



NEWPORT PAGNELL TOWN COUNCIL
80 High Street, Newport Pagnell, Buckinghamshire, MK16 8AQ

Newport Pagnell Neighbourhood Development Plan Second Review
Examiner's Clarification Note
Newport Pagnell Town Council Response

5th June 2024

The Town Council wishes to thank the examiner for providing the opportunity to clarify matters raised in the Clarification Note dated 14 May 2024. Responses are set out below showing the examiner's questions from the Clarification Note in italic text and the Town Council's response in bold text.

Policy NP3

In general terms, the policy takes a very positive approach towards new homes in the town centre.

It would be helpful to receive the Town Council's comments on the City Council's concerns about the deliverability of the Library Site (Item B) and 1 Station Road (Item C).

Library Site response:

Page 13 of the submitted Consultation Statement explains the Town Council's response to the questions raised by officers of the City Council on deliverability of the library site:

"The 1960s building on the site detracts from the significance and setting of heritage assets. It is also understood that the existing library building is too large for its existing purpose and one of the floors is not fit for purpose and is not used as part of the library. Previously the Town Council has consulted the Director of Library Services and the Head Librarian who agreed to open discussions on moving the library service. The Town Council is therefore seeking to negotiate the relocation of this service in a building that is more suitable, and negotiations are ongoing. The plan period runs until 2031 by which time the building is likely to require refurbishment in any case. The policy only supports the redevelopment of the site if this service can be relocated."

"Meeting with Simon Sims and Stuart Proffitt (February 24). It was agreed that the Library site was part of a wider conversation, and it would be discussed again in due course."

The Director of Environment and Property at the City Council (Stuart Proffitt), as the City Council owns the site, and Head of Service – Education Sufficiency, Access and Attendance at the City Council (Simon Sims) has confirmed that the delivery of library services in Newport Pagnell at this site in this building is not a fixed long-term agreement and the consideration of how, and where, library services are provided in the future in Newport Pagnell may mean that other possibilities, for which there are several options, will need to be explored.

The aim of the policy is therefore twofold:



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- To recognise that the site provides a redevelopment opportunity 'within the Conservation Area...and within the setting of heritage assets to enhance or better reveal their significance' as encouraged by §212 of the NPPF as the historic environment in the town plays a role in the vitality and viability of the town centre, and
- To safeguard the provision of the library service in the town if a redevelopment opportunity comes forward on this site or if libraries, which are not statutory services, can no longer be provided by the Borough Council.

The intent of the policy is therefore not to establish that the library service is required to move and could even be re-provided on the site as part of any future redevelopment proposals. The Town Council would therefore welcome the examiner's suggestion for a modification to make this clearer and offers the following suggested modifications: In the supporting text of the policy which precedes the policy:

~~"However, the library service is popular and Clause 6B therefore requires that it is either re-provided on the site as part of the redevelopment scheme, or relocated and operational before redevelopment commences. To that end, the Council has proposed intends to vacate its own offices in the Town Centre to the former police station nearby, which could provide one option for consideration in due course to enable its reuse for the library. This is dependent on the outcome of the current appeal for a 45 retirement apartments and 3 retirement cottages being granted which is anticipated to be determined in early 2024 and further negotiations with relevant stakeholders currently being pursued.~~

In the policy:

B. Proposals to redevelop the library site, as shown on the Policies Map, for a mixed-use or retail development as part of comprehensive redevelopment to replace 20th century architectural styles out of character with more historic developments will be supported, provided:

- The library service has been relocated and is operational on a site elsewhere in or adjoining the town centre or will be re-provided on site as part of the redevelopment scheme; and
- The scheme design conserves and enhances the character and appearance of the Conservation Area and of the setting to the designated heritage assets of St. Peter & St. Paul's Church, Tickford Bridge, Queen Anne's Almshouses and no's 22 – 32 St. John's Street.

1 Station Road response:

Page 13 and 14 of the Consultation Statement explains the Town Council's response to the questions raised by officers of the City Council on the sequential test matter relating to 1 Station Road:

"The fact that individual planning applications have not passed the sequential test is not relevant. It is not clear whether MKCC has interrogated the supporting text of Policy NP4 which explains how the sequential test has been applied. It explains that there are



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no reasonably available sites appropriate for the proposed development. The proposed development seeks to improve the vitality and viability of the Town Centre and conserve

and enhance the historic town centre. The site is the only prominent site at this gateway to the Town Centre which currently detracts from the character and appearance of the Conservation Area. There is therefore considered to be no other reasonably available sites appropriate for the proposed development in this specific location.

Planning Practice Guidance (PPG) makes it clear that the geographical area for the sequential test will be defined by local circumstances (PPG: 027 Reference ID: 7-027-20220825) and the objectives of the Modified Plan has done so in a way that promotes sustainable development, the vitality and viability of the Town Centre and that seeks to conserve and enhance the historic environment. A scheme should also lead to better outcomes in terms of managing flood risk as demonstrated in the Strategic Environmental Assessment (SEA). It is therefore recommended that this matter is clarified with MKCC at the proposed meeting.”

“Follow up meeting held with MKCC on 12th Dec 23. MKCC agreed to discuss the sequential test issue internally and respond early in the new year. No response received at the time of submission.”

The Town Council has therefore provided an assessment in the supporting text of the policy which demonstrates how it has applied the sequential test and used national policy and guidance to do so.

Policy NP4

The policy takes a positive approach towards the natural environment and biodiversity net gain.

Is Part B of the policy now needed given that key elements of the Environment Act are now in place?

It was confirmed that the Examiner intended to refer to Clause C above, and not Clause B. The Town Council accepts that Clause C of the policy, copied below, repeats key elements of the Environment Act which are now in place. It has been mindful that residents may not be aware of such provisions and has therefore included the requirements within the policy. The Town Council would welcome the examiner’s suggestion for a modification to move Clause C of the policy into the supporting text so that this context is not lost to residents should the examination be successful and the plan be sent to referendum.

“C. All qualifying development proposals will be required to deliver at least a 10% measurable biodiversity net gain using the Defra metric or locally approved Biodiversity Impact Assessment Metric. Biodiversity should be provided on site wherever possible. Offsite measures will only be considered where it can be demonstrated that, after following the mitigation hierarchy, all reasonable opportunities to achieve measurable net gains on site have been exhausted or where greater gains can be delivered offsite through maximising local placemaking and nature improvement opportunities.”

I note that elements of the policy are underpinned by the Future Nature WTC ecology report (Appendix 2). To what extent did the findings of that report take account of any



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engagement with the owners of the sites concerned (as specified in parts E and F of the policy)? High Street, Newport Pagnell, Buckinghamshire, MK16 8AQ

Page 9 and 10 of the Consultation Statement explains the Town Council's consideration of the engagement with owners of the sites:

“In line with DEFRA’s recommendations to Local Planning Authorities (LPAs) to prepare for Biodiversity Net Gain (BNG), the Qualifying Body has identified local habitat creation and enhancement opportunities in a way which maximises local place making and nature improvement opportunities. Identifying how and where off-site BNG should be delivered is also recommended by the Planning Advisory Service for the purposes of plan-making. The Qualifying Body has been guided by this leading practice and advice in identifying locations most suitable for BNG. Appendix 2 of the published Neighbourhood Plan document demonstrates the potential the proposed biodiversity off-setting sites have in increasing biodiversity within the town. Alongside this, the Neighbourhood Plan makes provision for growth over the plan period that remains in excess of what would have been a reasonable contribution to the LPA’s objectively assessed housing need. The site assessment process followed for the made Neighbourhood Plan has already been scrutinised and Portfield Farm ranked low in terms of its suitability for housing development, particularly in relation to accessibility. It was therefore not selected as a residential site allocation and is not needed to meet the housing requirement over the plan period. Its location in relation to the wider green infrastructure network however is significant and can play an important role in maximising local nature improvement opportunities. It is understood that realising these opportunities will rely upon future investment and the support of relevant landowners.”

Discussions have been held with all the relevant landowners. It is accepted that there is currently no formal designation mechanism in planning policy to identify how and where off-site BNG should be delivered. The policy has therefore sought to identify locations where there is the greatest opportunity to secure biodiversity net gain which will not only deliver net gain locally but as part of the wider green infrastructure network. In this respect Clause F of the policy is not a statutory designation or a constraint on the land but the identification of areas where there are substantial opportunities for improving biodiversity that should inform any future decision made on the development and use of the land. For example, all the BNG sites are currently farmed. There will be opportunities for landowners to continue to retain the land as farmed land, whilst still adding biodiversity opportunities through any or all of the following options:

- Placing hedgerows around farmed fields
- Changing to organic farming options
- Changing crops to lower dig options

and the policy seeks to encourage owners to consider these which could add financial benefits to sites either through trading these options for biodiversity offsetting, or through enhanced schemes with the Rural Payments Agency:

Policy NP5

In general terms the policy reads well and the criteria are locally-distinctive.

The proposed allocated site is currently in use as allotments. Has the Town Council undertaken any study to assess the implications of the loss of the allotments and/or the



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overall capacity of other allotments in the town to meet the recreational needs of its residents?

The proposed allocated site is not currently in use as allotments. That part of the site which was used for allotments has been vacant for two years and the few remaining

allotment holders have been accommodated at a newly created, additional site in the town, Burgess Gardens or elsewhere in the town. This new site also increased the number of available plots, allowing residents in the local area to have allotments close to their Green Park Homes. The Town Council manages nearly 300 allotments plots at various locations within the town and currently has no waiting list as all current applicants are being accommodated on various sites in the town. It reviews allotment provision on a regular basis and does not consider that there is currently a need to safeguard any sites to meet the needs of its residents.

Representations

Does the Town Council wish to comment on any of the representations made to the Plan?

NHS Property Services Ltd

The steering group consulted regularly with the NHS with respect to build provision for the NHS and were told on more than one occasion that the existing space provision catered sufficiently for the demands being created by the development of the Tickford Field Site. Notwithstanding this, the steering group agreed that funding would be necessary for additional medical staff, to serve the interim need between the development becoming occupied, and the final NHS contributions being made on the basis of actively registered members at the practice. The Town Council considers that Clause j of Policy NP2 adequately addresses this matter in relation to the Tickford Fields development and Clauses A and B of Policy NP9 in respect of other development.

The Town Council is supportive of the aim to consider the need for affordable housing for NHS staff, and those employed by other health and care providers in the neighbourhood area. In that respect it is considered that the provisions of Policy NP7 on employment criteria being considered to meet the definition of a strong local connection, as well as the provision of additional housing, will assist in meeting these demands.

I would find it helpful if the Town Council commented on the representations from:

- *Anglian Water; and*

The Town Council confirms that Anglian Water was consulted during the Regulation 14 consultation. An email with a notification letter attached was sent on 1st September 2023. The fact that it is not recorded within the list of consultees in the Consultation Statement is simply an administrative error. The Town Council has also contacted Anglian Water to understand the concerns raised in the representations. After a discussion with Anglian Water, the Town Council offers to amend the Tickford Field Development Brief, to delete the sentence under Access and Movement at para 4.15 (“Developers should also seek to negotiate with Anglian Water a redway route through the lakeside land to link with Priory Street.”) as the proposed redway route is an aspiration for the development and would not in any event run through Priory Street.

- *The Society of Merchant Venturers.*



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As set out in response to the examiner's question relating to this matter above, the policy intent is to demonstrate that the opportunity for biodiversity improvements does not extend solely to the identified biodiversity opportunity area to the north of the site but encompasses this land as demonstrated in the supporting evidence.

The City Council raises a series of comments on the Plan. It would also be helpful to receive the Town Council's comments on the points raised (in addition to those already raised in this note on a policy-by-policy basis).

Policy NP4

The City Council makes recommendations for amendments to paragraph 5.4.2, Clauses A and B. The Town Council accepts the suggested modifications and would be happy to agree modifications in this regard.

The City Council also highlights that there is a discrepancy between the wording used in Clause G of the policy and the Policies Map. The Town Council accepts that modifications are required to clarify that the new proposed Sports Ground would be located within the extension to the linear park. The Town Council therefore accepts that a modification is necessary to clarify the matter and would therefore welcome the examiner's suggestion for a modification and offers the following suggested modification:

G. The land to the East of existing Willen Road Sports Ground (~~excluding the new proposed Sports Ground~~), as shown on the Policies Map, is designated as an extension to the linear park for recreational use, public access and nature conservation, to complete the link between Riverside Meadow and the proposed Ouzel Valley Park extension.

Policy NP8

The City Council makes recommendations for a first sentence to be added to the policy. The Town accepts the suggested modification and would be happy to agree a modification in this regard.

Sharon Roselman – Town Clerk Newport Pagnell Town Council