



Buckinghamshire Councils Comments on the Newton Longville Neighbourhood Plan Reg16 Submission Consultation

Comment from team	Policy or Para	Page	Comment
Development Management (DM)	NL1 c		Replace VALP reference with development plan (affords greater protection/ resilience should the NP not be updated in light of emerging Local Plan for Buckinghamshire)
Planning Policy	NL2	25	Could some guidance be provided in the justifying paragraphs to Policy NL2 for how the Council in making planning decisions should judge 'significant adverse' and 'unacceptable harm' as mentioned in the policy (c), (e) and (f)
DM	NL2	25	'Proposals for small-scale development, including re-use of brownfield land and alterations to existing buildings within the Settlement Boundary, will be supported provided:' - Introductory text is missing reference to extensions
DM	NL2	25	'in the case of extensions, the character and appearance of the existing building.' - this should include reference to alterations.
DM	NL2 d	25	The word 'building' should be replaced with 'dwellings' as certain buildings may not be residential or relate to an existing property and therefore would not be appropriate.
DM	NL2 h	25	Remove reference to "adjoining" in regard to residential properties as all amenity should be protected not just the properties which adjoin the site.
Planning Policy		26	Footnote 10 - the page reference to the NLV005 site allocation is page 15 <u>4</u> rather than p.153

Comment from team	Policy or Para	Page	Comment
DM	NL3	28	Dagnall House - Note for policy NL3(A) refers to a further planning application (ref: 22/03770/AOP. By way of an update, there is a resolution to approve under delegated powers subject to conditions and satisfactory completion of the S106 to secure necessary and reasonable planning obligations (affordable housing provision, open space provision, financial contributions towards school expansion programme, sports and leisure facilities, and healthcare facilities). Our reading of policies of NL1, NL2, NL3 is that development at Dagnall House which conform would be supported but would not prohibit the proposal under 22/03770/AOP which includes residential development within the blue dashed line (land under the same ownership) subject to compliance with other policies.
DM	NL4		This should be amended to 'strategic developments allocated within the VALP'
Planning Policy	Map showing Areas of Separation	31	The neighbourhoods plan area doesn't have the ability to separate Newton Longville village to Drayton Parslow village. The policy can only separate up to the parish boundary with Drayton Parslow. It would be up to any development in Drayton Parslow parish to the north of the Drayton Parslow village to provide the separation. Therefore, the plan policy can't deliver on its aim here.
Planning Policy	NL6	33	The policy refers to sections of the NPPF latest version but we are expecting that to change (it has changed at least 3 times in 5 years) so it best to not refer to specific paragraphs in the policy itself.
DM	NL6	33	Over reasonableness with household extensions/ outbuilding (sheds/garages etc), new accesses, hardstanding, boundary treatment, agricultural development, annexes etc. What evidence is there for non-residential developments aiming to meet the Buildings Research Establishment BREEAM building standard 'excellent' - this is a very high standard, if there is sufficient evidence, agricultural buildings should be exempt. The policy reads as though it relates to new buildings/ dwellings but there is confusion as some points explicitly reference this compared to others. Need to clearly define what this policy relates to in terms of the level of development the requirement should be applied to.
DM	NL7		The Council's validation list only requires heritage statements when the proposal is situated within a conservation area or affects a Listed Building. If you want applicants to demonstrate they have taken into account the setting of an asset - the second bullet point would need to be more specific to state "development affecting the setting of Newton Longville's Conservation Area should be accompanied by a heritage statement".

Comment from team	Policy or Para	Page	Comment
			The associated table referred to in policy NL7 is not shown in a table format. Should be amended with information presented in a table.
DM	NL8 NL8 b		The first bullet point should be amended to preserve or enhance rather than add. Reference to “where appropriate” should be removed and replaced with 'development proposals affecting a listed building, including its setting should provide.....'
DM	NL9 b		Remove “The validation requirements for the Local Planning Authority includes the need for a heritage statement” and replace it with ‘Proposals relating to non-designated heritage assets should be supported by a heritage statement’.
DM	NL10a NL10 b		This should be amended to state 'all development proposals which include, or has the potential to include, heritage assets with archaeological interest will be required to' This should be reflected to reflect the NPPF in terms 'require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation'. Retaining the following section of the policy NL10: should include an assessment of the nature, extent and significance of the heritage asset, with as much detail as possible about the nature and extent of ground disturbance proposed as part of the development, and the impact this will have on the heritage asset/archaeological remains.
Highways DM	Policy NL11: Transport and Parking. Point D	47	Point D is very prescriptive; whilst a Transport Assessment may end up assessing the areas mentioned this will depend on the specifics of the proposal and it is not guaranteed that the assessment of all of these areas would be justified.
Highways DM	Policy NL11: Transport and Parking. Point E	47	If there are any differences between the VALP and the NP parking standards we will place the VALP parking standards above any parking standards in the NP, so these should align.
DM	NL11 E	47	With exceptions as in VALP Appendix B - this reference should be replaced with 'unless the dimensions accord with the requirements contained within Appendix B of the VALP’.

Comment from team	Policy or Para	Page	Comment
D	NL11 F	47	<p>For clarity maybe it should state 'new' tandem parking proposals will not be supported (this will then take into account dwellings which are seeking an extension and have an existing tandem arrangement).</p> <p>'unless in addition to minimum requirement on the number of spaces and size of those spaces' - this needs to be amended as it is still not clear in terms of when it would be acceptable. For residential dwellings, the policy is specific in terms of the number of spaces required and where it exceeds or falls below there are local circumstances or the application is supported by a parking survey. If tandem is therefore only allowed in addition to meeting the requirements of on-site - this would conflict with the requirement referenced. VALP requires tandem parking spaces to be larger in size (please see Appendix B of the VALP). It might be clearer to state that new tandem parking will not be supported unless sufficient justification has been provided to demonstrate that no suitable alternative can be achieved.</p> <p>There are concerns over the wording of this criteria, which may prohibit tandem parking at Salden Park and impact delivery of the site.</p> <ul style="list-style-type: none"> • The draft Design Code for Salden Park (required by condition 12 of outline permission ref: 15/00314/AOP) allows for tandem parking subject to compliance with non-negotiable design criteria. The approach / non-negotiable criteria were negotiated and agreed under a PPA with the Council's Highways and Urban Design Officers, and Taylor Wimpey, and justified through planning evidence and/or planning judgment (including consideration of highway safety, urban design and efficient use of land). I've cut and pasted the relevant extract of the design code below, but the whole document is available via public access. • The Design Code is also in line with the Aylesbury Vale Design Guide SPD (which also allows for Tandem Parking subject to specific design criteria – Section 5: Site Layout, Streets and Spaces - Parking). • policy should include a caveat to allow for tandem parking for appropriate circumstances (such as those allowed for in the SPD and Design Code). • The draft Design Code has been submitted for approval (ref: 15/C0314/DIS) and due to be determined at the end of this month.

Comment from team	Policy or Para	Page	Comment
			<p><i>“Improvements to the standard of accessibility for pedestrians <u>and cyclists</u>, and overall public amenity <u>will be required.</u>”</i></p> <p>Part B – It’s quite rare in our experience that a footpath in an open field would be impacted by a housing or other development. They are usually tagged onto existing developments close to amenities. The likelihood of an field edge footpath being impacted is therefore small. The policy is supported but it is recommended that reference to ‘open field’ is removed.</p> <p>Part B is supported, but I recommend making it clear the corridor is a green infrastructure asset that improves biodiversity and public amenity, rather than a highway asset, where the width of the footpath corridor should remain at say, 3m – 4m in that sense. Development space is often restricted, such that a prescriptive 20m corridor would be quite restrictive, so I would suggest this is amended to 10-20m. I would recommend the following amended wording for part b:</p> <p><i>When considering new development proposals which may impact on a public right of way it should be recognised that it is not just a route from A to B but an amenity providing wellbeing and an important environmental asset. The replacement for the original footpath <u>or bridleway</u>, whether it be along the original route or a diversion, should <u>be set within a 10-20m green corridor with a suitable wide green space on either side to provide wider green infrastructure and biodiversity benefits (which would include the width of <u>appropriate</u> planting on either side).</u></i></p>
DM	NL14		<p>Policy NE6 of the VALP allows for the following: Within local green spaces, small-scale development within the following categories will only be supported providing that its provision does not conflict with the demonstrably special significance of the local green space and preserves the purpose of its designation. Such development should be: a. For the purposes of agriculture or forestry, the enjoyment of tranquillity and richness of wildlife, appropriate facilities for outdoor sport and recreational facilities or cemeteries b. The replacement of existing buildings in the local green space by new buildings that are not significantly larger in volume, normally by no more than 25-30%. Measures to improve public access to local green spaces will be encouraged.</p>

Comment from team	Policy or Para	Page	Comment
DM	NL15 Part a		<p>Recommend this policy is amended to outline the community facilities and that the loss would be resisted unless the proposal is compliant with the requirements of policy 13 of the VALP (the policy in VALP is written more strongly).</p> <p>The second bullet point should state _ replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Recommended that reference is removed to “will be provided” as this could be complicated to secure.</p> <p>Remove reference to “where applicable”.</p>
Highways DM	Policy NL17: Employment	59	The word ‘Significant’ is open to interpretation, what we consider significant may differ to the Parish and again that may differ to what a developer considers significant. Everyone needs to be aware that there may be disagreement between different parties over traffic levels with no concrete threshold.

Date: 29 May 2024
Our ref: 473083
Your ref: Newton Longville Neighbourhood Plan



Planning Policy Team
Buckinghamshire Council

BY EMAIL ONLY

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Dear Sir/Madam

Newton Longville Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 11 April 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Our Ref: MV/ 15B901605

22 May 2024



Buckinghamshire Council
neighbourhoodplanning@buckinghamshire.gov.uk
via email only

Dear Sir / Madam

**Newton Longville Neighbourhood Plan - Regulation 16 Consultation
April - May 2024
Representations on behalf of National Grid Electricity Transmission**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to NGET infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Further Advice

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

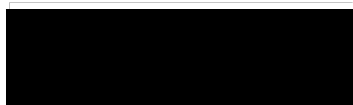
Tiffany Bate, Development Liaison Officer

box.landandacquisitions@nationalgrid.com

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI

Director

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For and on behalf of Avison Young

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Our Ref: MV/ 15B901605

22 May 2024



Buckinghamshire Council
neighbourhoodplanning@buckinghamshire.gov.uk
via email only

Dear Sir / Madam

**Newton Longville Neighbourhood Plan - Regulation 16 Consultation
April - May 2024
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:



Matt Verlander, Director

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Central Square
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NE1 3PJ

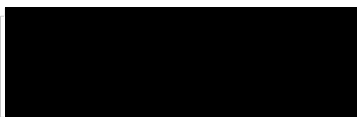
Kam Liddar, Asset Protection Lead

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Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI

Director

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For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

Newton Longville Neighbourhood Plan 2023 – 2033

Submission Plan Version

Representations on behalf of Willis Dawson

Date: May 2024 | Pegasus Ref: P22 2674

Author: Sarah Hamilton Foyl



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	07.05.2024	SHF	SHF	



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1. Introduction

- 1.1. Pegasus Group has been instructed by Willis Dawson Ltd to submit representations to the Submission version (Reg 16) of the Newton Longville Neighbourhood Plan.
- 1.2. Representations on behalf of our client were submitted to the Reg 14 Newton Longville Neighbourhood Plan consultation in December 2023.
- 1.3. The Consultation Statement (March 2024), Table 1 provides a brief summary of comments grouped by respondent rather than by policy. Given the very brief summary it would be helpful if the actual copies of the representations including the response from Buckinghamshire Council, were uploaded on to the website (it is acknowledged that in accordance with the principles of data protection, individual names of local residents cannot be identified and must be redacted if published on the website).
- 1.4. Whilst some points that we made in response to the Reg 14 NP consultation have been addressed, there remain some issues that we wish to raise with the examiner of the Neighbourhood Plan.
- 1.5. At the outset the considerable time and effort put into the preparation of the Neighbourhood Plan by the local community is acknowledged.



2. Regulation 16 Newton Longville Neighbourhood Plan

- 2.1. A neighbourhood plan should support the delivery of strategic policies set out in the local plan.
- 2.2. NPPF (Dec 2023) paragraph 13 states: –“ *Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.*”
- 2.3. Paragraph 29 of the NPPF states:

“Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.16”
- 2.4. Neighbourhood Plans should only include non-strategic policies.
- 2.5. It is noted that the purpose of the NP is to set out a series of planning policies that will be used to determine planning applications in the area in the period to 2033. The plan period is consistent with that of the adopted Aylesbury Vale Local Plan (September 2021). The plan period of the local plan is 2013–2033. The NP will need to be reviewed/updated once the BUCKS Local Plan is adopted. It is noted that the Buckinghamshire Local Plan has slipped and the consultation on the strategic growth scenario is anticipated to be in June 2024, but it is still some time away from publishing a Reg 18 Local Plan. Submission and Examination of the Buckinghamshire Local Plan is anticipated to be in 2026 with adoption in 2027. When adopted the Plan will replace the Aylesbury Vale Local Plan.
- 2.6. It is noted that the Parish Council intend to review the NP every five years.
- 2.7. A Neighbourhood Plan should contain policies for the development and use of land as if successful at examination and referendum, the NP becomes part of the statutory development plan. Any wider community aspirations than those relating to the development and use of land need to be clearly identifiable or should be made in a separate document. It is noted that the Parish Council have included two aspirations which relate to the strategic Salden Chase development (these are included in Section 7).

¹ 16 Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.



- 2.8. The NP needs to be prepared positively, in a way that is aspirational but deliverable. The NP must satisfy the basic conditions as set out in the PPG Neighbourhood Planning 065 Reference ID:41-065-20140306.
- 2.9. It is necessary for a Neighbourhood Plan to meet the 'Basic Conditions' in order to progress through an Examination and progress to a community referendum. This matter is re-iterated at paragraph 37 of the National Planning Policy Framework (NPPF) and again through the National Planning Practice Guidance.
- 2.10. Paragraph 37 of the NPPF (September 2023) states that:
- “Neighbourhood Plans must meet certain basic conditions’ and other legal requirements²³ before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.”***^A
- 2.11. One of the seven 'Basic Conditions' set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 is that the Neighbourhood Plan should be prepared in 'General Conformity' with the strategic policies in the Adopted Local Plan for the area in which they are located.
- 2.12. The Aylesbury Vale Local Plan 2013 -2033 was prepared under the NPPF (2012) (paragraph 1.5 of the adopted Local Plan), as such it does not differentiate between strategic and non-strategic policies. Therefore, in order to meet the Basic Conditions, test it is necessary to consider whether the NP is in general conformity with the adopted strategy and policies of the Aylesbury Vale Local Plan.
- 2.13. The Basic Conditions Statement which has now been prepared demonstrates how the emerging NP complies with the NPPF (Dec 2023) and the policies of the adopted Aylesbury Vale Local Plan 2021.



3. Neighbourhood Plan Policies.

- 3.1. We have set out below our comments on the Reg 16 NP policies.
- 3.2. Paragraph 2.3 states that Newton Leys now straddles the boundary between Milton Keynes City Council and Buckinghamshire Council. *“Presently there is effectively a green buffer between the two settlements and it is important that this is maintained in order for Newton Longville to retain its separate identity.”*
- 3.3. In response to the Reg 14 representation on this point about the green buffer it is noted that Buckinghamshire Council have not raised any concerns. However, to be clear there is no designation on the VALP policies map which designates the area between Newton Longville and Newton Leys as a “green buffer”. The description in the NP simply refers to the fields which separate the edge of the village of Newton Longville and Newton Leys.
- 3.4. Whilst reference is made to Policy S3 that defines the settlement hierarchy and also states that development in the open countryside (i.e. beyond the settlements) should be avoided, *“especially where it would: a) compromise the character of the countryside between settlements, and b). result in a negative impact on the identities of neighbouring settlements or communities leading to their coalescence.”* The policy states *“in considering applications for building in the countryside the council will have regard to maintaining the individual identity of villages and avoiding extensions to built-up areas that might lead to further coalescence between settlements.”*
- 3.5. In effect this policy rules out development that would lead to coalescence, however it does not prevent some development from taking place if it were to accord with other policies of the plan. Importantly it does not endorse a “blanket approach” of no development.
- 3.6. The issue is that there is no policy framework for the designation of any green buffer, other policies of the VALP e.g. Policy S3 provide the framework for the area and do not need to be supplemented by other designations which cannot be justified. The concern is that the reference to a green buffer is tantamount to a blanket designation of open countryside adjacent to settlements – this is not considered appropriate in the NPPF or the PPG. Designation should not be proposed as a ‘backdoor’ way to achieve what would amount to a new area of Green Belt by another name.
- 3.7. The vision for the parish by 2033 is to maintain the separation between the village and the new development at Milton Keynes. Indeed, this is one of the key objectives i.e. *“To maintain the separate identity of the village and parish and retain that essentially rural character which is valued by residents.”* Policies NL1, NL2, NL5, NL7, NL8, NL9, NL9, NL10, NL13, & NL14”.

Policy NL1: Settlement Boundary

- 3.8. The Policy defines the settlement boundary for the village of Newton Longville within the Neighbourhood Plan area. Policy NL1 also sets out the spatial strategy for the parish.



3.9. In response to the Reg 14 NP, we objected to the wording of Part C of the policy which stated:

In accordance with the NPPF (paragraphs 64, 65 and -82-84) and Local Plan policies (H2, H3 and H4) development proposals on land outside the defined Settlement Boundary will only be supported for rural housing exception schemes, uses that are suited to a countryside location such as appropriate leisure and recreational uses, or community right to build schemes. Well-designed proposals for employment, agriculture or forestry and tourism that may help the rural economy will be supported subject to there being no unacceptable adverse impact on the countryside or residents amenity.”A

3.10. We considered that this wording appeared to be a more restrictive approach than that set out in Policy S3 which states that:

“...new development in the countryside should be avoided, especially where it would:

a. compromise the character of the countryside between settlements, and

b. result in a negative impact on the identities of neighbouring settlements or communities leading to their coalescence.”A

3.11. The adopted VALP Local Plan Policy S3 identifies the issues as underlined above. Paragraph 3.22 of the VALP states:

“ToA furtherA protect theA area’sA characterA theA councilA willA alsoA resist development that would compromise the open character of the countryside between settlements, especially where the gaps between them are already small.”A

3.12. There is no quantification of what a constitutesA “small gap” between settlements, this has not been addressed in the emerging NP.

3.13. We also referred to paragraph 3.24 of the VALP states:

In addition to the general control of coalescence⁷, there is a need for more specific protection in locations that are, or will be, experiencing the strongest pressures for development, such as the villages in close proximity to Aylesbury. Relevant allocation policies will therefore ensure the retention of individual settlement identity.

3.14. There is no explicit recognition of the villages in close proximity to Milton Keynes.

3.15. In response to the Reg 14 NP, we considered that Policy NL1 did not address these points and instead applied a more restrictive approach and consequently limited development in rural areas to that which accords with NPPF paragraph 64 and 65 (September 2023) and VALP Policies H2 rural exception sites, H3 rural workers dwellings and H4 replacement dwellings in the countryside.

3.16. The Reg 16 NP includes changes to Part B with the additional bullet point:



3.17. It is noted that an additional criterion has been included under clause B:

~~“The Proposal is in accordance with other applicable policies in the development plan.”~~

3.18. Part C has been redrafted:

Development located outside of the defined settlement boundary shall only be permitted where its deemed acceptable under the policies contained within VALP and NPPF.

3.19. These changes are supported, in all cases the NPPF should be read as a whole, this also applies to the development plan.

Policy NL2: Development within the Settlement Boundary

3.20. The Reg 16 NP proposes changes to the policy. However, this policy is intended to focus on development within the settlement boundary. The preceding paragraph to the policy is misleading as the additional text states:

~~“To protect and enhance environmental assets both within the settlement boundary and in the surrounding area.”~~

3.21. The reference to the surrounding area should be deleted if the policy is intended for development within the settlement boundary.

Policy NL4: Housing Mix

3.22. It is noted that no changes are proposed to this policy from the version included in the Reg 14 NP. The Parish Council have proposed some changes to the text previously paragraphs 6.17 and 6.18 (now 6.20 and 6.21) and a clarification of the source of the date in Table A.

3.23. Consequently, are comments on Policy NL4 are still relevant. Policy NL4 seeks to ensure a mix of housing and is consistent with VALP Policy H6a. However, as set out in the VALP para 5.29:

~~“Developers are expected to provide housing solutions that contribute to meeting the housing needs of the housing market area, as identified in the latest Housing and Employment Development Needs Assessment (HEDNA) and any other appropriate local evidence.”~~

3.24. Paragraph 30 states:

~~The housing mix will be agreed taking into account the council’s most up-to-date evidence on housing need and any evidence available regarding local market conditions. It is imperative to recognise that an appropriate housing mix will vary between urban and rural locations.~~



3.25. The Parish Council has not provided any up-to-date evidence of need, instead it relies on the HEDNA 2016 that was prepared to support the VALP, which the VALP acknowledges provides a guide rather than a requirement as they may need to be varied on the basis of specific circumstances or evidence. The NP does not refer the Aylesbury Vale Area Affordable Housing Supplementary Planning Document (November 2022) which provides guidance on how affordable housing policy should be applied to proposals for development within the VALP. The guidance expands upon that already provided in the policies in the Adopted Vale of Aylesbury Local Plan 2021 (VALP). In terms of the dwelling size and mix paragraph 68 of the SPD states:

Policy H1 and H6a of the Vale of Aylesbury Local Plan is clear that the required affordable housing mix and tenure shall be provided in accordance with current evidence. In the case of housing mix, this evidence will include available evidence of developers on local market conditions and the mix shall be in general conformity with the council's evidence which currently is the Buckinghamshire HEDNA December 2016 which will be updated periodically. The mix and tenure will also have regard to any neighbourhood plan evidence for a made neighbourhood plan.

3.26. Paragraph 79 of the SPD clarifies that:

"Where an exception site is being proposed, an up-to-date Housing Need Survey for the Parish will be needed. The geographical extent of the survey should be agreed with the Council."

3.27. Paragraph 80 – 85 of the SPD provided further guidance.

Policy NL5: Areas of Separation to Prevent Further Coalescence

3.28. It is noted that the Parish Council have not made any changes in response to representations from Gladman, Marrons, Pegasus and Varsity Planning in respect of Policy NL5. The only change is to clarify that the Areas of Separation do not extend beyond the Newton Longville parish boundary.

3.29. At the Reg 14 stage we submitted the following comments: we recognised the need to avoid coalescence, however, it is necessary to consider whether the designation of Areas of Separation is in general conformity with the VALP.

3.30. The VALP does not include any policies which introduce a "blanket approach" to restrict development.

3.31. Consequently, an objection is made to this policy, which imposes a "blanket approach" outside the settlement boundary and identifies "Areas of Separation" between the Settlement boundary and the Bletchley- Bicester railway line to the north/north west, the



former brick works site and the villages of Stoke Hammond, Drayton Parslow and Mursley to the south/south west.

- 3.32. There is no strategic policy in the VALP that provides the framework or terms of reference for an Area of Separation policy to be included in the NP, furthermore there is no bespoke evidence to justify this application of this policy across the entire area outside the settlement of Newton Longville i.e. to the remaining area of the NP area. Policy S3 and D3 of the VALP provide sufficient policy guidance e.g. Policy S3:

“...The proposal must contribute to the sustainability of that settlement, be in accordance with all applicable policies in the Plan, and fulfil all of the following criteria:

c. be located within or adjacent to the existing developed footprint of the settlement * except where there is a made neighbourhood plan which defines a settlement or development boundary, where the site should be located entirely within that settlement boundary

d. not lead to coalescence with any neighbouring settlement

e. be of a scale and in a location that is in keeping with the existing form of the settlement, and not adversely affect its character and appearance

f. respect and retain natural boundaries and features such as trees, hedgerows, embankments and drainage ditches

g. not have any adverse impact on environmental assets such as landscape, historic environment, biodiversity, waterways, open space and green infrastructure, and h. provide appropriate infrastructure provision such as waste water drainage and highways.

- 3.33. It is therefore considered that the plan cannot be considered to be positively prepared in accordance with NPPF and the VALP.

Policy NL7: The Conservation Area

- 3.34. It is noted that the policy has been prepared to “ensure the protection of the Conservation Area”. Paragraph 6.35 states “...outside the Conservation Area, it identifies a small number of views within its setting that play an important part in defining its historic significance and character of its setting. Again, the expectation is that applicants should take care in ensuring the design of their proposals acknowledge these special views.”

- 3.35. It is not clear what evidence has been prepared to support this policy and what the justification is that the particular views need to be protected as shown on Map H.

- 3.36. Changes are now proposed in the Reg 16 NP area. The second line of Part B where “preserve” replaces “sustain”. Policy NL7 B states:



“Proposals for development located in the remainder of the village that form the setting of the Conservation Area must preserve or enhance its special character and appearance. In setting out their design proposals, applicants should be able to demonstrate that they have had full regard to the characteristics of the Conservation Area that are significant in forming its special character and appearance.”A

3.37. This change is in keeping with the NPPF (December 2023).

3.38. The Reg 16 NP proposes changes to the wording of Part C:

“The views radiating out of and into the Conservation Area including views on to open countryside as shown in Map H and in the associated table (which has images and descriptions for each of the four arrows on the map) should be retained. Any development proposals which could impact on those views must be subject to a Landscape and Visual Impact Assessment.” (proposed text is underlined)

3.39. Pages 36 and 37 include some views corresponding to the arrows on Map H, these were included in the Reg 14 version of the NP. The only new text that has been included relates to View 1 from St Faith’s Church Tower looking over the Conservation Area and secondly to the east from St Fatih’s Church Tower.A

3.40. The lack of evidence is still evident and consequently, an objection is made to part C of Policy NL7.

4. Conclusions

- 4.1. While it is right that Neighbourhood Plans prepare locally distinctive policies that build on the strategy of policies in an adopted local plan, such Neighbourhood Plan policies need to be rooted in evidence and subject to thorough examination. The VALP does not have a policy that invites the Neighbourhood Plan to prepare additional designations in terms for preventing the coalescence of the village of Newton Longville with surrounding settlements.
- 4.2. The new unitary authority was expected to have a new Local Plan covering the entire area including Aylesbury Vale, within 5 years of coming into effect i.e. by April 2025. It is noted that the timescale for the preparation of the Buckinghamshire Local Plan has now slipped. The NP has acknowledged that the Newton Longville NP will need to be reviewed once the Buckinghamshire Local Plan is adopted (on the current timescale for the Local Plan this is not expected until 2027).
- 4.3. Milton Keynes have already embarked on a review of their Local Plan. The New City Plan will take forward a Milton Keynes City Council's strategy for 2050 which sets out a bold and ambitious vision for MK over the next 28 years. The role of the New City Plan is to deliver on the vision set out in the Strategy for 2050 by way of sustainable development. The Strategy for 2050 carried forward many of the elements set out in the MK2050 Milton Keynes Strategic Growth Study prepared by David Lock Associates (August 2019). It is acknowledged that the Strategy for 2050 is not a formal planning policy document and therefore it has no weight in the planning process and is not a material consideration in the determination of planning applications. Nevertheless, both Aylesbury Vale and South Northamptonshire Councils were involved in commissioning the evidence study.

“The recommended growth strategy set out in this Strategy for 2050 has been prepared on a boundary blind basis, as a sensible and sustainable pattern of growth, which in some cases includes recommendations for areas outside of Milton Keynes Council's control. These are draft proposals generated by Milton Keynes Council alone and in no way commits those local planning authorities to bring forward growth in that way. Through the plan-making process, it will be for the individual local planning authorities across the Metropolitan Milton Keynes area to consider the spatial framework and policy directions set out in this Strategy, and where appropriate adopt them into statutory planning policy. The Strategy for 2050 will also be used to inform other Milton Keynes Council policies”. (Milton Keynes Strategy for 2050 January 2020 Engagement Draft)

- 4.4. The Strategic Growth MK2050 considered several options for growth around Milton Keynes, one of which was further growth west of Newton Leys.
- 4.5. Willis Dawson would welcome the opportunity to engage with Newton Longville Parish Council in the preparation of a development scheme to the west of Newton Leys that is planned sensitively to ensure the village maintains its separate identity and physical separation with Milton Keynes/Bletchley. Willis Dawson also believes that a scheme to the



west of Newton Leys has the potential to bring forward benefits particularly in relation to highways and social infrastructure.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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30th May 2024
Ref: 21167



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Dear Sir/Madam,

RE: Newton Longville Neighbourhood Development Plan – Regulation 16 Consultation

Black Box Planning submit these Representations on behalf of Edward Ware Homes Ltd (EWH) in respect of the Newton Longville Draft Neighbourhood Development Plan (NDP) – Regulation 16 consultation open to Thursday 30th May 2024.

National Policy

The National Planning Policy Framework (NPPF) states at Paragraph 13 that neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.

NPPF Paragraph 29 sets out that neighbourhood plans can shape, direct and help deliver sustainable development. It goes on to say that neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies. Footnote 16 states that neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers the area. NPPF Paragraph 20 defines strategic policies as those which set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for [inter-alia] housing (including affordable housing).

Neighbourhood Plan Basic Conditions

In accordance with Schedule 4B of the Town and Country Planning Act 1990 (as inserted by Section 116 of the Localism Act 2011), in order for a draft neighbourhood plan to proceed to a referendum and be made, it must meet a number of basic conditions. These are:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses.
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area.
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

The Planning Practice Guidance (PPG) confirms that a qualifying body should consider throughout the process how it will demonstrate that its neighbourhood plan will make the basic conditions that must be met.

It should also be noted that the Levelling-Up and Regeneration Act 2023 (LURA) also prospectively replaces condition (e) with:

- (ea) 'the making of the order would not have the effect of preventing development from taking place which –
 - (i) is proposed in the development plan for the area of the authority (or any part of that area), and
 - (ii) if it took place, would provide housing.

Upon the Secretary of State bringing forward regulations, this new provision in the LURA will effectively prevent NDPs from bringing forward policies which serve to actively prohibit or limit housing development already identified within the development plan of the local planning authority (LPA).

Vale of Aylesbury Local Plan (VALP) Adopted September 2021

The village of Newton Longville is considered a medium village in the settlement hierarchy. This is defined within the local plan as having some provision of key services and facilities, making them moderately sustainable locations for development.

Policy S2 'Spatial Strategy for Growth' sets out that the primary focus of strategic levels of growth and investment will be at Aylesbury, and development at Buckingham, Winslow, Wendover and Haddenham supported by growth at other larger, medium and smaller villages.

The expectation in S2 is that across medium villages there should be housing growth of 1,423 no. dwellings, at a scale in keeping with the local character and setting. This growth will be encouraged to help meet local housing and employment needs and to support the provision of services to the wider area.

The policy makes provision of 52 no. houses at Newton Longville in the plan period 2013-2033 which was entirely consumed by completions and commitments at the time of writing the Local Plan.

Policy D3 'Proposals for non-allocated sites at strategic settlements, larger village and medium villages' confirms that development proposals in medium villages that are not allocated will be restricted to either:

- 1) Small scale development and infilling

- a) Infilling of small gaps in developed frontages in keeping with the scale and spacing of nearby dwellings and the character of the surroundings, or
 - b) Development that consolidates existing settlement patterns without harming important settlement characteristics, and does not comprise partial development of a larger site.
- 2) Larger scale development – exceptionally further development beyond allocated sites and small-scale development will only be permitted where the council’s monitoring of housing delivery across Aylesbury Vale shows that the allocated sites are not being delivered at the anticipated rate. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner. The proposal must contribute towards the sustainability of that settlement, be in accordance with applicable policies in the plan and fulfil all the following criteria:
- c) be located within or adjacent to the existing development footprint of the settlement except where there is a made neighbourhood plan which defines a settlement or development boundary, where the site should be located entirely within that settlement boundary
 - d) not lead to coalescence with any neighbouring settlement
 - e) be of a scale and in a location that is in keeping with the existing form of the settlement, and not adversely affect its character and appearance
 - f) respect and retain natural boundaries and features such as trees, hedgerows, embankments and drainage ditches
 - g) not have any adverse impact on environmental assets such as landscape, historic environment, biodiversity, waterways, open space and green infrastructure
 - h) provide appropriate infrastructure provision such as waste water drainage and highways.

Policy D3 is effectively a permissive policy enabling unallocated sites to come forward and is engaged when the Council’s monitoring of housing delivery across Aylesbury Vale shows that the allocated sites are not being delivered at the anticipated rate (as is currently the case). This is a similar mechanism to the housing land supply and housing delivery tests which are set nationally and are material considerations in planning decisions, except however this mechanism is enshrined in local development plan policy.

The VALP allocated a single site within Newton Longville for the provision of 17 dwellings (ref: NLV005). It is understood that this site is now built out.

Assessment of NDP against Basic Conditions

In terms of basic condition (a), the NDP must have regard to national policies and advice. The Planning Practice Guidance (PPG) confirms that a NDP must not constrain the delivery of important national policy objectives and that the NPPF is the main document setting out the government’s planning policies for England and how these are expected to be applied. PPG suggests that NPPF Paragraph 13 is important in this regard and that qualifying bodies should plan positively to support local development, shaping and directing development in their area which is outside these strategic

policies. In allocating previously consented sites, the Neighbourhood Plan fails to align with the National Planning Policy Framework, to shape and direct development.

EWH are promoting land to the south-west of Pond Close - Ref Site 2B with reference to the Newton Longville Neighbourhood Plan – Site Options and Assessment Document – April 2022. There are no landscape, ecology or other environmental designations covering or near the site that would restrict or prohibit development. The site is not within any Conservation Area and is not near any listed buildings, with the nearest listed building being Grade II listed Jasmine Cottage, which is over 320m away from the site. The site is in Flood Zone 1 and is therefore in the lowest risk probability of flooding. The site is well enclosed visually by a mature boundary including many trees and there exist no public rights of way across the site or adjacent to its boundaries.

The site has the potential to accommodate approximately 20 no. dwellings. The site was assessed as part of the NDP Site Options and Assessment on the basis of the delivery of 38 dwellings (Site 2B). In this case, the site was assessed as being unsuitable by reason of being an intrusion into the countryside. It is noteworthy that the AECOM site assessment report assessed every edge of settlement site at Newton Longville in this fashion. It is also worth noting that adjacent land to the south-east (Site 2A) is currently the subject of an outline planning application for 50 no. dwellings (24/01220/AOP) and this site would protrude further into the countryside than the EWH site.

The submission version of the NDP provides for a “infilling” policy at Draft Policy NL1 which enables residential sites of up to 5 no. dwellings to come forward within the settlement boundary – Draft Policy NL2 supports this aim. This would serve to constrain the effect of Policy D3 in the sense that it seeks to place an artificial ceiling on appropriate infilling proposals.

The NDP also currently proposes two site allocations within the neighbourhood plan area under Draft Policy NL3. These are as follows:

- **Dagnall House, Buckingham Road, Bletchley** – 6 no. dwellings – the site is already subject to outline planning permission 19/02126/AOP
- **Land Between Cobb Hall Road and Drayton Road** – 15 no. dwellings – this site is the subject of outline planning application 15/02242/AOP which was validated in July 2015 but currently remains undetermined – it is worth noting that the Parish Council originally objected to this application

It is our position that the identification of the two sites in question, does not plan positively to support local development in meeting the strategic needs of the Local Plan – as referenced at Paragraph 3.71 of the VALP. The sites in question are purely reactionary to existing commitments and applications. In the case of Dagnall House, whilst the site is located just within the parish boundary, this site represents infill between Milton Keynes and the Saldon Chase strategic site and would not serve to meet the needs of Newton Longville. It is worth noting the VALP spatial strategy which is for growth at the larger, medium and smaller villages to support the primary focus of development at the strategic sites. Policy S2 and D3 are clear that growth at medium villages is encouraged to help meet local housing needs – which is evidently not the case with the site at Dagnall House. Draft Policy NL3 therefore fails to meet the basic conditions.

Draft Policy NL5: ‘Areas of Separation to Prevent Further Coalescence’ seeks to avoid coalescence with nearby settlements and as a result indicates ‘Areas of Separation’ between the settlement boundary of Newton Longville and other nearby settlements, namely; The Bletchley-Bicester railway line to the

north/north west, the former brickworks site, the FCC landfill site and Newton Leys to the north/north east, and the villages of Stoke Hammond, Drayton Parslow and Mursley to the south/south west.

Whilst it is entirely recognised that the Salden Chase strategic site decreases the distance between Newton Longville and West Bletchley / Milton Keynes. The justification for designating an area of separation to the south and south west of the village is strongly disputed. In the case of the EWH site, this would not materially lead to coalescence between Newton Longville and other settlements. At this location, the distance between the settlement and the nearest next settlement of Mursley is recognised as being over 2 miles, and as a result it is considered that the designation of an area of separation seeks to do nothing but frustrate or prevent development from happening in this location.

This Draft Policy NL5 is clear and direct conflict with the strategic policies of the local development plan. As it does not contain a provision to enable sites to come forward where housing delivery falls below that expected, it would serve to severely constrain the effective operation of Policy D3 at Newton Longville. Policy D3 already refers to settlement coalescence as one of its criteria to consider, so Draft Policy NL5 is rendered effectively meaningless. Draft Policy NL5 fails to meet the basic conditions.

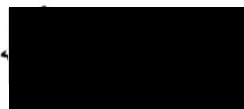
NPPF Paragraph 71 states that neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites suitable for housing in their area. Smaller windfall sites below 5 no. houses, as indicated within Draft Policy NL1 will result in inadequate contributions to village and community infrastructure. For example, national policy is that affordable housing is only provided on major developments which are 10 dwellings and above. Similarly, the capacity for a development scheme to make meaningful contributions towards other infrastructure is vastly reduced at such a smaller scale – especially when such reliance is placed on infilling schemes of less than 5 dwellings.

Limiting development to fewer than 5 no. dwellings, also contradicts the NDP objective set out in Paragraph 6.15 which recognises that the village needs to ensure the housing needs of its residents and future residents are met, particularly in relation to affordable housing and provision for the elderly. This again, demonstrates the potential benefits of a medium sized allocation to meet the needs of residents as part of the draft Neighbourhood Plan, and it is considered that in seeking to limit development through the Draft NDP, may result in being unable to meet the needs of the local community. In allocating previously consented sites or live applications, the Neighbourhood Plan fails to align with NPPF Paragraph 13, which confirms the purpose of neighbourhood plans to shape and direct development outside of strategic policies. In contrast, the allocation of a medium sized site could provide a key opportunity for the NDP to directly address the needs of the community.

Currently our concerns are that the Submission Version of the NDP does not have complete regard to national policies and advice – particularly that provided within the NPPF. Nor does it contribute towards the achievement of sustainable development by failing to positively plan for housing. Furthermore, by generally seeking to limit or restrict residential growth at Newton Longville, the NDP cannot be said to be in general conformity with the strategic policies of the VALP.

These representations to the NDP are intended to be positive and constructive, they are an invitation to openly engage moving forward with our client regarding the site opportunity and the role it may be able to play within the NDP. Please do not hesitate to contact me to discuss further.

Yours sincerely



Dan Trundle MRTPI
Associate



Newton Longville
Neighbourhood Plan 2023 -2033

Regulation 16 Consultation

MAY 2024



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1 INTRODUCTION

1.1 Context

- 1.1.1 These representations provide Gladman Development Ltd.'s (Gladman) response to the Newton Longville Neighbourhood Plan (NLNP) under Regulation 16 of the Neighbourhood Plan (General) Regulations 2012.
- 1.1.2 Gladman specialises in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in contributing to the Development Plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Local Plan and Neighbourhood Plan examinations.
- 1.1.3 Through these representations, Gladman provides an analysis of the NLNP and the policy choices promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the NLNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG.
- 1.1.4 Gladman is promoting land off Drayton Road for development within the neighbourhood plan area and a site submission is included within these representations at Section 6.

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the NLNP must meet are as follows:

“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.

(d) The making of the order contributes to the achievement of sustainable development.

(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”

2.2 National Planning Policy Framework

2.2.1 At the heart of the National Planning Policy Framework (‘The Framework’ or ‘NPPF’) is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed housing needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

2.2.2 The Planning Practice Guidance (PPG) make clear that neighbourhood plans should conform to national policy requirements and take account of the most up-to-date evidence. This is so that Newton Longville Parish Council can assist Buckinghamshire

Council in delivering sustainable development and be in accordance with basic condition (d).

2.2.3 The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development. In addition, paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

2.2.4 Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

3 RELATIONSHIP TO LOCAL PLANS

3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted Development Plan relevant to the preparation of the NLNP and the Development Plan which the NLNP will be tested against is the Vale of Aylesbury Local Plan (VALP) 2013-2033. The Plan was adopted in September 2021 and is the overarching planning policy document for the area and forms the basis for the decision making process in relation to all planning applications looking forward to 2033, or such a time as it, or elements of it are superseded.
- 3.1.3 Newton Longville's place is identified in the settlement hierarchy as a medium village with 52 dwellings committed, no further allocations are made. There will be housing growth of 1,423 at a scale in keeping with the local character and setting in the medium villages, with only 39 new dwellings allocated to the tier with the remainder development already completed or committed. A further 760 dwellings are identified as windfall development across the district in the plan period.
- 3.1.4 It is clear that Newton Longville is a sustainable settlement that will need to assist Buckinghamshire in meeting not only the settlement's but also the wider authority area's wider housing needs.

3.2 Emerging Development Plan

- 3.2.1 Buckinghamshire Council became a unitary authority in April 2020 following the merger of four councils: Aylesbury Vale, Wycombe, South Bucks and Chiltern and Buckinghamshire County Council.
- 3.2.2 As part of becoming a unitary authority the Council is required to produce a Local Plan within 5 years of coming into being (by April 2025). This emerging plan is still the very early stages of plan preparation with the next stage 'Growth Scenarios' to take place early summer 2024.

4 NEWTON LONGVILLE NEIGHBOURHOOD PLAN

4.1 Introduction

4.1.1 This section provides Gladman's response to the NLNP consultation document and its supporting evidence base.

4.2 Policy NL1: Settlement Boundary

4.2.1 Gladman does not consider the use of development limits to be an appropriate planning tool if they would limit the ability of sustainable development opportunities from coming forward. Indeed, the approach taken is highly restrictive towards development outside the Development Limit as it fails to take into consideration the site characteristics and the benefits of development.

4.2.2 The Framework is clear that development which is considered sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. Accordingly, Gladman recommend that this policy should be modified so that it allows for a degree of flexibility. The following wording is put forward for consideration:

"When considering development proposals, the Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they:

- **Provide new homes including market and affordable housing; or**
- **Opportunities for new business facilities through new or expanded premises; or**
- **Infrastructure to ensure the continued vitality and viability of the neighbourhood area.**

Development adjacent to the existing settlement will be supported provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development."

4.2.3 This is of further importance due to the status of the emerging Local Plan. It may yet become apparent that the quantum of housing Newton Longville is required to deliver in supporting the delivery of the Council's housing needs may increase given the new Buckinghamshire Local Plan encompassing the unitary authority.

4.2.4 The need for flexibility is essential to ensure the Plan is responsive to changes in circumstance which may occur over the plan period (e.g. a Local Plan Review). Indeed, the need for flexibility was considered in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner's Report states:

"...Policy GMC1 should be modified to state that "Development...shall be focused within or adjoining the settlement boundary as identified in the plan." It should be made clear that any new development should be either infill or minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development."

4.3 Policy NL3: Housing Site Allocations

4.3.1 The Neighbourhood Plan proposes two site allocations allocates for residential development for 21 dwellings in total. In the case of both sites, the principle of development has already been established through the granting of previous planning permission.

4.3.2 The allocation of Dagnall House currently has planning permission granted in October 2020¹ for six dwellings. Gladman understand that this site was included in the committed dwellings for Newton Longville within the adopted Local Plan. As such, we consider this to be repetition of the VALP, Paragraph 16(f) of the NPPF indicates that repetition should be avoided.

4.3.3 Further, in instances such as this the PPG is clear that *'Policies and allocations within other development plan documents, for example strategic site allocations or windfall development set out in a local plan or spatial development strategy, will not meet*

¹ Application Reference 19/02126/AOP

criterion 14b of the National Planning Policy Framework. If this allocation is to be retained in the NLNP it is important that this distinction is made as part of the policy.

- 4.3.4 Whilst there has been no subsequent reserved matters application for this site and the approval has not been implemented, the policy framework of the VALP would support a resubmission of this planning application and allocation within the neighbourhood plan is not required in this instance.
- 4.3.5 Land between Cobb Hall Road and Drayton Road is also subject to an outline pending planning application submitted in July 2015². This application was approved in November 2017 but following a legal challenge the application was remitted back to the council for redetermination and as it stands is still pending a decision. An officer report to Committee was published in May 2019 stating that following the satisfactory completion of a Section 106 agreement the application should be approved and a draft of the Section 106 was published in July 2023. Whilst the Section 106 agreement has still not been completed coming up to 9 years since the submission, the principle has effectively been established, although Gladman would now question the viability and deliverability of the site following the introduction of legal requirement for sites to demonstrate biodiversity net gain.
- 4.3.6 This is all notwithstanding the Parish Councils own objection to the site in 2019 and the conflict of this site with Policy NLP2, in particular part E. Finally, if issues can be overcome the principle of development would be acceptable, as otherwise policy compliant, in line with the windfall requirements of the Aylesbury Vale Local Plan.
- 4.3.7 To conclude as both allocated sites are subject to advanced applications the principle of development has already been established and there are other mechanisms within the VALP which support further future applications. Therefore, to meet the basic conditions these sites should be removed from the neighbourhood plan as drafted.

² Application Reference 15/02242/AOP

4.4 Policy NL4: Housing Mix

4.4.1 In principle, Gladman supports Policy NL4 which seeks to deliver a range of housing types and sizes to meet the local communities housing needs. However, it is important to note that evidence supporting this policy only provides an assessment of need at a single point in time and will be subject to change over the duration of the plan period. It is important that this policy promotes a flexible strategy to ensure a choice of housing options are available to residents over the course of the plan period. The policy should therefore be modified so that it allows consideration of the most up-to-date evidence on housing need available.

4.5 Policy NL5: Areas of Separation to Prevent Further Coalescence

4.5.1 The neighbourhood plan should seek to avoid blanket designations across large parts of the open countryside. A change is necessary to ensure that the NLNP supports sustainable development in accordance with the basic conditions and does not conflict with policies of the Vale of Aylesbury Local Plan, which provides no basis for policy NL5. There is currently no risk of coalescence with any settlement surrounding Newton Longville: Mursley, Stoke Hammond/Newton Leys and Drayton Parslow are significant distances from Newton Longville. The railway line provides a demarcation between West Bletchley and Newton Longville, meaning that the two settlements cannot coalesce. Gladman suggests that this policy is deleted in accordance with the basic conditions.

4.5.2 At present Gladman consider that a number of the proposed areas of separation, predominantly to the south and west of the settlement, do not meet the tests set out by case law or national policy guidance, and the supporting evidence base does not provide a robust justification for the areas identified.

4.5.3 An area of separation towards open countryside which is partly or wholly screened by trees and wooded areas;; or glimpsed views through vegetation looking across agricultural fields are not 'out of the ordinary' and do not meet the required tests.

4.5.4 Further consideration is required in relation to whether the identified areas of separation in Policy NL5 are justified and meet the basic conditions.

4.6 Policy NL6: Climate Change – Energy Efficient Buildings

4.6.1 Gladman supports the construction of energy-efficient homes; indeed, the requirement for energy efficiency and sustainable construction is included within the Building Regulations and climate change in general within the NPPF, as stated in the policy. There is no need for the policy to replicate wording included within the Local Plan, national policy, or legislation. Given that developments must be in accordance with the Building Regulations, it is not necessary for the NLNP to include Policy NL6. Indeed, a Written Ministerial Statement specifically prohibits this:

‘From the date the Deregulation Bill is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.’³

4.6.2 As such, NL6 should be deleted from the Newton Longville NP.

4.7 Policy NL11: Transport and Parking

4.7.1 Gladman notes that Policy NL11 of the Neighbourhood Plan provides a copy/reword of VALP Policies T4, T5 and T6. Therefore, there is no need for the policy to replicate the wording included within the Local Plan, national policy, or legislation. It is suggested this policy is deleted in accordance with Paragraph 16(f) of the NPPF.

4.8 Policy NL12: Green Infrastructure Network

4.8.1 Gladman supports the inclusion of GI and biodiversity net gain on development sites. Gladman welcomes the removal of part c from the policy which was recommended to be deleted as part of the representations submitted to the regulation 14 consultation.

³ Written Ministerial Statement – Planning Update. Statement UIN HCWS488 25th March 2015

4.9 Policy NL13: Public Rights of Way

4.9.1 This policy states that new development affecting a right of way should make provision for that right of way as part of the development, or for its diversion on a convenient alternative route.

4.9.2 Gladman takes issue with part b of Policy NL13. It is not reasonable, nor lawful, to require applicants to replace or upgrade a public right of way in the countryside in a manner that provides a 'green corridor' of 20 metres. Such a demand would not pass CIL Regulation 122 tests, mandating that contributed funds to aid in PRow enhancement be a) necessary to make the development acceptable, b) directly related to the development, and c) fairly and reasonably related in scale and kind to the development. Gladman suggests the deletion of part b of NL13.

5 STRATEGIC ENVIRONMENT ASSESSMENT

5.1 Context

- 5.1.1 The preparation of neighbourhood plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects.
- 5.1.2 The SEA is a systematic process that should be undertaken at each stage of a Plan's preparation. It should assess the effects of a neighbourhood plan's proposals and whether they would be likely to have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.
- 5.1.3 Both the SEA Directive and Neighbourhood Planning PPG make expressly clear that an SEA Screening Assessment should be undertaken at the earliest opportunity⁴. Noting that the SEA process was undertaken following the conclusion of the Regulation 14 consultation. As such the SEA has been written to support the existing Neighbourhood Plan rather than to inform the process as it is intended to do.
- 5.1.4 Notwithstanding comments raised earlier in this representation in relation to the proposed site allocations of the NLNP, Gladman query the necessity of the SEA in relation to the NLNP. In assessing sites where the principle of development has already been established, in essence the decisions have already been made and taken out of the hands of the Parish Council.
- 5.1.5 If seeking to plan positively for further development in the area, alternative sites should have been looked at and at the very least Land off Drayton Road, Newton Longville should have been considered through the SEA process. The reasons for discounting of the site through the Site Assessment Report do not allow for the consideration of mitigation measures that are required through the SEA process. As

⁴ PPG Paragraph 029 Reference ID: 11-029-20150209

a minimum the site should have been considered as a reasonable alternative, as it has not Gladman consider this to be a failure of the SEA and the legal requirements of the NLNP, and therefore basic condition (f).

- 5.1.6 This issue of course would be resolved through the deletion of the proposed site allocations which would negate the need for the SEA process to be undertaken.
- 5.1.7 There is a suite of information available relating to land off Drayton Road, Newton Longville through the previous application (19/01754/AOP) or the current pending application (24/01220/AOP). This demonstrates the sustainability and suitability of development on this site which has not been assessed as part of the SEA. The documents in support of the previous application were available for consideration through the site assessment process, the fact that they do not appear to have been considered could be considered to be a legal failing of the site assessment and therefore SEA process.

6 SITE SUBMISSION

6.1 Land off Drayton Road, Newton Longville

- 6.1.1 Gladman is promoting land off Drayton Road, Newton Longville for residential development. The site is 2.5ha in size and is capable of delivering up to 50 high quality dwellings including a policy compliant level of affordable housing.
- 6.1.2 An outline planning application was submitted to Buckinghamshire Council for up to 50 dwellings and was validated by the Council on the 18th April 2024 (Ref24/01220/AOP). The proposed Development Framework Plan for this application is provided in Appendix A.
- 6.1.3 The site is located in a sustainable location, with the facilities and services in the settlement of Newton Longville well within the 2km catchment for walking from the centre of the site. This demonstrates that facilities are within walking distance from the site and walking will be a practical as well as a theoretical option.
- 6.1.4 Vehicular access can be achieved from Drayton Road with pedestrian and cycle links to Drayton Road.
- 6.1.5 The site will provide new publicly accessible space in the form of attractively landscaped formal and informal open spaces including the provision of a locally equipped area of play (LEAP) and new public footpaths and cycle links connecting to the surrounding network. The site can achieve a 10% net gain in biodiversity.
- 6.1.6 Overall, it is considered that the site is suitable for allocation within the NLNP.

7 CONCLUSIONS

7.1 Summary

- 7.1.1 Gladman welcomes the opportunity to comment on the Regulation 16 Consultation currently being considered. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF2023) and the associated updates to Planning Practice Guidance.
- 7.1.2 Gladman has provided comments on several issues that have been identified in the consultation material and raised significant concerns in relation to the meeting of housing needs and the proposed site allocations contained within the document.
- 7.1.3 Gladman respectfully requests due to the nature of the representations that have been raised that the examination of the NLNP is dealt with through a public examination and if the Examiner agrees that Gladman is afforded the opportunity to present its case at such a hearing.

Appendix A – Drayton Road (Ref:24/01220/AOP) Framework Plan





Our ref: 794-PLN-MNP-00019

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Date: 29 May 2024

FAO Planning Policy Team
Buckinghamshire Council

Dear Sir / Madam,

Newton Longville Neighbourhood Plan 2023-2033 Submission Version (Regulation 15) consultation (carried out under Regulation 16)

This submission has been prepared on behalf of Richborough in response to the above consultation. It has been prepared in accordance with the basic conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

Basic Conditions

The basic conditions are:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

Only a draft neighbourhood plan that meets each of a set of basic conditions can be put to a referendum and be made.

Relevant national policy and guidance on neighbourhood planning

Paragraph 13 of the NPPF (2023) says that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.

Paragraph 18 says that policies to address non-strategic matters should be included in neighbourhood plans that contain just non-strategic policies.

Paragraph 29 says neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.

Importantly, paragraph 31 says that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned.

Buckinghamshire Council is currently preparing a new local plan¹, which (when adopted) will supersede all the adopted local plans that currently cover those individual district councils that made up the county structure prior to amalgamation into a single authority. National planning practice guidance (PPG 41-009) provides advice for those qualifying bodies (in this case, Newton Longville Parish Council) that intend to progress their neighbourhood plan before the emerging plan is adopted. Notably, the guidance says:

- although a draft neighbourhood plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.
- The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.
- The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act

¹ <https://www.buckinghamshire.gov.uk/planning-and-building-control/local-development-plans-info/buckinghamshire-local-plan/>

2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan².

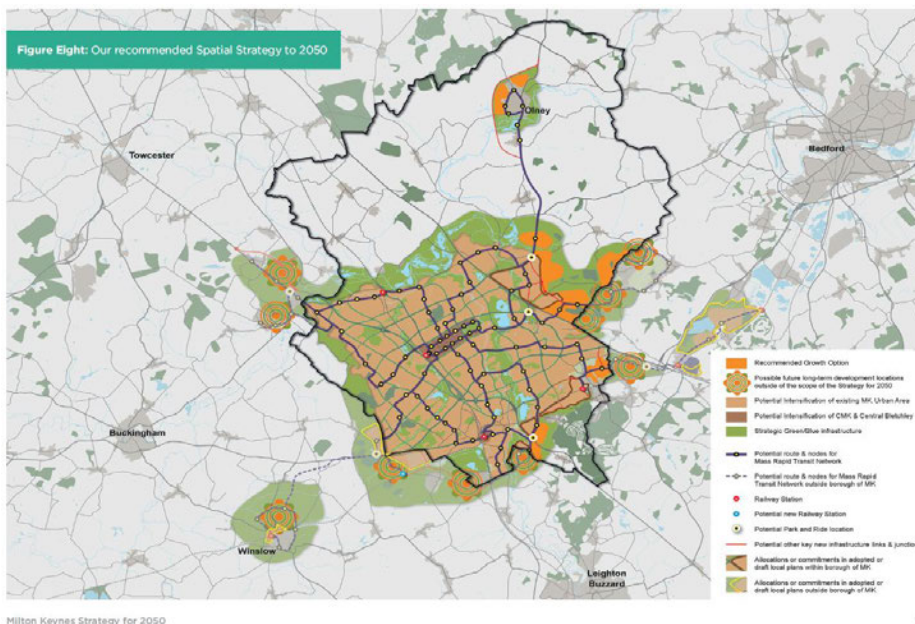
Emerging evidence base for the emerging Buckinghamshire Local Plan

Paragraph 2.5 of the NP makes reference to the Milton Keynes Strategy for 2050 (MK2050)³. MK2050 considers the future growth requirements and how this could be accommodated in the period up to 2050.

According to the MK2050 website, the MK Futures 2050 Commission was set up in September 2015 as a way of thinking about the future of the city, helping to create a long term vision for the way MK should grow and prosper over the coming decades. The Commission process was supported by Council officers and the political Group Leaders also attended the Commission meetings to be able to contribute to the debate. The role of the MK Futures 2050 Commission came to a formal end in July 2016 when they published their report. Picking up on the Commission's recommendations, the Council has worked to deliver the Six Big Projects through the MK Futures 2050 programme, including preparing the now adopted Strategy for 2050.

The Parish Council indicate that the MK2050 is not a planning document and applies only to development within the Milton Keynes City Council boundary. Whilst the MK2050 does not (currently) form part of the statutory development plan for City of Milton Keynes or Buckinghamshire, it nonetheless forms a key piece of evidence that will inform the Buckinghamshire Local Plan. Figure 8 of MK2050 provides a 'recommended' strategy to 2050. This is show below.

MK2050 – 'recommended' spatial strategy to 2050



² Paragraph: 009 Reference ID: 41-009-20190509 Revision date: 09 05 2019

³ <https://www.mkfutures2050.com/>

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It can be seen that a number of 'possible future long-term development locations' have been identified outside the scope of the 2050 Strategy. These include locations within the Buckinghamshire area that adjoin the southern edge of City of Milton Keynes, and which relate to allocations in adopted local plans outside the city (notably in what was previously Vale of Aylesbury). It is our view that the MK2050 forms a clear piece of relevant and proportionate evidence that falls within the remit of the PPG that should be properly taken into account in the preparation of the NP and should not be dismissed as currently proposed.

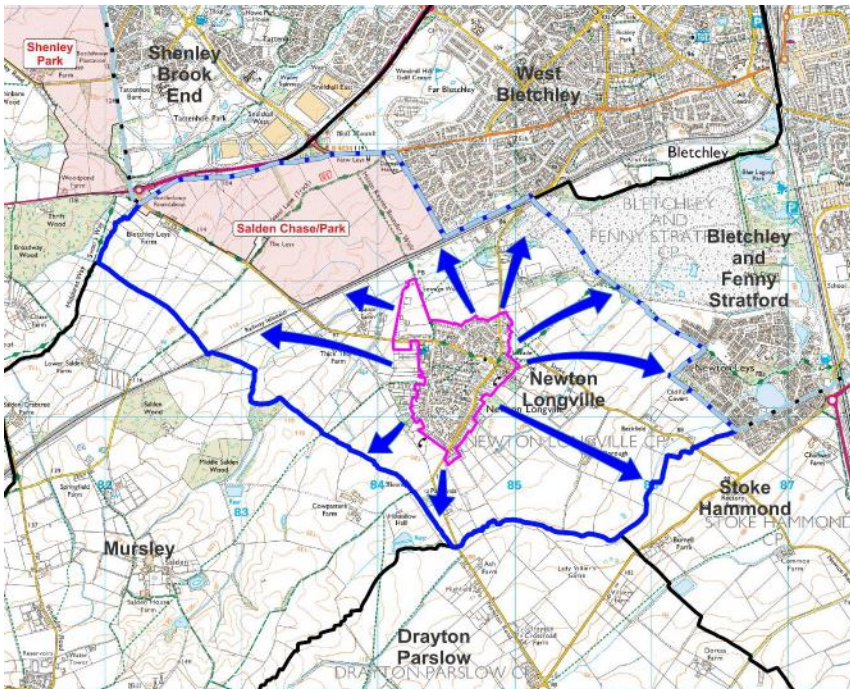
A number of these potential, future growth locations are located within and adjacent to Newton Longville parish. However, the NP seeks to distance itself from the MK2050 strategy by ignoring the strategy and detailed proposals, including the possible future development locations. In doing so, it is our view that the NP has not considered the relevance or the reasoning that has informed the MK 2050; the NP has not had regard for national policy and guidance and so has **failed criteria a) of the basic conditions.**

This is also important given the proposals included in the NP which seek to adopt 'areas of separation' in this part of the parish.

Neighbourhood plan proposals – Areas of Separation

Draft Policy NL5 of the NP proposes 'Areas of Separation to Prevent Further Coalescence'. This illustrated in Map G of the NP and the policies map. This is shown below.

Plan extract – Areas of Separation in Newton Longville parish



It can be seen that these areas would, if part of the development plan, offer complete 'protection' for Newton Longville from any development extending outward from the edge of the settlement up to the edge of the neighbourhood plan boundary, in all directions, including in a south-easterly direction until it reaches the

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Stoke Hammond parish boundary. This would, in effect, establish a 'blanket' protection across a significant proportion of the NP area. Paragraph 6.23-6.24 of the NP says that this policy expands on VALP14 policies S3 and D3 which recognise that new development in the rural areas needs to be avoided where it would have a negative impact on the character of the countryside separating communities and on the identities of individual settlements through coalescence, the need to avoid further coalescence is also described as 'critical'.

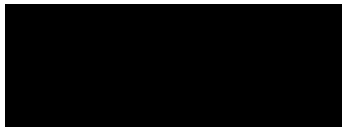
However, the NP provides no evidence to demonstrate that such a highly restrictive and prescriptive approach to controlling future development across such a large expanse of the parish is justified.

Furthermore, the NP has also ignored the emerging evidence which points to potential foci for future growth within the parish, as highlighted above. Such a restrictive approach clearly undermines the key purpose of neighbourhood plans, which is to '*shape and direct sustainable development in their area*'. Seeking to apply a blanket constraint over large areas of the parish is clearly at odds with the achievement of sustainable development. Taken together, the NP **fails criteria a) and d) of the basic conditions**.

For the reasons set out above, RPS is of the opinion that the Newton Longville Neighbourhood Plan has failed the basic conditions and so, in this basis, should not be taken forward to referendum.

Yours sincerely,

for RPS Consulting Services Ltd



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30 May 2024



BY EMAIL TO neighbourhoodplanning@buckinghamshire.gov.uk

Dear Sirs,

Newton Longville Neighbourhood Plan, Regulation 16 Draft Submission

We respond to the Regulation 16 consultation on the draft Newton Longville Neighbourhood Plan (NLNP).

Policy background

The Vale of Aylesbury Local Plan (VALP) adopted in September 2021 includes various policies that support development over the plan period. These policies include allocations for housing development across the borough and include allocations for development, specifically in Newton Longville, which the VALP classes as a 'medium village'.

The VALP Policy S2 Spatial strategy for growth sets out that:

"The primary focus of strategic levels of growth and investment will be at Aylesbury, and development at Buckingham, Winslow, Wendover and Haddenham supported by growth at other larger, medium and smaller villages.

Strategic growth and investment will be concentrated in sustainable locations as follows:

h. At medium villages, listed in Table 2, there will be housing growth of 1,423 at a scale in keeping with the local character and setting. This growth will be encouraged to help meet local housing and employment needs and to support the provision of services to the wider area. "

The VALP Table 2 states:

"Table 2 Proposed settlement hierarchy and housing development

Medium villages have some provision key services and facilities, making them moderately sustainable locations for development. The plan allocates some sites at medium villages."

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COMPANY REGISTRATION No. 4816246 RIBA CHARTERED PRACTICE



It is clear from the Local Plan that the Council identifies medium villages as being sustainable to deliver additional housing growth. The Plan expects the medium villages to deliver additional housing growth to support, and sustain, the provision of local services. The Neighbourhood Plan should therefore be consistent with spatial strategy and adopt a positive approach to delivering this Policy requirement.

The VALP identifies housing allocations within the medium villages, specifically two sites at Newton Longville at NLV001 and NLV005. These both occur within the Neighbourhood Plan area.

The VALP Policy D2 states:

“D2 Delivering site allocations in the rest of Aylesbury Vale

D-NLV005 Land south of Whaddon Road and west of Lower Rd, Newton Longville

Newton Longville has an excess of suitable HELAA sites beyond a reasonable amount for a medium village, and so the most sustainable site has been selected.”

This site is referred to as the allocation NLV005.

The VALP Policy D3 states:

“D3 Proposals for non-allocated sites at strategic settlements, larger villages and medium villages

Development proposals in strategic settlements, larger and medium villages that are not allocated in this plan or in a made neighbourhood plan will be restricted to small scale areas of land within the built-up areas of settlements. Subject to other policies in the Plan, permission will be granted for development comprising:

- a. infilling of small gaps in developed frontages in keeping with the scale and spacing of nearby dwellings and the character of the surroundings,*
- b. development that consolidates existing settlement patterns without harming important settlement characteristics, and does not comprise partial development of a larger site“*

The above policy recognises the benefits of appropriate scale development within the medium villages that reinforce the settlement pattern and characteristics. The policy states that it will grant permission for developments that accord with these criteria.



The VALP allocation of site NLV005 evidences the criteria acceptable for securing and encouraging housing growth in the medium villages and for accommodating non-allocated development.

The allocation for housing development in Newton Longville at NLV005 is set out below.

“NLV005

Development proposals must be accompanied by the information required in the council’s Local Validation List and comply with all other relevant policies in the Plan. In addition, proposals should comply with all of the following criteria:

- a. The site will make provision **for at least 17 dwellings** [our emphasis] at a density that takes account of the adjacent settlement character*
- b. The site should be accessed via Whaddon Road and be accompanied by a design and access statement*
- c. The site will need to provide for a footpath extension from the site access to Longueville Hall and access to Hammond Park*
- d. A transport statement will be required to assess the developments impact on the highway and where necessary public transportation network*
- e. An assessment of sewerage capacity and/or water supply will be required in consultation with Thames Water*
- f. The development design and layout will be informed by a full detailed landscape and visual impact assessment (LVIA)*
- g. Any proposed development should be expected to provide a buffer to address all boundaries.“*

The above allocation specifically sets out the **minimum** requirements for delivering development on the site. This includes the quantum of development and consideration of the impact on the highways network. The allocation site is defined on the North East Aylesbury Vale plan within the VALP. An extract is included below in Figure A.





Figure A – extract of the North East Aylesbury Vale plan from the VALP

It is evident from the extract above that the allocated site extends along Whaddon Road, to mirror the extent of development to the north of Whaddon Road, and also extends eastwards to adjoin the existing built form of the village.

The Draft Newton Longville Neighbourhood Plan states under Paragraph 3.3:

“S3 Settlement hierarchy and cohesive development - which identifies Newton Longville village as a “medium village” in the hierarchy and provides a target housing number of 52 homes in the VALP plan period (VALP S3 Table 2) with a housing allocation of 17 (Policy D-NLV005 ‘Land south of Whaddon Road’) – which has now been completed.” [our emphasis].

The above statement is incorrect.



Part of the whole allocation has been developed under planning permissions 19/01241/AOP and 20/02996/ADP, and a portion of the site, within the allocation, remains undeveloped. This remains an allocated site within the VALP.

The allocation under NLV005 was for “...*at least 17 dwellings*...” and therefore 17 dwellings was not a restriction on the amount. It was a minimum requirement over the whole allocation.

The allocation NLV005 also remains a current allocation for housing within the current VALP and therefore there remains an extant allocation for housing development, which has currently been excluded from the draft NLNP.

The NLNP must be amended to ensure that it compliant with the conditions the NLNP has set out under paragraph 1.6 to be “...*consistent with the local planning policy*.”

Paragraph 3.2.16 of the draft NLNP refers to the two allocated housing sites within the Neighbourhood Plan area and describes the site’s location within Newton Longville.

Figure 3.1 of the NLNP, illustrates the NLV001 housing allocation from the VALP, however the other housing allocation site at NLV005 is missing from the NLNP figures, and should be included, to ensure that the allocations identified within NLNP are both represented as current allocations relevant to the NLNP. The NLNP must be consistent in its representation of the allocated sites as they are both allocated to bring forward future development.

When bringing forward the NLV005 allocated site, the Highways Authority were consulted on the proposals and the development that was delivered on part of the site specifically included potential access to the remainder of the allocated site. This was included to ensure that the allocated site was served by the minimum number of junctions onto Whaddon Road, to address the NLV005 Policy Allocation criteria and also to limit the impact upon highway safety.

The opportunity to access the remaining part of the allocated site has been offered to the landowners to support their proposals for bringing the remaining allocated site forward for housing.

Strategic growth

The Draft NLNP includes a draft Policy NL5 which seeks to control coalescence with adjoining settlements and preserve the areas of separation to these.

“Policy NL5: Areas of Separation to Prevent Further Coalescence

A. Development will not be supported within the Areas of Separation described in paragraph 6.25 above and shown in Map G and the

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Policies Map, which would lead to further coalescence with adjoining communities, particularly West Bletchley, Newton Leys and Drayton Parslow, along with the approved strategic development Salden Chase (VALP D-NLV001).”

The Policy is accompanied by the Map G (see Figure D), which illustrates the areas to which the Policy is intended to be applied. Whilst the Policy appears to be focussed on the pressures of development arising from Bletchley and the allocation of Salden Chase / Park, the development pressures associated with Drayton Parslow and Mursley appear extremely remote and unfounded.

Mursley is currently developing its neighbourhood plan, and the latest draft in 2024 does propose to extend development up to the parish boundary with Newton Longville and, indeed, seeks to retain its ‘*rural character*’. As such there is no apparent threat or pressure from Mursley to warrant a concern relating to coalescence between the two villages.

Drayton Parslow is not currently in the process of developing a Neighbourhood Plan and is reliant upon the VALP policies to direct development. Under VALP Policy D3, development will be granted where they infill or consolidate the village. Therefore, it is unlikely that development will extend sufficiently to create pressure on coalescing with Newton Longville.

The inclusion of the Policy NL5, to the west of the village, is therefore unjustified, as this conflicts with Policy D3 of the VALP.

Having regard to the VALP Policy D3, the settlement boundary shown on Map O excludes areas of the village that would satisfy the criteria of the Local Plan Policy.





Figure B - extract of the draft Neighbourhood Plan, Map O

It is evident from the attached plan above in Figure B that the extent of the village has been breached to the west by development. It is also evident that the land is substantially defined by smaller parcels, with a large number of these being associated with the existing development in the village. This compares with the larger field pattern that exists to the east, south and north of the village.

The land pattern to the west of the village offers the opportunity to accommodate development that accords with the criteria used to define the allocation of NLV005,

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and also to accord with the VALP Policy D3 to consolidate the settlement. Our client would like to propose that the sites A and B below are considered for development.

Figure D below illustrates the potential development land opportunities to reinforce the settlement boundary and to deliver positive development growth in the village.

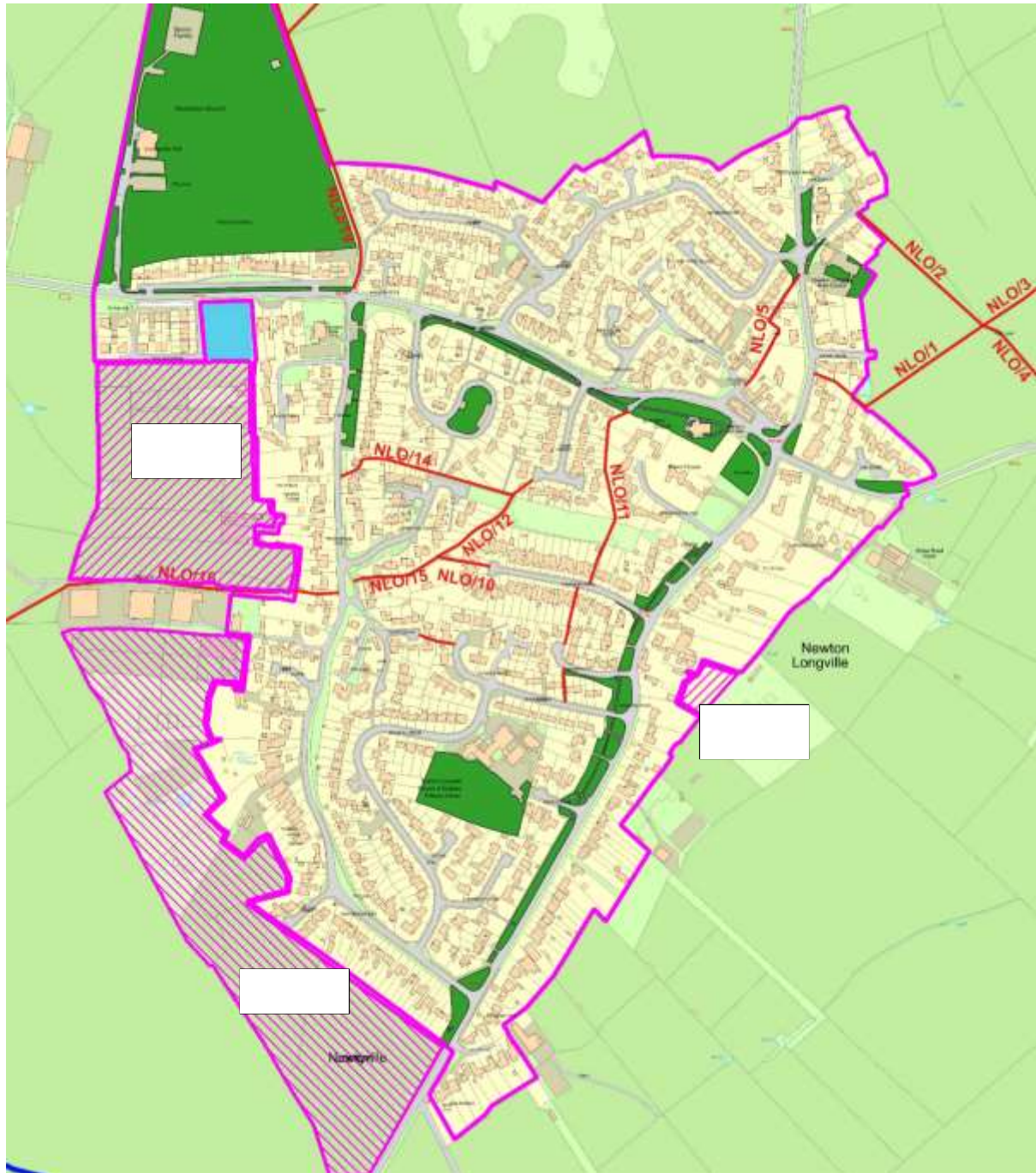


Figure C – extract of the draft Neighbourhood Plan, Map O overlaid with areas of potential development and housing growth to accord with VALP Policy S2 and D3

The areas indicated in Figure C, Sites A and B, above, offer the opportunity to accommodate improved local services and facilities and to improve accessibility to

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these. The area could address the current constraints on the school to expand and grow to serve the local population. The areas also offer an opportunity to create a natural landscaped edge that could form part of a local amenity space strategy that serves the whole of the village.

In consolidating the settlement boundary to the west there is a small parcel to the east that could be considered under the same VALP Policy basis, where the landowner is supportive of the allocation - see Site C.

The areas of opportunity are indicated on the extract of Map G that shows the proposed areas of separation. The Policy NL5 should be amended, as this conflicts with the Policy D3 and has no tangible evidence to support its application to the west of the village.

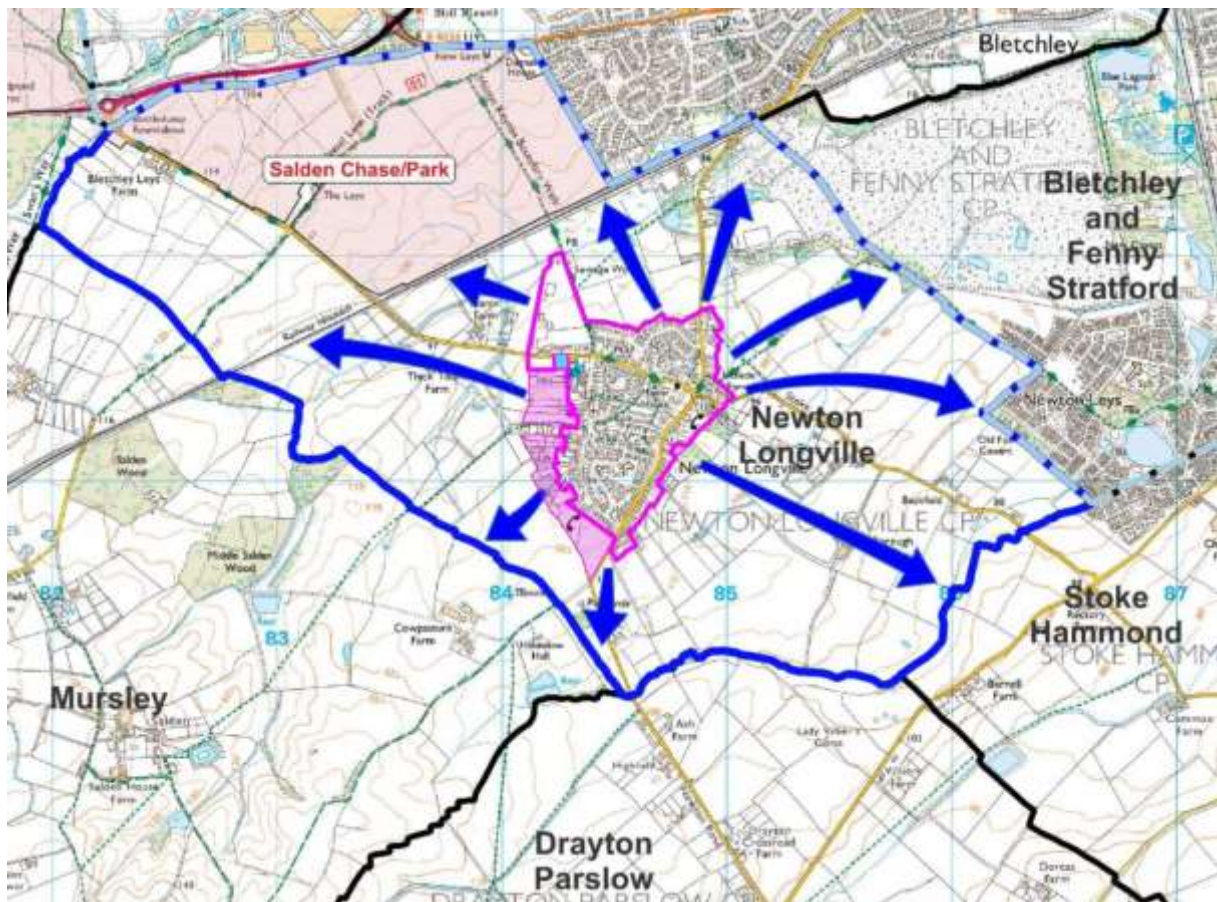


Figure D – extract of the Map G overlaid with areas of potential development and housing growth to accord with VALP Policy S2 and D3 with little or no effect upon areas of separation

The overlay above illustrates that the inclusion of the land to the west would consolidate the villages boundaries and also strengthen its definition as a settlement.

We trust that the above comments will be taken on board to ensure the Neighbourhood Plan is consistent with the Vale of Aylesbury Local Plan and its adopted policies.

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Should you have any queries, or require any further details, please let us know.

Yours sincerely



Julian Buttel BSc(Hons) BArch RIBA



From: [REDACTED]
To: [Neighbourhood Planning Mailbox](#)
Subject: [EXTERNAL] Newton Longville Neighbourhood Plan submission consultation
Date: 23 April 2024 16:40:12

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Sir/Madam

Thankyou for allowing a comment on above plan. I have a bungalow with 1.5 acres land to the rear.

I note that the line that the village is submitting goes to the end of my garden and gives them a say in what I would like to do with my land beyond that line. How about me going to one of the committees house and tell them they are going to have a line drawn halfway down their garden and tell them to come and ask if they want to do anything with it.

We have lived in village 41 years and had problem with a committee member who objected to Bucks County Council removing a dead tree on the roadway outside my bungalow where it was falling on my car and dangerous to my family. He said it has to go through the village committee.

I would like to apply for planning permission to build some quality bungalows and will apply to Bucks county council if and when I decide to do that. These committees have their own agendas and I'm not a fan.

Yours sincerely
David Shepherd

Sent from my iPad

What is your full name?	What is your interest?	What is the name of your organisation ?	Do you support or object to the submitted Neighbourhood Plan.	Please provide your comments, suggested changes or reasons for objecting.
John Careford	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Richard forrest	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Barry Ward Holmes	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Danielle Klar	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Jan Blackhall	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered

What is your full name?	What is your interest?	What is the name of your organisation ?	Do you support or object to the submitted Neighbourhood Plan.	Please provide your comments, suggested changes or reasons for objecting.
ROBERT NORMAN BARNES	Resident	Not Answered	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>GIVEN THAT THE VILLAGE WILL EVENTUALLY BE ENGULFED BY SURROUNDING DEVELOPMENTS (SALDEN PARK BEING THE FIRST) IT IS INAPPROPRIATE TO CONSIDER ANY INFILL DEVELOPMENTS. THE VILLAGE CORE SHOULD BE LEFT FREE FROM FURTHER DEVELOPMENT BUT ENDEAVOUR TO UTILISE SUCH AREAS FOR RECREATIONAL ;AMENITY; AND POSSIBLY GRAVEYARD NEEDS. PLEASE LEAVE THE VILLAGE ALONE.</p> <p>TRAFFIC CALMING MEASURES SHOULD BE INTRODUCED NOT TO ACCOMMODATE HEAVY / COMMUTER TRAFFIC BUT AS A MEANS TO DETER IT.</p> <p>THERE IS NO SUCH THING AS CAN'T BE DONE - ONLY PEOPLE NOT PREPARED TO DO!</p>
Tim Arnold	Resident	Not Answered	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>I support the Neighbourhood Plan and would like to highlight several important aspects that are covered by the plan:</p> <ol style="list-style-type: none"> 1. The need to retain Newton Longville's distinct village character and to prevent its coalescence with the urban area of Milton Keynes. This especially relates to policies NL1 and NL2 (settlement boundary and to policy NL5 (areas of separation). 2. The housing-related policies (principally NL3 to NL6, but aspects of other policies such as NL11 in relation to parking) seem to have been carefully thought-through. The two identified site allocations meet the target identified in the VALP. Taken with the strategic development at Salden Chase, and there is no demonstrable need for other additional housing, particularly not outside the settlement boundary.

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				<p>3. I would also add that the higher proportion of the village's population aged 65+ (see SEA 8.2.2) taken with the higher proportion of existing properties with four or more bedrooms being significantly higher than the target in the VALP (see NP 6.20) fully justify policy NL4 regarding the proportion of new homes to be built with fewer than 4 bedrooms.</p> <p>4. For me, the key visual characteristics of Newton Longville are the conservation area (including the presence of many large mature trees, as well as the buildings in that area), the other listed buildings linking it to its agricultural and small village heritage, and the green spaces. Hence I very much welcome the policies on heritage (NL7 to NL10) and environment (NL12 to NL16).</p> <p>5. I have a particular interest in nature and the environment. Green spaces are important not only for the village character, but also for well-being for people who live there. Moreover - as paragraph 6.57 points out - the parish has a significant number of Notable Species. I know from personal experience that these are to be found within the settlement boundary (in gardens, green and "untidy" spaces around the village including the various off-street footpaths) - but also in the farmland that surrounds it.</p> <p>There has in fact been almost no organised wildlife surveying of much of the farmland in the parish and it is notable that many of the existing records of Notable Species in the parish - particularly for invertebrates - come from the few surveys that have been undertaken in specific non-farmland areas. For example, three-quarters of the invertebrate records in the parish apparently come from targetted work in only three areas (the railway line being reopened by East-West</p>

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				<p>Rail, the former brickworks and a single village garden): it is likely that far more Notable Species would be recorded on farmland if there were any targeted surveys. A similar point applies to bat records: 60% of the total comes from targeted work in certain areas.</p> <p>The likelihood of finding many more Notable Species on farmland in the parish if they were looked for further demonstrates the importance of keeping development within the settlement boundary (NL1 and NL2).</p>
Lauren-Ashleigh Hall	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Michael John Chapman	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	
James Robbins	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Richard Hunter	Resident	Not Answered	I support the submitted Neighbourhood Plan but	Not Answered

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			do not wish to make any comments or suggest changes	
Gillian Hunter	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Ian William Whipp	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Patricia Anne Layer	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Sandra Chapman	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered

What is your full name?	What is your interest?	What is the name of your organisation ?	Do you support or object to the submitted Neighbourhood Plan.	Please provide your comments, suggested changes or reasons for objecting.
Mr Tim Welch	Resident	Not Answered	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>I am supportive of the plan overall and of the following policies in particular:</p> <p>Policy NL5: Areas of Separation to Prevent Further Coalescence I strongly support the intention to: Protect the character and identity of the existing settlement, protect the relationship of the settlement with the open countryside, and protect against the risk of future coalescence.</p> <p>Policy NL6: Climate Change – Energy efficient buildings. I strongly support the intention of establishing best practice to assist in mitigating the effects of climate change.</p> <p>Policy NL13: Public Rights Of Way. I strongly support the intention to create the minimum width corridors for the ecological benefits that will ensue.</p>
Mrs D A Scott	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Mr Paul Hallmark	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
David C Miller	Resident	Not Answered	I support the submitted Neighbourhood Plan but	Not Answered

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			do not wish to make any comments or suggest changes	
Mrs Yvonne Whipp	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Christopher John Collinge	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Emma Young	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Michael Young	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered

What is your full name?	What is your interest?	What is the name of your organisation ?	Do you support or object to the submitted Neighbourhood Plan.	Please provide your comments, suggested changes or reasons for objecting.
Steve Cookman	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Karen Helen Cookman	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Kenneth Goodman	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Sheila Goodman	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Michael Horton	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any	Not Answered

What is your full name?	What is your interest?	What is the name of your organisation ?	Do you support or object to the submitted Neighbourhood Plan.	Please provide your comments, suggested changes or reasons for objecting.
			comments or suggest changes	
Barry Anthony Hardwick	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Pauline Welch	Resident	Not Answered	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Pippa Cheetham	Agent	O&H	I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons	<p>We have assessed both Newton Longville Parish Council's response dated 5 February 2024 and the new evidence provided in the Strategic Environmental Assessment (SEA) by AECOM dated January 2024. Despite these reviews, there have been no meaningful changes and, on behalf of our clients we maintain our previously stated objections to the draft Neighbourhood Plan and wish to re-assert this position.</p> <p>The SEA's "Identification of reasonable alternatives for the Newton Longville Neighbourhood Plan" raises concerns that we would like to address further at the hearing. The Parish Council, along with AECOM, evaluated various site options to determine suitability for allocation in the Plan, concluding that only two sites were reasonable for allocation. However, these sites and the assessment raise significant issues that we believe warrant independent</p>

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				<p>examination.</p> <p>We would like the opportunity to attend the Hearings and to expand on these points. Below are our detailed comments on the Neighbourhood Plan and policies, reaffirming our original objections:</p> <p>Introduction and Background - no comment</p> <p>The Neighbourhood Plan Area - no comment</p> <p>Planning Policy Context - Paragraph 3.4 should be expanded to note that the Vale of Aylesbury Local Plan identifies a second tier in its settlement hierarchy as 'North East Aylesbury Vale' and includes Newton Longville within this area. This is important as its status is reflective of its proximity to Milton Keynes. An additional paragraph should be added after paragraph 3.7 that recognises the fact that the Milton Keynes Strategy for 2050 shows a "possible future long-term development location" within the neighbourhood plan boundary. There is no expectation that strategic growth would be facilitated through the Neighbourhood Plan but it is disingenuous not to acknowledge this in the consideration of the strategic policy context as this document has been endorsed by Milton Keynes City Council and is forming the basis of their New City Plan. The Strategy also indicates a potential new infrastructure link which is locally known as the 'Bletchley Southern Bypass' and this would be primarily delivered through the parish of Newton Longville. Again, there is no expectation on the Neighbourhood Plan to plan around this but it is important to recognise the aspiration as part of the planning context.</p>

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				<p>Vision and Objectives - We suggest that there is a missing criterion from the set of key objectives and that relates to the provision of housing to support a balanced community. The Government's Planning Practice Guidance is clear that Neighbourhood Plans should be used to plan positively for growth and can have a real role in shaping the type of growth that is appropriate for the area. There is specific guidance on how Neighbourhood Plans can support the delivery of affordable housing. An additional key objective should be added along the following lines, "To encourage a balanced community through the provision of different housing tenures to support the housing needs of residents".</p> <p>Consultation Summary - no comment</p> <p>Policy NL1: Settlement Boundary - The use of a Neighbourhood Plan to define a settlement boundary has been established elsewhere in Buckinghamshire but in this instance, the boundary is so tightly drawn that there is no flexibility to actually deliver the required housing growth within it. That is unless the Parish Council has deliberately included the land around Longueville Hall to provide opportunities for a change of use from community to built development? Instead, the Parish Council have chosen to allocate a site on green space within the centre of the village and a further site on the limits of the parish boundary. This makes no sense of subsequent policies to channel growth to within the settlement boundary. Paragraph 6.10 recognises this discord and suggests that growth outside of the settlement boundary is acceptable if it conforms to other policies within the Neighbourhood Plan. It is suggested that if a settlement boundary is to be used that it has areas of flexibility to allow for reserve sites to be identified for future growth.</p>

What is your full name?	What is your interest?	What is the name of your organisation ?	Do you support or object to the submitted Neighbourhood Plan.	Please provide your comments, suggested changes or reasons for objecting.
				<p>Policy NL2: Development within the Settlement Boundary - This a criteria based policy which immediately raises issues about the proposed allocations. Can it be that the Cobb Hall Road site will, “not have any significant adverse impact on environmental assets such as landscape, biodiversity, waterways, open space or other green infrastructure”, which is a specific requirement of NL2c. It is also likely that the Cobb Hall Road site could, “harm the amenities of adjoining neighbouring properties” as set out in NL2f. The Neighbourhood Plan needs to be read as a comprehensive document and so the criteria within NL2 should be reflected in the subsequent allocations.</p> <p>Policy NL3: Housing Site Allocation - It is contended that the Newton Longville Neighbourhood Plan should have been supported by an up-to-date housing needs assessment to establish whether the 52 home requirement set out in VALP continues to be reflective of local housing need. Our evidence suggests that the housing waiting lists in Buckinghamshire are significantly worse than when VALP was adopted and that the Neighbourhood Plan could be doing more to address this problem. The Government’s Planning Practice Guidance tells us at paragraph 009 that, “Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed.” The amount of housing needed in Newton Longville should be re-examined and updated evidence presented. Regardless of the amount, the draft allocations appear to be wholly undeliverable. The Dagnall House site is the subject of a lapsed outline planning permission, and then a subsequent permission for 5 times the original amount, and the Cobb Hall Road site has not yet reached a determination stage despite being lodged with the Council since 2015. A conclusion could be reached that these sites have been chosen because they are unimplementable and the effect</p>

What is your full name?	What is your interest?	What is the name of your organisation ?	Do you support or object to the submitted Neighbourhood Plan.	Please provide your comments, suggested changes or reasons for objecting.
				<p>will be no further growth in the village within the Neighbourhood Plan period. This is not a positively prepared plan and is not meeting the requirements of the PPG.</p> <p>Policy NL4: Housing Mix - support</p> <p>Policy NL5: Areas of Separation to Prevent Further Coalescence - Map F is very unclear. The interpretation is that Newton Longville cannot grow in any direction but the blue arrows shown on the plan do not match the notation in the key. Perhaps the intention of Policy NL5 and Map F is to send a message to future policy makers but we would argue that this blanket approach is unhelpful to plan making. Neither is it based on any qualitative assessment of landscape character which should really inform such an approach. This policy is a blunt tool and not justified.</p> <p>Policy NL6: Climate Change - Energy Efficient Buildings - no comment</p> <p>Policy NL7: The Conservation Area - Map G is very unclear. The interpretation is that Newton Longville cannot grow in any direction but the red arrows shown on the plan are undefined. Again, the intention of Policy NL7 and Map G is to send a message to future policy makers but we would argue that this blanket approach is unhelpful to plan making. Neither is this approach in accordance with the National Planning Policy Framework as there is no requirement to protect the setting of a Conservation Area. Policy NL7, criterion 'c' should be deleted.</p> <p>Policy NL8: Listed Buildings (and/or the associated Appendix 1) - no comment</p>

What is your full name?	What is your interest?	What is the name of your organisation ?	Do you support or object to the submitted Neighbourhood Plan.	Please provide your comments, suggested changes or reasons for objecting.
				<p>Policy NL9: Non-Designated Heritage Assets - Buildings (and/or the associated Appendix 2) - no comment</p> <p>Policy NL10: Other Heritage Assets - Archaeology - no comment</p> <p>Policy NL11: Transport and Parking - no comment</p> <p>Policy NL12: Green Infrastructure Network - no comment</p> <p>Policy NL13: Public Rights of Way - no comment</p> <p>Policy NL14: Local Green Spaces (and/or the associated Annex 3) - It is unclear why the allocated land at Cobb Hall Road doesn't fall into the category of a 'Local Green Space' when some road verges are considered to be of value. The site hasn't even been assessed as to whether it could add value. This is an omission and an oversight given that it is clearly a rare area of green space within the village.</p> <p>Policy NL15: Local Community Uses - no comment</p> <p>Policy NL16: Commercial, Business & Service Uses (and/or the associated Annex 4) - no comment</p> <p>Policy NL17: Employment - no comment</p> <p>Aspiration A: Street Naming (and/or the associated Annex 5) - no comment</p>

What is your full name?	What is your interest?	What is the name of your organisation ?	Do you support or object to the submitted Neighbourhood Plan.	Please provide your comments, suggested changes or reasons for objecting.
				<p>Aspiration B: Traffic Reduction and Traffic Calming - no comment</p> <p>Implementation - no comment</p>
Fae Mackay	Agent	Not Answered	I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons	<p>We have assessed both Newton Longville Parish Council's response dated 5 February 2024 and the new evidence provided in the Strategic Environmental Assessment (SEA) by AECOM dated January 2024. Despite these reviews, there have been no meaningful changes and, on behalf of our clients, we maintain our previously stated objections to the draft Neighbourhood Plan and wish to re-assert this position.</p> <p>The SEA's "Identification of reasonable alternatives for the Newton Longville Neighbourhood Plan" raises concerns that we would like to address further at the hearing. The Parish Council, along with AECOM, evaluated various site options to determine suitability for allocation in the Plan, concluding that only two sites were reasonable for allocation. However, these sites and the assessment raise significant issues that we believe warrant independent examination.</p> <p>We would like the opportunity to attend the Hearings and to expand on these points. Below are our detailed comments on the Neighbourhood Plan and policies, reaffirming our original objections:</p> <p>Introduction and Background - no comment</p>

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				<p>The Neighbourhood Plan Area - no comment</p> <p>Planning Policy Context - Paragraph 3.4 should be expanded to note that the Vale of Aylesbury Local Plan identifies a second tier in its settlement hierarchy as 'North East Aylesbury Vale' and includes Newton Longville within this area. This is important as its status is reflective of its proximity to Milton Keynes. An additional paragraph should be added after paragraph 3.7 that recognises the fact that the Milton Keynes Strategy for 2050 shows a "possible future long-term development location" within the neighbourhood plan boundary. There is no expectation that strategic growth would be facilitated through the Neighbourhood Plan but it is disingenuous not to acknowledge this in the consideration of the strategic policy context as this document has been endorsed by Milton Keynes City Council and is forming the basis of their New City Plan. The Strategy also indicates a potential new infrastructure link which is locally known as the 'Bletchley Southern Bypass' and this would be primarily delivered through the parish of Newton Longville. Again, there is no expectation on the Neighbourhood Plan to plan around this but it is important to recognise the aspiration as part of the planning context.</p> <p>Vision and Objectives - We suggest that there is a missing criterion from the set of key objectives and that relates to the provision of housing to support a balanced community. The Government's Planning Practice Guidance is clear that Neighbourhood Plans should be used to plan positively for growth and can have a real role in shaping the type of growth that is appropriate for the area. There is specific guidance on how Neighbourhood Plans can support the delivery of affordable housing. An additional key objective should be added along the following lines, "To encourage a balanced community through the provision of</p>

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				<p>different housing tenures to support the housing needs of residents”.</p> <p>Consultation Summary - no comment</p> <p>Policy NL1: Settlement Boundary - The use of a Neighbourhood Plan to define a settlement boundary has been established elsewhere in Buckinghamshire but it in this instance, the boundary is so tightly drawn that there is no flexibility to actually deliver the required housing growth within it. That is unless the Parish Council has deliberately included the land around Longueville Hall to provide opportunities for a change of use from community to built development? Instead, the Parish Council have chosen to allocate a site on green space within the centre of the village and a further site on the limits of the parish boundary. This makes no sense of subsequent policies to channel growth to within the settlement boundary. Paragraph 6.10 recognises this discord and suggests that growth outside of the settlement boundary is acceptable if it conforms to other policies within the Neighbourhood Plan. It is suggested that if a settlement boundary is to be used that it has areas of flexibility to allow for reserve sites to be identified for future growth.</p> <p>Moreover, Policy NL1 restricts development outside the settlement boundary to rural exceptions schemes, community uses, or right-to-build schemes. While we appreciate the intention behind this policy, we question its impact on addressing the identified housing needs, especially for young people and older residents. The limitation on the provision of affordable housing to just ‘exception sites’ contradicts the vision for the village's future.</p> <p>We acknowledge that the definition of a settlement boundary in a</p>

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				<p>Neighbourhood Plan provides consistency in planning decisions and allows for the development of 'exception sites.' These sites can facilitate specific types of development, including 100% affordable housing schemes that might not be viable when competing with market housing. However, they are generally 'minor' developments and we suggest that there is room for a more flexible approach to affordable housing provision to better align with the current and future housing needs of Newton Longville.</p> <p>Policy NL2: Development within the Settlement Boundary - This a criteria based policy which immediately raises issues about the proposed allocations. Can it be that the Cobb Hall Road site will, "not have any significant adverse impact on environmental assets such as landscape, biodiversity, waterways, open space or other green infrastructure", which is a specific requirement of NL2c. It is also likely that the Cobb Hall Road site could, "harm the amenities of adjoining neighbouring properties" as set out in NL2f. The Neighbourhood Plan needs to be read as a comprehensive document and so the criteria within NL2 should be reflected in the subsequent allocations.</p> <p>Policy NL3: Housing Site Allocation - It is contended that the Newton Longville Neighbourhood Plan should have been supported by an up-to-date housing needs assessment to establish whether the 52 home requirement set out in VALP continues to be reflective of local housing need, with particular need for 100% affordable housing. Our evidence suggests that the housing need in Buckinghamshire are significantly worse than when VALP was adopted and that the Neighbourhood Plan could be doing more to address this problem. The Government's Planning Practice Guidance tells us at paragraph 009 that,</p>

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				<p>“Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed.” The amount of housing needed in Newton Longville should be re-examined and updated evidence presented. Regardless of the amount, the draft allocations appear to be wholly undeliverable. The Dagnall House site is the subject of a lapsed outline planning permission, and then a subsequent permission for 5 times the original amount, and the Cobb Hall Road site has not yet reached a determination stage despite being lodged with the Council since 2015. A conclusion could be reached that these sites have been chosen because they are unimplementable and the effect will be no further growth in the village within the Neighbourhood Plan period. This is not a positively prepared plan and is not meeting the requirements of the PPG.</p> <p>Policy NL4: Housing Mix - support. The wording to include 100% affordable housing.</p> <p>Policy NL5: Areas of Separation to Prevent Further Coalescence - Map F is very unclear. The interpretation is that Newton Longville cannot grow in any direction but the blue arrows shown on the plan do not match the notation in the key. Perhaps the intention of Policy NL5 and Map F is to send a message to future policy makers but we would argue that this blanket approach is unhelpful to plan making. Neither is it based on any qualitative assessment of landscape character which should really inform such an approach. This policy is a blunt tool and not justified.</p> <p>Policy NL6: Climate Change - Energy Efficient Buildings - no comment</p>

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				<p>Policy NL7: The Conservation Area - Map G is very unclear. The interpretation is that Newton Longville cannot grow in any direction but the red arrows shown on the plan are undefined. Again, the intention of Policy NL7 and Map G is to send a message to future policy makers but we would argue that this blanket approach is unhelpful to plan making. Neither is this approach in accordance with the National Planning Policy Framework as there is no requirement to protect the setting of a Conservation Area. Policy NL7, criterion 'c' should be deleted.</p> <p>Policy NL8: Listed Buildings (and/or the associated Appendix 1) - no comment</p> <p>Policy NL9: Non-Designated Heritage Assets - Buildings (and/or the associated Appendix 2) - no comment</p> <p>Policy NL10: Other Heritage Assets - Archaeology - no comment</p> <p>Policy NL11: Transport and Parking - no comment</p> <p>Policy NL12: Green Infrastructure Network - no comment</p> <p>Policy NL13: Public Rights of Way - no comment</p> <p>Policy NL14: Local Green Spaces (and/or the associated Annex 3) - It is unclear why the allocated land at Cobb Hall Road doesn't fall into the category of a 'Local Green Space' when some road verges are considered to be of value. The site hasn't even been assessed as to whether it could add value. This is an omission and oversight given that it is clearly a rare area of green space</p>

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				<p>within the village.</p> <p>Policy NL15: Local Community Uses - no comment</p> <p>Policy NL16: Commercial, Business & Service Uses (and/or the associated Annex 4) - no comment</p> <p>Policy NL17: Employment - no comment</p> <p>Aspiration A: Street Naming (and/or the associated Annex 5) - no comment</p> <p>Aspiration B: Traffic Reduction and Traffic Calming - no comment</p> <p>Implementation - no comment</p>