

Newport Pagnell Neighbourhood Plan

Summary of responses received to Regulation 16 publicity period

<p>Anglian Water</p>	<p>Anglian Water is the statutory water and sewerage undertaker for the Newport Pagnell neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012. Anglian Water does not appear to have been consulted at the Regulation 14 stage, according to the list of those notified in the accompanying consultation statement (section 5). Whilst the proposed modifications to the Neighbourhood Plan are limited to specific areas and policies, Anglian Water makes the following comments in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water. Policy NP2 Tickford Fields Development Site Specific Policy and Development Brief The development brief for the Tickford Fields site makes reference under the section on 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.” It is not clear as to what work has been made regarding the extent of this proposal to construct a redway link on this land and what it exactly would entail. Para. 5.2.2.4 states the Town Council will maintain a dialogue with various service providers and any other relevant bodies, with respect to bus services, education services, play areas and open space provision, highways department, waste recycling provision and cycle route provision. This also relates to Policy NP8 ‘Local Cycling and Walking Network’ and the policy objectives of improving walking and cycling routes around the town. Figure 7 ‘Local cycling and Walking Network in Newport Pagnell’ is also relevant as this identifies proposed redway routes and their status for potential progression i.e. straightforward to provide or assessment required. The neighbourhood plan group is strongly encouraged to clarify the position on this matter, and I should be grateful if you could please contact me directly to discuss as the Anglian Water lead for neighbourhood plans. My contact details are provided in this response. Maps of Anglian Water’s assets detailing the location of our water and water recycling infrastructure (including both underground assets and aboveground assets such as pumping stations, water treatment and water works and water recycling centres) are available at: www.utilities.digdat.co.uk. Policy NP4 Green and Blue Infrastructure Network Anglian Water supports the policy of prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing and new areas. Anglian Water has made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all AW-owned land.</p>
<p>NHS Property Services</p>	<p>Detailed Comments on Draft Neighbourhood Plan Policies Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Neighbourhood Plan in a way that supports sustainable growth.</p>

Policy NP9 Developer Contribution policy

Policy NP9 sets out the overarching policy in ensuring there is sufficient provision for infrastructure alongside major housing schemes. The specific list of infrastructure includes school places, cycling, walking and green space. In line with Milton Keynes Local Plan Policy INF1 referred to in supporting paragraph 5.9.3, health infrastructure should also be clearly identified in the Neighbourhood Plan as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan. We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Neighbourhood Plan area. The Neighbourhood Plan should emphasise that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. As outlined in supporting paragraph 5.2.2.3, the Town Council has maintained engagement with the relevant Integrated Care Board (ICB) in determining the healthcare infrastructure facility required as a result of the Tickford Fields Development Site specifically. NHSPS welcomes the engagement between the ICB and the Town Council thus far, and recommend the continued engagement with the ICB for future developments in the area. In support of this, we further suggest the following process:

- Assess the level and type of demand generated by the proposal.
- Work with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality.
- Identify appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery.
- Identify the appropriate form of developer contributions. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. As such, we encourage and welcome the Town Council to continue working with the NHS and its partners in the formulation of appropriate mitigation measures.

Policy NP7 Affordable Housing and Tenure

NHSPS support the principle of affordable housing provision, and we further recommend that as part of implementing Policy NP7, the Council

	<p>consider the need for affordable housing for NHS staff and those employed by other health and care providers in the neighbourhood plan area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff. Housing affordability and availability can play a significant role in determining people’s choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:</p> <ul style="list-style-type: none"> • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers. <p>Conclusion NHSPS thank Milton Keynes Council for the opportunity to comment on the Newport Pagnell Neighbourhood Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan.</p>
Savills on behalf of the Society of Merchant Venturers	<p>Comments on the latest version of the draft plan – Policy NP4 ‘Stepping Stones’</p> <p>The Neighbourhood Plan makes several references to the proposed BNG sites as ‘stepping stones’ which is taken from the National Planning Policy Framework (NPPF) paragraph 185. The NPPF defines these as ‘pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes’. The proposals for the three sites on the edge of Newport Pagnell read less as stepping stones for the movement of species but as a barrier to development in what are largely sustainable locations in close proximity to the urban edge of the settlement. Page 36 of the Plan goes so far as to identify that retaining gaps, to prevent the Town from merging with the existing and new City was already an important objective for NPTC. If these areas were to be given over to BNG set aside in their entirety this would prevent development on the edge of the town in these locations for a period of at least 30 years. With these sites effectively removed from the assessment of sustainable development under the planning system, it could stifle the sustainable growth of Newport Pagnell.</p> <p>Principle of BNG designation</p> <p>SMV objects to the proposals to designate land for BNG in the manner proposed by Policy NP4 and specifically in respect of Portfield Farm. By its definition the process as set out in the Environment Act (2021) is to provide a ‘net’ gain. The gain is set against the loss arising through new development on land. No development is being proposed via the NPNP that will specifically link delivery of BNG offset to Portfield Farm.</p>

	<p>Furthermore, the Environment Act requires that land be registered for BNG offsetting by the landowner. Portfield Farm is not registered for offsetting, which would contradict the statutory provisions of the Act. Clause C of NP4 seeks onsite BNG delivery wherever possible. Supporting text of the NPNP (page 35) notes 'if... BNG cannot be achieved on site, then offsite BNG may be acceptable, and applicants are directed to the opportunities identified as part of this Neighbourhood Plan'. There is no policy mechanism that requires the 'stepping stone designations' to be utilised in achieving that objective and in turn it potentially sterilises land. The Consultation Statement sets out that earlier responses should be considered and addressed and whilst the Appendix acknowledges previous SMV comments, it is not clear as to how these concerns have been addressed. Whilst Newport Pagnell Town Council (NPTC) has cited DEFRA guidance on how to promote BNG there is significant jump then made to the proposed 'designation' of three sites specifically for BNG purposes. Appendix 2 of the NPNP identifies that the Biodiversity Net Gain Assessment was commissioned specifically to assess the three 'designated' sites. No assessment appears to have been undertaken in respect of alternative sites and the merits they may hold. Page 36 of the NPNP goes further in that supporting text refers to this 'designation' for BNG offsetting to safeguard them from development. It is noted that Plan: MK 2016-2031 specifically identifies Biodiversity Opportunity Areas (BOA), as per the Proposals Map, which are 'landscape-scale areas which have been identified as opportunities to improve the biodiversity'. One such area is the Ouse Valley, which lies directly north of Newport Pagnell. The BOA boundary incorporates SMV's land interest, though does not extend to the edge of the built-up area, unlike the NPNP stepping stone designation. In light of large area identified by BOA, it is questionable as to why NPTC has not focussed BNG ambitions within this already designated BOA. This further emphasises that NP4 is to serve to safeguard against development. Paragraph 10.3 of the Strategic Environmental Assessment - Environmental Report Update (ERU), (February 2024) prepared by Aecom highlights that MKCC shared similar concerns to the SMV (expressed in the Regulation 14 consultation), that designation of areas of land for green infrastructure around the town could lead to stagnation of growth of the town and does not make 'effective use of land' as set out in the NPPF (2023) (paras 123 and 129). This is because sites which could potentially come forwards for development to meet identified housing needs are being designated in the plan for other alternative uses that would preclude their allocation for at least 30 years, and likely beyond, were they to become established ecological sites. The solution highlighted in the ERU is for the green infrastructure network to be 'identified' and not 'designated', in the hope that this apparent weakening of the language could lessen the impact. Nevertheless, this amendment is only made at Clause A of the policy. Clause F retains the 'designation' status and therefore the SMV objection remains. Furthermore, the NPNP Second Modification Consultation Statement (SMCS) identifies MKCC's concern that deliverability of the Clause E sites (e.g. Portfield Farm) is not evident. Page 16 of the SMCS reports 'the policy does not need to demonstrate deliverability, rather its aim is to identify sites that would be suitable'. It follows that, as per the amendment applied to Clause A, Clause E (if</p>
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appropriate at all) should be subject to a similar amendment to identify the potential of the sites listed, as opposed to ‘designating’ or even allocating these. SMV contest the designation that arises from Clause E, which in the context of the above considerations reads more as an allocation. Respectfully, our client seeks the removal of reference to Portfields Farm under Clause F of the Policy NP4. Furthermore, the adopted development plan identifies land immediately north as a ‘Biodiversity Opportunity Area’ and yet the NPNP does not consider the value uplift that could be achieved in respect of the BOA, as opposed to designating a further and immediately adjacent site. The NPNP does not meet the basic condition test of being in ‘general conformity with strategic policies contained in the development plan’ on the basis that the rationale for the approach is not clear and nor is the evidence to justify the approach taken.

Landowner Support

In response to the earlier consultation NPTC set out that ‘investment and the support of relevant landowners is required’ in order to realise the opportunity set out in NP4 for biodiversity. NPTC’s ambition does not align with the SMV’s desire to promote its land on what is considered a sustainable location for residential development. Portfield Farm is subject to an agricultural tenancy and as such is not currently available for any form of use other than for agriculture. The allocation proposed by NP4 is not subject to a policy mechanism to secure BNG and is not deliverable.

Additional Observations

SMV notes its general support for the aims and goals of the BNG process as set out in the Environment Act (2021) and the implementation of the minimum target of 10% gain is laudable. Notwithstanding the above comments, SMV notes additional amendments now made to Policy NP4 at this Regulation 16 stage. Greater clarity has been provided by way of the newly drafted clause C in the policy text itself. Setting out the minimum figure of 10% in policy provides greater certainty for developers and landowners whilst still leaving the opportunity for greater than 10% gains which is appropriate. The policy text is clear and flexible as it follows the PPG guidance for BNG Hierarchy for onsite/offsite provision, whilst making some allowance for placemaking to be the driver for offsite BNG provision when appropriate.

Mapping Clarity

On a technical point several references are made throughout the draft policy to the policy map at Figure 5 of the report. However, it is not clear in every case which part of the map is being referenced. For example, clause D refers to the identified parts of the map which are ‘known or likely to have biodiversity value either as habitat areas’. It is not clear whether this is specifically referring to the area labelled Green Infrastructure. SMV consider that clearer distinctions should be made between the text and the map for reader clarity.

Summary

In summary, SMV maintains its objection to the designation of Portfields Farm under Policy NP4. Whilst supportive of the aspirations of the NPNP generally, SMV respectfully requests the removal of Portfields Farm under Clause F, which it considers does not meet the basic conditions test for reasons set out above.

Natural England	Natural England does not have any specific comments on this draft neighbourhood plan.
National Highways	Thank you for notifying National Highways of the consultation on changes to the Newport Pagnell Neighbourhood Plan. National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Newport Pagnell Neighbourhood Plan, our principal interest is in safeguarding the operation of the M1 which borders the plan to the west. We agree with the policies set out in the plan and would request that we are consulted when planning applications come forward, in the usual way. In particular for the Tickfords Field Development, due to its size and location we would want the developer to show the impact on the SRN (in this case the M1).
Canal & River Trust	The Trust have no waterways, assets or land interests within the area covered by the document and as such we have no comment to make.
Historic England	We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/planmaking/improve-your-neighbourhood/ .
Emberton Parish Council	I write to advise that Emberton Parish Council is in support of the proposed modifications to the Newport Pagnell Neighbourhood Plan.
Milton Keynes City Council	The Council has the following comments to make on the Submission Version Neighbourhood Plan: Policy NP1: Settlement Boundary and New Housing Clause A - The Police Station site This modification materially changes the allocation of this site from 14 homes to an indeterminate number of homes, with a preference for retirement living uses. Part of this site lies within Flood Zones 2 and 3 and therefore any development must meet the sequential test. Permission has been refused for development on this site (ref. 22/00280/FUL) on flood risk sequential test grounds and is the subject of a current appeal. A robust assessment has not been supplied that demonstrates the site passes the sequential test. However, should the planning appeal be allowed, the Council has no “in principle” objection to the proposed allocation. Policy NP3: Living in the Town Centre Clause B - The library site The deliverability of this policy is questioned. There is no evidence that the library is looking to relocate or that the Town Council’s offices would be an acceptable alternative site. Clause C - 1 Station Road The site lies within flood zone 3. A robust assessment which demonstrates that the site passes the sequential test has not been supplied. It is noted that permission has been refused for development on this site on several occasions in the last 2 years (refs. 21/02388/FUL, 22/02078/FUL and 23/01163/FUL) on flood risk sequential test grounds. An appeal is now pending consideration of the latest refusal.

Policy NP4 – Green Infrastructure Network

Para 5.4.2 (third para) states “Green infrastructure is multi-functional but some features – for example amenity and formal recreational land – are unlikely to have biodiversity value, or will be suited to improving that value by the nature of their use.” All areas will have some value and most will be capable of improvement and enhancement. Clause A No reference is made to allotments which should also be classified as ‘green infrastructure’. Clause B The first part of the clause needs amending to clarify its intention. It includes a requirement for development proposals that lie within or adjoining the Network to create, maintain and improve the Network. However, proposals will not need to do all three things – ‘and’ should be replaced with ‘or’. Clause F There needs to be confirmation from the landowners that they are willing to use their land for biodiversity offsetting. We are not aware of any evidence to demonstrate this and, as such, the policy may not be in general conformity with the NPPF. Clause G The policy states that land to the east of Willen Road sports ground is designated as an extension to the linear park, yet the Policy Map shows the Sports Ground as part of the proposed extensions to the linear park.

Policy NP5 – Aston Martin Heritage Centre

Part of the proposed site was last used as allotments. Para 98 of the NPPF and Plan:MK policy L2 (although not a strategic policy) protect open space, unless an assessment has been undertaken which shows that the open space is no longer required or alternative provision will be provided elsewhere. The Submitted Consultation Statement identifies that there are other allotments sites in Newport Pagnell, but it does not evidence whether these are sufficient to meet demand.

Policy NP8 – Local Cycling and Walking Network

It is not clear from the wording as to what is required from development proposals. Also, development proposals is a wide-ranging term. Not all development proposals will impact on the cycling and pedestrian network. The following wording for the first sentence is suggested: “Proposals on land that lies adjacent to the Network for development which would generate walking and cycling trips should make provision for a direct connection to the Network.”