhood Plan. This application was approved on the 12th October 2017.

Basic Requirements of the Neighbourhood Plan

- 2.12 Whilst there is considerable scope for the local community to decide the content of the Neighbourhood Plan and the policies therein, the plan must meet basic conditions.
- 2.13 The Basic Requirements include:

- Have appropriate regard to national planning policy.
- Promote the principles of sustainable development.
- Be in general conformity with the Development Plan policies for the local area.
- Be compatible with legal obligations, for example environmental and human rights legislation.

Plan Period, Monitoring and Review

- 2.14 The Emberton Neighbourhood Plan is a response to the needs and aspirations of the local community as understood today. It is recognised that current issues and challenges are likely to change over the plan period and a review of the plan to accommodate new priorities may be necessary.
- 2.15 Emberton Parish Council, as the qualifying neighbourhood plan authority, will be responsible for maintaining and periodically reviewing the plan. This will ensure that it remains relevant and conforms with other Milton Keynes Development Plan documents and national planning policy.

Objectives and Policies

- 2.16 The neighbourhood plan, if confirmed through referendum will become part of the development plan documents used by Milton Keynes Council to determine planning applications.
- 2.17 It will also assist the Parish Council to comment on proposals within the parish and reflect the wishes of the local community.
- 2.18 Planning law requires that applications for planning permission must be made in accordance with the development plan unless material considerations indicate otherwise. This Neighbourhood Plan is an opportunity for the community to have a clear say and influence over the future of the parish.

- 2.19 The policies in our Neighbourhood Plan have been drafted in a manner that makes them easy to read and understand, avoid duplication with policies contained in the Milton Keynes Local Plan and the adopted Plan:MK, reflect the vision and objectives and meet local needs and aspirations.
- 2.20 Overall, the policies in the Neighbourhood Plan should be positive, clear, relevant and capable of delivery. When drafting these policies, the Neighbourhood Plan Steering Group has reflected upon these requirements to ensure that the Plan will accord with the requirements of national planning policy and other policies in the development plan.



3. Community Engagement

- 3.1 The Neighbourhood Plan has been prepared with community engagement at the forefront of developing the overall strategy, content and policies.
- 3.2 A survey questionnaire was distributed to every household in the Parish in February 2018. It was requested that one questionnaire was returned by each household, but allowance was made for more than one questionnaire should respondents hold differing views.

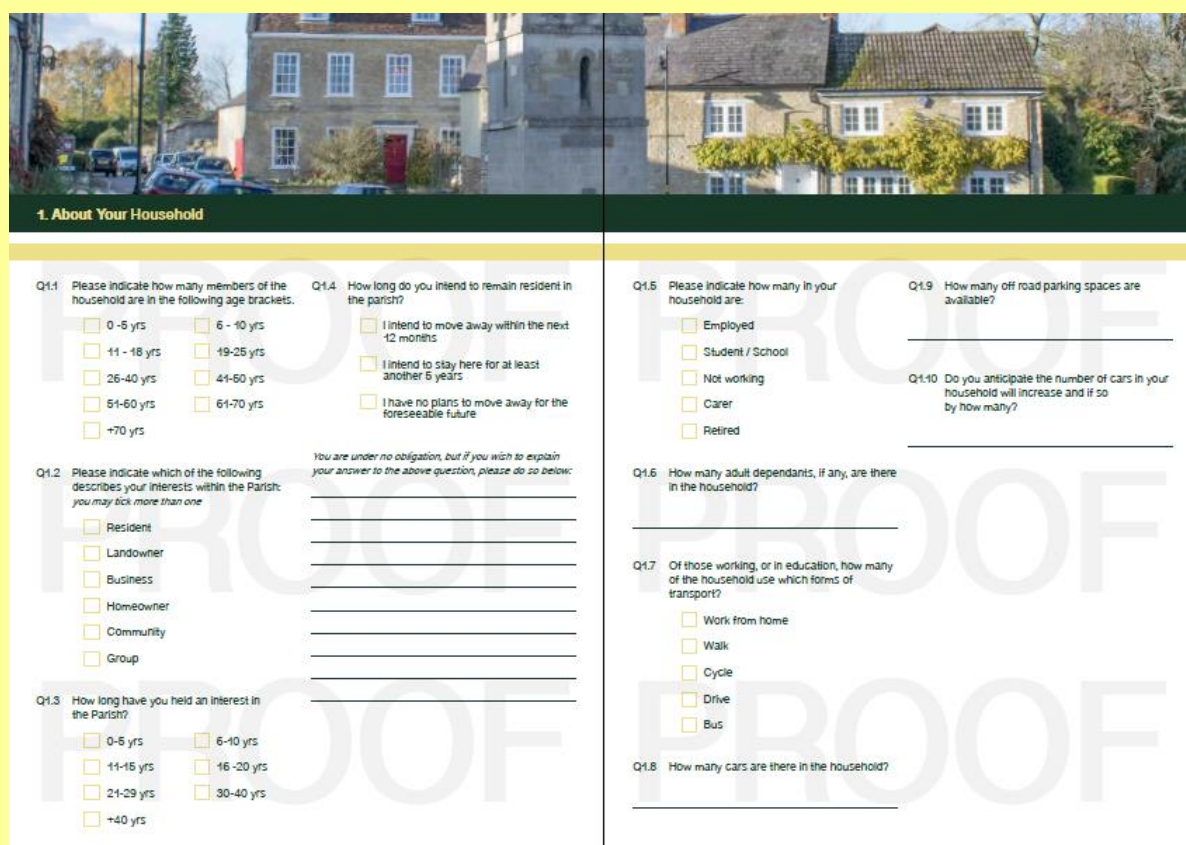


Figure 6: Extract from the village survey questionnaire

- 3.3 Approximately 300 questionnaires were distributed, and 111 completed copies were received.
- 3.4 The results of the survey were analysed and incorporated into the draft version of the Neighbourhood Plan. A copy of the survey results can be seen in the accompanying consultation statement.
- 3.5 A public consultation was held in November 2018 to preview the consultation draft of the plan and receive early feedback from the community into the proposals.
- 3.6 A call for potential housing sites was launched in late July 2019, with a closing date of September 2019, although further sites were submitted after this time and considered as part of the same process.
- 3.7 The submitted sites were considered against the questionnaire responses and feedback received to the public exhibition, leading to Regulation 14 Consultation on the draft plan, which took place between February 2019 and March 2019 for a period of 6 weeks.

3.8 The feedback to the Regulation 14 consultation and a housing need assessment have refined the Neighbourhood Plan housing policies and aspirations for housing delivery, which has shaped this submission version of the Neighbourhood Plan.

Key findings from the Consultation

3.9 The key findings from the consultation were:

- The countryside surrounding the village should be protected from development
- There is a need for new homes in the village
- New homes should be affordable and provide a mix of house types and tenures
- Support was expressed for up to 10 new homes, beyond this level there were more responses in disagreement
- Housing should ideally be located within the existing settlement on infill sites or brownfield land
- Housing should be high quality, efficient and respect the character of the village
- Vehicle speeds should be slowed with traffic calming measures
- Existing green spaces, local wildlife and habitats should be protected




4. Vision

Challenges and Opportunities

- 4.1 There are several challenges facing our community. It is recognised that not all of these challenges can be addressed by land-use policies in the Neighbourhood Plan, but they have informed our strategy and policies where possible.
- 4.2 Equally, the Neighbourhood Plan represents an opportunity to shape our community, protect what we see as special to the character of Emberton and meet our future development needs for the next generation.
- 4.3 These challenges and opportunities include:
- To allow the village to grow and thrive and retain a special sense of community
 - Managing problems relating to traffic within the parish, in particular:
 - Rat running to avoid congestion on the A509
 - Speeding on the A509 and Newport Road
 - Traffic noise generated by the A509
 - Protecting the green spaces around the Parish
 - To foster integration and a greater sense of 'one community' to both sides of the A509
 - To develop new housing to meet our future housing needs
 - To ensure new housing is affordable to residents
 - To provide additional car parking within the village centre
 - To help support our important community asset

Vision

- 4.4 The Neighbourhood Plan Steering Group adopted the following vision to help shape the direction taken by the Neighbourhood Plan and its land use policies...



To maintain Emberton as a thriving community, maintaining and where possible enhancing the rural character and special identity of Emberton parish, whilst allowing the parish to evolve to meet the community's needs, now and in the future.

Community Projects

- 4.5 Within the policy sections of this Neighbourhood Plan, several community projects have been identified. These have been included to address points raised by the village questionnaire survey and consultation results. The Community Projects will be led by the Parish Council or other working groups to deliver improvements to the village and the surrounding Parish.
- 4.6 The Community Projects do not form part of the land use policies of the Neighbourhood Plan and are identified separately at the end of the relevant chapter after the land use policies. Development proposals that would aid the delivery of community projects would be viewed favourably, but only if such proposals do not conflict with the other policies of the Neighbourhood Plan or Development Plan.

5. Development Strategy

- 5.1 The National Planning Policy Framework describes the achievement of sustainable development as the purpose of the planning system, (NPPF, Para 7). Plans and decisions should apply a presumption in favour of sustainable development and should plan positively to meet the development needs in their area, (NPPF, Para 11).
- 5.2 Neighbourhood plans should not promote less development than set out in strategic policies for the area (NPPF, Para 29) and once in force take precedence over the non-strategic policies of the local plan (NPPF, Para. 30).
- 5.3 Plan:MK does not outline a housing requirement for each neighbourhood area. However, Milton Keynes Council has published a briefing note as an interim position to provide an indicative housing figure for those preparing new neighbourhood plans, in accordance with paragraph 66 of the National Planning Policy Framework, 2019 (NPPF).
- 5.4 The indicative housing figure for the neighbourhood plan area is 1 home, although, in the interests of positive planning, plans are encouraged to allocate land for more homes.

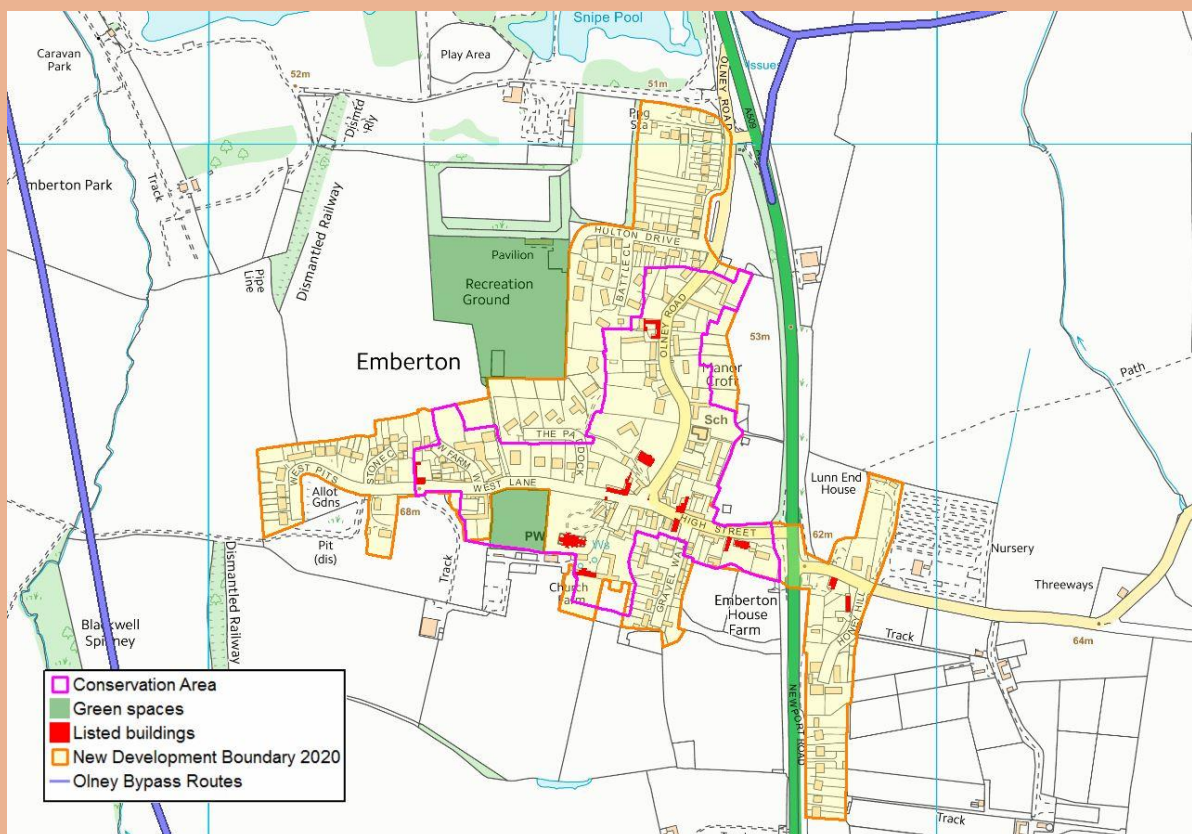


Figure 7: Revised development boundary

- 5.5 Prior to considering locations for new developments the settlement boundary has been reviewed and redefined to include new development or development that had been excluded from the original boundary, but clearly fell within the scope of the settlement. The revised boundary can be seen above.

- 5.6 The expanded settlement boundary meets the aspirations of the Neighbourhood Plan to unify the two elements of the village, addressing the split in the village created by the A509 bypass. The expanded area represents a consistent approach to including existing properties within the settlement boundary.

Survey results and housing need assessment

- 5.7 The survey questionnaire results have highlighted that over 60% of respondents were concerned about the affordability of housing in the parish.
- 5.8 A majority of 70% of respondents said they would not be in support of greenfield land being used for agricultural development, whilst a majority indicated a preference towards development being restricted to infill development within the village.
- 5.9 The housing needs assessment has revealed a limited supply of past building in the village, coupled with high entry costs to property ownership and a lack of rental properties place barriers to those wishing to stay within the village, or move into the village from elsewhere.
- 5.10 The housing need assessment also considered the proportion of rural housing allocated to the villages by Plan:MK. Proportionally compared to the population of the village, Emberton should deliver growth of 7.6 dwellings p.a., however, this figure should be tempered by lower growth rates seen historically and the results of survey questionnaire that supported a lower growth rate.
- 5.11 Accordingly, a 'mid-ground' figure has been selected that delivers housing growth sufficient to meet the aspirations of the Neighbourhood Plan to address affordability, whilst also protecting the countryside, green field land and rural areas of the Parish.
- 5.12 The plan therefore indicates a target housing growth figure of 3.5 dwellings p.a. for the plan period.
- 5.13 A housing allocation is necessary to ensure that the Neighbourhood Plan is compliant with National Planning Policies and can said to have been 'positively prepared', meeting the housing needs of the designated Neighbourhood Area. Making no allocation for housing would not be policy compliant and could be challenged by a speculative developer in the future, takings decisions over the type of housing and where development occurs out of the hands of the community.

Objectives

- To ensure that any development provides Affordable Housing as our number one priority
- To ensure that new housing proposals within the parish show general accord with the wishes and needs of the community in relation to scale, location and mix of dwellings.
- To require new housing to be carefully integrated into the built form of the village and not cause harm to existing important views or heritage assets.

- To secure commitment that any new housing will be highly sustainable, both in construction and operation to reduce the building's carbon footprint.
- New housing should use high quality materials and include measures to enhance the biodiversity of its setting.

Policies

POLICY DS1: HOUSING REQUIREMENTS

The Emberton Neighbourhood Plan will provide for around 40 homes to meet the housing needs of the Parish over the plan period 2019 to 2031.

New housing will be supported on sites that lie within the Settlement Boundary of Emberton as shown on the Policies Map in accordance with other relevant policies of the development plan.

New housing will be delivered through:

- a) Windfall opportunities in accordance with Policy DS3 and Plan:MK Policy DS5 and the NPPF;
- b) A new housing allocation at Acorn Nurseries under Policy H5.
- c) The delivery of affordable housing and discounted market sales housing on suitable sites well related to the rest of the village.

POLICY DS2: DEVELOPMENT STRATEGY

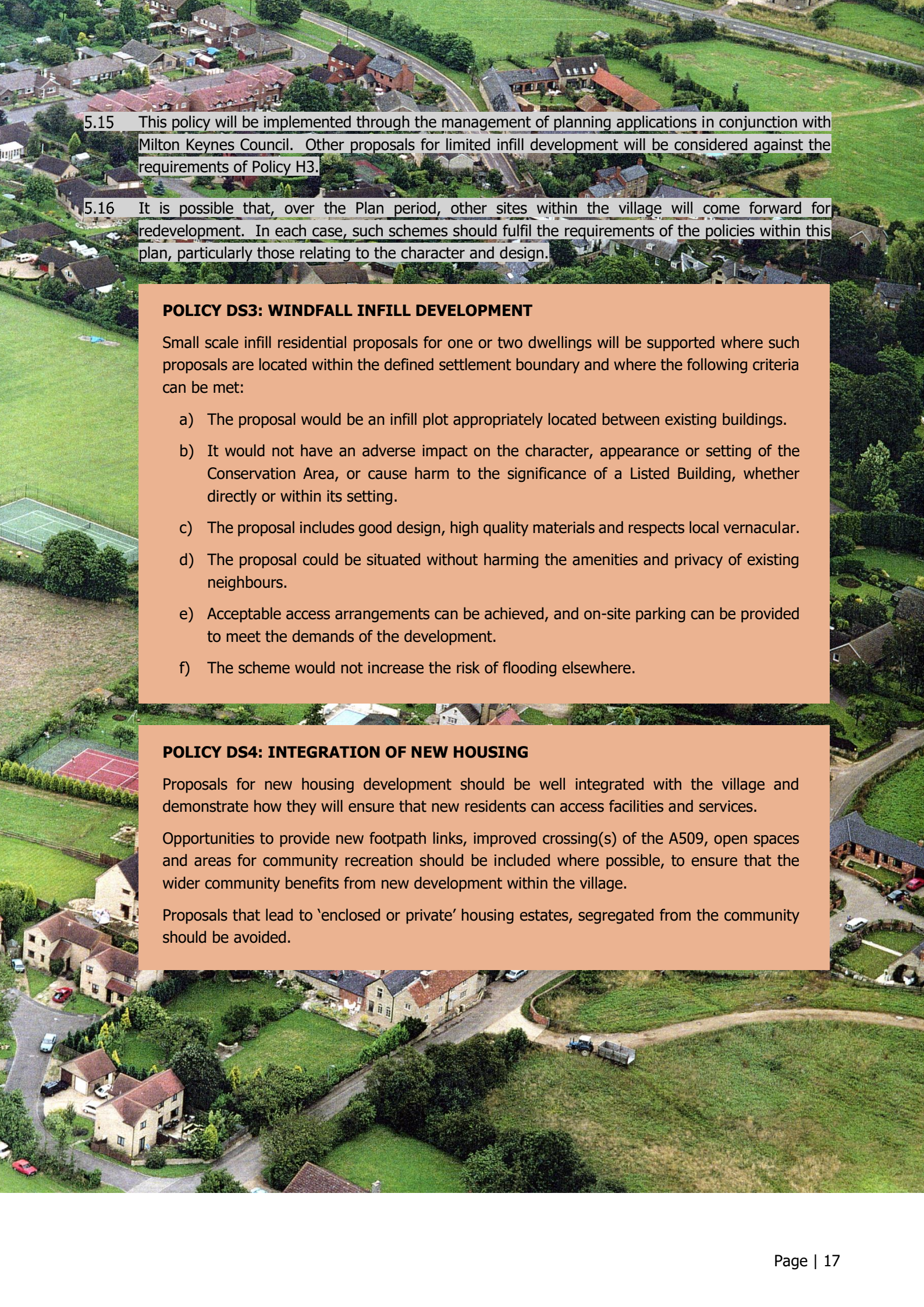
There is a presumption in favour of sustainable development within the settlement boundary shown on the Policies Map, provided that the proposals comply with the provisions of the Emberton Neighbourhood Plan and the Milton Keynes Development Plan.

Development proposals, including windfall development, should:

- a) Preserve or enhance the character and appearance of the Conservation Area and/or the setting of listed buildings and other heritage assets.
- b) Protect and wherever possible, enhance the rural character of the village.
- c) Preserve the wider landscape setting of the village.

Outside of the settlement boundary the remainder of the Parish is defined as countryside. Development proposals will be supported where they are appropriate to the rural area and are in accordance with the NPPF and the Milton Keynes Development Plan.

- 5.14 It is notable that Emberton has grown by 12 net additional dwellings in approximately 10 years, through infilling and small-scale development. There are few infilling opportunities left in the village which would not have significant adverse effects on either the character of the village, the setting of a listed building, or an important gap view.



5.15 This policy will be implemented through the management of planning applications in conjunction with Milton Keynes Council. Other proposals for limited infill development will be considered against the requirements of Policy H3.

5.16 It is possible that, over the Plan period, other sites within the village will come forward for redevelopment. In each case, such schemes should fulfil the requirements of the policies within this plan, particularly those relating to the character and design.

POLICY DS3: WINDFALL INFILL DEVELOPMENT

Small scale infill residential proposals for one or two dwellings will be supported where such proposals are located within the defined settlement boundary and where the following criteria can be met:

- a) The proposal would be an infill plot appropriately located between existing buildings.
- b) It would not have an adverse impact on the character, appearance or setting of the Conservation Area, or cause harm to the significance of a Listed Building, whether directly or within its setting.
- c) The proposal includes good design, high quality materials and respects local vernacular.
- d) The proposal could be situated without harming the amenities and privacy of existing neighbours.
- e) Acceptable access arrangements can be achieved, and on-site parking can be provided to meet the demands of the development.
- f) The scheme would not increase the risk of flooding elsewhere.

POLICY DS4: INTEGRATION OF NEW HOUSING

Proposals for new housing development should be well integrated with the village and demonstrate how they will ensure that new residents can access facilities and services.

Opportunities to provide new footpath links, improved crossing(s) of the A509, open spaces and areas for community recreation should be included where possible, to ensure that the wider community benefits from new development within the village.

Proposals that lead to 'enclosed or private' housing estates, segregated from the community should be avoided.

POLICY DS5: HOUSING AFFORDABILITY

To address housing affordability in the Parish, affordable housing will be required to be delivered in accordance with Plan:MK.

In addition, support will be given to sites where Discount Market Sales Housing is proposed, where they are:

- a) Well related to the village
- b) Located where any adverse traffic impacts can be minimised
- c) Off street parking can be achieved
- d) Where there would be no adverse impacts on the character and setting of the Conservation Area and other Heritage Assets.

Sites not well related to the settlement boundary will not be supported.

- 5.17 In order to meet the future housing needs of Emberton and deliver a 'step-change' in housing provision an allocation of new housing has been made at Acorn Nurseries. This site represents the only large 'brownfield' land in the Parish that can provide sufficient housing numbers to enable the delivery of affordable housing, that will benefit those wishing to stay in village or join our community. The integration of the new housing allocation into the village is essential, so it is expected that improvements to the A509 will be necessary to provide an upgraded pedestrian crossing.

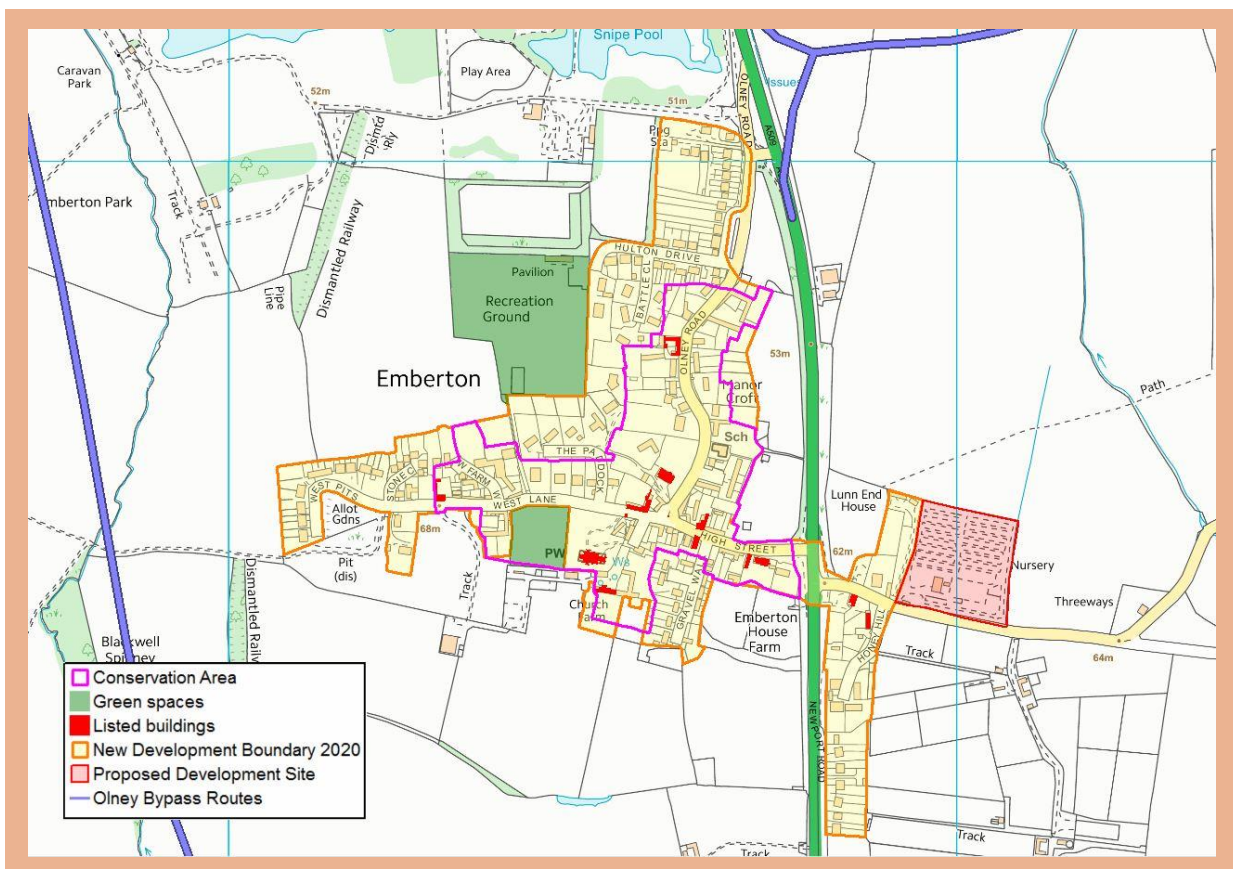


Figure 8: Map of proposed development site

POLICY DS6: NEW HOUSING ALLOCATION ACORN NURSERIES

Land at Acorn Nurseries, as defined on the proposals map is allocated for a new housing development to be delivered as part of housing delivery under Policy DS1 'Housing Requirements'.

Proposals will be supported where it can be demonstrated that they:

- a) Include at least 31% affordable housing in accordance with Plan:MK Policy HN2. Strong support will be given for development that provides greater levels of affordable housing.
- b) Provide a balanced mix of housing, including a range of house types and sizes suitable for meeting a range of needs. These should reflect the recommended mix of housing type and size included at Table 7.1 of Plan:MK.
- c) Be very sensitive to the site surroundings and nearby heritage assets, including below ground archaeology and demonstrate through appropriate assessment that the scheme will make a positive contribution to the character and appearance of the area.
- d) Incorporate good design, high quality materials and local vernacular design details.
- e) Provide a high-quality landscaping scheme to the site boundaries and demonstrate through an effective management plan that there will be net gain in biodiversity.
- f) Ensure that the proposed houses are highly sustainable, including energy efficiency measures and meet lifetime homes standards.
- g) Include highway and access improvements as required by MKC, to include visibility splays and pavements as required.
- h) To be safely integrated with the remainder of the village, including pedestrian access improvements across the A509.
- i) Parking spaces and turning areas should be provided to fully meet the needs of each house and should include visitor spaces and turning for refuse and delivery vehicles.
- j) Provide future residents with landscaped shared spaces and private amenity gardens.
- k) Provide on-site attenuation for drainage and prevent surface water runoff causing a greater level of flood risk elsewhere.

Implementation

- 5.18 These policies will be implemented through the development management process and with early engagement from developers, including informal discussions prior to applications being made if necessary. Developers will be expected to demonstrate through their design and access statements how the policy requirements of the Neighbourhood Plan are to be delivered.

Community Project... Developer Engagement

- 5.19 Whilst not a land use policy, the Parish Council will encourage the engagement of developers with the Parish Council to consider the options for the layout and design of new housing development.

6. Business and Employment

Context and justification

- 6.1 Emberton comprises a small village set within a largely rural parish. Agriculture plays an important role of in the life of the Parish, with a number of farms surrounding the settlement. The majority of working residents commute to work, benefiting from the convenient access to Milton Keynes and the M1 motorway offered by the A509, or the close proximity to Olney.
- 6.2 Around 60% of the respondents to the survey felt that businesses should be encouraged to establish and develop in the Parish. No sites for employment development have been identified or submitted for consideration, so this Neighbourhood Plan proposes no allocations within the development boundary for employment uses.
- 6.3 Support will be given to new business proposals on a windfall basis, subject to them meeting the requirements of Plan:MK Policy DS5, being appropriately located, not having significant adverse impacts on the character and village or rural area, and would not give rise to unacceptable impacts on neighbours.
- 6.4 This would apply to new development as well as conversions of existing buildings.
- 6.5 Whilst improvement has been made to the internet access speed within the Parish, the need to ensure online connectivity remains as fast as possible and remains stable. This is particularly important to support flexible home working and ensuring access to online services.



Objectives

- To support local businesses to grow within the parish and encourage employment opportunities such as home working.
- To support the conversion of redundant buildings to appropriate employment generating uses subject to impacts being acceptable

Policy

POLICY BE1: BUSINESS AND EMPLOYMENT

Applications for development that will create employment will be positively supported subject to meeting the following criteria:

- a) The site is located within the defined settlement boundary or is an existing building suitable for conversion. New buildings outside of the settlement boundary will be supported in accordance with NPPF policy on the rural economy and the Milton Keynes Development Plan.
- b) The proposed development can be accommodated into its surroundings in terms of design, materials and is sympathetic to the character of the area.
- c) There would not be an adverse impact on the amenity of neighbouring properties and the character of the area by virtue of parking, lighting, noise, vibration and fumes.
- d) The development can be safely accessed by the expected volume and size of vehicles, including staff and deliveries and would not generate traffic to such an extent that would harm the rural character of the village.

Implementation

- 6.6 This policy will be applied through the consideration of planning applications in conjunction with Milton Keynes Council.



7. Character and Design

Context and justification

- 7.1 Emberton has a distinct character that makes the parish a special place to live and work. There are numerous buildings designated as heritage assets and attractive views through the historic core of the village along Olney Road, the High Street and West Lane. Indeed, the clock tower here is a key feature, creating a focal point for the village.
- 7.2 The Neighbourhood Plan allows the community to have a say in future development proposals and ensure that they respect the character and appearance of the parish, the Conservation Area and Listed Buildings.
- 7.3 The choice of high-quality building materials, stone walls where appropriate and good landscaping will help development proposals to respect and blend into the character of the parish. The Neighbourhood Plan seeks to ensure that the parish evolves in a managed way for the benefit of future generations.
- 7.4 The National Planning Policy Framework emphasises the weight that should be afforded to the protection of heritage assets. Proposals will be required to consider the significance of nearby heritage assets; the level of detail should be proportionate to the importance of the assets.
- 7.5 Good design should contribute towards making places better for people, providing buildings that are fit for purpose, adaptable and sustainable. The delivery of good design is key to the planning system and a requirement of the National Planning Policy Framework. This policy will be delivered by careful consideration of proposals through the development management process.



Objectives

- To conserve and enhance the historic environment of the parish.
- To maintain and enhance the character of Emberton, ensuring that changes are carefully considered to be harmonious with existing buildings and development.

- To integrate new development into the village, to avoid a sense of 'add-on' estates.
- To ensure that new buildings and extensions are designed to the very best standards and reflect the rural setting of the parish and use high-quality materials that enhance the surroundings.
- To ensure that new development protects important views, buildings and character elements that the community cherish.

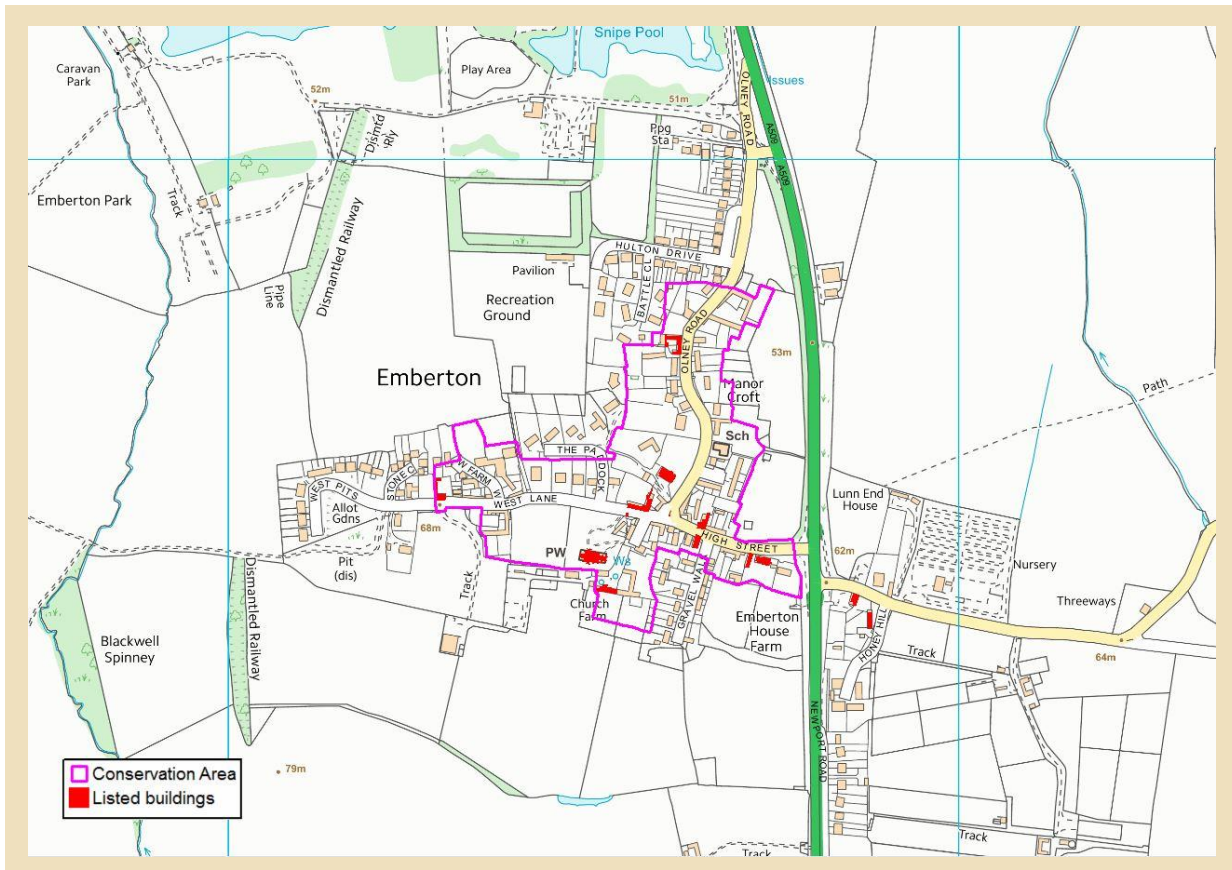


Figure 9: Emberton Conservation Area and Listed Buildings

Policies

POLICY CD1: CONSERVATION AND HERITAGE

Development proposals should protect, conserve and, wherever possible, enhance the significance of heritage assets within the Parish, including the character and appearance of the Conservation Area, Listed Buildings, Ancient Monuments and their settings.

This will include consideration of the following:

- a) The setting of any nearby listed buildings and their curtilages.

POLICY CD1: CONSERVATION AND HERITAGE CONTINUED...

- b) The setting of Ancient Monuments.
- c) Impact on the character and setting of the Conservation Area.
- d) Site specific design issues, including demonstration that proposals would make a positive contribution to the street scene, would be sympathetic to the character of neighbouring properties and would incorporate high-quality materials.

Development proposals that would harm the character and setting of the Conservation Area and heritage assets will be resisted.

POLICY CD2: HIGH QUALITY DESIGN

All new development should demonstrate high quality design, respect the character of the surrounding area and enhance the quality of design within the village wherever possible. Development proposals that would enhance the character and appearance of the Conservation Area will be supported.

A central part of achieving high quality design is responding to and integrating with local surroundings and landscape context, as well as the built environment, through:

- a) Using high quality materials that complement the existing palette of materials used within the area.
- b) Demonstrate how proposals achieve sustainable development and are integrated into the village to promote social inclusion and support of village facilities.
- c) Being of a scale, density, massing, height, design and layout that reflect the character of the village or particular area in which the development proposal is located.
- d) Ensuring safe access for pedestrians, cyclists and road users.
- e) Providing adequate refuse and recycling storage incorporated into the scheme to minimise visual impact.
- f) Innovative design that is sustainable in its design, construction and operation.
- g) Promoting high quality interior spaces and the use of natural light and solar gain.
- h) Adopting the principles of sustainable urban drainage, where appropriate.

All dwellings capable of being inhabited by families should provide sufficient private garden amenity space to meet household recreational needs. These should be in scale with the dwelling, reflect the character of the area and be appropriate in relation to topography and privacy.

POLICY CD3: LOCATION OF CAR PARKING

Parking spaces should be located in a manner that ensures that parked cars do not overly dominate the street scene and do not form clusters of frontage car parking.

Parking should be designed so that it fits in with the character of the proposed development. Considerations should include:

- a) Garages designed to reflect the architectural style of the house they serve.
- b) Garages set back from the street frontage.
- c) Parking located in between houses (rather than in front) so that it does not dominate the street scene.

Parking for employment development, including conversions of existing buildings should meet the requirements of the proposed use and be located so as to respect the character of the village and rural area.

Implementation

- 7.6 This policy will be implemented through consultation with Milton Keynes Council during the planning application process. Early discussion and communication with the Parish Council when formulating proposals will assist developers to obtain feedback on their proposals.



Figure 10: West Lane (date unknown)

8. Highways and Transport

Context and justification

- 8.1 Views on traffic, speeding and the risk of accidents were issues covered by the resident's survey questionnaire. It was evident that the around three quarters of residents who responded felt that additional traffic calming to reduce vehicle speeds through the parish would be beneficial.
- 8.2 There are also rat-running issues created by congestion and queuing traffic on the A509 leading to drivers taking a short cut through the village to re-join the A509 further along the queue. Busy times at the Country Park can also give rise to parking problems and congestion at that end of the village, as visitors spill out into the surrounding area to park. Speeding is also evident on the A509 and within Emberton village.
- 8.3 The survey questionnaire asked respondents if noise and air quality were an issue to them. Whilst a significant number identified with these statements, a majority did not, suggesting that this is localised to those areas of the village and parish closer to the A509 corridor.
- 8.4 The use of private cars dominates journeys out of the village. The village has a bus service, which provides a vital lifeline for those residents who do not use a car and need to access services in the surrounding towns and was relatively well used by around 14% of respondents.
- 8.5 Presently it is unclear where speed limits change from the national speed limit to 30 mph at the Emberton village boundary.
- 8.6 The same speed limit applies to Prospect Place and Newport Road, although it is not obvious that the speed limit has changed from the 40 mph stretch of the A509.
- 8.7 The aim would be to unify the location of entrance signs into the village with the speed limit change and establish a clearer feature or signage that signals to drivers they have entered a settlement.
- 8.8 This policy will be delivered through the development management process and by seeking contributions towards the village entrance improvements from development proposals.



Objectives

- To ensure that footpaths, bridleways and cycling routes throughout the Parish are maintained and accessible.
- To consider ways to improve off-road car parking for existing properties, where this can be achieved without adverse impacts on the character of the village streets.
- To ensure that the new homes in the village have information available to promote non-car transport choices supporting sustainable development.

Policies

POLICY HT1: TRANSPORT, HIGHWAYS AND NEW DEVELOPMENT

New development proposals will be expected to demonstrate that a safe and satisfactory access can be achieved, including the delivery of visibility splays to meet the requirements of the Highway Authority.

Proposals for housing development east of the A509 should demonstrate how pedestrian access to village facilities and services can be achieved, including improvements to pedestrian crossings to ensure a safe and convenient link to the existing footpath network.

Subject to other policies in the Development Plan, proposals will be supported where it can be demonstrated that they have carefully considered the impact of traffic and car parking on the character and appearance of the village, particularly in areas where narrow streets can exacerbate the impact of additional traffic.

New development, including reserved matters applications on existing permissions will be expected to demonstrate how information will be made available to the first occupiers to help them make sustainable, non-car-based transport choices, including maps for walking and cycling routes and information on bus services.

POLICY HT2: VILLAGE HIGHWAY ENHANCEMENT

Development proposals that include measures to reduce the impact of traffic, improve the highway environment within Emberton and the wider Parish and to increase use of non-car modes of transport will be supported, subject to compliance with other policies of the Development Plan.

Implementation

- 8.9 These policies will be delivered in conjunction with the requirements of the Milton Keynes Residential Development Design Guide and will be applied through the consideration of planning applications.



Figure 11: Parking around the clock town in the centre of Emberton



Figure 12: The Ouse Valley way runs through the Parish close to the village

9. Environment

Context and justification

- 9.1 The review of the Neighbourhood Plan questionnaire has revealed that the residents of Emberton strongly support the protection and enhancement of green spaces, habitats and local wildlife. Therefore, under the scope of the Neighbourhood Plan there is an opportunity to implement several measures aimed to preserve and enhance the environment of the parish.
- 9.2 Emberton is fortunate to have a variety of countryside access opportunities nearby, including Emberton Country Park adjacent to the River Ouse. The Ouse Valley Way and the Three Shires Way long-distance footpaths both pass through the parish.
- 9.3 With these resources on our doorstep, it is important to encourage access to the countryside for several reasons including increasing public engagement with the environment around them, promoting interest in wildlife and supporting sport and recreation. These are all beneficial to health and well-being.



Figure 13: River Ouse which runs to the north of the Village

- 9.4 Ensuring that the connections between Emberton and these recreation opportunities are well sign posted, maintained and appealing will aid residents to choose non-car modes of transport, such as cycling and walking for short journeys, will also help achieve sustainable travel choices.
- 9.5 It is recognised that without the support of local landowners in the parish, there is a limited amount that the Neighbourhood Plan can achieve itself, but where opportunities do exist to improve access to the countryside they will be supported, subject to compliance with other policies in the Neighbourhood Plan.

- 9.6 The Parish Council will consider ways in which it can enhance the ecological and biodiversity value of land that they control, through habitat creation and adopting alternative management practices. In turn this could encourage other landowners to do the same on their own sites, with support and guidance if required.
- 9.7 Through the Neighbourhood Plan, support will be given to proposals that have a positive enhancement of the environment and biodiversity of the parish for the benefit of existing and future generations.

Green Spaces

- 9.8 The following areas of local green space are important features within Emberton and should be protected from future development.
- Recreation ground, Hulton Drive
 - Field next to Church, West Lane
- 9.9 The extent of the green spaces can be seen on Figure 14 below and the Policies Map.

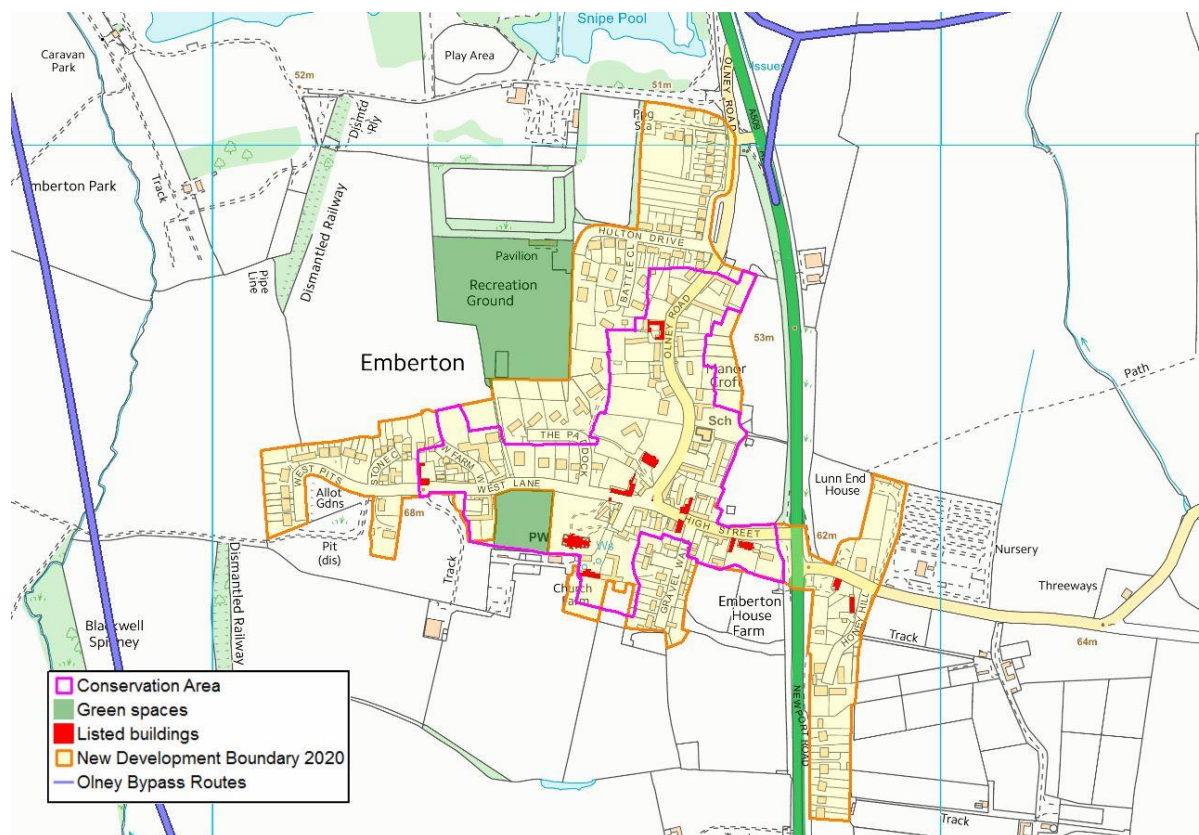


Figure 14: Proposed Green Spaces

- 9.10 Each of these spaces is important to the village in terms of the recreation value the space has to local residents or the contribution it makes visually to the setting of the Grade II* Listed Church and the Conservation Area.

- 9.11 The protection of these green spaces is important to the community and fulfils the requirements of Paragraph 100 of the NPPF. They are all in close proximity to the community, hold local historical significance and recreational value and are not extensive tracts of land.
- 9.12 It is therefore appropriate to protect these spaces from development.

Ancient Woodland

- 9.13 Hollington Wood situated to the south of Petsoe End is designated as Ancient Woodland and as such is protected by Policy NE1 of Plan:MK.

Objectives

- To promote access to the countryside for recreation and enjoyment where possible.
- To protect important Local Green Spaces and other landscape designations within the Parish
- To support the provision and enhancement of habitats for wildlife.
- To seek opportunities to enhance the quality of the environment within the parish, including biodiversity and wildlife networks.
- To ensure any development proposals do not adversely impact natural features including mature trees and hedgerows.

Policies

POLICY E1: LOCAL GREEN SPACE

The following areas as shown on the policies map are designated as Local Green Space, as they are important to the community for their recreational value and contribution towards the heritage significance of the Conservation Area and Listed Church.

- a) Recreation ground, Hulton Drive
- b) Field next to Church, West Lane

Local Green Space will be protected from inappropriate development that causes harm to its open character. Development leading to the loss total or partial loss of these spaces will only be supported in very exceptional circumstances.

POLICY E2: ENVIRONMENT AND BIODIVERSITY ENHANCEMENT

Appropriate proposals that enhance the natural environment and biodiversity of the parish will be supported.

New development will be expected to demonstrate how the environment of the site and the wider parish can be enhanced. Biodiversity improvements will be a focus of development contributions to aid the mitigation of the adverse effects of development on the environment.

These could include the following:

- a) Playing Field - Scope for planting scattered trees within the grounds; developing shrubs and stands of wildflowers along field boundaries; installing habitat boxes with a focus on birds, bats, hedgehogs and invertebrates.
- b) Roadside verges - Scope for the introduction of wildflowers along selected sections of the grass verge.
- c) Development proposals should maintain and enhance existing onsite biodiversity assets, and provide for wildlife needs on site, where possible. Where appropriate on-site biodiversity enhancements such as new roosting features for bats or nesting features for birds should be incorporated into the fabric of the development.

The delivery of environmental and biodiversity enhancements will be secured through management plans and / or planning conditions. The Parish Council would welcome early engagement and discussion to identify strategies that could assist the delivery of this policy.

POLICY E3: TREES AND HEDGEROWS

All development proposals should identify any significant trees within the site or affected by the proposals and demonstrate how these trees will be protected in accordance with BS5837 or the equivalent standards.

Mitigation and protection schemes must be implemented prior to construction work commencing and must be retained in good order throughout the construction period.

If the loss of trees and/or other established vegetation cannot be avoided, all development proposals will have to allow for clear, effective measures to offset the loss of biodiversity. This may include (but may not be limited to) planting new, high-quality trees and/or funding off-site planting schemes (although on-site mitigation is encouraged).

Implementation

9.14 These policies will be implemented using planning conditions, developer agreements governing contributions and the preparation of effective biodiversity management plans.

10. Climate Change and Flooding

Context and justification

- 10.1 Emberton is located within the River Ouse valley, slightly elevated above the flood plain. The risk of fluvial flooding within the village is low, although other parts of the parish including Petsoe End are affected and are at medium risk. The risk of flooding from surface water (pluvial), primarily from heavy rainfall during storm events overwhelming the drainage system is more widespread through the village, as indicated by Figure 15.
- 10.2 The Environment Agency Flood Map for Planning identifies that some of the village is at risk from surface water (Pluvial) flooding, primarily from surface water running off the surrounding fields when the ground is saturated or during storm events.

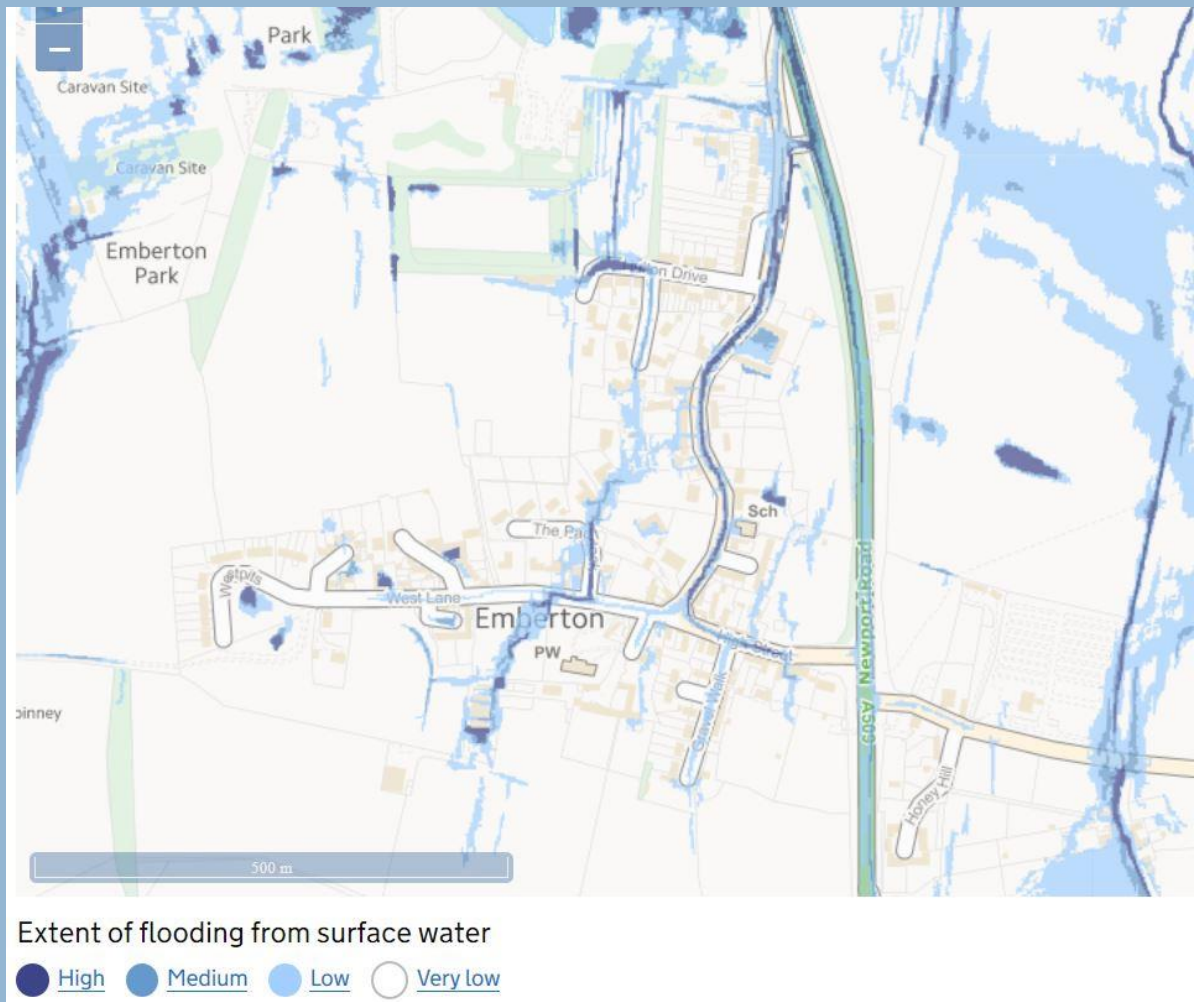


Figure 15: Environment Agency surface water flood risk map

- 10.3 The Neighbourhood Plan cannot make changes directly to the drainage system around the parish, but it can require development proposals to ensure that surface water is managed effectively within the site and risk of flooding elsewhere is not exacerbated.

- 10.4 The Neighbourhood Plan recognises the threat that climate change poses, particularly to low lying areas that are at risk of flooding or could be brought into flood risk in the future.
- 10.5 Extreme climate events are likely to become more common place, with heavier and more concentrated rainfall, coupled with periods of drought. Development proposals should be designed in a manner that helps to address the effects of climate change, whilst also minimising as far as possible future impacts.



Figure 16: Emberton Solar Farm and Wind Farm

Objectives

- To respond to climate change and encourage sustainable development.
- To require development to be safe from flooding and not exacerbate the risk of flooding elsewhere.
- To encourage the improvements in drainage systems to capture and slow surface water run-off.

Policy

POLICY FR1: CLIMATE CHANGE AND FLOODING

To promote sustainable development and combat climate change, all new development in the Parish will be expected to adopt sustainable drainage schemes.

Surface water runoff should be attenuated on site whenever possible, and if achievable, should be combined with semi-natural balancing ponds to provide enhanced biodiversity and new wildlife habitats.

Proposals should include where possible measures to reduce the carbon footprint of the development in operation, including measures to benefit from solar gain, provide shading and cooling, natural light and insulation.

Energy efficiency and renewable energy proposals will be supported where they are appropriate sited and would not cause significant adverse visual or amenity impacts.

Implementation

- 10.6 The Neighbourhood Plan will deliver this policy through the planning application process when considering development proposals.

11. Community

Context and justification

- 11.1 Emberton has a strong sense of community offering a range of facilities and services to residents.
- 11.2 Emberton has a bus service, which provides a vital lifeline for those residents who do not drive, connecting the village to Newport Pagnell, Olney, Milton Keynes and Northampton. As with all rural bus routes, there is pressure to reduce services in response to funding restrictions and this is a matter of great concern to those who rely upon this service.
- 11.3 It is recognised that the Neighbourhood Plan cannot control the provision of bus services in Emberton. Nevertheless, it is important to recognise the role that bus services play to our community, meeting the needs of those who do not drive or have access to a car.



Figure 17: The Bell and Bear P.H. Emberton

- 11.4 It is therefore important that the bus route remains unobstructed and free from parked cars that can disrupt the bus service. The objective to support the bus services and respond to any proposed changes is one that the Parish Council will embody and take forward when considering development proposals.
- 11.5 The Bell and Bear public house on the High Street recently closed (2019). This is the last remaining dedicated public house in the village, although there is a bar in the Pavilion, this is not open on a daily basis. The community are preparing a bid for the premises under the Assets of Community Value scheme to allow the pub to be run by the community for the benefit of the community.

Objectives

- To support the provision of new and protection of existing community facilities.
- Support the bus route through the village by not allowing development proposals that would exacerbate on street parking along the route and disrupt the bus service through the village.
- Support the school being brought back into active use.
- Prevent the permanent closure of the last public house in the village, a cornerstone to our community and social life in the village.

Policy

POLICY CF1: COMMUNITY FACILITIES

There will be a presumption in favour of the protection of existing community facilities for current and future generations. Proposals that would involve the loss of a community facility, or its change of use to a non-community beneficial use, will not be supported without evidence to justify the loss.

For the avoidance of doubt, community facilities within the village are defined as:

- a) Church
- b) The Pavilion and the Archive room in the Pavilion
- c) The recreation area
- d) Emberton country park
- e) The Bell and Bear Public House
- f) Emmots Well

Proposals for improvements to existing community facilities, or additional services and facilities within the village, will be supported subject to consideration of the potential for noise, disturbance, fumes or smell, traffic generation and car parking.

POLICY CF2: EMBERTON SCHOOL

Emberton School is not in active use and is under threat of closure. Any development proposals that would prevent the School from being brought back into active educational use will be resisted.

Any proposal for development of the School grounds, including the playing field, will be carefully considered and should demonstrate clear benefits to the village and community, such as the delivery of affordable housing, car parking improvements and environmental enhancement.

Proposals should ensure that the School is left with adequate space to meet the present and future needs, including the future expansion of the School should the requirement arise.

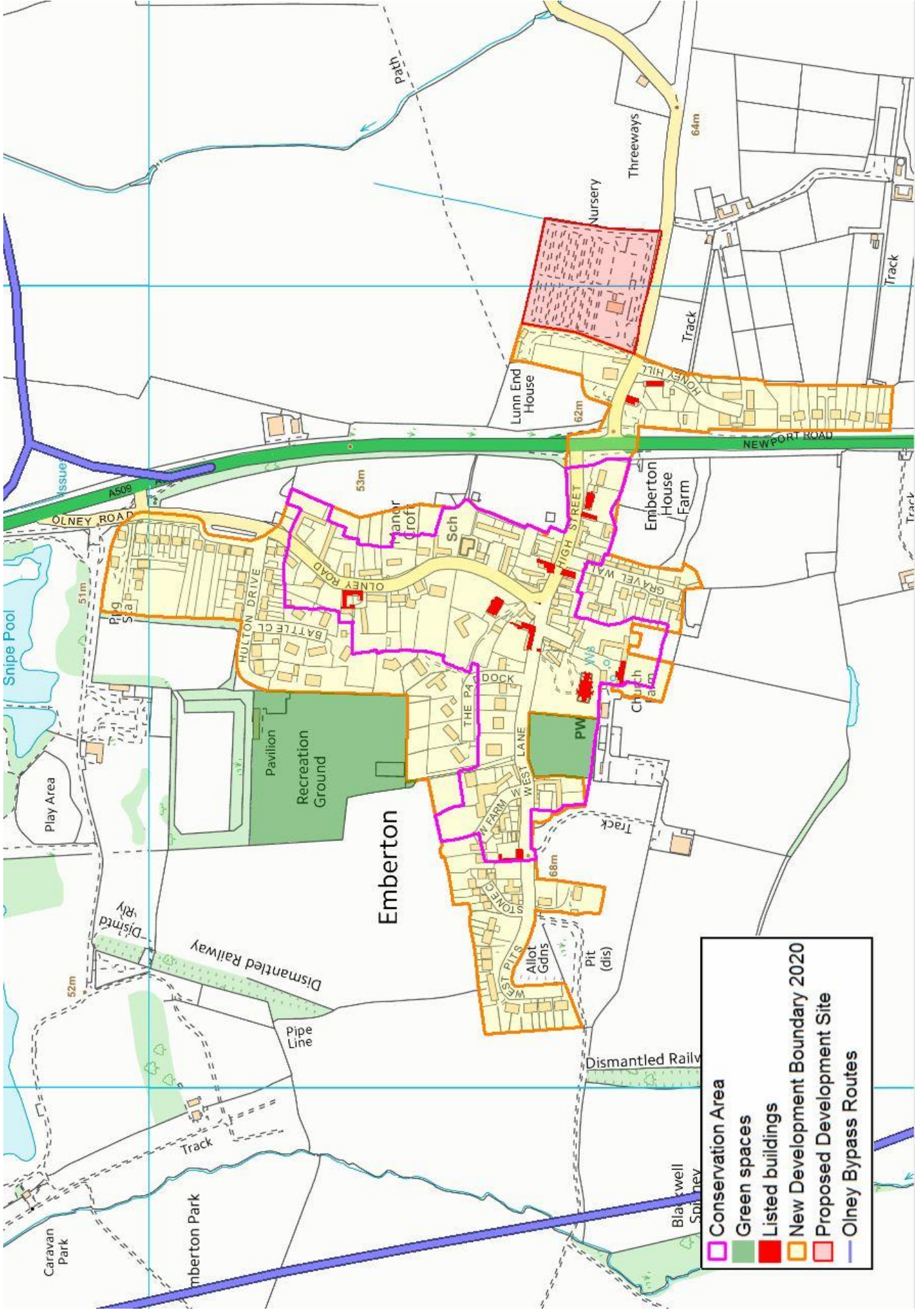
Implementation

- 11.6 These policies will be implemented through the development management process through the consideration of planning applications.



Figure 18: Emberton Street Fair

Proposals Map



- Conservation Area
- Green spaces
- Listed buildings
- New Development Boundary 2020
- Proposed Development Site
- Olney Bypass Routes

Annex A: Listed Buildings

Listed buildings in Emberton Parish

Source: Historic England (March 2018)

CHURCH OF ALL SAINTS, CHURCH LANE, Emberton, Milton Keynes
MEMORIAL CLOCK TOWER, HIGH STREET, Emberton, Milton Keynes
THE COACH HOUSE, 19A, HIGH STREET, Emberton, Milton Keynes
STABLE BUILDING TO SOUTH EAST OF EMBERTON HOUSE, NEWPORT ROAD, Emberton, Milton Keynes
OLNEY BRIDGE, OLNEY ROAD, Emberton, Milton Keynes
LYCHGATE AT NORTH EAST CORNER OF CHURCH OF ALL SAINTS, CHURCH LANE, Emberton, Milton Keynes
GRAVEL LODGE, 4, GRAVEL WALK, Emberton, Milton Keynes
THURSBY, 2, GRAVEL WALK, Emberton, Milton Keynes
CEDAR HOUSE, 19, HIGH STREET, Emberton, Milton Keynes
THE OLD RECTORY COTTAGE, 7, OLNEY ROAD, OLNEY ROAD, Emberton, Milton Keynes
STONEPITS HOUSE, WEST LANE, Emberton, Milton Keynes
THE OLD POST HOUSE, 31, OLNEY ROAD, Emberton, Milton Keynes
EMBERTON HOUSE, NEWPORT ROAD, Emberton, Milton Keynes
THE BELL AND BEAR PUBLIC HOUSE, 12, HIGH STREET, Emberton, Milton Keynes
BRAMLEY COTTAGE, 23, OLNEY ROAD, Emberton, Milton Keynes
HIRONS, 25, OLNEY ROAD, Emberton, Milton Keynes
WEST LANE HOUSE, WEST LANE, Emberton, Milton Keynes
CHURCH FARMHOUSE, CHURCH LANE, Emberton, Milton Keynes

Note: Listed buildings are marked on the Conservation Area map in red.

Annex B: Assessment of Potential Housing Sites

Call for sites

During the initial consultation process, local landowners surrounding the village were contacted to invite them to put forward sites for consideration as part of this Neighbourhood Plan. A total of fifteen sites were suggested for consideration, which between them could deliver more than 160 houses.

Site selection methodology

When considering locations for new development, an assessment of potential options around the village has been undertaken. The sites were assessed on a comparative basis against the following consistent criteria:

- Applying a clear preference in accordance with the National Planning Policy Framework (NPPF) and the wishes of the community, for new housing to be located on previously developed land (brownfield sites), over and above greenfield development
- Compatibility with relevant sections of Plan:MK that apply to Neighbourhood Plans
- Potential sites within the proposed settlement boundary would be prioritised over sites separated from it
- Development in open countryside will be avoided
- Sites that provide affordable housing would be prioritised
- Highways considerations
- Potential sites should not have significant adverse impacts upon the historic setting of the village or heritage assets
- Potential sites should avoid locations that are at risk of flooding if lower risk opportunities are suitable, in accordance with the NPPF and applying the sequential test and exceptions test
- Other factors such as access, utilities, feasibility, land availability, and whether housing could be realistically delivered within the timeframe of the Neighbourhood Plan

Consideration of potential housing sites

On that basis it has been necessary to compare the suggested sites against the site selection methodology to assess their suitability for inclusion within the Neighbourhood Plan. The suggested sites are indicated on the map at Figure 19 as shown overleaf and have been assessed using a standard methodology.

The following tables detail the planning merits of each site put forward on a consistent basis and have allowed a direct comparison to be made for each opportunity.

The assessment has also had regard to the aspirations of the Neighbourhood Plan and the feedback of the community through the consultation and parish questionnaire.

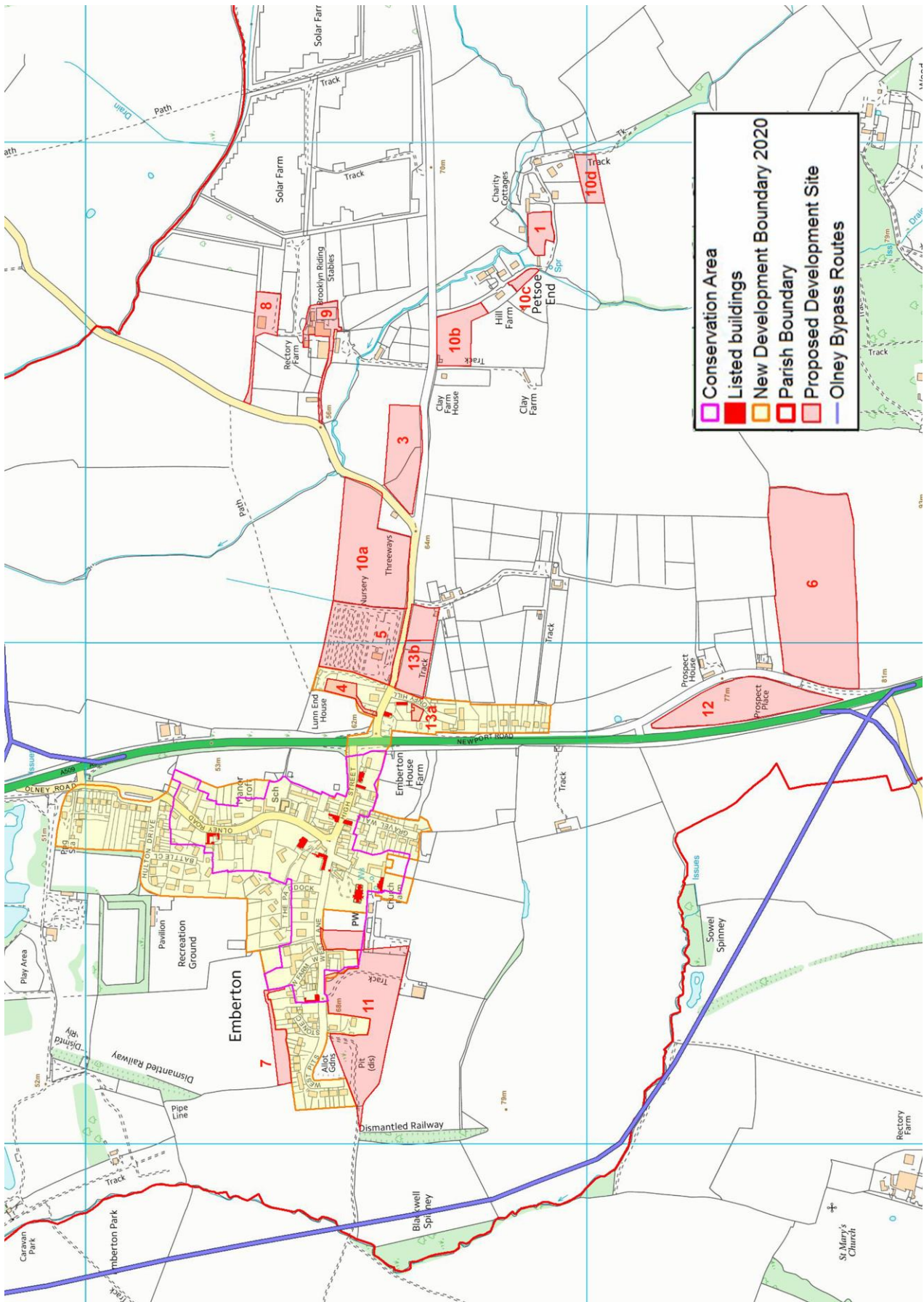


Figure 19: Potential Housing Allocations put forward for consideration

Site Ref	001/2018	
Site Address	Charity Fields, Petsoe End, Emberton	
Area / No. of units?	0.8 ha / Several dwellings	
Compatible with Plan:MK	No. DS5 Open Countryside	
Qty of Affordable units	No mandatory requirement and none offered	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?		
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	✓
	Zone 1 (Low Risk)	
Surface Water Flooding risk?	High	
	Medium	✓
	Low	
	Very Low	
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "unsustainable location and there are fewer facilities for pedestrians. The width and alignment of the local roads in Petsoe End is unsuitable for an increase in vehicle traffic."
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	✓
Assessment	<ul style="list-style-type: none"> Not acceptable due to Highways and Plan:MK DS5 & CT5 	
Community benefits?	None	

Site Ref	002/2018	
Site Address	The Institute, Olney Road, Emberton	
Area / No. of units?	Not Known / Several small dwellings	
Compatible with Plan:MK	Yes	
Qty of Affordable units	No mandatory requirement, would be offered for sub market rent by EUC.	
Location type?	Greenfield	
	Previously developed	✓
Within settlement boundary?	Outside	
	Within existing area	✓
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	
Relationship to settlement generally?		
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Existing community hall.
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	✓
	No	
	Describe	Opposite Clock Tower
Highway access constraints?	Yes	✓
	No	
	Describe	Parking only on the road which is a bus route
Utilities constraints? (Specify type)	Yes	
	No	✓
	Unknown	
Assessment	Withdrawn	
Community benefits?	Chance to improve parking around Clock Tower the parking issues associated with popular events at the Institute.	

Site Ref	003/2018	
Site Address	Rectory Grange, Petsoe	
Area / No. of units?	3.69 ha / 6 to 8 dwellings	
Compatible with Plan:MK	No. DS5 & CT5	
Qty of Affordable units	No mandatory requirement and none offered	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	Separated from settlement by the Nursery site, another field and the Newton Road.	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "remote from the village and unconnected to it with footways. It's on an unlit rural road where the national speed limit applies. ... therefore not acceptable including from a general sustainable point of view."
Utilities constraints? (Specify type)	Yes	✓
	No	
	Unknown	✓
Assessment	<ul style="list-style-type: none"> Not acceptable due to Highways, and Plan:MK DS5 & CT5 	
Community benefits?	None	

Site Ref	004/2018	
Site Address	The Lodge, Newton Road, Emberton	
Area / No. of units?	0.24 ha / One dwelling	
Compatible with Plan:MK	Yes	
Qty of Affordable units	No mandatory requirement and none offered	
Location type?	Greenfield	
	Previously developed	✓
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	✓
	Linear extension	
	Detached or remote	
Relationship to settlement generally?	Would be a rounding of the existing settlement boundary.	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Garden/Tennis court
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	
	No	✓
	Describe	
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	✓
Assessment	<ul style="list-style-type: none"> • Would be an infill that would round the existing settlement boundary • Arguably brownfield as part of existing garden and so fits highest priority in assessment 	
Community benefits?	None	

Site Ref	005/2018	
Site Address	Acorn Nursery, Emberton	
Area / No. of units?	2.0 ha / 20 to 40 dwellings	
Compatible with Plan:MK	Potential issue with DS5 – open countryside, would need to argue an exception due to current use and requirement for affordable housing or extend development boundary to include site.	
Qty of Affordable units	7 - 13	
Location type?	Greenfield	
	Previously developed	✓
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	✓?
	Linear extension	✓?
	Detached or remote	
Relationship to settlement generally?	Would extend the existing settlement boundary down Newton Road.	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Horticultural nursery.
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Visibility is not acceptable and there are some conflicts with the adjacent access. A new access slightly further east could be acceptable including the provision of footways. This is a relatively large number of units which will generate pedestrian movements including across the A509. The footways in this area are not to standard and we have to consider the crossing of the A509. There are currently two uncontrolled crossing points of the A509 and one of these (probably the northern one) could be upgraded to a controlled crossing.
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	
Assessment	<ul style="list-style-type: none"> Is currently used as a nursery with a few buildings on site. Is immediately next to the existing settlement boundary. 	

	<ul style="list-style-type: none">• Would provide more than 10 units and would therefore allow for the provision of affordable housing.• Is a short walk to village• Would need a crossing on A509
Community benefits?	Provision of affordable housing.

Site Ref	006/2018	
Site Address	Land South of Prospect Place	
Area / No. of units?	6.14 ha / Not Specified	
Compatible with Plan:MK	No. DS5	
Qty of Affordable units	???	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	Removed from the existing settlement.	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	✓
	No	
	Describe	Footpath from Prospect Place across to Hollington Wood and Petsoe End.
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "similar to site 12", "it has not so far been demonstrated that right hand turners can safely be accommodated on the A509. I am not convinced based on accident history that this is an appropriate location for roadside services which would for north bound traffic create two right hand turns (one in and one out of the site)."
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	
Assessment	<ul style="list-style-type: none"> Not acceptable due to Highways considerations and remoteness from existing settlement as well as Plan:MK DS5 	
Community benefits?	None	

Site Ref	007/2018	
Site Address	Land North of West Pits, South of Emberton Park	
Area / No. of units?	0.25 ha / 3 dwellings	
Compatible with Plan:MK	No. DS5	
Qty of Affordable units	No mandatory requirement and none offered	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	✓
	Detached or remote	
Relationship to settlement generally?	At the back of houses in existing settlement area.	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	
	No	✓
	Describe	Highways "For a low number of units such as those proposed (3) then I would have no objections to this site."
Utilities constraints? (Specify type)	Yes	
	No	✓
	Unknown	
Assessment	Not acceptable due to Plan:MK DS5 and whilst Highways are comfortable it would add to the traffic congestion on West Lane and around the clock tower.	
Community benefits?	None	

Site Ref	008/2018	
Site Address	Rectory Farm, Newton Road, Emberton	
Area / No. of units?	0.33 ha / 5 dwellings	
Compatible with Plan:MK	Compatible with DS5. Not compatible with CT5.	
Qty of Affordable units	No mandatory requirement and none offered	
Location type?	Greenfield	
	Previously developed	✓
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	Detached from current settlement boundary out in the countryside	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	
Public footpaths on site?	Yes	
	No	
	Describe	Not sure, map implies there might be
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "unsustainable location and there are fewer facilities for pedestrians. The width and alignment of the local roads in Petsoe End is unsuitable for an increase in vehicle traffic."
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	✓
Assessment	Not acceptable due to Highways and Plan:MK CT5.	
Community benefits?	None.	

Site Ref	009/2018	
Site Address	Rectory Farm, Newton Road, Emberton	
Area / No. of units?	0.35 ha / Five dwellings	
Compatible with Plan:MK	Compatible with DS5. Not compatible with CT5.	
Qty of Affordable units	No mandatory requirement and none offered	
Location type?	Greenfield	
	Previously developed	✓
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	Detached from current settlement boundary out in the countryside	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	
	No	
	Describe	Check
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "unsustainable location and there are fewer facilities for pedestrians. The width and alignment of the local roads in Petsoe End is unsuitable for an increase in vehicle traffic."
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	✓
Assessment	<ul style="list-style-type: none"> Not acceptable due to Highways and Plan:MK CT5. 	
Community benefits?	None.	

Site Ref	010a/2018	
Site Address	Manor Farm, Petsoe End - Newton Road	
Area / No. of units?	Unknown / 20+ dwellings	
Compatible with Plan:MK	No. DS5 and CT5	
Qty of Affordable units	7+	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	Currently separated from settlement boundary by Acorn Nursery	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	✓
	Very Low	
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "remote from the village and unconnected to it with footways. It's on an unlit rural road where the national speed limit applies. ... therefore, not acceptable including from a general sustainable point of view.
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	✓
Assessment	<ul style="list-style-type: none"> • Currently detached from settlement boundary • Highways issues with the junction 	
Community benefits?	None	

Site Ref	010b/2018	
Site Address	Manor Farm, Petsoe End - Corner adjacent Clay Farm House and Hill Farm	
Area / No. of units?	Unknown / 20+ dwellings	
Compatible with Plan:MK	No. DS5 and CT5	
Qty of Affordable units	7+	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	Is separated from the settlement boundary	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	✓
	Very Low	
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "unsustainable location and there are fewer facilities for pedestrians. The width and alignment of the local roads in Petsoe End is unsuitable for an increase in vehicle traffic."
Utilities constraints? (Specify type)	Yes	✓ No mains gas or sewerage in Petsoe
	No	
	Unknown	
Assessment	Not acceptable due to Highways and Plan:MK DS5 and CT5	
Community benefits?	none	

Site Ref	010c/2018	
Site Address	Manor Farm, Petsoe End - Petsoe End next to Emmott's Well	
Area / No. of units?	Unknown / 20+ dwellings	
Compatible with Plan:MK	No. DS5 and CT5	
Qty of Affordable units	7+	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	Is separated from existing settlement boundary	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	✓
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	
Surface Water Flooding risk?	High	
	Medium	✓
	Low	
	Very Low	
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "unsustainable location and there are fewer facilities for pedestrians. The width and alignment of the local roads in Petsoe End is unsuitable for an increase in vehicle traffic."
Utilities constraints? (Specify type)	Yes	✓ No mains gas or sewerage in Petsoe
	No	
	Unknown	
Assessment	Not acceptable due to Highways and Plan:MK DS5 and CT5	
Community benefits?	none	

Site Ref	010d/2018	
Site Address	Manor Farm, Petsoe End - rear of Springside & Springside Pasture	
Area / No. of units?	Unknown / 20+ dwellings	
Compatible with Plan:MK	No. DS5 and CT5	
Qty of Affordable units	7+	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	Is separated from existing settlement boundary	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "unsustainable location and there are fewer facilities for pedestrians. The width and alignment of the local roads in Petsoe End is unsuitable for an increase in vehicle traffic."
Utilities constraints? (Specify type)	Yes	✓ No mains gas or sewerage in Petsoe
	No	
	Unknown	
Assessment	<ul style="list-style-type: none"> Not acceptable due to Highways and Plan:MK DS5 and CT5 	
Community benefits?	none	

Site Ref	011/2018	
Site Address	West Lane, Emberton	
Area / No. of units?	3.31 ha / 25 dwellings	
Compatible with Plan:MK	No. DS5	
Qty of Affordable units	8	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	✓
	Linear extension	
	Detached or remote	
Relationship to settlement generally?	Is adjacent to the settlement boundary.	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Agricultural
Public footpaths on site?	Yes	✓
	No	
	Describe	
Heritage constraints nearby?	Yes	✓
	No	
	Describe	Part of the site is next to the Church and would obscure the views.
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "I have concerns with this site for the number of units proposed and I consider it should be rejected for 25 units. However, perhaps a small number of units could be considered. If site 7 is accepted, then perhaps reducing site 11 down to say 5 units making a total of 8 units for this area. Obviously, there will still be some impact in terms of increased traffic and pedestrian activity"
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	✓
Assessment	Not acceptable due to Plan:MK DS5. Also, even if no. units reduced to 5 then there would be a highway's impact on West Lane and around the clock tower.	
Community benefits?	If the site were for 10 units or more there would be a provision for affordable housing, however the highways issues and the restriction of the site size to keep the views of the church mean the site would probably be restricted to less than 10 units.	

Site Ref	012/2018	
Site Address	Land between Prospect Place and A509	
Area / No. of units?	2.0 ha / Unspecified no of dwellings / mixed use employment and roadside uses	
Compatible with Plan:MK	No. Is part of what has been designated a wild life corridor.	
Qty of Affordable units	???	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	None. Remote.	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Unused
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	
	Describe	Highways "This has had an interim assessment and it has not so far been demonstrated that right hand turners can safely be accommodated on the A509. I am not convinced based on accident history that this is an appropriate location for roadside services which would for north bound traffic create two right hand turns (one in and one out of the site)."
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	✓
Assessment	Nor acceptable as it is part of a wild life corridor in Plan:MK as well as policy DS5	
Community benefits?	None	

Site Ref	013a/2018	
Site Address	Land South of Newton Road	
Area / No. of units?	.054 ha / 1	
Compatible with Plan:MK	No, DS5	
Qty of Affordable units	none	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	None. Remote.	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Unused
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	✓
	Describe	Highways - no objection
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	✓
Assessment	Nor acceptable due to Plan:MK DS5	
Community benefits?	None	

Site Ref	013b/2018	
Site Address	Land South of Newton Road	
Area / No. of units?	1.25 ha / 12-20	
Compatible with Plan:MK	No, DS5	
Qty of Affordable units	4 - 7	
Location type?	Greenfield	✓
	Previously developed	
Within settlement boundary?	Outside	✓
	Within existing area	
Relationship to settlement boundary?	Contiguous or rounding	
	Linear extension	
	Detached or remote	✓
Relationship to settlement generally?	None. Remote.	
Flood Risk Designation? (tick all that apply)	Zone 3 (High Risk)	
	Zone 2 (Medium Risk)	
	Zone 1 (Low Risk)	✓
Surface Water Flooding risk?	High	
	Medium	
	Low	
	Very Low	✓
Land use?	Specify Use	Unused
Public footpaths on site?	Yes	
	No	✓
	Describe	
Heritage constraints nearby?	Yes	
	No	✓
	Describe	
Highway access constraints?	Yes	✓
	No	✓
	Describe	Highways "OK if access is off Honey Hill (subject to visibility). An access onto Newton Road might be acceptable but would need more details on location. The site would need connecting with the footway network."
Utilities constraints? (Specify type)	Yes	
	No	
	Unknown	✓
Assessment	Nor acceptable due to Plan:MK DS5	
Community benefits?	None	

Proposed site updates

The Institute Site

The results of this exercise originally led to the prioritisation of site 002/2018, the Institute. That site brought forward is both a brownfield site and within the proposed settlement boundary.

In response to the original consultation we received a letter from the Emberton United Charities stating “whilst the Trustees broadly support the possible redevelopment of the Institute, currently there is no plan to convert the building to residential use”, this means that we cannot assume that the site would be available during the plan period and so have taken it out of consideration.

However, should the Institute become available during the plan period, especially if it was added to the Feoffee estate for rental then we would support that. There are sufficient community facilities available between the Church and the Pavilion.

Our Preferred Option(s)

A windfall development policy to meet small scale infill and individual dwelling needs would meet our obligations under Milton Keynes Council’s suggested housing requirement for villages in the rural area of a single dwelling. What that does not do is provide for any affordable housing. In order to be able to mandate any affordable housing we would need a development of a minimum of 11 units.

The Steering Group’s preferred site for a development of that scale is the Acorn Nursery site. The rationale for this is:

- It is the only site that meets the selection criteria
- Whilst it is not in the settlement boundary it is directly adjacent to it
- Not a development in the open countryside
- It is a site that would provide for more than 10 homes and therefore under Plan:MK policy HN2 at least 31% of the homes would be affordable.
- Milton Keynes Highways have no objections to this site, although they would require certain works to be carried out.

Annex D: Glossary

BIODIVERSITY – The degree of variation of life forms within a particular ecosystem. Biodiversity is a measure of the health of an ecosystem. Human activity generally tends to reduce biodiversity, so special measures often need to be taken to offset the impact of development on natural habitats.

CHANGE OF USE – A material change in the use of land or buildings that is of significance for planning purposes e.g. from retail to residential.

COMMUNITY – A group of people who hold something in common. They could share a common place (e.g. individual neighbourhood) a common interest (e.g. interest in the environment) a common identity (e.g. age) or a common need (e.g. a particular service focus).

CONDITIONS – Planning conditions are provisions attached to the granting of planning permission.

CONFORMITY – There is a requirement for neighbourhood plans to have appropriate regard to national policy and to be in conformity with local policy.

CONSERVATION AREA – An area of special architectural or historic interest, the character and appearance of which are preserved and enhanced by local planning policies and guidance.

CONSULTATION – A communication process with the local community that informs planning decision-making

CORE STRATEGY – A development plan document forming part of a local authority's Local Plan, which sets out a vision and core policies for the development of an area.

DEVELOPMENT – Legal definition is "the carrying out of building, mining, engineering or other operations in, on, under or over land, and the making of any material change in the use of buildings or other land."

DEVELOPMENT MANAGEMENT (also known as Development Control) – The process of administering and making decisions on different kinds of planning applications.

DEVELOPMENT PLAN – A document setting out the local planning authority's policies and proposals for the development and use of land in the area.

FLOOD ZONE – A designation to categorise the risk of flooding. Flood Zone 1 Low Risk, Flood Zone 2 Medium Risk, Flood Zone 3a High Risk, Flood Zone 3b Functional Floodplain.

GREENFIELD SITE – Land where there has been no previous development.

GREEN SPACE – Those parts of an area which are occupied by natural, designed or agricultural landscape as opposed to built development; open space, parkland, woodland, sports fields, gardens, allotments, and the like.

INDEPENDENT EXAMINATION – An examination of a proposed neighbourhood plan, carried out by an independent person, set up to consider whether a neighbourhood plan meets the basic conditions required.

LISTED BUILDINGS – Any building or structure which is included in the statutory list of buildings of special architectural or historic interest.

LOCALISM – Shifting power away from central government control to the local level. Making services more locally accountable, devolving more power to local communities, individuals and councils.

LOCAL AUTHORITY – The administrative body that governs local services such as education, planning and social services.

LOCAL PLAN – The name for the collection of documents prepared by your local planning authority for the use and development of land and for changes to the transport system. Can contain documents such as development plans and statements of community involvement.

LOCAL PLANNING AUTHORITY – Local government body responsible for formulating planning policies and controlling development; a district council, metropolitan council, a county council, a unitary authority or national park authority.

LOCAL REFERENDUM – A direct vote in which communities will be asked to either accept or reject a particular proposal.

MATERIAL CONSIDERATIONS – Factors which are relevant in the making of planning decisions, such as sustainability, impact on residential amenity, design and traffic impacts.

MIXED USE – The development of a single building or site with two or more complementary uses.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) – The government policy document adopted in March 2012 intended to make national planning policy and guidance less complex and more accessible. The National Planning Policy Framework introduces a presumption in favour of sustainable development. It gives five guiding principles of sustainable development: living within the planet's means; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

NEIGHBOURHOOD AREA – The local area in which a neighbourhood plan or Neighbourhood Development Order can be introduced.

NEIGHBOURHOOD PLAN (NP) – A planning document created by a parish or town council or a neighbourhood forum, which sets out vision for the neighbourhood area, and contains policies for the development and use of land in the area. Neighbourhood plans must be subjected to an independent examination to confirm that they meet legal requirements, and then to a local referendum. If approved by a majority vote of the local community, the neighbourhood plan will then form part of the statutory development plan.

NEIGHBOURHOOD PLANNING – A community-initiated process in which people get together through a local forum or parish or town council and produce a plan for their neighbourhood setting out policies and proposals for the development they wish to see in their area.

POLICY – A concise statement of the principles that a particular kind of development proposal should satisfy in order to obtain planning permission.

PLANNING PERMISSION – Formal approval granted by a council allowing a proposed development to proceed.

PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT – The concept introduced in 2012 by the UK government with the National Planning Policy Framework to be the 'golden thread running through both plan making and decision taking'. The NPPF gives five guiding principles of sustainable development: living within the planet's means; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

QUALIFYING BODY – Either a parish/town council or neighbourhood forum, which can initiate the process of neighbourhood planning.

REFERENDUM – A vote by the eligible population of an electoral area may decide on a matter of public policy. Neighbourhood Plans and Neighbourhood Development Orders are made by a referendum of the eligible voters within a neighbourhood area.

ANCIENT MONUMENT – A nationally important archaeological site, building or structure which is protected against unauthorised change by the Ancient Monuments and Archaeological Areas Act 1979.

SEQUENTIAL TEST – A principle for making a planning decision based on developing certain sites or types of land before others, for example, developing brownfield land before greenfield sites.

SETTING – The immediate context in which a building is situated, for example, the setting of a listed building could include neighbouring land or development with which it is historically associated, or the surrounding townscape of which it forms a part.

SIGNIFICANCE – The qualities and characteristics which define the special interest of a historic building or area.

STATUTORY DEVELOPMENT PLAN – Focus on land use development set within the context of wider social, economic and environmental trends and considerations. Reflects national planning policies to make provisions for the long-term use of land and buildings.

SUSTAINABLE DEVELOPMENT – An approach to development that aims to allow economic growth without damaging the environment or natural resources. Development that “meets the needs of the present without compromising the ability of future generations to meet their own needs”.

TOWN AND COUNTRY PLANNING ACT 1990 – Currently the main planning legislation for England and Wales is consolidated in the Town and Country Planning Act 1990; this is regarded as the ‘principal act’.



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THE EMBERTON NEIGHBOURHOOD PLAN

OPINION

1. I am instructed by Mr Paul Johnson, the Land and Planning Director of Francis Jackson Homes Ltd ('FJH'). He has submitted representations in respect of an emerging Neighbourhood Plan ('NP'), which I am instructed have been ignored by the 'qualifying body' promoting the NP. I am asked to advise on the legal implications arising from this action by the qualifying body, and whether it can and should be the subject of legal challenge.
2. FJH has an Option Agreement on a site known as Acorn (MK) Nurseries, Newton Road, Emberton ('the site'). The site has a Certificate of Lawful Existing Use as a retail garden centre.
3. Emberton lies within the Parish of Emberton, which is situated within the administrative area of Milton Keynes City Council ('MKCC'). The Parish Council ('PC') of Emberton has been engaged in preparing a NP for the Parish of Emberton. The process of preparing the NP has been overseen by a PC Steering Group ('the SG').

4. The landowner of the site has, with the aid of a professional planning consultant, promoted the inclusion of the site as the preferred housing site in the emerging NP. In February 2020 the PC consulted on a draft NP under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 ('the NP Regulations'). This plan proposed the provision of 40 homes; acknowledged that there were few suitable infill opportunities left within the village; noted that a site of more 11 dwellings should be allocated so as to trigger the requirement to provide affordable housing (the latter being an important consideration); expressed a strong preference for previously developed land; assessed the pros and cons of circa. 13 submitted sites, and opted to allocated the Acorn Nurseries site (which was assessed to have a capacity of between 20 and 40 units).

5. Since that time, the composition of the SG has changed and there have been several further iterations of the emerging plan, all of which have been publicised and consulted upon under Reg.14 of the NP Regulations. On each occasion the issue of a new draft NP has been preceded by a fresh call for sites. The last call for sites took place in October 2021, and there was consultation on a revised Reg. 14 NP from May to June 2022. In February of 2023 this last version of the plan was submitted to MKCC under Reg. 15 of the NP Regulations, and MKCC are currently engaged in the process of publicising and seeking representations on it pursuant to Reg. 16 of the NP Regulations. The consultation opened on the 10th March 2023 and is due to close on 21st April 2023.

6. It is fair to say that there has been a fairly radical shift in the approach taken to housing provision within the submitted plan as compared with the February 2020 version. The submitted plan states that a figure of 10 dwellings is suitable (para. 4.7), and that all dwellings should be provided within the amended settlement boundary. This boundary has been extended marginally in some

places to include residential garden land, including at Harvey Drive. Policy H3 of the plan now allocates a site at Harvey Drive for 2 dwellings within the amended settlement boundary. The Acorn Nursery site has been removed.

7. FJH responded to the October 2021 call for sites, and made extensive representations during the 2022 Regulation 14 consultation. Judging by the comments summarised by the PCSG in the Consultation Statement (to which I return below), the representations made by FJH were fairly unique both in breadth and depth. They were also markedly different from the other comments in that they were in favour of higher housing growth, whereas the vast majority of the other comments were either wholly opposed to more housing or, at best, favoured very modest growth. By contrast, FJH questioned the approach taken to the assessment of housing needs; challenged the approach of extending the settlement boundary to include residential garden land (which does not fall within the definition of previously developed land and would encourage greenfield development as opposed to its site which is previously developed); made the point that relying on windfall infill development and an allocation for two houses would not deliver affordable housing, and raised concerns about the transparency of the methodology by which the housing allocation had been selected. In short, it argued that there was nothing in the evidence base, or in the rational and reasoning set out in the draft plan, that justified the radical shift away from the previous version of the plan.
8. I have been provided with evidence that FJH's representations were received by the PC SG within the consultation deadline.
9. Regulation 15(1)(b) of the NP regulations stipulates that where a qualifying body (in this case, the PC) submits a plan proposal to the LPA it 'must include',

amongst other documents and statements, a ‘consultation statement’. Reg. 15(2) defines ‘consultation statement’ to mean

‘a document which (a) contains details of the persons and bodies who were consulted ... (b) explains how they were consulted; (c) summarises the main issues and concerns raised by the persons consulted; and (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.’

10. The PC SG has submitted to MKCC what purports to be a consultation statement pursuant to Reg. 15(2). It is dated February 2023, and it should therefore set out who was consulted in respect of the latest, pre-submission, Reg. 14 version of the NP, summarise the main issues and concerns raised by the persons consulted, and describe how those issues and concerns have been considered and, where relevant, addressed in the proposed NP. However, contrary to this requirement, the consultation statement is completely silent as regards the issues and concerns raised by FJH in its 2022 consultation response. There is no mention of the fact that they were consulted, no summary of the main issues and concerns raised in its representations, and certainly no description of how those issues and concerns have been considered and/or addressed.

11. There is a section starting at p.18 of the consultation document (at para. 3.60) which is introduced as ‘Other comments made and issues raised as part of the village survey.’ This runs to p.31, but there is no mention of FJH’s representations (and in any event this summary of comments reads as though it was compiled prior to the 2022 public consultation). At p.32 of the document there begins a summary of consultation responses that were received during the February 2019 to March 2019 consultation exercise (where comments

made by 'Acorn Nursery' are summarised, but these are clearly different from the comments made in respect of the 2022 consultation). At p.37 there is a section summarising the comments received during the March to April 2020 consultation, and at p.48 a section summarising the comments received during the January to March 2021 consultation. Beginning at p.64 there is a section summarising the comments received during the May to June 2022 consultation. Whilst this was the relevant consultation window for the submitted plan, there is mention whatsoever of the consultation responses submitted by FJH.

12. FJH's comments as part of the consultation process were preceded by it submitting its site for consideration as part of the call for sites process that took place prior to publication of the final Reg. 14 draft plan. The information it put forward when it submitted its site is neither mentioned nor assessed in the consultation statement, and nor is it mentioned or assessed in the Assessment of Housing Sites document produced by the PC SG.
13. There has been, on the basis of the evidence set out above, a clear breach of Reg. 15(1)(b) in that a consultation statement, as defined, has not been submitted to MKCC. What has been submitted does not do what the regulations expressly require a consultation statement to do. The legal consequence of this failure is best understood by considering what is set out in Schedule 4(B) of the Town and Country Planning Act 1990 ('the 1990 Act'). All though this schedule refers throughout to Neighbourhood Development Orders, s.38(A) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') states that this schedule applies equally to NP.
14. Paragraph 1(3)(b) of Schedule 4B provides that when a qualifying body puts forward a proposal it must be accompanied by, inter alia, 'other information and documents of prescribed description.' Para. 4(1) states that

‘Regulations may make provision as to requirements that must be complied with before proposals for a neighbourhood development order may be submitted to a local planning authority or fall to be considered by a local planning authority’.

Para. 4(2) provides that

‘regulation may in particular make provision ... (d) as to the consultation with and participation of the public, (e) as to the making and consideration of representations ..., (f) requiring prescribed steps to be taken before a proposal of a prescribed description falls to be considered by a local planning authority.’

Importantly, para. 4(3) imposes a duty on the Secretary of State in respect of what he must do in making these regulations. This sub-paragraph states that

‘The power to make regulations under this paragraph must be exercised to secure that— ... (b) a statement containing the following information in relation to that consultation and participation must accompany the proposal submitted to the authority—(i) details of those consulted, (ii) a summary of the main issues raised, and (iii) any other information of a prescribed description’.

15. Pausing there, it can be seen that the requirement set out in the NP Regulations to submit a consultation statement to the LPA alongside the submission version of the plan arises as a direct result of the duties imposed on the Secretary of State under the 1990 Act to issue regulations that ensure the submission of such a document. NP Regulation 15(1)(b) is designed to give effect to the requirement set out in Schedule 4B(4) of the 1990 that the qualifying body submit with the plan a statement setting out who has been consulted, a summary of the main issues raised by those consulted, and how

those issues were considered.

16. Schedule 4B para. 6 explains the consequences of a failure to comply with the Regulations. Para. 6(1) applies if a proposal has been submitted to the LPA, and it has not exercised its powers under para. 5 to decline to consider it (a provision not relevant to this case). Para. 6(2) states that in such a case

‘the authority must consider ... (d) whether the body has complied with the requirements of regulations made under paragraph 4 imposed on it in relation to the proposal’.

17. As set out above, the regulations made pursuant to paragraph 4 include the requirement to submit a consultation statement. Para. 6(4)(a) imposes a duty on the LPA to notify the qualifying body whether or not they are satisfied that the matters mentioned in, inter alia, para. 6(2) have been met or complied with, and para. 6(4)(b) provides that (emphasis added):

‘in any case where they are not so satisfied, refuse the proposal and notify the body of their reasons for refusing it.’

18. Thereafter Schedule 4B para. 7 goes onto explain that if the local planning authority are satisfied that the requirements of the regulations have been met they must submit the NP for independent examination, and para. 8 sets out the role of the examiner is to consider if the ‘basic conditions’ in respect of a NP are met. None of these basic conditions, nor the further prescribed conditions set out in Schedule 4B(8)(2)(g), require the examiner to concern him or herself with whether a consultation statement as defined in and required by the NP Regulations was submitted to the planning authority alongside the submitted draft plan. In other words, the duty to consider whether the qualifying body

complied with requirements of the regulations made under Schedule 4B(4), including the requirement to submit a consultation statement, is a duty imposed solely on the planning authority. It is its responsibility to be satisfied that the requirements of the Regulations in this regard has been met, and if it is not so satisfied it must refuse the proposal and let the qualifying know the reasons for its refusal. This is further supported by Schedule 4B(7)(1) and (2) which makes clear that the duty on the local planning authority to submit the NP for independent examination arises if and only if they are satisfied that the requirements of the Regulations have been met.

19. In this case MKCC cannot be satisfied the requirements of the Regulations have been met, because the consultation statement clearly has not done what it is supposed to do. The LPA is duty bound to refuse the proposal submitted to it, and explain to the NP SG why it has refused it. It has no power under Schedule 4B(7) to submit the plan for examination because it cannot be satisfied the matters mentioned in para. 6(2) have been met or complied with. On the basis of my instructions, and what I have read in the Consultation Statement, it is wrong for MKCC to state (as it does on its website) that

‘All of the issue raised I response to the pre-submission consultation are included in the Consultation Statement that Emberton Parish Council has submitted with the Plan.’

20. I advise that those instructing me write to MKCC advising it that, for the reasons set out above, it must refuse the proposal put forward by the qualifying body, and that for those same reasons it would be unlawful for it to submit the draft plan for independent examination. If MKCC has already advised the qualifying body under Schedule 4B (6)(4)(a) that it is satisfied that the matters mentioned in subpara. (2) have been complied with, it should be requested to

reconsider and reverse its decision, and issue instead a decision under Schedule 4B(6)(4)(b). It should also be asked to provide an undertaking that it will not submit the plan for independent examination under Schedule 4B(7). If it declines to take these steps, its decisions in this regard should be challenged by way of an application for judicial review within 6 weeks of receipt of their decision that they intend to certify that the requirements of the regulations have been met and/or that they intend to submit the plan for independent examination.

21. The above answers the questions raised by my instructions. If further advice is required in respect of any of the matters set out in this advice, I can be contacted via my clerks.

Satnam Choongh

2nd April 2023

No5 Chambers

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THE EMBERTON NEIGHBOURHOOD PLAN

NOTE

Your ref:

Paul Johnson MA (Cantab) TP MRTPI
Land and Planning Director
Francis Jackson Homes Ltd

Satnam Choongh

No5 Chambers

Email: ssc@no5.com

Paul Johnson

From: Paul Johnson
Sent: 10 June 2022 17:15
To: plan@embertonparishcouncil.co.uk
Cc: plan@embertonparishcouncil.co.uk
Subject: Emberton Neighbourhood Plan - Representation Submission jointly by Francis Jackson Homes Ltd. and Acorn (MK) Nurseries

Dear Sir/Madam,

We act jointly for and on behalf of both Francis Jackson Homes Ltd., and Ian Pretty and Stephen Burchmore of Acorn (MK) Nurseries, which is located north of Newton Lane in Emberton.

We have responded previously to the various former iterations of the emerging Neighbourhood Plan (NP), including various 'call for sites' submissions.

This response has been prepared in light of the current Regulation 14 (May 2022) consultation exercise, following a review of the latest emerging version of the NP in full.

Evidence Base

Section 3 of the emergent NP is entitled "Community Engagement". The Plan states that this has been at the forefront of developing the overall strategy, content and policies.

However, the global, national and local context has significantly altered as a result of the COVID-19 Pandemic, war in Ukraine, pressure on the cost of living, and the ongoing energy crisis leading to issues of household affordability and fuel poverty since the initial 'fact finding' exercise was undertaken in 2018. Additionally, at that time the village had a different range of services, many of which have now altered due to one or more of the above.

The survey questionnaires were issued in early 2018 – some 4 ½ years ago. Our first query is therefore whether the results remain relevant and valid as an evidential basis for producing policy from, given i) the notable passage of time since the evidence was collected, and ii) the significant change in context at all scales set out above. It would seem the time when the questionnaires were devised, and indeed the answers given, may not be reflective of the views of the residents of the Parish any more, and/or that their priorities may well have changed given these momentous societal shifts and issues.

Indeed, since 2018, there have been 33 property transactions in Emberton, indicating that since these questionnaires were undertaken, there has been a change in the population within the village, equating to approximately 11% of households.

For the Neighbourhood Plan, which is still only at Regulation 14 consultation stage, to genuinely meet the needs and aspirations of the local community, given the huge shifts affecting the residents lives in the intervening 4 ½ year period, we consider an updated questionnaire and/or community engagement/fact finding exercise should be undertaken to ensure the plan is sound, up to date (thus still relevant), is evidence based on up-to-date views of the households living there today, and meets the genuine aspirations of the residents of the village as whole now.

Secondly, we query the methodology of the "Housing Needs Assessment" document available on the Emberton Parish Council website.

Whilst titled a Housing Needs Assessment, it reads more as summary document of past build trends and attitude to development based on the questionnaire noted above. Further, given the passage of time and number of iterations

of the Neighbourhood Plan during the last few years, the attitudes of residents may have changed, especially in the context of sites that have been discussed as being potentially available for development.

We therefore query whether a genuinely robust, independent assessment of future demographics and Objectively Assessed Housing Need has been undertaken for the Parish by MKC to guide need based housing numbers within this specific Parish and Neighbourhood Area, with a genuine level of provision that can stand up to scrutiny – one that is not based solely on past building in-fill trends which are naturally diminishing.

In particular, paragraphs 66 and 67 of the NPPF state;

“Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”

It is currently unclear if MKC have provided either the housing requirement figure or an indicative figure based on the draft NP, utilising *tangible and transparent evidence* of “local housing need” (as defined within the NPPF) and demographic analysis.

Reference is made at paragraphs 5.3 and 5.6 of the emergent NP, but the MKC figure is stated as being “set at a nominal” number of 1. As such, it is not clear at this time if the emergent plan meets the basic tests of compliance with national planning policy, or general conformity with the higher tier Development Plan on this basis as this is not a locally derived figure based on objective needs or demographics, evidence or up to date housing market data, as opposed to what currently appears to be an overly simplified blanket nominal figure that has no regard whatsoever to local need, local demographics, local connections, the spatial relationship of each Parish to other settlements, etc. Can such a simplistic approach stand up to scrutiny?

Key Consultation Findings

Notwithstanding the above comments, based on the previous, historic questionnaire responses, the key findings are set out in paragraph 3.9 of the emergent NP.

Bullet point 2 is a ‘wish’ – it does not seek to provide any housing based on any actual objectively assessed need. If the level of need is higher than this ‘wish’, the NP would act as a barrier to access housing within the NP Area.

Bullet point 4 states, “Housing should ideally be located within the existing settlement on infill sites or brownfield land”. As will be set out below, the proposed allocations in the emergent NP fail to meet this criteria as both sites represent garden land (and thus fall outside of the definition of Previously Developed Land as defined within the NPPF) and also both sites extend the village outward, having existing housing immediately located on only one side, thus not representing ‘infill’ *between* existing dwellings.

Previous Regulation 14 versions of the NP set out the key aspiration to deliver local needs housing and in particular Affordable Housing. The current plan is totally silent on this matter yet purports to utilise the same evidence base. The February 2020 Regulation 14 Consultation Version of the NP stated at paragraphs 5.10 to 5.13 and in its Objectives,

“Objectives

- *To ensure that any development provides Affordable Housing as our number one priority*
- *To ensure that new housing proposals within the parish show general accord with the wishes and needs of the community in relation to scale, location and mix of dwellings.*
- *To require new housing to be carefully integrated into the built form of the village and not cause harm to existing important views or heritage assets.*
- *To secure commitment that any new housing will be highly sustainable, both in construction and operation to reduce the building's carbon footprint.*
- *New housing should use high quality materials and include measures to enhance the biodiversity of its setting."*

We query therefore, how Affordable Housing goes from being "our number one priority" to being totally silent in the current version of the plan.

Additionally, the plan provides an incredible opportunity to secure Affordable Housing for those with a local connection and who otherwise cannot access the housing market – be that connection by family, relative, job or other tangible connection to the Parish. The failure to utilise this key tool perpetuates a barrier to all those with genuine local need and connection from accessing housing in the village, and it is disappointing that this is the case.

Policy H1: Development Strategy and Policy H2: Windfall Infill Development

These policies set out a strategy for supporting development opportunities within the village confines as redrawn as part of this version of the emergent plan.

There is no guarantee that such an approach will deliver any housing whatsoever. As such, is the plan positively prepared and will the aspiration of the plan to deliver around 10 dwellings over the plan be met?

The February 2020 Regulation 14 Consultation Version of the NP stated: -

5.14 It is notable that Emberton has grown by 12 net additional dwellings in approximately 10 years, through infilling and small-scale development. There are few infilling opportunities left in the village which would not have significant adverse effects on either the character of the village, the setting of a listed building, or an important gap view.

As such, we question whether this approach will deliver any housing at all, given the previous version of the very same plan confirms there are few infilling opportunities that would not have significant adverse impacts on the character of the village, setting of listed buildings, or important gaps.

We also query whether such an approach is NPPF compliant, as this in fact states at paragraph 71, "*Plans should consider the case for setting out policies to resist inappropriate development of residential gardens*".

Oddly, the current emergent NP seeks to take a completely counter approach to this – rather than seeking to resist development of residential gardens, it seeks to add some garden land into the village confines in the hope of some of it might delivering housing. We do not consider this to be the best or most suitable land that is available in the village for housing in terms of the hierarchy of land uses, as set out below.

Whilst we also note that the proposed development boundary is proposed to be revised in a number of locations, they are all generally: -

- Garden land (so again not Previously Developed Land as above);
- Land locked with extremely limited or no direct highway access opportunity (as such, what is the benefit of doing this if suitable access cannot be afforded to the area as it will never deliver housing, and thus is not genuinely positively prepared);
- Backland development (so potentially out of keeping with the prevailing form and character of the settlement);
- Would have an impact on the openness of the Conservation Area and/or its setting.

As such, whilst purporting to be positively prepared, this approach is questionable as to whether it will in fact deliver any housing whatsoever.

It is also noteworthy that this strategy completely fails to make any reference to Affordable Housing or Local Needs provision. As highlighted above, we consider this is a missed opportunity. unless it is in fact the view of the PC that Affordable Housing is not wanted in the local area for those in most need of housing? Why has there been such a substantial U-turn on this point in only 2 years, when this was identified as the number one priority previously?

Policy H3 and H4

In other Neighbourhood Plans in which we have been involved, the 'call for sites' process, and subsequent site assessment, has been undertaken by a professional independent organisation e.g. AECOM. This ensures a genuinely independent assessment of sites and their ranking. In this instance, it is not clear how the process in Emberton has been undertaken, and whether the Parish Council has sought independent professional advice in selecting sites. It is therefore unclear who has selected the current proposed allocations, how the sites have been scored, what criteria have been used and who has devised them.

Have these sites been put forward along with other options for the Community to consider, or is this the preferred view of the Steering Group only at this time? If so, the Parishioners should also be made aware of any other sites that have been considered, and the reasons why these are not being pursued – this should all be available in a transparent and open manner.

These policies also do not allocate or reference Affordable Housing whatsoever.

As set out above, being both garden land and being on the very edge of the settlement, these allocations are not 'infill' either – they extend the built form of the settlement outwards and this makes them contrary to one of the key findings of the old consultation that took place, and provides further reason for fresh, up to date evidence to be gathered.

The Policy H3 site extends the built form of the settlement out into the open countryside to the south of the village.

The Policy H4 site represents piecemeal backland development, where no development of this nature has occurred before. The proposal is served by a very limited access, and the scheme is poorly related in form, layout and character to the existing dwellings in the immediate proximity of the proposed allocation. We do not consider this to be good planning. Again, it is unclear how these sites have been selected and ranked and what criteria have been used for this assessment.

Alternative Site

The February 2020 Regulation 14 Consultation Version of the NP stated,

5.17 In order to meet the future housing needs of Emberton and deliver a 'step-change' in housing provision an allocation of new housing has been made at Acorn Nurseries. This site represents the only large 'brownfield' land in the Parish that can provide sufficient housing numbers to enable the delivery of affordable housing, that will benefit those wishing to stay in village or join our community. The integration of the new housing allocation into the village is essential, so it is expected that improvements to the A509 will be necessary to provide an upgraded pedestrian crossing.

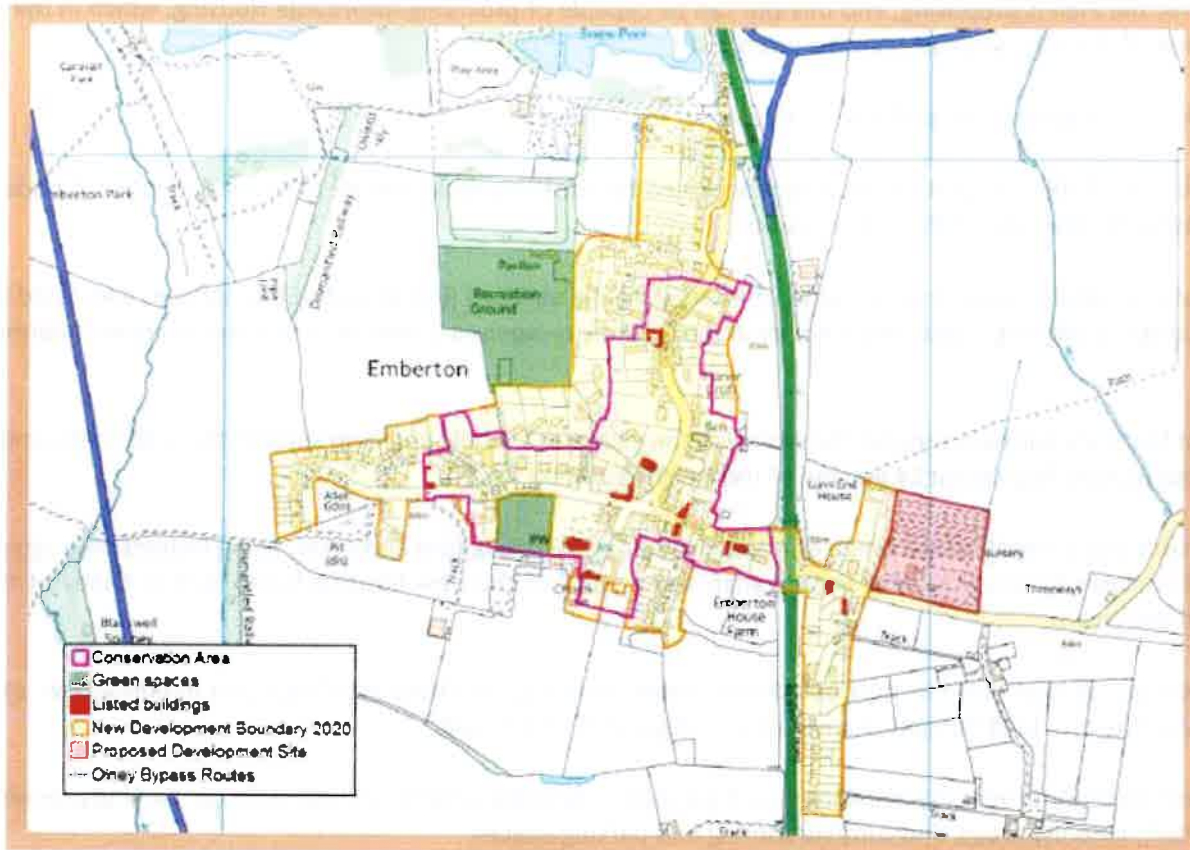


Figure 8: Map of proposed development site

The Acorn (MK) Nurseries site identified above remains available, deliverable and achievable for housing development – as well as providing significant opportunities for biodiversity net gain enhancement, local community benefits through S106 funding, local needs Affordable Housing and to enhance the crossing provision on the A590 for both existing and future residents of Emberton on the east side of the A590.

Bizarrely, since the 2020 Regulation 14 consultation version of the plan, all of the existing houses in Emberton on the east of the A509 have been excluded from the revised Development Boundary for the village in the 2022 Regulation 14 emergent NP (see Figure 8 above taken from the 2020 plan above). Are the residents there not considered to be part of the village, or has this area been consciously excluded for some reason that has not been set out or justified? It is unclear why in this version of the plan, circa 22 properties have been removed from the proposed settlement boundary just 2 years after being proposed to be included within it.

As Previously Developed Land (PDL) containing a range of buildings and extensive areas of hard standing, is it not far better and sequentially preferential to develop such land comprehensively, as opposed to small, piecemeal sites with no wider community benefit?

As noted, the site was the proposed village housing allocation in the 2020 Regulation 14 version of the Neighbourhood Plan. We consider that the proposed allocation demonstrates the site can be supported, and offers significant advantages over other sites put forward in this version of the plan, especially when the site scoring and selection process has been unclear. It is wholly in the behest of the Neighbourhood Plan process to include the site

as part of the Development Boundary, thus any perceived or stated 'policy conflict' or non-compliance with Plan:MK advanced to suggest the site cannot come forward in principle on that basis, is wholly flawed, as it in fact at the behest of the NP to make it part of the development boundary or allocate it accordingly.

Exceptionally and uniquely the site provides the opportunity for a genuinely mixed tenure market/affordable housing scheme to deliver a step change in Affordable Housing Provision within the Parish with a range of housing sizes, types and tenures to help deliver a thriving, inclusive, mixed and balanced community. Why should historic build trends perpetuate future growth and continue to restrict access to housing in the village, especially when the Housing Needs Assessment indicated that there was generally support for a higher number of dwellings than the current version of the Plan is proposing, and this site can be capable of providing Affordable Housing, which in the previous iteration of the NDP was considered a priority.

The site is available and deliverable with known developer involvement.

The 2020 Regulation 14 NP Consultation document accepted the location, scale, nature and broad number of houses as being acceptable on the Acorn (MK) Nurseries site.

Development of the scale proposed would support existing village services (including the bus service) and could be decisive in securing the ongoing vitality and viability of the recently re-opened Community Pub and the new Children's Nursery.

Development of this scale will help support the vitality of the village as a whole and help support the 'one community' stance advocated in 2020 Regulation 14 version of the Neighbourhood Plan.

This is a sustainable site accessible by a range of transport modes, including foot and cycle, being located off a signed Cycle Route. It is closer to Olney Market Square than some parts of the new housing being built in Olney at the northern end of the Town.

It makes the best use of land that has previous development, buildings and hard-standing upon it, and a new, safe highway access will be provided mitigating any concerns flagged in this regard.

There is sufficient place for proper placemaking – well planned, in keeping streets, with suitable car parking provision (visually mitigated), amenity areas, and suitable turning and parking spaces.

There are no adverse heritage, ecological, landscape, flood risk, amenity or landscape impacts associated with the proposed re-development of the site. The site is not designated open space, important open land or similar nor does it impact on the setting of any Listed Building nor the Conservation Area.

Opportunities for biodiversity and landscape enhancement will be taken to provide a significant bio-diversity net gain.

The site is visually enclosed by mature landscaping thus minimising any wider visual impact on surrounding countryside and the abutting residential development, and it is better related to the adjacent housing development than the genuine open countryside to the north and east.

The site has been promoted previously for up to 41 dwellings, and we have actively sought to meet the Steering Group (an offer which still stands, despite a meeting not being forthcoming) to potentially discuss any matter relating to the site, including, without prejudice, a lesser quantum of development if this remains a key sticking point. The current owners of the site are nearing retirement age, after operating from the site since 1986 – the allocation of this site for housing will secure the future of the site and ensure an attractive enhancement to the village into the future, with potentially significant infrastructure, community benefits and local needs Affordable Housing, that may otherwise be lost.

We respectfully ask you to reconsider the considerable opportunities presented by this land for the village and community as a whole and allocate it for housing for the reasons set out above as part of the Emberton Neighbourhood Development Plan.

Please also consider the other points raised above in your progression of the Plan.

Should you have any questions regarding any of the above, please do not hesitate to contact me.

Yours faithfully,

Paul Johnson

Paul Johnson

From: Plan@embertonparishcouncil.co.uk
Sent: 13 June 2022 16:26
To: Paul Johnson
Subject: Re: Emberton Neighbourhood Plan - Representation Submission jointly by Francis Jackson Homes Ltd. and Acorn (MK) Nurseries
Attachments: ATT00001.htm

Dear Mr Johnson

I write to acknowledge receipt to your response of the Neighbourhood Plan.

Kind regards

Karen Goss
Clerk to Emberton Parish Council

----- Original Message -----

From: "Paul Johnson" <paul@francisjackson.co.uk>
To: plan@embertonparishcouncil.co.uk
Cc: plan@embertonparishcouncil.co.uk
Sent: Friday, June 10, 2022 5:15:01 PM
Subject: Emberton Neighbourhood Plan - Representation Submission jointly by Francis Jackson Homes Ltd. and Acorn (MK) Nurseries

Dear Sir/Madam,

We act jointly for and on behalf of both Francis Jackson Homes Ltd., and Ian Pretty and Stephen Burchmore of Acorn (MK) Nurseries, which is located north of Newton Lane in Emberton.

We have responded previously to the various former iterations of the emerging Neighbourhood Plan (NP), including various 'call for sites' submissions.

This response has been prepared in light of the current Regulation 14 (May 2022) consultation exercise, following a review of the latest emerging version of the NP in full.

Evidence Base

Section 3 of the emergent NP is entitled "Community Engagement". The Plan states that this has been at the forefront of developing the overall strategy, content and policies.

However, the global, national and local context has significantly altered as a result of the COVID-19 Pandemic, war in Ukraine, pressure on the cost of living, and the ongoing energy crisis leading to issues of household affordability and fuel poverty since the initial 'fact finding' exercise was undertaken in 2018. Additionally, at that time the village had a different range of services, many of which have now altered due to one or more of the above.

The survey questionnaires were issued in early 2018 - some 4 ½ years ago. Our first query is therefore whether the results remain relevant and valid as an evidential basis for producing policy from, given i) the notable passage of time since the evidence was collected, and ii) the significant change in context at all scales set out above. It would seem the time when the questionnaires were devised, and indeed the answers given, may not be reflective of the

views of the residents of the Parish any more, and/or that their priorities may well have changed given these momentous societal shifts and issues.

Indeed, since 2018, there have been 33 property transactions in Emberton, indicating that since these questionnaires were undertaken, there has been a change in the population within the village, equating to approximately 11% of households.

For the Neighbourhood Plan, which is still only at Regulation 14 consultation stage, to genuinely meet the needs and aspirations of the local community, given the huge shifts affecting the residents lives in the intervening 4 ½ year period, we consider an updated questionnaire and/or community engagement/fact finding exercise should be undertaken to ensure the plan is sound, up to date (thus still relevant), is evidence based on up-to-date views of the households living there today, and meets the genuine aspirations of the residents of the village as whole now.

Secondly, we query the methodology of the "Housing Needs Assessment" document available on the Emberton Parish Council website.

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We therefore query whether a genuinely robust, independent assessment of future demographics and Objectively Assessed Housing Need has been undertaken for the Parish by MKC to guide need based housing numbers within this specific Parish and Neighbourhood Area, with a genuine level of provision that can stand up to scrutiny - one that is not based solely on past building in-fill trends which are naturally diminishing.

In particular, paragraphs 66 and 67 of the NPPF state;

"Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority."

It is currently unclear if MKC have provided either the housing requirement figure or an indicative figure based on the draft NP, utilising tangible and transparent evidence of "local housing need" (as defined within the NPPF) and demographic analysis.

Reference is made at paragraphs 5.3 and 5.6 of the emergent NP, but the MKC figure is stated as being "set at a nominal" number of 1. As such, it is not clear at this time if the emergent plan meets the basic tests of compliance with national planning policy, or general conformity with the higher tier Development Plan on this basis as this is not a locally derived figure based on objective needs or demographics, evidence or up to date housing market data, as opposed to what currently appears to be an overly simplified blanket nominal figure that has no regard whatsoever to local need, local demographics, local connections, the spatial relationship of each Parish to other settlements, etc. Can such a simplistic approach stand up to scrutiny?

Key Consultation Findings

Notwithstanding the above comments, based on the previous, historic questionnaire responses, the key findings are set out in paragraph 3.9 of the emergent NP.

Bullet point 2 is a 'wish' - it does not seek to provide any housing based on any actual objectively assessed need. If the level of need is higher than this 'wish', the NP would act as a barrier to access housing within the NP Area.

Bullet point 4 states, "Housing should ideally be located within the existing settlement on infill sites or brownfield land". As will be set out below, the proposed allocations in the emergent NP fail to meet this criteria as both sites represent garden land (and thus fall outside of the definition of Previously Developed Land as defined within the NPPF) and also both sites extend the village outward, having existing housing immediately located on only one side, thus not representing 'infill' between existing dwellings.

Previous Regulation 14 versions of the NP set out the key aspiration to deliver local needs housing and in particular Affordable Housing. The current plan is totally silent on this matter yet purports to utilise the same evidence base. The February 2020 Regulation 14 Consultation Version of the NP stated at paragraphs 5.10 to 5.13 and in its Objectives,

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- * To ensure that any development provides Affordable Housing as our number one priority
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Additionally, the plan provides an incredible opportunity to secure Affordable Housing for those with a local connection and who otherwise cannot access the housing market - be that connection by family, relative, job or other tangible connection to the Parish. The failure to utilise this key tool perpetuates a barrier to all those with genuine local need and connection from accessing housing in the village, and it is disappointing that this is the case.

Policy H1: Development Strategy and Policy H2: Windfall Infill Development

These policies set out a strategy for supporting development opportunities within the village confines as redrawn as part of this version of the emergent plan.

There is no guarantee that such an approach will deliver any housing whatsoever. As such, is the plan positively prepared and will the aspiration of the plan to deliver around 10 dwellings over the plan be met?

The February 2020 Regulation 14 Consultation Version of the NP stated: -

[cid:image001.jpg@01D87CAE.56CBA510]

As such, we question whether this approach will deliver any housing at all, given the previous version of the very same plan confirms there are few infilling opportunities that would not have significant adverse impacts on the character of the village, setting of listed buildings, or important gaps.

We also query whether such an approach is NPPF compliant, as this in fact states at paragraph 71, "Plans should consider the case for setting out policies to resist inappropriate development of residential gardens".

Oddly, the current emergent NP seeks to take a completely counter approach to this - rather than seeking to resist development of residential gardens, it seeks to add some garden land into the village confines in the hope of some

of it might delivering housing. We do not consider this to be the best or most suitable land that is available in the village for housing in terms of the hierarchy of land uses, as set out below.

Whilst we also note that the proposed development boundary is proposed to be revised in a number of locations, they are all generally: -

- * Garden land (so again not Previously Developed Land as above);
- * Land locked with extremely limited or no direct highway access opportunity (as such, what is the benefit of doing this if suitable access cannot be afforded to the area as it will never deliver housing, and thus is not genuinely positively prepared);
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- * Would have an impact on the openness of the Conservation Area and/or its setting.

As such, whilst purporting to be positively prepared, this approach is questionable as to whether it will in fact deliver any housing whatsoever.

It is also noteworthy that this strategy completely fails to make any reference to Affordable Housing or Local Needs provision. As highlighted above, we consider this is a missed opportunity. unless it is in fact the view of the PC that Affordable Housing is not wanted in the local area for those in most need of housing? Why has there been such a substantial U-turn on this point in only 2 years, when this was identified as the number one priority previously?

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Have these sites been put forward along with other options for the Community to consider, or is this the preferred view of the Steering Group only at this time? If so, the Parishioners should also be made aware of any other sites that have been considered, and the reasons why these are not being pursued - this should all be available in a transparent and open manner.

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As set out above, being both garden land and being on the very edge of the settlement, these allocations are not 'infill' either - they extend the built form of the settlement outwards and this makes them contrary to one of the key findings of the old consultation that took place, and provides further reason for fresh, up to date evidence to be gathered.

The Policy H3 site extends the built form of the settlement out into the open countryside to the south of the village.

The Policy H4 site represents piecemeal backland development, where no development of this nature has occurred before. The proposal is served by a very limited access, and the scheme is poorly related in form, layout and character to the existing dwellings in the immediate proximity of the proposed allocation. We do not consider this to be good planning. Again, it is unclear how these sites have been selected and ranked and what criteria have been used for this assessment.

Alternative Site

The February 2020 Regulation 14 Consultation Version of the NP stated,

[cid:image002.jpg@01D87CAE.56CBA510]

[cid:image003.jpg@01D87CAE.56CBA510]

The Acorn (MK) Nurseries site identified above remains available, deliverable and achievable for housing development - as well as providing significant opportunities for biodiversity net gain enhancement, local community benefits through S106 funding, local needs Affordable Housing and to enhance the crossing provision on the A590 for both existing and future residents of Emberton on the east side of the A590.

Bizarrely, since the 2020 Regulation 14 consultation version of the plan, all of the existing houses in Emberton on the east of the A509 have been excluded from the revised Development Boundary for the village in the 2022 Regulation 14 emergent NP (see Figure 8 above taken from the 2020 plan above). Are the residents there not considered to be part of the village, or has this area been consciously excluded for some reason that has not been set out or justified? It is unclear why in this version of the plan, circa 22 properties have been removed from the proposed settlement boundary just 2 years after being proposed to be included within it.

As Previously Developed Land (PDL) containing a range of buildings and extensive areas of hard standing, is it not far better and sequentially preferential to develop such land comprehensively, as opposed to small, piecemeal sites with no wider community benefit?

As noted, the site was the proposed village housing allocation in the 2020 Regulation 14 version of the Neighbourhood Plan. We consider that the proposed allocation demonstrates the site can be supported, and offers significant advantages over other sites put forward in this version of the plan, especially when the site scoring and selection process has been unclear. It is wholly in the behest of the Neighbourhood Plan process to include the site as part of the Development Boundary, thus any perceived or stated 'policy conflict' or non-compliance with Plan:MK advanced to suggest the site cannot come forward in principle on that basis, is wholly flawed, as it in fact at the behest of the NP to make it part of the development boundary or allocate it accordingly.

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The site is available and deliverable with known developer involvement.

The 2020 Regulation 14 NP Consultation document accepted the location, scale, nature and broad number of houses as being acceptable on the Acorn (MK) Nurseries site.

Development of the scale proposed would support existing village services (including the bus service) and could be decisive in securing the ongoing vitality and viability of the recently re-opened Community Pub and the new Children's Nursery.

Development of this scale will help support the vitality of the village as a whole and help support the 'one community' stance advocated in 2020 Regulation 14 version of the Neighbourhood Plan.

This is a sustainable site accessible by a range of transport modes, including foot and cycle, being located off a signed Cycle Route. It is closer to Olney Market Square than some parts of the new housing being built in Olney at the northern end of the Town.

It makes the best use of land that has previous development, buildings and hard-standing upon it, and a new, safe highway access will be provided mitigating any concerns flagged in this regard.

There is sufficient place for proper placemaking - well planned, in keeping streets, with suitable car parking provision (visually mitigated), amenity areas, and suitable turning and parking spaces.

There are no adverse heritage, ecological, landscape, flood risk, amenity or landscape impacts associated with the proposed re-development of the site. The site is not designated open space, important open land or similar nor does it impact on the setting of any Listed Building nor the Conservation Area.

Opportunities for biodiversity and landscape enhancement will be taken to provide a significant bio-diversity net gain.

The site is visually enclosed by mature landscaping thus minimising any wider visual impact on surrounding countryside and the abutting residential development, and it is better related to the adjacent housing development than the genuine open countryside to the north and east.

The site has been promoted previously for up to 41 dwellings, and we have actively sought to meet the Steering Group (an offer which still stands, despite a meeting not being forthcoming) to potentially discuss any matter relating to the site, including, without prejudice, a lesser quantum of development if this remains a key sticking point. The current owners of the site are nearing retirement age, after operating from the site since 1986 - the allocation of this site for housing will secure the future of the site and ensure an attractive enhancement to the village into the future, with potentially significant infrastructure, community benefits and local needs Affordable Housing, that may otherwise be lost.

We respectfully ask you to reconsider the considerable opportunities presented by this land for the village and community as a whole and allocate it for housing for the reasons set out above as part of the Emberton Neighbourhood Development Plan.

Please also consider the other points raised above in your progression of the Plan.

Should you have any questions regarding any of the above, please do not hesitate to contact me.

Yours faithfully,

Paul Johnson

Paul Johnson MA (Cantab) MA TP MRTPI
Land & Planning Director
Francis Jackson Homes
6 High Street, Olney, Buckinghamshire
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The Sunday Times BuildQuality Winner
LABC Warranty Developer of the Year

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Paul Johnson

From: Paul Johnson
Sent: 19 November 2021 09:20
To: clerk@embertonparishcouncil.co.uk
Subject: Emberton Neighbourhood Plan - Call for Sites Submission - Acorn (MK) Nurseries
Attachments: 1 to 2500 Site Location Plan Red Line.pdf; Completed 2021 Call for Sites Form - Acorn 18.11.2021.pdf; Call for Sites - Acorn 3 Supporting Sheets 18.11.2021.pdf

Dear Karen,

I trust you are keeping safe and well?

Karen, we have been made aware of the recent 'call for sites' exercise being undertaken as part of the Neighbourhood Plan process. As you are know, we are acting jointly with Ian Pretty and Stephen Burchmore in relation to the Acorn (MK) Nurseries land off Newton Road, and accordingly have pleasure in now attaching details we wish to submit to the Parish Council as part of this process. This information should be read alongside any previous information submitted or held in relation to the land.

The current submission comprises a site location plan, the completed 2021 pro-forma document from the EPC website, plus 3 sides of A4 of additional information.

Please would you be so kind as to confirm receipt of the attached ahead of Monday's submission deadline.

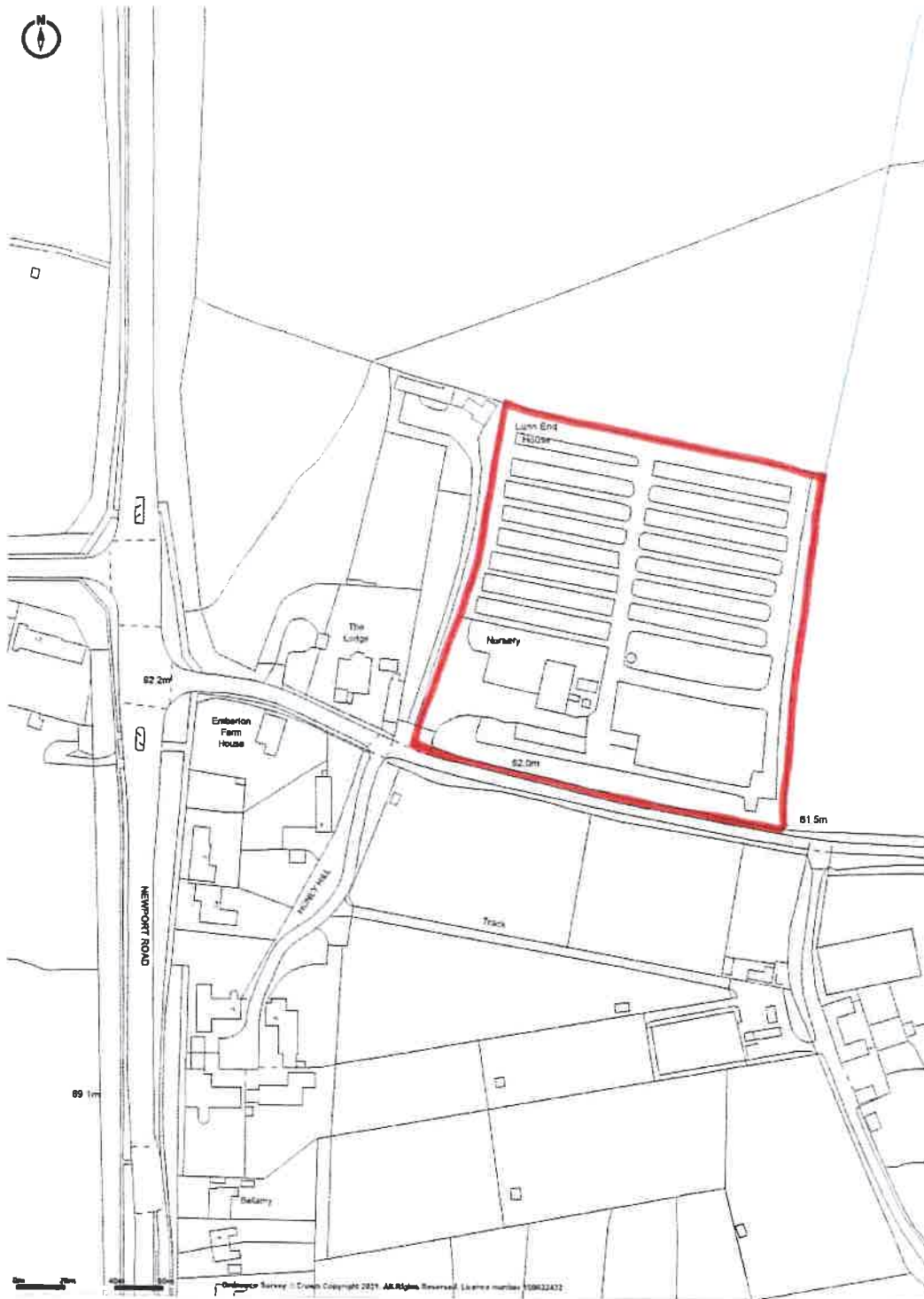
If there are any immediate queries regarding the attached, please do not hesitate to contact me.

Yours sincerely,

Paul Johnson

SITE LOCATION PLAN

1: 2,500 @ A4.



EMBERTON PARISH COUNCIL

Working for the Local Community

Emberton Neighbourhood Plan - Call for Sites

Response Number:

Date Received:

Date Acknowledged:

FOR OFFICIAL USE ONLY

Emberton Parish Council are preparing a Neighbourhood Plan for our village. The Neighbourhood Plan will help to shape the future of our community and once adopted will be an integral part of the policies used to assess future planning applications. We are revising the housing allocation within the Neighbourhood Plan and need to identify further sites that have potential for development.

To prepare a robust Neighbourhood Plan it is proposed to make **a small housing allocation of up to 10 houses** that are well related to the Development Boundary. Making a housing allocation will ensure that the Neighbourhood Plan is 'positively prepared' and meets the tests of 'soundness' required by National planning policies. Sites can also be put forward for other types of development, including employment, community and leisure uses. All suggested sites will be assessed against a standard methodology to assess positive and negative planning merits.

Please use this form to provide supporting information on sites suggested for future development. A separate form should be completed for each site suggested. You may photocopy this form or obtain more copies free of charge on request. Please provide a site plan identifying the land suggested at a scale of no less than 1:2500. Emberton Parish Council will process your personal data in accordance with the General Data Protection Regulations (GDPR). Details of suggested sites will be open to public view, but not your personal data.

Please return your completed forms by Monday 22nd November 2021 to:

Karen Goss (Clerk), Emberton Parish Council, clerk@embertonparishcouncil.co.uk

1. Personal Details	
Title	Mr.
First Name	Ian Pretty and Mr.
Last Name	Stephen Burchmore
Job Title (where relevant)	Owners/Directors
Organisation (where relevant)	Acorn (MK) Nurseries
Address Line 1	Newton Road
Line 2	Emberton
Line 3	Milton Keynes
Line 4	Buckinghamshire
Post Code	MK46 5JW
Telephone Number	c/o Agent
Email address	c/o Agent

2. Agent Details (if applicable)	
Title	Mr.
First Name	Paul
Last Name	Johnson
Job Title (where relevant)	Land & Planning Director
Organisation (where relevant)	Francis Jackson Homes Ltd.
Address Line 1	6 High Street
Line 2	Olney
Line 3	Buckinghamshire
Line 4	
Post Code	MK46 4BB
Telephone Number	01234 717703
Email address	paul@francisjackson.co.uk

3. I am...			
Owner of the site	<input checked="" type="checkbox"/>	Planning Consultant	<input type="checkbox"/>
Leaseholder	<input type="checkbox"/>	Land Agent	<input type="checkbox"/>
Local Resident	<input type="checkbox"/>	Developer	<input checked="" type="checkbox"/>
Amenity/Community Group	<input type="checkbox"/>	Registered Social Landlord	<input type="checkbox"/>
Other (please specify): Housebuilder acting jointly with, and on behalf, of the Landowners			
4. Site Information			
Site location (including address and post code)	Acorn (MK) Nurseries, Newton Road, Emberton, Milton Keynes, Buckinghamshire, MK46 5JW		
Grid reference (if known)	488970 Easting – 249417 Northing		
Site area (hectares)	2 Ha		
Current Land Use e.g. agriculture, employment, unused/vacant etc.	Plant Nursery		
Type of site e.g. greenfield, previously developed land as defined in Annex 2 of NPPF	Site has had all topsoil removed and the land is laid to hardstanding with various structures inc. poly tunnels thereon.		
Existing trees and other landscape features on the site	Around perimeter of site – detailed arboricultural report to assess the quality of same and LVIA to assess the landscape value and implication of this can be supplied if required.		
Availability of access to the site	Existing highways access serves the existing use – could be repositioned and upgraded as necessary.		
Ecological features and areas of biological importance	Given the nature of the land use, only the perimeter hedges and trees have potential value. A detailed ecological report can be provided if required.		
Relevant Planning History (if known – please include relevant planning application numbers)	21/01921/OUT – current outline planning application (with access) for the redevelopment of the site for up to 41 dwellings, including affordable housing and off-site Highways works to the A509 crossing/s		
5. Proposed Future Uses & Capacity			
USE (if mixed use, please tick all that apply)	Yes	Basic Information – area/number of units/proposed Floorspace/number of pitches	
Residential	<input checked="" type="checkbox"/>	Up to circa 41 dwellings, including a mix of affordable housing types and tenures to meet local needs.	
Affordable Housing	<input checked="" type="checkbox"/>	As above.	
Self-build or custom build housing serviced plots / un-serviced land	<input type="checkbox"/>		
Office, Research & Development, light industrial (B1)	<input type="checkbox"/>		

Retail (please specify)	<input type="checkbox"/>	
Community facilities (please specify)	<input type="checkbox"/>	
Sports/leisure (please specify)	<input type="checkbox"/>	
Other (please specify)	<input type="checkbox"/>	

6. Site Ownership

I (or my client)

Are the sole owners of the site

Is a part owner of the site

Does not own (or hold any legal interest in) the site whatsoever

If Owner/Part-owner have you attached a copy of the title plan and deeds with this form?

Yes

No

If you are not the owner, or own only part of the site, do you know who owns the remainder? (please provide details):

Does the owner (or other owners) support your proposal for the site?

Yes

No

7. Market Interest

Please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

	Yes	Comments
Site is owned by a developer	<input type="checkbox"/>	
Site is under option to a developer	<input checked="" type="checkbox"/>	There is strong interest for the housing proposed on the site.
Enquiries received	<input type="checkbox"/>	
Site is being marketed	<input type="checkbox"/>	
None	<input type="checkbox"/>	
Not Known	<input type="checkbox"/>	

8. Utilities

Please tell us which of the following utilities are available to the site

	Yes	No	Unsure
Mains water supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mains sewerage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Electrical supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gas supply	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Public highway	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landline telephone/broadband internet	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify):	<p>All properties will be served by Air Source Heat Pumps (ASHP) to ensure there is no need for future reliance on gas.</p> <p>Stuart Simmonds of MKC Passenger Transport on 02/08/21 stated that Public Transport is available from the bus stop on the A509 (Newport Road) as Service 21 no longer calls within the village itself. This is a short walk from the site.</p>		

9. Availability Issues

Please tell us if there are any of the following constraints

	Yes	No	Unsure
Land in other ownership must be acquired to develop the site	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Restrictive covenants exist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Current use needs to be relocated	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Physical constraints (topography, trees, other)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public rights of way cross or adjoin the site	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contamination	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Conservation Area/Listed Buildings	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Flood plain	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please provide any relevant information of likely measures to address any of the above that you have answered "YES" to:

The existing site owners will retire in the next couple of years and at that point the current use will cease.

There are no flood risk issues with regards to the development of the site – there are surface water matters that need to be considered on the eastern boundary, but these can be managed and mitigated through careful design and do not represent an overriding constraint to development – as confirmed by the LLFA response to planning application 21/01921/OUT. The site is in Flood Zone 1 for planning purposes.

10. Timescale for Availability

Please indicate the approximate timescale for availability:

		Comments – particularly if you have indicated that the site is not immediately available, please explain why:
Immediately	<input checked="" type="checkbox"/>	The current planning application demonstrates a clear commitment to the deliverability of the site.
Up to 5 years	<input type="checkbox"/>	
5 - 10 years	<input type="checkbox"/>	
10 - 15 years	<input type="checkbox"/>	
Beyond 15 years	<input type="checkbox"/>	

11. Other Relevant Information – Please use the space below to for additional information or further explanations on any of the topics covered in this form (any additional info should be limited to 3 sides of A4):

The site was the proposed village housing allocation in the 2020 Regulation 14 version of the Neighbourhood Plan. We consider that the proposed allocation demonstrates the site can be supported, and offers significant advantages over other sites in this 'call for sites' process.

Exceptionally and uniquely the site provides the opportunity for a genuinely mixed tenure market/affordable housing scheme to deliver a step change in Affordable Housing Provision within the Parish with a range of housing sizes, types and tenures to help deliver a thriving, inclusive, mixed and balanced community. Why should historic build trends perpetuate future growth and continue to restrict access to housing in the village?

It is available and deliverable with known developer involvement.

The 2020 Regulation 14 NP Consultation document accepted the location, scale, nature and broad number of houses as being acceptable on the Acorn Nurseries site.

There will be wider community benefits arising from S106 funding, Highways improvements, and A509 crossing improvements that will benefit existing and future residents alike.

Development of the scale proposed would support existing village services (including the bus service) and could be decisive in securing the ongoing vitality and viability of the recently saved Community Pub and the new Children's Nursery.

Development of this scale will help support the vitality of the village as a whole and help support the 'one community' stance advocated in 2020 Regulation 14 version of the Neighbourhood Plan.

This is a sustainable site accessible by a range of transport modes, including foot and cycle, being located off a signed Cycle Route. It is closer to Olney Market Square than some parts of the new housing being built in Olney at the northern end of the Town.

It makes the best use of land that has previous development, buildings and hard-standing upon it, and a new, safe access will be provided.

There is sufficient place for proper placemaking – well planned, in keeping streets, with suitable car parking provision (visually mitigated), amenity areas, and suitable turning and parking spaces.

There are no adverse heritage, ecological, landscape, flood risk, amenity or landscape impacts.

Opportunities for biodiversity and landscape enhancement which will be taken.

The site is visually enclosed and related more to the adjacent housing development than the genuine open countryside to the north and east.

The site is not designated open space, important open land or similar nor does it impact on the setting of any Listed Building nor the Conservation Area.

Further comments are set out on the accompanying 3 sides of A4.

Signature: 

Date: 18/11/2021



Emberton Development Boundary (shown with orange line)

18th November 2021

Karen Goss – Clerk
Emberton Parish Council

Via e-mail only

Dear Karen,

Re: Emberton Neighbourhood Plan 2021 'Call for Sites' Representation - Acorn (MK) Nurseries, Newton Lane, Emberton

Thank you very much for the opportunity to make further representations to the current 'call for sites' as part of the Neighbourhood Plan (NP) process. As you are aware, we act jointly for and on behalf of Ian Pretty and Stephen Burchmore of Acorn (MK) Nurseries. This additional information has been prepared in light of the current 'call for sites', and the most up to date information we have available regarding the site and associated background evidence.

At the outset, we welcome the view that a housing allocation is appropriate/necessary to ensure that any Neighbourhood Plan could be deemed 'positively prepared' and duly 'sound', allowing it to proceed to a community referendum in the fullness of time.

The duly completed and accompanying 'call for sites' form sets out the benefits of the Acorn (MK) Nurseries site for housing.

We also wish to take the opportunity to raise some queries in relation to the current consultation, to ensure it is robust, 'sound', evidence based and genuinely represents the views of the Emberton community as a whole, and thus can stand up to scrutiny at the appropriate time.

Our first query relates to the premise upon which the current 'call for sites' is being undertaken. We have concerns that some of the criteria stated on the Parish Council website and associated 'call for sites' form is more than a little pre-determinative/prejudicial, and thus is not wholly objective or transparent in the manner in which it seeks to pre-select only certain information and/or allow certain sites to even get to a point where they may be given more detailed consideration.

Should a 'call for sites' not be a simple, objective, fact finding exercise with regards to all potential land in and around the village/wider Parish, whether big or small, related to the village or not?

The current website and forms set out a specific list of criteria for assessment, that as far as we aware, have not been devised, decided on or have had their criteria developed by (and thus may not have the support of) the general community and parishioners of Emberton. These include the site/s being "well related to the development boundary surrounding Emberton village", and allowing "convenient access to facilities and the centre of the village", amongst a number of other 'criteria'.

Our questions in relation to these points are therefore:

- Where have these criteria come from?;
- Who developed them?;
- What is their evidential basis, and who is the arbiter of their inclusion and assessment?;
- Have they been agreed by the local community as a whole?;
- Where has the proposal to make, "a small housing allocation of up to 10 houses" (in bold text) as per the Call for Sites Form come from?;

- Has this been consciously set at a level to fall below the Affordable Housing threshold?;
- Why limit the sites that may come forward or have a prejudicial view on what may be possible at this stage?;
- Has a robust independent assessment of future demographics and Objectively Assessed Housing Needs been undertaken for the Parish by MKC to guide target housing numbers with a genuine level of provision that can stand up to scrutiny – that is not based solely on past building in-fill trends which are naturally diminishing?

The Parish website states, in relation to the current 'call for sites' process that, "This will be run on the same basis as the previous Call for Sites, to be fair to all land owners who have put forward sites so far. All sites will be considered against the current version of the Neighbourhood Plan, using the latest defined development boundary for the village."

With regards to the relationship to the existing village, it is wholly at the behest of the Neighbourhood Plan process itself to set a new/revised/appropriate development boundary for the village.

As such, this is in effect a self-defeating criteria, as the Steering Group and community could revise this as part of the NP process.

Indeed, various Regulation 14 versions of the plan have been produced and the 2020 Regulation 14 consultation version included the dwellings that in reality are, and always have been, part of Emberton village but are now east of the A509 within a revised settlement boundary – see plan extract below.

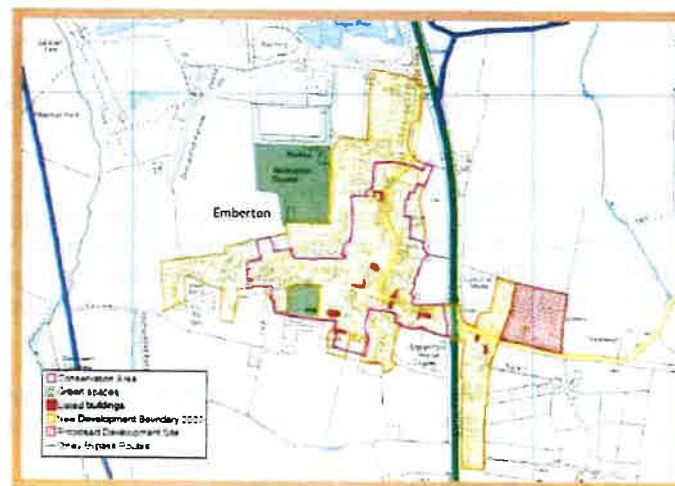


Figure 8: Map of proposed development site

As such, to restrict this in the current 'call for sites' process to a boundary which has not been subject at this point to wider public scrutiny seems a rather closed approach, which could be perceived to seek to predetermine the outcome either toward, or away from, certain sites.

We feel a more balanced and objective assessment needs to be undertaken to ensure that all sites are fairly assessed, and can be considered in terms of their constraints and opportunities in a transparent, comparable and evidentially ranked basis, without any restrictive, prescriptive or unduly pre-determinative criteria/filtering.

In other Neighbourhood Plans in which we have been involved, the 'call for sites' process, and subsequent site assessment, has been undertaken by a professional independent organisation e.g. AECOM – this ensures a genuinely independent assessment of sites and their ranking.

Equally, in some instances where we have been involved with a NP, sites that have come forward as part of the 'call for sites' process have been put to a community vote. This seeks to prevent any nasty surprises at referendum stage, and ensures that the local community, as a whole, are able to steer development to a location that is the genuine preference of the majority.

In terms of "convenient access to the facilities and centre of the village", please can we ascertain what convenient means in this context?

Regarding the Acorn Nurseries site, the Highway to the front of the site is a signed cycle route. It thus demonstrates MKC Council consider the site is accessible to/by this sustainable transport mode, and as part of a package of improvements facilitated by any development of the site, works could be undertaken to upgrade the pedestrian crossing point/s on the A509. This will ensure the site is also safely accessible to and by pedestrians to the centre of the village.

There are therefore wider community benefits to the numerous existing residents on the east side of the A509 that nevertheless live within the village of Emberton. Development on the Acorn Nurseries site would actually have wider benefits to not only future occupiers, but existing ones, in terms of a betterment to the "access to the facilities and centre of the village". This should be given weight in the assessment exercise.

In the context of the recent purchase of the village pub by the local community, and new children's day nursery, the additional footfall and support this development could generate would surely be welcomed?

Is it not better and ultimately more sustainable to have local residents accessing and supporting these local services by foot or cycle, than those travelling in from further afield?

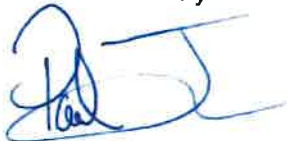
The site is also the only one we are aware of capable of delivering a meaningful amount of affordable housing. The NP has within its power the ability to ensure this is genuine Affordable Housing for local people, thus helping the community to thrive and grow sustainably, through the adoption of a local connection criteria policy – which we would strongly support. At present, we feel this significant opportunity is not being utilised.

Finally, the criteria fail to mention the best use of previously developed land. Government Policy has a strong presumption in favour of such sites coming forward. In this instance, whether it be on a Planning or common sense basis – the site has a range of structures and buildings on it, and is otherwise laid to hard standing. A Certificate of Lawful Use is being prepared to confirm this position with MKC.

It seems illogical to the landowners and ourselves that any genuine greenfield site could be deemed preferential in the above context over a site which has existing features, structures and development already upon it, such as the Acorn Nurseries site.

We kindly request the above is given detailed consideration in your assessment, Should you require any further information please do not hesitate to contact me via telephone or e-mail.

Yours sincerely



Paul Johnson MA (Cantab) MA TP MRTPI
Land and Planning Director

E-mail: paul@francisjackson.co.uk

Paul Johnson

From: Paul Johnson
Sent: 22 November 2021 09:25
To: clerk@embertonparishcouncil.co.uk
Subject: RE: Emberton Neighbourhood Plan - Call for Sites Submission - Acorn (MK) Nurseries

Morning Karen,

Thank you for confirming receipt as requested. Much appreciated.

With kind regards,

Paul

From: clerk@embertonparishcouncil.co.uk <clerk@embertonparishcouncil.co.uk>
Sent: 19 November 2021 16:06
To: Paul Johnson <paul@francisjackson.co.uk>
Subject: Re: Emberton Neighbourhood Plan - Call for Sites Submission - Acorn (MK) Nurseries

Dear Paul

Yes thank you, hope you are too?

Please accept this email as acknowledgement of the call for sites submission for Acorn (MK) Nurseries.

Kind regards

Karen Goss

From: "Paul Johnson" <paul@francisjackson.co.uk>
To: "Emberton Parish Council" <clerk@embertonparishcouncil.co.uk>
Sent: Friday, November 19, 2021 9:20:02 AM
Subject: Emberton Neighbourhood Plan - Call for Sites Submission - Acorn (MK) Nurseries

Dear Karen,

I trust you are keeping safe and well?

Karen, we have been made aware of the recent 'call for sites' exercise being undertaken as part of the Neighbourhood Plan process. As you are know, we are acting jointly with Ian Pretty and Stephen Burchmore in relation to the Acorn (MK) Nurseries land off Newton Road, and accordingly have pleasure in now attaching details we wish to submit to the Parish Council as part of this process. This information should be read alongside any previous information submitted or held in relation to the land.

The current submission comprises a site location plan, the completed 2021 pro-forma document from the EPC website, plus 3 sides of A4 of additional information.

Please would you be so kind as to confirm receipt of the attached ahead of Monday's submission deadline.

If there are any immediate queries regarding the attached, please do not hesitate to contact me.

Yours sincerely,

Paul Johnson

Paul JohnsonMA (Cantab) MA TP MRTPI

Land & Planning Director

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Paul Johnson

From: clerk@embertonparishcouncil.co.uk
Sent: 03 May 2022 14:42
To: Paul Johnson
Subject: Re: Neighbourhood Plan Steering Group meeting

Dear Paul

Apologies for the delay in responding to your email below.

The parish council have asked me to advise you that the Regulation 14 Pre-Submission consultation of the Emberton Neighbourhood Plan started on the 2nd May and will run for 6 weeks. The parish council is also aware that there is a Certificate of Lawfulness for Acorn Nurseries (MK) currently in the process.

Kind regards

Karen Goss
Clerk to Emberton Parish Council

From: "Paul Johnson" <paul@francisjackson.co.uk>
To: "Emberton Parish Council" <clerk@embertonparishcouncil.co.uk>
Sent: Friday, April 1, 2022 6:10:22 PM
Subject: RE: Neighbourhood Plan Steering Group meeting

Dear Karen,

Further to my e-mail of 21st January 2022, I was just after a quick update please as we never did hear anything back at all from the Neighbourhood Plan Steering Group.

Our proposal to meet with them to have a completely open discussion remains, and we would really like to take the opportunity to do so.

Very little remains off the table at present, and we would be happy to informally discuss anything in relation to the proposals – be it quantum, S106 funding for a school bus stop, local connection criteria for affordable housing, etc.

I would have hoped such a meeting could be beneficial to all parties, and hope to hear back from you presently once you have chased this up with them.

With thanks in advance and kind regards,

Paul

Paul Johnson MA (Cantab) MA TP MRTPI
Land & Planning Director

Francis Jackson Homes
6 High Street, Olney, Buckinghamshire MK46 4BB

e paul@francisjackson.co.uk
t 01234 717700
d 01234 717703
m 07508 884039

www.francisjacksonhomes.co.uk

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From: clerk@embertonparishcouncil.co.uk <clerk@embertonparishcouncil.co.uk>
Sent: 21 January 2022 21:02
To: Paul Johnson <paul@francisjackson.co.uk>
Subject: Re: Neighbourhood Plan Steering Group meeting

Dear Paul

Thank you and to you.

I acknowledge receipt of your email and have passed it to the steering group for their response.

Kind regards

Karen

From: "Paul Johnson" <paul@francisjackson.co.uk>
To: "Emberton Parish Council" <clerk@embertonparishcouncil.co.uk>
Sent: Friday, January 21, 2022 11:54:31 AM
Subject: Neighbourhood Plan Steering Group meeting

Dear Karen,

A belated happy new year to you.

Karen, we corresponded previously regarding the Acorn Nurseries site, which you are aware we are involved with, about which we have made submissions to the recent 'call for sites'.

I am writing to see if it would be possible please to arrange a meeting with the Neighbourhood Plan Steering Group within the next week or so. I see from the PC website that we are referred to yourself if we wish to contact them, so I hope you don't mind me doing this?

The objective would be to have an open discussion about the site, and would give all parties the opportunity to raise any comments, answer any questions, or raise matters to consider.

We would happily work around the Steering Group (appreciating there are various member and thus diaries to coordinate) with regards to a suitable date and time, to help facilitate this.

Please would you be so kind as to forward this/liaise with them about this and let me know their thoughts and hopefully a proposed date and time.

Thank you in advance,

With kind regards,

Paul

Paul Johnson MA (Cantab) MA TP MRTPI
Land & Planning Director

Francis Jackson Homes
6 High Street, Olney, Buckinghamshire MK46 4BB

e paul@francisjackson.co.uk

t 01234 717700

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Flore Parish Housing Need Report

March 2021



**West
Northamptonshire
Council**

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Introduction

It should be noted that the duration for responses to this survey coincided with the third national lockdown due to the Coronavirus (COVID-19) pandemic.

The responses were recorded prior to the West Northamptonshire Unitary, with the report following. Therefore, distinction between the West Northamptonshire area and the former District Council are made throughout this report.

Housing need is a particularly complex issue that local authorities across the country are facing.

Nationally there is a significant shortfall in the provision of housing compared with the level of need.

All over the country, local people are not able to find a home within their communities, that is suitable for their needs and they can afford. There are several contributing factors to this including:

- Increases in rural house prices
- Lack of available affordable homes
- Lack of specialist housing
- Availability of finance for developers and prospective homeowners
- Availability of sufficient land for new homes
- Local opposition for new homes

The Objectively Assessed Housing Needs (OAHN) Report (August 2013)¹, identifies the level of housing need across West Northamptonshire.

Whilst this, together with the earlier Strategic Housing Market Assessment (June 2010)¹, allows the Council to plan for the future of the area as a whole, we also need to understand the housing

need on a more local level, whether this is for market or affordable homes.

Policies in the recently adopted Settlements and Countryside Local Plan, Part 2 (2011 – 2029) for the former Daventry District administrative area, and the West Northamptonshire Joint Core Strategy provide for development outside of the village confines to meet local needs where this is supported by up-to-date evidence in a Housing Needs Survey or Housing Needs Assessment as set out in Chapter 5 - Development in Rural Areas Chapter.

Whilst there is no single approach that will provide a definitive answer to the exact housing need of a parish, Housing Surveys and analysis of local Housing Register data will give a credible result.

This report consists of three main parts. The first provides statistical information from secondary data sources i.e. Census information, and looks at the current households in the parish in order to provide a description of the existing housing and affordability in Flore Parish.

The second part provides views, in terms of future housing provision, and demographics of the households that responded to the survey.

The final section of this report examines the households that have declared that they have need for new housing within the parish. Of the households that have declared a need, a financial assessment has been undertaken in order to further help determine the housing tenure types required.

¹westnorthamptonshirejpu.org/connect.ti/website/view?objectId=2737904

Strategic and Planning Context

Local authorities have a statutory responsibility to assess local housing needs as per the 1985 Housing Act.

To help achieve this and aid in the delivery of housing, several strategies, policies, and documents are available to, or have been produced by the Council. The following provides a list of these which includes national and local level documents. A number of the local documents have been produced or made by the former Daventry District Council (as identified below) and are relevant until superseded.

National

- National Planning Policy Framework (February 2019)
- Planning Practice Guidance (Launched March 2014)

Local

- West Northants Joint Core Strategy (December 2014)
- Objectively Assessed Housing Need (August 2013)
- West Northants Strategic Housing Market Assessment (June 2010)
- Gypsy and Traveller Accommodation Assessment (January 2017)
- Settlements and Countryside Local Plan, (for Daventry District) Part 2 (2011-2029)
- Daventry District Council Corporate Strategic Plan (2017 – 2021)
- Housing Supplementary Planning Document (adopted by DDC - July 2017)
- Allocations Scheme (for Daventry District), (July 2017, reviewed April 2019)
- Tenancy Strategy (for Daventry District), (December 2012 reviewed March 2019)
- The Strategic Housing Plan (for Daventry District), 2014-2019 (February 2014)
- Affordable Housing Marketing and Communication Strategy (for Daventry District), (December 2007 revised Dec 2010)
- Daventry District Community Strategy 2018
- Daventry District Area Profile (December 2014)
- Flore Neighbourhood Development Plan 2014 – 2029 (Made version September 2016)

Methodology

The methodology that is used for housing surveys is set out below.

Stage 1 – Identification of Parish

The order in which parishes are surveyed is not definitive and can change for different reasons including where villages are undertaking neighbourhood planning activity or if a village is faced with a planning application/appeal and there would be a benefit from having an up-to-date survey to help inform the decision. Parishes can also request Housing Surveys to be carried out if the existing Survey is more than three years old.

Stage 2 – Engaging with the Parish Council

Early discussions take place with the Parish Council or their nominated representatives about the survey. Officers talk through the process and objectives of the survey and establish any priorities the Parish Council may have. The Parish Council is given the opportunity to add any bespoke questions to the survey. Unfortunately, the core questions and format cannot be changed to ensure consistency across the Housing Surveys.

Stage 3– Marketing

Posters and literature on the Housing Survey are distributed to the Parish Council to place in relevant areas. Officers from the Council's Local Strategy Service can attend one public event in the area. This could take the form of a drop-in event, a public meeting or an item on the Parish Council Meeting Agenda.

Stage 4 – Survey

A letter is sent to all households within the parish, explaining how to access and complete the survey. Surveys are made available to complete online. If someone cannot access the survey online, paper copies are made available. The Survey remains open for a minimum of 4 weeks.

Stage 5 – Collection & Analysis

The Council's Local Strategy Service collates and analyses the completed surveys and produces a draft report. The report details the number, type and tenure of homes required, as identified via the surveys and analysis of the DDC Housing Register.

Stage 6 Review

The Parish Council/nominated representatives are given the opportunity to factually comment on the draft report prior to its publication. This is for a maximum of 4 weeks.

Stage 7 Publication

The final version of the Housing Survey is published on the Council's website considering any relevant comments which may have been received from the Parish Council.

Flore Parish Statistics

The following information is taken from the Neighbourhood Statistics Site² which uses the Census 2011 data.

Location

Flore Parish is located in the former Daventry District, West Northants, within the county of Northamptonshire.

Dwellings³

Census information for Flore Parish reports a total of 521 dwellings in 2011. However, since the census, additional development has taken place in the area.

In 2011 there were:

- 514 (99%) bungalows or houses,
- 7 (1%) other dwellings such as flats, apartments, converted or shared homes,
- 19 household spaces (4% of all dwellings) had no usual residents.

According to the most recent Housing Land Availability report for the former Daventry District, April 2020⁴, since 2011 there has been further development totalling an additional 105 homes, 28 (27%) of these homes are affordable housing. Information past April 2020 is not currently available although updates (when they are released) can be found on DDC's website⁵.

Household & Tenure³

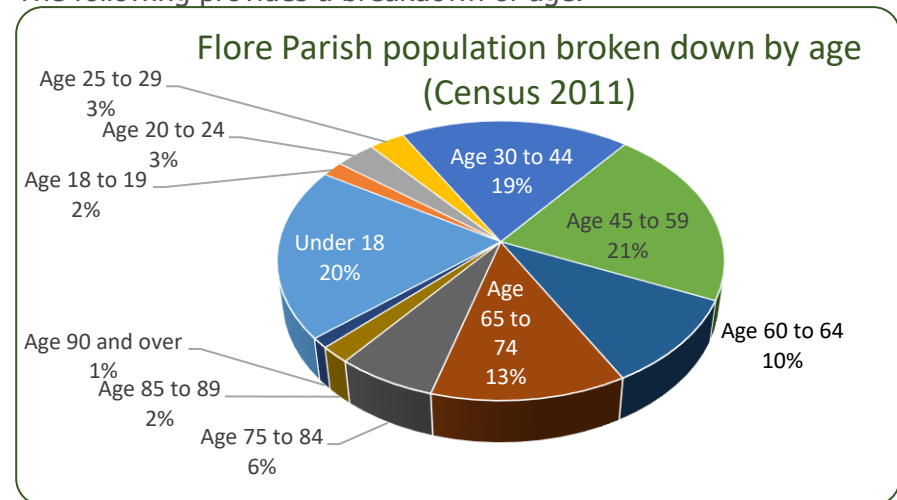
According to 2011 Census data Flore Parish contained 502 households:

- 393 (78%) are owner occupiers
- 51 (10%) are renting from a Registered Provider
- 50 (10%) are renting from a Private Landlord
- 2 (0%) live in shared ownership
- 6 (1%) are living rent free

Population

Census (2011) recorded a population of around 1,194. The gender split for the area is an even split (50% Female, 50% male). 2019 estimates⁶ place the population at around 1364.

The following provides a breakdown of age.



² Neighbourhood.statistics.gov.uk

³ gov.uk/definitions-of-general-housing-terms

⁴ DDC [Housing Land Availability Report April 2020](#)

⁵ [Housing Land Supply](#)

⁶ [ONS 2019 Mid-year estimates](#)

Affordability in Flore Parish

The National Picture

According to ONS, on average in 2019, in England full time workers can expect to pay an estimated 7.8 times their annual workplace-based earnings on buying a home.

The Council of Mortgage Lenders October 2016 report showed that first time buyers were typically borrowing 3.56 times their gross income and were tending to use around 18% of their income towards paying off the loan. The average loan size was £136,300.

Assessing Affordability

Assessing affordability involves comparing the house costs against the ability to pay.

This is done by determining the ratio of lower quartile house prices to lower quartile earnings which indicates whether people on the lowest earnings can afford to access the cheaper housing in their area.

The lower quartile house prices are determined by ranking all property prices within the area and taking the lowest 25%.

The lower quartile incomes are determined by ranking all incomes in the area and taking the lowest 25%.

The higher the ratio the less affordable the homes are within an area.

The Office of National Statistics produces information that shows the lower quartile housing affordability ratio of price paid to gross annual earnings.

⁷<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2018>

The latest release (2020) is shown in the below table and illustrates that house prices in the former Daventry District in 2019 were around ten times higher than gross annual workplace-based earnings.

Year	2015	2016	2017	2018	2019
Lower quartile	8.63	10.42	10.72	11.00	9.91

Source: ONS, Housing affordability in England and Wales: 2019⁷

The following table shows the comparison between the former Northamptonshire Local Authorities based on the latest figures (2019) and shows that Daventry is second highest figure in the County after South Northamptonshire.

Authority	Ratio
Corby	8.09
East Northants	7.87
Kettering	7.74
Northampton	7.71
South Northants	10.92
Wellingborough	8.12

ONS, Housing affordability in England and Wales: 2019

*The English indices of Deprivation*⁸ provide a relative measure of deprivation at a small area level across England. Areas are ranked from the least deprived to the most deprived on seven aspects of deprivation including 'Barriers to Housing and Services' which contribute to an overall combined measure of multiple deprivation. The former area of Daventry District ranked 243 out of 317 authorities with 1 being the most deprived and 317 being the least deprived (figures based on 2019 indices).

Flore Parish

16 properties were sold within Flore Parish during the period February 2020 until February 2021 (data sourced from Land Registry⁹). According to Land Registry, sold prices ranged from £225,000 to £1,150,000 which provides an average price paid of £431,937. 9 sales in Flore during the last year were semi-detached properties, selling for an average price of £386,722. Detached properties, of which there were 6 sales, sold for an average of £526,750. There was 1 terraced property sold fetching £270,000.

For the following analysis, the average price for a semi-detached home has been used (£386,722).

Using the overall average value and the Money Advice Service¹⁰ mortgage calculator, repayments would equate to

Amount	Frequency
£381	Weekly
£1,650	Monthly
£19,800	Annually

This is assuming a 10% deposit (£38,672), 3% interest rate and 25-year mortgage term.

⁸ <https://www.gov.uk/guidance/english-indices-of-deprivation-2019-mapping-resources>

⁹ [Land Registry](https://www.landregistry.gov.uk/)

¹⁰ [MoneyAdviceService.org.uk](https://www.moneyadviceservice.org.uk/)

The repayment costs stated are for housing only and would need to be added to living costs to determine the level of household income required.

*The Minimum Income Standard for the United Kingdom*¹¹ reports on how much income households need to afford an acceptable standard of living by using a Minimum Income Calculator¹²

The programme is carried out by Centre for Research in Social Policy at Loughborough University with funding from the Joseph Rowntree Foundation.

The calculator estimates that an average family of 2 parents and 2 children in primary education, living to a minimum standard and excluding any housing costs and tax payments, requires the following household income for a basic standard of living:

Amount	Frequency
£725	Weekly
£3,142	Monthly
£37,706	Annually

If the housing costs were added to this, a household in Flore Parish would require an income of:

Amount	Frequency
£1,106	Weekly
£4,792	Monthly
£57,506	Annually

¹¹ [boro.ac.uk/research/crsp/mis/](https://www.boro.ac.uk/research/crsp/mis/)

¹² [boro.ac.uk/research/crsp/mis/calculator/](https://www.boro.ac.uk/research/crsp/mis/calculator/)

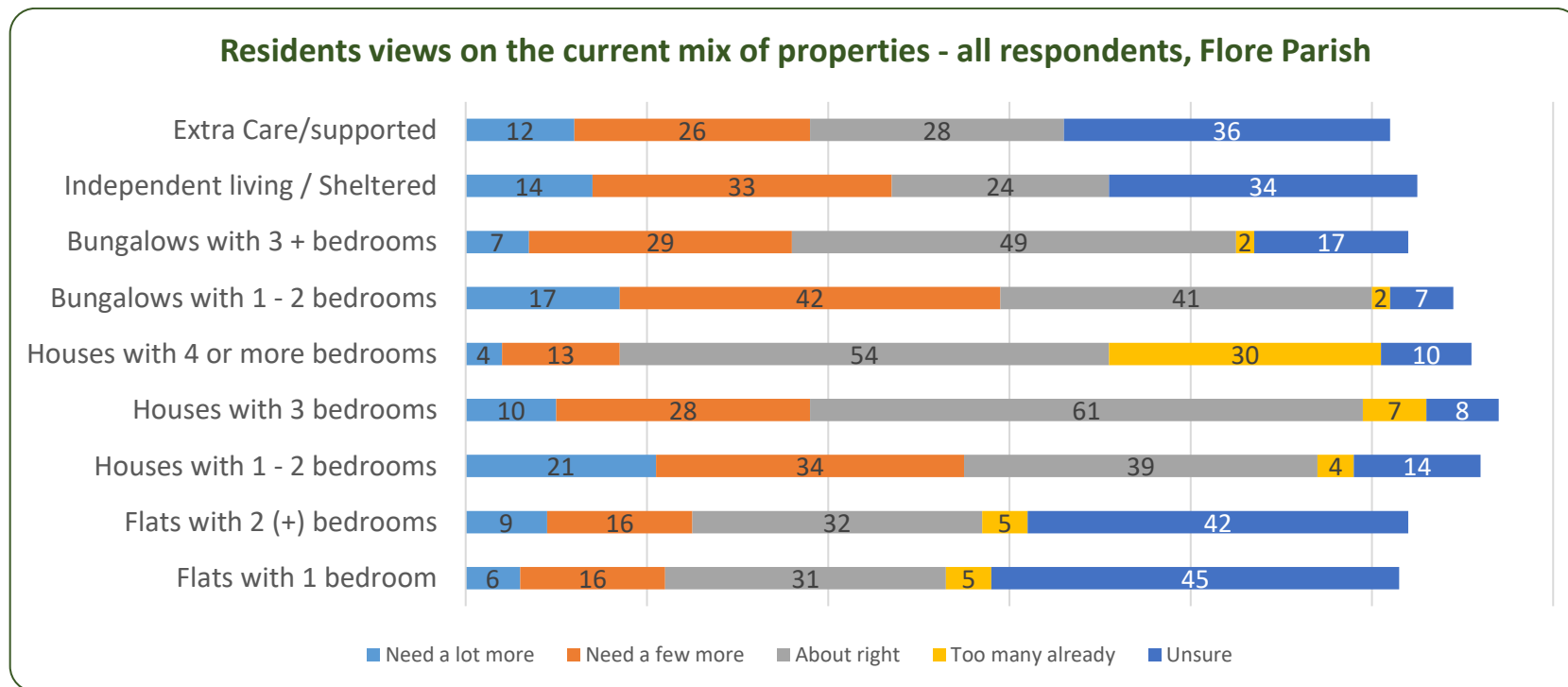
Overall Survey Analysis

Responses

622 letters were sent to households within Flore Parish, inviting them to complete a Housing Survey for the area. A total of 122 surveys were completed, equating to 22%. There were 17 respondents that were aware of someone moving away from the Parish as they could not find a suitable home within the Parish.

Mix of Properties

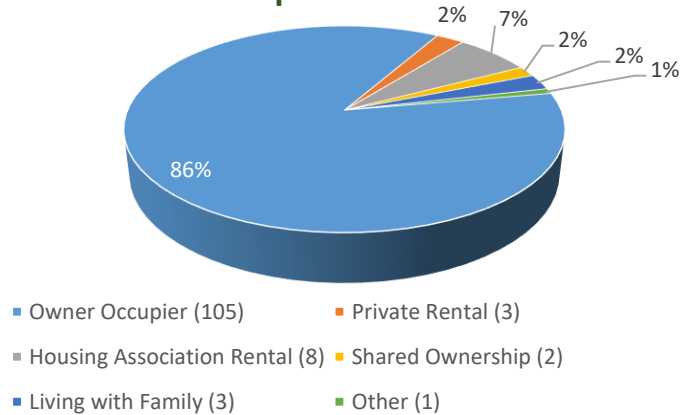
The graph below shows the opinion of Flore Parish Households on the mix of properties within the parish. Some key points from this were that a high number of respondents (42) felt that there needs to be more 1 – 2 bedroom bungalows. Many felt that there are enough 3-bedroom houses (61).



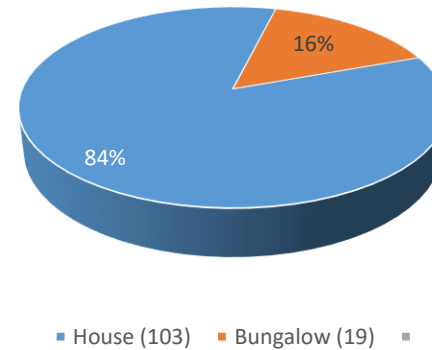
Demographics of all Respondents

The following charts show the demographics for those households that completed the Flore Parish Housing Survey.

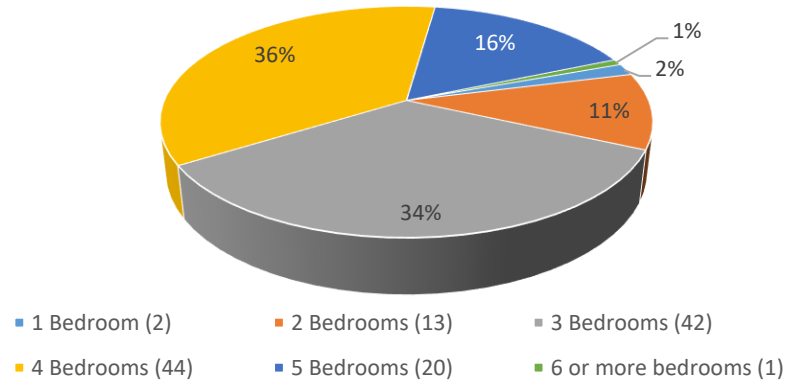
Flore Parish Housing Survey, tenure - all respondents



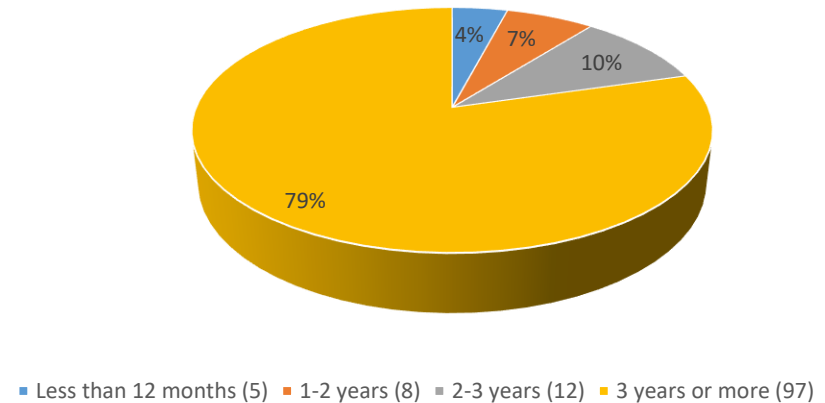
Flore Parish Housing Survey, property type - all respondents



Flore Parish Housing Survey, number of bedrooms - all respondents



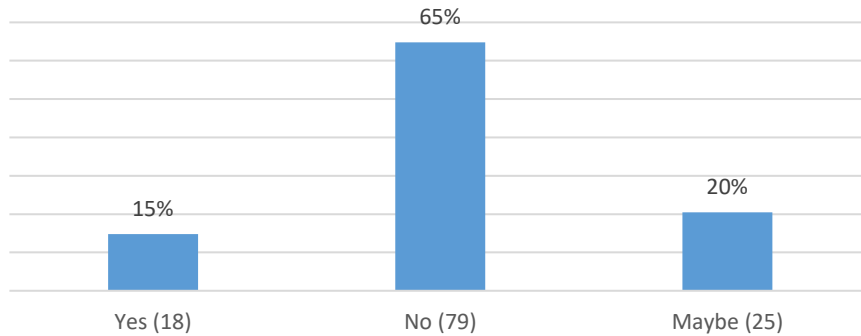
Flore Parish Housing Survey, residence period - all respondents



Housing Need Responses

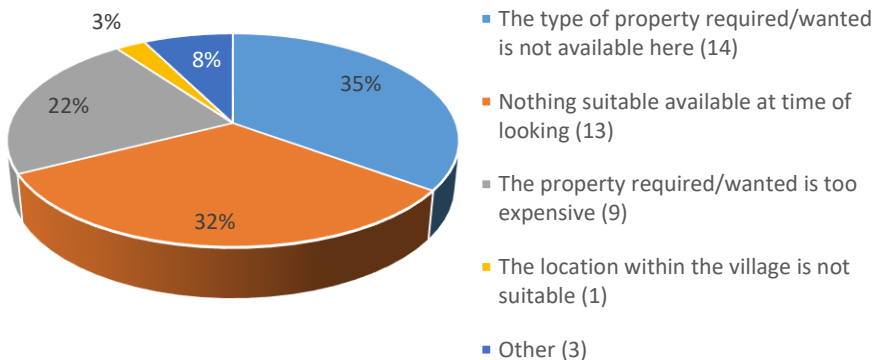
The following section of this report provides the responses to the survey that were completed by respondents that expressed a current or future housing need within the next five years, and therefore offers a broad picture of the need for both market and affordable housing within the Parish. A full breakdown of the responses can be found in the Analysis Table (found on page 19).

Flore Parish Housing Survey - respondents that have a current or future housing need



Respondents were asked if in the next five years, they will need to move to alternative accommodation in the parish. Of the 122 responses received for the question, 43 respondents stated they have or could have a housing need in the next five years (18 selected they would have a need, and 25 selected they may have a need). This equates to 35% of all respondents to this question. However, not all residents that stated a current or potential need for housing have provided further details. They have therefore been omitted from the following charts.

Flore Parish Housing Survey - unable to find a property suited to needs, housing need respondents



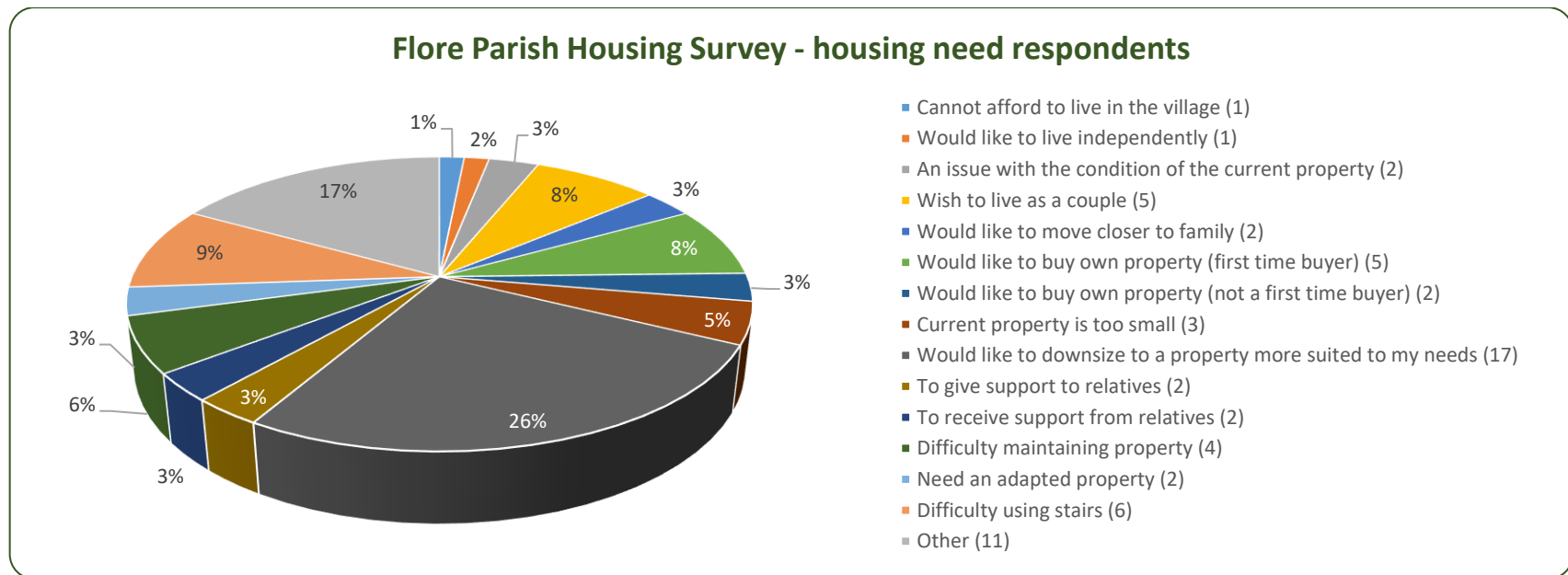
Housing need respondents were asked if they could give reason if they have tried to find a property to suit their needs and have been unable to do so.

This question allowed more than one selection; full result can be found within the Analysis Table (Page 19). 26 respondents provided 40 answers. The following provides result of the selections: 35% felt that the type of property is not available in the parish, 32% felt that the property required was not available at the time of looking, 22% felt that the property wanted is/was too expensive, 3% felt that the location within the village was not suitable, and 8% selected other. The details for other consisted of 3 respondents indicating they had no immediate need to move.

Respondents were asked for the main reason they will or may require alternative accommodation. It is important to note that this question allowed more than one selection.

Out of the answer choices, the answer with the most responses was that respondents wished to downsize to a property more suited to their needs, which received 17 selections (26% of all selections). Of the others:

- Cannot afford to live in the village received 1 selection,
- Would like to live independently received 1 selection,
- An issue with the condition of the property had 2 selections,
- Wish to live as a couple had 5 selections,
- Would like to move closer to family received 2 selections,
- Would like to buy first home had 5 selections. Would like to buy own property (not a first-time buyer) received 2 selections,
- Current property is too small had 3 selections,
- To give support to relatives received 2 selections, to receive support from relatives also had 2 selections,
- Difficulty maintaining property had 4 selections,
- Need an adapted property had 2 selections,
- Difficulty using stairs had 6 selections,
- Other received 11 selections (see full result Analysis Table on Page 19).



Local Connection to Flore Parish for Housing Need Respondents

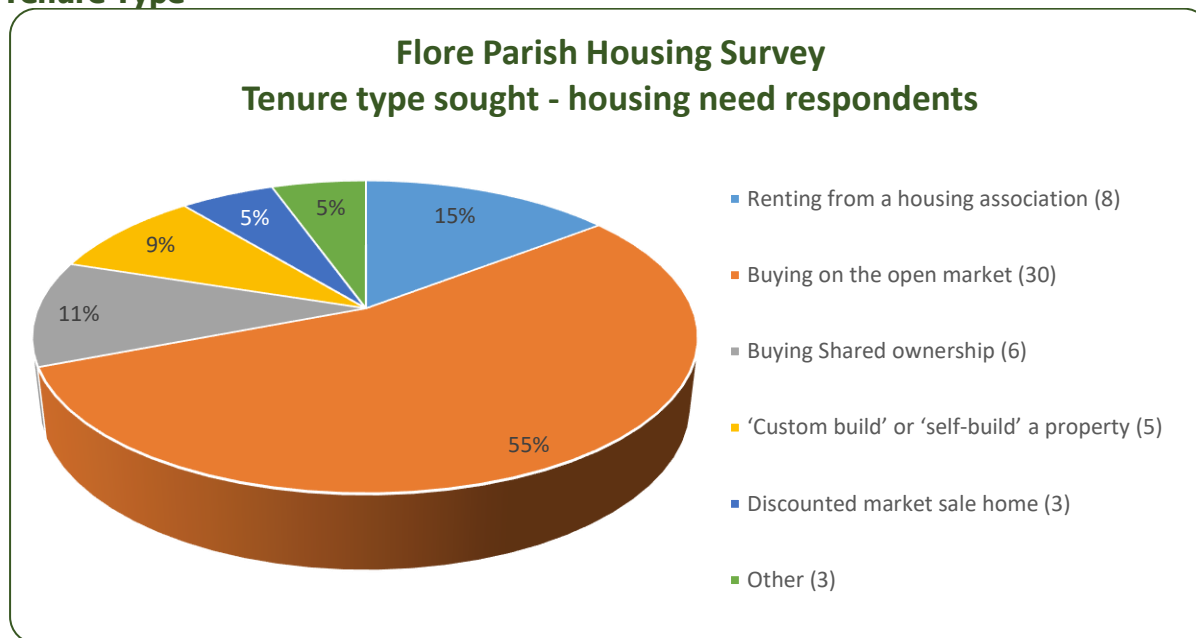
Respondents were asked about their connection to Flore Parish. The following provides the local connection to Flore Parish of respondents expressing a housing need that chose to answer this series of questions. Respondents with a housing need were able to select one or more local connections to the parish area, a full breakdown can be found on page 19.

- **Current residence within the Parish**
41 of the 43 respondents that chose to answer this question are currently resident in the Parish. The 2 respondents not currently resident, both lived in the Parish in the past and have family that have remained in the Parish.
- **Historic residence**
7 of the 41 respondents that chose to answer this question have lived in the Parish in the past.
- **Family connection within the Parish**
Of the 42 respondents that answered this question, 10 had other family living in the Parish (excluding family included as their existing household).
- **Employment**
3 of the 41 respondents that answered this question are employed in the Parish.

Requirements of Housing Need Respondents

The following charts show the preference for those households who stated they have or may have housing need. This section permitted more than one selection; therefore, a full breakdown can be found within the Housing Need Analysis found on page 19.

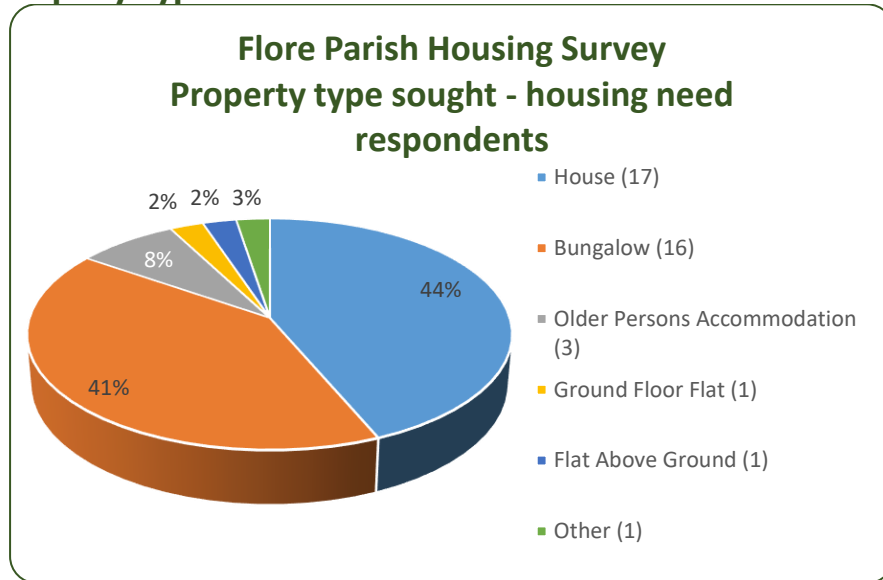
Tenure Type



Housing need respondents were asked about the type of housing tenure that most suited their needs. 39 housing respondents identified as having a current or future need answered this question.

Market homes are the most desired with 30 selections (55%). Of those that sought market properties, 28 are currently owner-occupiers (including bought outright or mortgaged), and 2 are living with family. Of the 8 selections received for a housing association home, 3 respondents are currently owner-occupiers, 1 is in a private rental and 4 are in a housing association home. Of the 6 selections for shared ownership, 4 respondents are owner-occupiers and 2 are in a private rental.

Property Type

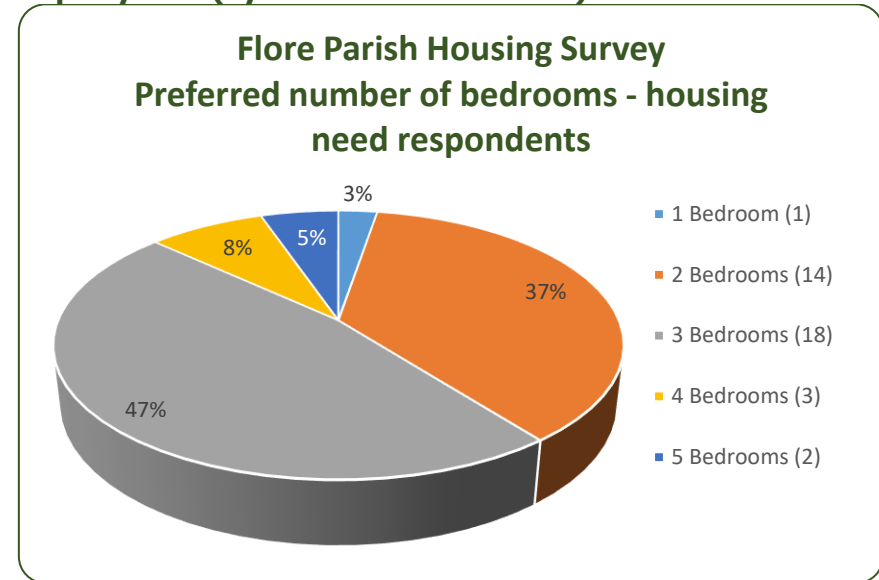


Housing need respondents were also asked about the type of housing that they required, 39 answered this question.

The results show that a need is evident for a number of property types. Houses received 17 selections (44%), bungalows 16 (41%), older person accommodation 3 (8%), flats or apartments 2 (4%), and other 1 (3%).

33 of those that responded to this question are currently in a house and 6 are in a bungalow.

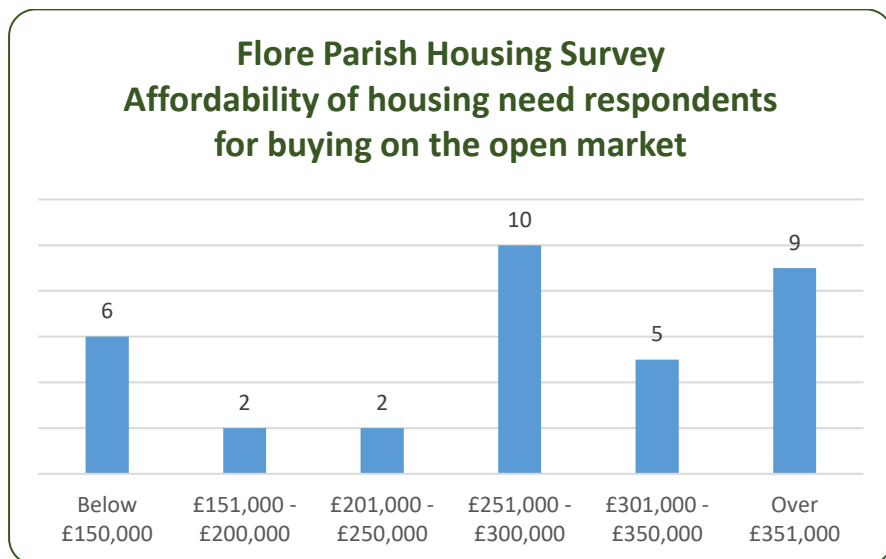
Property Size (by number of bedrooms)



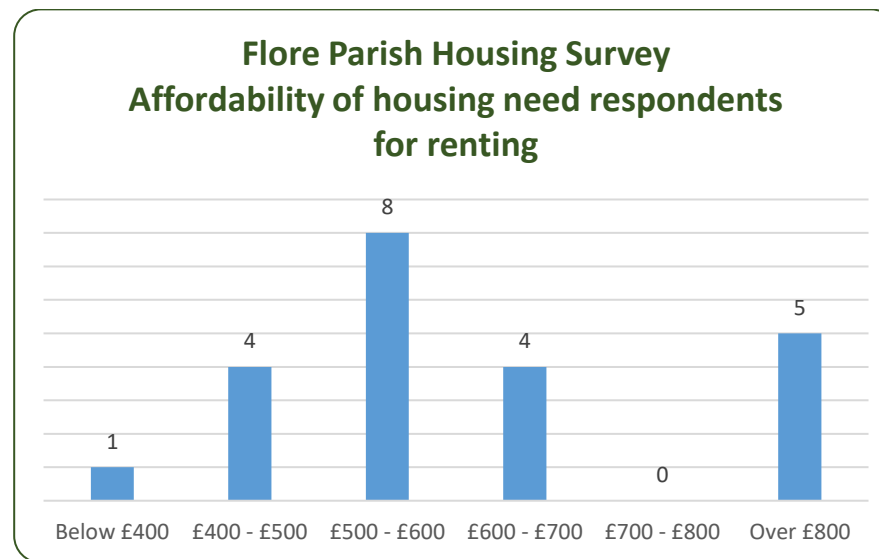
Respondents were asked how many bedrooms they would prefer to have, based on what they could reasonably afford. 38 housing respondents answered this question.

From these results it is evident that there is a strong preference for two- or three-bedroom properties, which received 14 (37%) and 18 (47%) selections, respectively. There were 3 selections (8%) for four beds, 1 (3%) for one bed, and 2 (5%) selection for five- beds. Of the one selection for a one-bedroom home, the respondent wished to downsize. Of the 14 respondents that stated a preference for a two-bedroom property, 11 wished to have less bedrooms that what they already had, the other 3 wished for something with the same number of bedrooms. Of the 18 respondents that would like a three bedroom, 12 wished to downsize from a larger property, 5 wanted the same number of bedrooms as they have, and one wished for more bedrooms. The 3 respondents that would like a four bedroom, 2 would like a home larger than what they already live in, the other would like to downsize. The two respondents that would like a five bedroom would like to live in a property larger than what they already live in.

Affordability of Housing Need Respondents



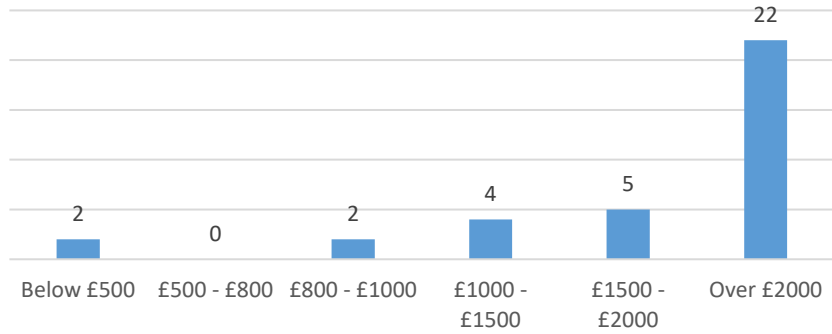
Housing need respondents were asked; should they consider buying a property, what price range could they reasonably afford. 9 out of the 34 respondents that answered this question could afford a property valued over £351,000. All 9 of these respondents are currently homeowners and have access to some savings. 8 of these homeowners are wishing to downsize, with one wishing to have a slightly larger home.



Respondents were asked; should they wish to rent a property in the Parish, what level of rent they could reasonably afford.

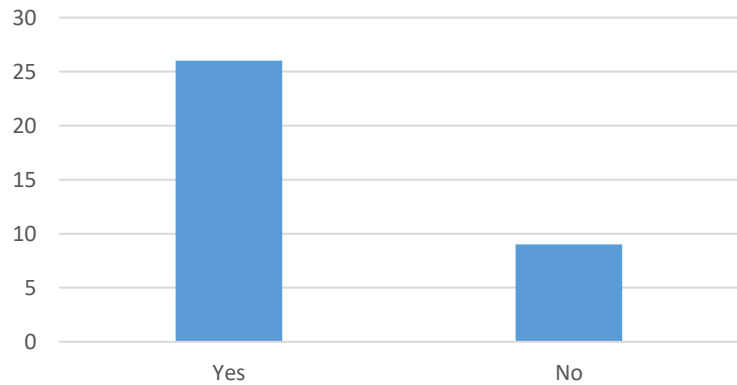
22 respondents answered this question. 5 of these respondents are currently already living in a form of rented home, and 2 are living with family. The remaining 15 are owner occupiers.

Flore Parish Housing Survey
Monthly household income of housing need respondents



Housing need respondents were asked if they could indicate the monthly income of the household (excluding housing benefit). 35 housing need respondents provided an answer for this question.

Flore Parish Housing Survey
Housing need respondents with access to savings



Housing need respondents were asked to indicate if they have any savings. 26 out of 35 respondents that answered this question confirmed that they had some savings.

Housing Need Analysis

Survey results

The following table shows the breakdown of respondents who have identified that they have or may have a housing need, their current property and tenure, and their preference in tenure where this has been supplied. Respondents who have not provided a preference and need have been omitted from this table.

Ref	Household makeup (moving with)	Current number of bedrooms	Current property type	Current tenure	Preferred number of bedrooms	Preferred property type	Preferred tenure	Local connection	Reason (need)
10	Family	5	House	Living with family	3	Flat Above Ground	Buying on the open market, shared ownership, discount market sale	Residence	Would like to buy own property (first time buyer), would like to downsize
11	Single	3	House	Owner Occupier	3	House	Buying on the open market	Residence	Issue with condition of property, wish to live as a couple
12	Family	5	House	Owner Occupier	2	Ground Floor Flat	Buying on the open market	Residence, close family	Would like to downsize to property more suited to needs
15	Couple	3	Bungalow	Owner Occupier	2	Bungalow	Buying on the open market	Residence	A future need to downsize
18	Family	5	House	Owner Occupier	4	House	Buying on the open market	Residence	Would like to downsize to property more suited to needs
20	Couple	4	Bungalow	Owner Occupier	3	Bungalow	Buying on the open market	Residence, close family, past residence	Would like to downsize to property more suited to needs, difficulty maintaining property
27	Couple	4	House	Owner Occupier	3	Bungalow	Buying on the open market	Residence	Would like to downsize to property more suited to needs
28	Couple	2	Bungalow	Housing Association Rental	2	Bungalow	Renting from a housing association	Residence	Issue with access to property due to mobility

Ref	Household makeup (moving with)	Current number of bedrooms	Current property type	Current tenure	Preferred number of bedrooms	Preferred property type	Preferred tenure	Local connection	Reason (need)
30	Couple	4	House	Owner Occupier	3	Bungalow	Buying on the open market, Custom or self-build	Close family, past residence	Would like to downsize to property more suited to needs, wish to live near family, difficulty using stairs
31	Family	4	House	Owner Occupier	2	House	Shared ownership, discounted market sale	Residence	Would like to downsize to property more suited to needs, wish to live independently, would like to buy own home (first time buyer)
35	Family	3	House	Housing Association Rental	5	House	Renting from a housing association	Residence	Wish to live as a couple, would like to buy (first time buyer), current home too small
39	Single	1	House	Owner Occupier	3	House	Buying on the open market	Residence, employment	Current property too small
41	Couple	4	House	Owner Occupier	3	Bungalow	Buying on the open market, custom or self-build	Residence	Would like to downsize to property more suited to needs, give support to relatives, considering re-location
46	Couple	3	House	Owner Occupier	3	House	Buying on the open market	Residence	Current property too small
48	Couple	3	House	Living with Family	3	House	Buying on the open market, shared ownership	Residence	Wish to live as a couple
50	Family	4	House	Living with Family	2	House	Buying shared ownership	Residence, close family	Would like to buy own home (first time buyer)

Ref	Household makeup (moving with)	Current number of bedrooms	Current property type	Current tenure	Preferred number of bedrooms	Preferred property type	Preferred tenure	Local connection	Reason (need)
51	Couple	3	House	Owner Occupier	4	House	Buying on the open market	Close family, past residence	Wish to live as a couple
52	Couple	4	House	Living with Family	3	House	Buying on the open market	Residence	Wish to live as a couple, would like to buy own home (first time buyer)
54	Family	3	House	Owner Occupier	2	Other	Buying on the open market, renting from a housing association, other	Residence, past residence	
62	Single	2	Bungalow	Housing Association Rental	Not stated	Bungalow	Renting from a housing association	Residence	To receive support from relatives
64	Couple	4	House	Owner Occupier	2	Older Persons Accommodation	Buying on the open market	Residence, past residence, employment	Would like to downsize to property more suited to needs
66	Family	4	House	Owner Occupier	5	House	Buying on the open market, custom or self-build	Residence	Wish to own larger new property
69	Family	4	House	Owner Occupier	3	Bungalow	Buying on the open market, custom or self-build, discounted market sale, other affordable and accessible	Residence	Need fully adapted home, difficulty using stairs
71	Couple	3	House	Owner Occupier	4	House	Buying on the open market, custom or self-build	Residence, close family, past residence	Wish to have a detached home

Ref	Household makeup (moving with)	Current number of bedrooms	Current property type	Current tenure	Preferred number of bedrooms	Preferred property type	Preferred tenure	Local connection	Reason (need)
78	Couple	4	House	Owner Occupier	3	House	Buying on the open market	Residence, close family, past residence	Would like to downsize to property more suited to needs, difficulty maintaining property
80	Couple	3	House	Owner Occupier	3	Bungalow	Buying on the open market, shared ownership	Residence	Would like to downsize to property more suited to needs, wish to move closer to family, to receive support, difficulty maintaining home, difficulty using stairs
81	Couple	3	House	Owner Occupier	3	Bungalow	Buying on the open market	Residence, close family	Would like to buy (not first time buyer), difficulty using stairs
83	Couple	5	House	Owner Occupier	3	Bungalow	Buying on the open market	Residence	Would like to downsize to property more suited to needs
90	Family	4	House	Owner Occupier	2	Bungalow	Buying on the open market	Residence, close family	Would like to downsize to property more suited to needs, difficulty using stairs
96	Single	4	House	Owner Occupier	3	House	Buying on the open market	Residence	Would like to downsize to property more suited to needs
98	Single	2	Bungalow	Owner Occupier	1	Older Persons Accommodation	Renting from a housing association	Residence	May need sheltered accommodation
101	Couple	4	House	Owner Occupier	2	Bungalow	Buying on the open market	Residence	Would like to downsize to property more suited to needs

Ref	Household makeup (moving with)	Current number of bedrooms	Current property type	Current tenure	Preferred number of bedrooms	Preferred property type	Preferred tenure	Local connection	Reason (need)
108	Single	2	Bungalow	Private Rental	2	Bungalow	Renting from a housing association	Residence, employment	Issue with the condition of the property
111	Family	4	House	Owner Occupier	2	House	Buying on the open market	Residence	Would like to buy property (not a first-time buyer)
114	Couple	3	House	Housing Association Rental	2	Bungalow	Renting from a housing association	Residence	Would like to downsize to property more suited to needs
115	Couple	4	House	Owner Occupier	2	Bungalow	Buying on the open market	Residence	Would like to downsize to property more suited to needs
116	Family	4	House	Owner Occupier	3	House	Buying on the open market	Residence, close family	To give support to relatives
120	Family	5	House	Owner Occupier	3	House	Renting from a housing association	Residence	
121	Couple	2	House	Owner Occupier	2	Older Persons Accommodation	Buying on the open market	Residence	Difficulty maintaining home, need adapted, difficulty using stairs

Housing register information

As of March 2021, there were 10 applicants with a close local connection to Flore Parish on the (former Daventry District) Councils general housing register. It should be noted that for the former administrative area of Daventry District the Council operates a Choice Based Lettings Scheme, this allows applicants to apply for any property they are eligible for. Therefore, the below chart shows what applicants can apply for (property eligibility) as well as their preference.

Household type	Bedroom eligibility	Property preference	Property eligibility	Local connection
Single	1-2 bedrooms	Bungalow	House, flat, bungalow, sheltered	Residence
Family	3 bedrooms	No preference	House, flat	Residence
Single	1 bedroom	House, flat, bungalow	House, flat, bedsit, general needs bungalow	Close family
Single	1 bedroom	Flat, single person accommodation, bungalow	House, flat, bedsit, general needs bungalow	Past residence
Family	4 bedrooms	House	House	Employment

Household type	Bedroom eligibility	Property preference	Property eligibility	Local connection
Single	1 bedroom	No preference	House, flat, bedsit, general needs bungalow	Residence
Couple	1-2 bedrooms	No preference	House, flat, general needs bungalow	Close family
Family	2-3 bedrooms	No preference	House, flat	Residence
Family	2-3 bedrooms	No preference	House, flat	Residence
Single	1-2 bedrooms	Bungalow	House, flat, bungalow, sheltered	Residence

Housing Need Conclusion

The following table provides the results from the housing survey and from information sourced from the housing register in a summarised format. Please refer to Appendix A for the full results.

The following should be noted in viewing the below table (and that contained within Appendix A):

- Residents that have not selected a preferred tenure have been omitted from the table
- No limit has been applied to the tenure and property type selection for survey respondents and therefore some households have expressed their main tenure preference, in other cases household have selected more than one preference. There are 10 respondents that have selected more than one tenure preference in this instance. Please refer to Appendix A for the full results.
- Recommendations for numbers of bedrooms in shared ownership, market and Custom or Self Build are based on the number of bedrooms specified by the respondent, applicants can purchase the size of home that they are able to afford which may be of a different size than indicated below.
- Bedroom need for applicants from the housing register has been calculated using the family size criteria implemented as part of the Welfare Reform Act 2012; Housing Register data does not take into account affordability and therefore an assumption is made on the most affordable property size based on the family make up. In this respect calculation is made on requirement only (as opposed to eligibility).

Property tenure	1 bed flat	2 bed flat	2 bed house	1-2 bed bungalow	2 bed bungalow	3 bed flat	3 bed house	3 bed bungalow	4 bed house	5 bed house	Other
Affordable housing for rent	4			7			4		1	1	1 older person accommodation
Market Housing		1	1		4	1	8	8	3	1	2 x 2 bed older person accommodation
Custom / self-build								3	1	1	
Discount market			1			1		1			
Shared Ownership			1		1	1	1				
Other								1*			*other affordable, accessible bungalow 1 x Other (unspecified)

The Flore Parish Housing Survey was carried out over a four-week period during February 2021. The following conclusions can be drawn from the survey. It should be noted that the number identified is based on the answer provided by the household (in respect of survey respondents), and the household can choose more than one option, **therefore recommendation is to view this alongside the full results breakdown that forms Appendix A.**

Affordable housing for rent

16 households were identified with a need for affordable housing for rent from a housing association, providing responses as recorded below.

Number Required	Property Type
4	1 bedroom flat
7	1 to 2 bedroom bungalow
4	3 bedroom house
1	4 bedroom house
1	5 bedroom house
1	Older person accommodation

Affordable housing - Shared Ownership

4 households were identified with a need for Shared ownership, one of the three also expressed a preference to buy on the open market:

Number Required	Property Type
1	3 bedroom flat

Number Required	Property Type
1	2 bedroom house
1	3 bedroom house
1	3 bedroom bungalow

Market Housing

29 households expressed a need for market housing:

Number Required	Property Type
1	2 bedroom ground floor flat
1	3 bedroom flat
1	2 bedroom house
4	2 bedroom bungalows
8	3 bedroom house
8	3 bedroom bungalows
3	4 bedroom house
1	5 bedroom house
2	2 bedroom older person accommodation

Other

Three respondents gave a preference for discounted market sale for first time buyers.

Five households expressed an interest in obtaining land to custom build or self-build a property. One of these households also expressed a preference for discounted market sale or other affordable and accessible property.

Appendix A - Results breakdown

Ref	Affordable rent: 1 bed house, flat, bungalow	Affordable 2 bed house, flat, bungalow	Affordable rent: 3 bed flat or house	Affordable rent: 4 bed house	Affordable rent: 1 or 2 bed bungalows	Market: 2 bed flat	Market: 3 bed flat	Market : 2 bed house	Market: 3 bed house	Market: 4 bed house	Market: 2 bed bungalow	Market: 3 bed bungalow	Shared Ownership	Custom build or self-build	Other
10							1						1		Discount sale
11									1						
12						1									
15											1				
18										1					
20												1			
27												1			
28					1										
30												1		1	
31													1		Discount sale
35															Affordable 5 bed house
39									1						
41												1		1	
46									1						
48									1				1		
50													1		
51										1					
52									1						
54		1						1						1*	*2 bed on own land
62					1										Size unspecified
64															2 bed market older person accommodation
66														1	5 bed market
69												1		1	Any affordable or accessible
71										1				1	

Ref	Affordable rent: 1 bed house, flat, bungalow	Affordable 2 bed house, flat, bungalow	Affordable rent: 3 bed flat or house	Affordable rent: 4 bed house	Affordable rent: 1 or 2 bed bungalows	Market: 2 bed flat	Market: 3 bed flat	Market : 2 bed house	Market: 3 bed house	Market: 4 bed house	Market: 2 bed bungalow	Market: 3 bed bungalow	Shared Ownership	Custom build or self-build	Other
78									1						
80												1	1		
81												1			
83												1			
90											1				
96									1						
98	1				1										Older person accommodation
101											1				
108					1										
111								1							
114					1						1				
115											1				
116									1						
120			1												
121															2 bed older person accommodation
123					1										
124			1												
125	1														
126	1														
127				1											
128	1														
129	1	1													
130		1	1												
131		1	1												
132					1										

All respondents to the survey that have not selected a property type preference and specified a preferred tenure have been omitted from the table. Lines 123 to 132 have been sourced from the Councils general housing register and displays the applicant's preference where this has been specified, where no preference has been selected the eligibility of property type has been shown.

Easy read summary – Organised by tenure

Ref	Tenure	Type	Bedrooms
11	Buying on the open market	House	3
12	Buying on the open market	Ground Floor Flat	2
15	Buying on the open market	Bungalow	2
18	Buying on the open market	House	4
20	Buying on the open market	Bungalow	3
27	Buying on the open market	Bungalow	3
39	Buying on the open market	House	3
46	Buying on the open market	House	3
51	Buying on the open market	House	4
52	Buying on the open market	House	3
64	Buying on the open market	Older Persons Accommodation	2
78	Buying on the open market	House	3
81	Buying on the open market	Bungalow	3
83	Buying on the open market	Bungalow	3
90	Buying on the open market	Bungalow	2
96	Buying on the open market	House	3
101	Buying on the open market	Bungalow	2
111	Buying on the open market	House	2
115	Buying on the open market	Bungalow	2
116	Buying on the open market	House	3
121	Buying on the open market	Older Persons Accommodation	2
30	Buying on the open market, Custom or self-build	Bungalow	3
41	Buying on the open market, custom or self-build	Bungalow	3
66	Buying on the open market, custom or self-build	House	5
71	Buying on the open market, custom or self-build	House	4
69	Buying on the open market, custom or self-build, discounted market sale, other affordable and accessible	Bungalow	3
54	Buying on the open market, renting from a housing association, other	Other (please specify)	2

Ref	Tenure	Type	Bedrooms
48	Buying on the open market, shared ownership	House	3
80	Buying on the open market, shared ownership	Bungalow	3
10	Buying on the open market, shared ownership, discount market sale	Flat Above Ground	3
50	Buying shared ownership	House	2
31	Shared ownership, discounted market sale	House	2
28	Renting from a housing association	Bungalow	2
35	Renting from a housing association	House	5
62	Renting from a housing association	Bungalow	2
98	Renting from a housing association	Older Persons Accommodation	1
108	Renting from a housing association	Bungalow	2
114	Renting from a housing association	Bungalow	2
120	Renting from a housing association	House	3
123	Renting from a housing association	Bungalow (preference)	1-2
124	Renting from a housing association	House, flat	3
125	Renting from a housing association	House, flat, bedsit, general needs bungalow (preference)	1
126	Renting from a housing association	House, flat, bedsit, general needs bungalow (preference)	1
127	Renting from a housing association	House (preference)	4
128	Renting from a housing association	House, flat, bedsit, general needs bungalow	1
129	Renting from a housing association	House, flat, general needs bungalow	1-2
130	Renting from a housing association	House, flat	2-3
131	Renting from a housing association	House, flat	2-3
132	Renting from a housing association	Bungalow (preference)	1-2

Appendix B – Summary of comments

Respondents with a housing need were invited to give comments on the Housing Survey; this Appendix provides a summary of the comments. Those comments that do not relate to the Survey have been omitted from this table.

Summary of comment – housing need respondents
We don't need to move at the moment but might have to in the near future
Currently far too many 3-, 4- and 5-bedroom houses being built in Flore, too few single storey dwellings. The building of more single-story dwellings is specifically an aspiration in the Flore Neighbourhood Plan, developers appear to entirely ignore it, as does planning authority. When a single storey dwelling goes up for sale, it is bought immediately and at a premium price.
My concerns: No provision for older people`s needs who live in social amenity housing to move to housing within the village more suited to their age and physical needs. They cannot afford to buy property due to age and financial situation. Many older people have either been in the village since birth or lived here for a very long time and being totally ignored because the emphasis is on private housebuilding i.e. large expensive properties which totally ignore needs, could be viewed as discriminatory. Housing mix does not reflect aging population unless you can afford to buy. Older people having no choice but to move from the village and the stress and upset this causes and isolation.
There are too many homes in village, do not want to see more built for sheltered homes of OAP needs, although I would like. Maybe current properties should be adapted.
Not enough housing for couples, either older retired, or newly married.
Larger gardens are required for the styles of houses recently built in Flore, to make them worth moving too. Houses not too squashed in together too.
The village needs sympathetic development to retain its nature.
Need a little more flexibility given we live in Conservation zone and have none.
Historically upsizing in Flore has always been a problem, where until the recent developments there was no new builds available to buy and very few modern homes, when available were sold very quickly. Recall only a few of the recent houses being available as re sales in last 5 years. Accept that future build should be of a sensible proportion but without some further development we and no doubt others like us who want to remain in Flore will be in the same position for the next move and must move to the outer areas of Northampton or Daventry, not ideal. A Pub and hairdressers have all recently closed, the remaining pub is just surviving, clubs struggle for numbers and with now only a shop to support the village, a sensible amount of new build can only help sustain these community assets and should be supported.
Recently moved away from Flore as nothing new available at the time for me to buy in the village and whilst happy at present, would welcome the opportunity in the future of buying a new build in Flore.
Don't currently live in village, would like to buy a first time buyer house 2 or 3 bed with partner living in the village.
Lived in Flore for many years, contributed & participated in village activities. Wanted to live in a village to feel part of a community. Our house was not a new build. Expected some development, recall a similar questionnaire where a need for a small number of "social housing properties" or bungalows was identified, we supported. Now dismayed that despite that survey & Neighbourhood Plan, in the region of 100+ homes have been built within the last 5 years. A very large proportion are large, detached houses - but completely outside the requirements of the village in our view. Landowners are trying to obtain planning permission now for sizeable developments. Questionnaire

Summary of comment – housing need respondents
therefore seems worthless. Allow the building of a sensible number of appropriate properties, but don't ignore the bigger picture & what is actually going on.
I really like Flore as a village, it combines the best of both worlds: a semi-rural and picturesque location with excellent road access to work and facilities. The bypass has made a big difference and was one of the reasons we chose to move here. The village was also promised traffic-calming measures, which have sadly not materialised, and speed/type of traffic is an issue. The village has few facilities, and dependent on Weedon, Daventry, Towcester and Northampton for schools, GP surgeries etc. We avoid Northampton but like Daventry. Our GP practice and dental surgery in Weedon is excellent and we like the independent shops in Towcester and Daventry. Our son can commute to education easily. Sceptical about further housing development in Flore without consideration of road and infrastructure. This is after all a small village with few facilities and employment opportunities, and therefore not ideal for people who need easy access or have their own transport. There is only one small primary school. We plan to move away from Flore due to retirement/current home will not suit our future need. Northamptonshire quite expensive, although we like the countryside, don't like many of the towns, including Northampton. Larger retirement properties are hard to find - small older bungalows available but they frequently require renovation. Would like a larger detached bungalow, possibly difficult to find but would like to future-proof our next move. With an ageing population, feel new housing is not meeting needs. Do not want to live on a new estate of young families, which is what developers seem to build.
I've a need for a bigger house. Home is too small for extended family to stay. Cannot afford to buy, village too expensive. Need a 5-bedroom house.
There is insufficient suitable accommodation for younger people at affordable prices and that should be available for example on a shared ownership basis.
The new estate on the outskirts of the village has eased the problem of building in all gaps available in the village.
Feel the village plan, Daventry development or developers' ideas, suits the needs of the villagers or residents. Plans made without planning for infrastructure, for new houses with no new shops, school, or medical facilities, yet there is spare land suitable in the village to the North. Homes allowed are not imaginative, fake Georgian, blocks, not always well made, built to minimum standards compared to some European counties, poor environmental credentials (Not self-sufficient on heating, energy etc.) No solar panels for electricity, no solar heating sufficient to be energy neutral. Small windows mean low light levels and higher electric use, lower mental health. I realise this is not all local issues, some is overall government. Failing to traffic calm the old main road, instead of lots of traffic we now have a high-speed rat run and still used unnecessarily by HGV as short cut.
No more estates like the one recently built off High Street.
Lack of suitable properties for village residents to downsize as well as properties for first time buyers