

Great Horwood Parish Neighbourhood Plan 2014-2031

CONSULTATION RESPONSES



**Responses to the Consultation held by Great Horwood Parish Council
from 28 April 2014 to 9 June 2014
under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012
(S.I. 637, 2012) and in accordance with EU Directive 2001/42**

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1. Responses from Members of the Public

The names and addresses (or email addresses) of the respondents have been withheld.

001	<p>Both Mr XXXXXX and myself would like to express our support for the Neighbourhood Plan that has been approved by the Parish Council for Great Horwood. Great Horwood is a small village and the proposition to build groups of houses of no more than 15 respects the size and character of the village. The situations of the proposed developments are also in keeping with the nature of the village which has through the years only allowed small outcrops of modern housing to be built within its boundaries. These have flowed very successfully into the original buildings that have historical significance here in Horwood and not jarred the senses as could so easily happen with a development of a larger size.</p> <p>Small building projects, tastefully done in this way would preserve the heritage of this historic village for the next generation to enjoy.</p>
002	<p>Responses have been invited to the consultation of the pre-submission Great Horwood Neighbourhood Plan. This is my response as a resident and not as a parish councillor. I wish to express my wholehearted support for the Plan, which I believe is the best compromise achievable for future development and associated policies for our local community. I welcome the principle of a Great Horwood Settlement Boundary to ensure that future development does not occur into the surrounding green spaces in an ad hoc manner. I also applaud the 3 specific sites chosen for future development as representing the best balance of locations for the village of Great Horwood and the aim for 15 dwellings on each. I also believe that the overall proposal for 45 dwellings which represents a 10% growth in our community over the next 15 years as being entirely sensible and realistic. I would not wish to see any other sites proposing more than one house being approved by AVDC and therefore not incorporated in our Neighbourhood Plan.</p>
003	<p>In response to the circulation of the Neighbourhood Plan, I wish to state my agreement to the proposals therein.</p>
004	<p>Having seen the new proposed building areas, I want to say I approve completely.</p> <p>The village as it is, is rural and that is why we moved here.</p> <p>Having a new build at the edges of the village is ideal. It does not make our small inner village roads congested (or more congested), which they would be if plans to build down Willow Road was accepted. The road down there is narrow, made more so by cars parking on the road. Where can the cars go? The houses and bungalows down there were not built with garages nor drive ways.</p> <p>Having the new houses at the edge of the village would mean [I hope] that space in the form of drives or adjoining garages would be available with each house. Space for cars must be thought about. Many houses have occupants with more than one car, more space IS needed. My own house in Greenway at one time had three cars and a motor bike. Our long drive and garage could accommodate them all. How many new houses can do that?</p> <p>Many new builds have small gardens and no garage, so where do the cars go - on the road. This has happened in Milton Keynes, lovely estates, but no room for cars. Do we want "Milton Keynes" planning, in our village, I for one do not. So yes put new build at the edge of the village, but build with space for more than one car.</p> <p>As a matter of interest, we were told when we moved into Greenway, that the building of our houses was objected to. Then the plans were put forward that the new estate should be at the</p>

	<p>end of the village, so it did not spoil the high street nor detract from the older rural parts. So Greenway and Spring Lane were built, we are part of the village, but the houses do not detract from the rural centre. Let us repeat that historical decision and build at the ends.</p> <p>YES great, the building of new houses at the edge/ends of the village.</p>
005	<p>I am writing to confirm that my husband and I are in support of the Great Horwood Neighbourhood Plan seen and discussed at the public meeting on 30th March. I also attended the Parish Council meeting where the plan was submitted and approved. Great Horwood is a village with a long history and a fantastic sense of community. Having moved to Great Horwood in 1976 we believe any development should be assimilated within the village itself and the natural boundary as far as possible bearing in mind that the increase in traffic will impact upon the centre of the village. The pre-submission proposals map accurately reflects what we think to be the best sites for development.</p>
006	<p>We strongly support the proposed Neighbourhood Plan for Great Horwood. Having reviewed the plans in detail we believe that it has sensitively considered and balanced the need for future housing provision with the wishes of villagers. The plan has considered the stresses that additional housing will put on the village and has attempted to overcome this by creating smaller developments at different locations within the village. Within the plans, there is also obvious concern for creating spaces (such as recreation areas) which will benefit the village as a whole, and care has been taken to ensure that the impact on surrounding properties is minimised. We think this plan is an excellent one in terms of balancing the needs of new housing requirements with the villagers desires to preserve Great Horwood as a rural community. As such, we give our full support to this plan and will definitely vote for the plan when it goes to referendum.</p>
007	<p>Please accept this email as our support for the NPT proposed plan.</p>
008	<p>I write to state my approval of the Great Horwood Parish Plan 2014-2031 (Pre-submission Plan) as detailed on the Parish Website. I consider the the proposals as to housing numbers, location, and general layout at each individual site to be sensible given the external, government driven, stated need for more housing both in this locality and the nation generally, This coupled with what I would see as an absolute priority for Great Horwood to keep its essential character and remain a small country village. The proposal to fit in a small park at the eastern edge of the village between the existing housing and the proposed new development is a good one, however I suggest that although the use of a mini roundabout at the road access point for the development sites onto Little Horwood Road will indeed slow down traffic, a suitably designed pinch point on Little Horwood Road, roughly central to the park road boundary, might be sensible in order to further reduce traffic speeds and also make it easier for pedestrians to cross the road. Finally, in the unfortunate event that any developer achieves planning permission for the mooted large developments at the end of either Weston Road or Willow Road, and before a Neighbourhood plan is finalised, I would ask that the Parish Council still proceeds to complete the Neighbourhood Plan from the point of view of preventing further large-scale developments which will almost certainly be considered inappropriate by the village community as a whole. I understand that without a Neighbourhood Plan the village would still be open to regular forays by development companies endeavouring to build wherever they can.</p>
009	<p>We are happy with the neighbourhood plan as presented, particularly the Nash Road site if it could include a roundabout access from Nash Road which would slow traffic entering the village.</p>
010	<p>I am emailing to confirm my support for the Great Horwood Neighbourhood plan</p>
011	<p>We fully support the Great Horwood Neighbourhood Development plan; it will be more in keeping with the village as it stands now, if you start putting large housing estates in it will no longer look or feel like a village which is unfair to the older residents who have lived in the village all their lives and for the people who bought in to a village location.</p>

012	<p>Without sounding like a NIMBY, the development does seem largely situated at my end of the Village (living at Townsend Cottages). I understand the need for more housing and think that the Nash Road site is ideal, mainly because of the nature of the road it will be built on. The Nash Road is busy anyway and some development along it would hopefully slow the cars down, as people drive incredibly fast along the road. I am concerned about the impact of traffic along the Little Horwood Road which is a lovely, quiet, rural road. Obviously, I am also worried about the loss of the lovely views as you enter Gt Horwood, although I understand that this doesn't have much sway, but I am sure that the additional amount of traffic (60+ cars) would.</p> <p>The future of the village could be that the land along the Nash Road is continually developed over the years, eventually linking the houses at the top end of the Village with the main part. I have a friend who lives at that end and she would love a safe path to walk down into the Village as at the moment with cars speeding down at 60 mph and a narrow footpath it is not a pleasant or safe walk at all. If the Nash Road was developed, nobody would lose their views and it would have only a minor adverse impact on residents.</p> <p>Once our beautiful countryside is built on, that is it - forever....</p> <p>I hope you take my points into consideration.</p>
013	<p>We would like to thank all members of the NPT for the abundance of work they have put in to this extremely difficult project on behalf of the village.</p> <p>We believe that the plan is more in keeping with GH due to its small settlements and being no through roads, therefore safer for families, less, slower traffic, and hopefully less likely to continue building unlike larger developers.</p> <p>However, we'd just like to put our rose tinted glasses on for a minute.</p> <p>Although we'd hate any building out the back of us or indeed the back of anyone, if AVDC were to encourage negotiation, 15 dwellings each on the Willow Rd and Weston Rd sites would seem sensible if done sensitively with decent gardens and parking and landscaping plus the Nash site as this would hardly change the views that we all share, knowing that we may need to put affordable housing via CIB to.</p> <p>Therefore as it stands, we support the GHNP.</p>
014	<p>I wish you to record my support for the Neighbourhood Development Plan as proposed by the Parish Council and as outlined in your Newsletter 3rd May 2014.</p>
015	<p>Having looked at the Neighbourhood Plan (and being involved in it's development through my position on the NPT) Kate and I support the proposal.</p>
016	<p>Happy with the Plan as shown on Newsletter dated 3rd.May. Can you remind me,please, of the number of houses and how many might be small/social?</p>
017	<p>My wife and I support the Neighbourhood Plan.</p>
018	<p>This email contains the feedback on the Neighbourhood plan from myself and my family at XXXXXX.</p> <p>I would like to lodge my objection to:</p> <p>Policy 2: Land South of Little Horwood Road on the basis that:</p> <ul style="list-style-type: none"> • this is outwith the current boundary of the village and would open the door for development into the Little Horwood Parish and extend the village beyond its current

furthest extent.

- this would involve giving planning permission for developers to build on agricultural land but is in current use for growing crops. It is not grazing land (as the other proposed sites are) and is not brown filed land.
- The provision of a roundabout on a small rural road is not feasible, the whole road would need re-development. The surface is very poor and of all the roads in the village, it is the most dangerous in icy conditions. The junction to the East of the village along Little Horwood Road is already extremely dangerous with poor visibility and additional traffic would compound this problem.
- I don't understand what it meant by a 'more strongly defined settlement boundary'? There is already a clear settlement boundary at Townsend Cottages, straddling 15 houses with frontages along Little Horwood Road would make a weaker settlement boundry with the potential being opened up for further development as the site is not contained by an existing boundary (unlike the sites proposed adjacent to Weston Road and Willow Road).
- If such a site was developed despite opposition, I would want a guarantee that this would be a single row development along the line of Little Horwood road with gardens to the rear and not an estate development with a road parallel to Townsend Cottages as this would contradict objective 4.19 'The direct access of the site onto one of the main roads serving the village will enable the traffic movements to be accommodated without major any effect on the amenities of existing local residential service roads. The local community has expressed strong support for the allocation of this site at the March 2014 Community Event. '

Policy 3: Land North of Little Horwood Road on the basis that:

- This area was excluded from the original draft plan due to the fact that it is a nesting site for swallows and swifts – why is this no longer an issue?
- The provision of a roundabout on a small rural road is not feasible, the whole road would need re-development. The surface is very poor and of all the roads in the village, it is the most dangerous in icy conditions. The junction to the East of the village along Little Horwood Road is already extremely dangerous with poor visibility and additional traffic would compound this problem.

However I am less opposed to this site than Policy 2 as:

- it is grazing and not arable land
- it is within the natural boundary of the village
- the provision of a park on land which is already commonly used for recreation is attractive

Policy 4: Land off Nash Road

I strongly support this site and the proposals put forward by the Neighbourhood Plan. This is a far more favourable site than any of the others as it is located on the main road and does not present the hazards of Little Horwood Road.

	<p>Sites not included in these proposals</p> <p>I am aware that outwith the Neighbourhood Plan proposals are being considered for development behind Weston Road and also Willow Road. Both of these sites are more naturally within the village boundary and have a developed interested. While I believe 40plus houses on any site it too many, I also favour one site rather than 3 as I think multiple sites opens up the threat of 'sprawl' development in the future, particularly where there is not natural boundary, as on Little Horwood Road. I would therefore support Nash Road alone, but if this is not able to opffer sufficnet housing to satisfy Aylesbury Vale, then I would support the Weston or Willow Road sites over any sites offered in the Neighbourhood Plan.</p>
019	<p>I wish to give my full support to the GH parish neighbourhood development plan as presented at the consultation on 29 March.</p> <p>I believe this is the right balance of small scale developments, maintaining the heritage of the village and providing more homes for local and incoming residents.</p>
020	<p>I would like to express my support for the current Neighbourhood Plan having read through it on the website. In particular I think 15 dwellings per development site is a reasonable number and I like the priority given to developing traffic-free routes to enable better cyclist/pedestrian access to Winslow's facilities.</p> <p>Having enjoyed living in Spring Lane for over 20 years, I am very much against any large-scale development on the old airfield, but think the new crossrail station, though a great asset to the area, will inevitably increase the pressure for future development there. Having said that, as long as the same principle of small, proportionate development sites can continue to be applied so the village maintains its identity, this may not be such a bad thing.</p> <p>As an additional note, I am something of an environmentalist by nature and would therefore like to see current and future development proposals be from companies that are serious about local energy generation such as Ground Source Heat Pumps, Solar Thermal & PV. Unlike wind turbines, I've seen modern forms of this kind of generation that are virtually invisible but provide clean, renewable energy at source. I'm not in the business, but it makes a lot of sense to me and it would be nice if Great Horwood could take a lead on this in the area.</p>
021	<p>I am writing to say that whilst I wish that the village could stay as it is I realise that this isn't possible and therefore I support the Neighbourhood Plan as the only and best option.</p>
022	<p>I consider the proposed sites acceptable in principle as long as the layout of houses and style of houses is appropriate to the existing architectural form of the village. One assumes that our present sewage works will cope with the extra effluence, and the school will be able to absorb the inevitable number of extra children.</p> <p>In view of movement of children to and from the school, it would be good if the footpath passing near the proposed site on the Nash road could be extended making it possible for children to safely walk by an extended footpath from their houses to school and back.</p>
023	<p>I'm sending this email to register my support of the Great Horwood Neighbourhood Plan which I saw at the presentation in the village hall on 29th March. I think it's been extremely well thought through and is exactly how the village should be expanded over the coming years. I would like to say what a good job the Great Horwood Neighbourhood Planning Team have done.</p>
024	<p>I would like to support the Great Horwood Neighbourhood Plan as outlined on the Great Horwood Parish Council website. I have looked at it and think the plans to expand the village are sensible and reasonable. I do not think it would be in the village's best interests to have additional large single developments such as those proposed by Taylor Wimpey et al.</p>

025	<p>We wish to object to the parish plan as shown on the draft map.</p> <p>Why in a time of food shortages are the parish deciding to use good farmland to build houses when there are three brown field sites in the village which seem to have been discounted for spurious reasons?</p> <p>The end of Pilch lane and that at the top of Winslow road are eyesores and the reasons given for not considering them are nonsense. Pilch lane because cyclists and dog walkers do not want to pass an estate of new houses as if those of us at the "common" end of the village are so lacking in aesthetic values we do not mind viewing them 24 hours a day.</p> <p>As far as the site in Winslow road is concerned we are told it may be of archaeological interest. Of what I may ask? Are they expecting to find the site of King Offa's lost palace or a Roman villa?</p>
026	<p>Following receipt of the circular re the above, I am writing to advise you of my support for the Plan.</p> <p>I will be moving from the village in the not too distant future but believe that by coming up with the plan it will prevent the village from being spoilt.</p>
027	<p>Just an observation on the suggested proposals for the development of new houses in Great Horwood.</p> <p>Several of the developments put forward suggested that they were looking for a maximum of 5 houses, spread over the village. If this is the case these small developments may not attract 106 money from the developer. Great Horwood would get no benefit for the amenities of the village. Larger developments would attract the 106 money.</p> <p>It would be worth looking into, what is the smallest development that would attract this money. As the village has to take new developments then we must get the benefit, otherwise we will be missing out on any benefits to the village as a whole.</p>
028	<p>I came to the Community Event regarding new housing in Great Horwood and I would like to make known that I fully support the neighbourhood plan presented by the Parish council. In my opinion it represents a way of incorporating new housing in the village allowing the community to grow in an organic way. I have grave concerns about a development of 50 or so houses being built at the same time, such as the plan by Taylor Woodrow and similar, and the ability of the village to assimilate a sudden, large increase in residents.</p>
029	<p>I very much liked the plan the Neighbourhood Planning Team presented for Great Horwood going forward and would like to register my support for it. In my opinion the plans to expand the village are measured and reasonable, and considerably better than other proposals which I have seen such as those by Taylor Wimpey etc. Please do keep us updated on any further developments which require our input.</p>
030	<p>This is to let you know that I am in full support of the Neighbourhood Plan, as advertised in their community events held on 29th and 30th March - as it seems to be well thought out, due to the fact that they are smaller scale developments on 3 separate sites, which is more in keeping with the village outlook.</p>
031	<p>This is to show full support and advocacy of the new proposals of sites D, sites G and site F - which are smaller scale and much more suitable for this village and I agree fully with the new proposals by the neighbourhood planning team to deliver this.</p>
032	<p>Just a quick email to say that we support the neighbourhood plan and thank everyone on the team for the work carried out to get to this stage.</p>
033	<p>I am writing to say that Ann and myself give out total support to your neighbourhood plan 100%, and also the areas you chose for small developments look satisfactory. We must try as hard as we can to protect our village from huge developments</p>
034	<p>Please find the attached PDF copy of a letter of objection to the proposed Neighbourhood Plan</p>

signed by 49 village residents. *[NOTE: Some signatories have also submitted separate representations. The petition reads as follows:]*

We the undersigned residents of Great Horwood wish to make known our objections to the Great Horwood Parish Neighbourhood Plan 2014-2031 Pre-submission Plan (dated April 2014) on the following grounds:

The Neighbourhood Plan proposes development of 30 dwellings adjacent to Townsend Cottages in the Little Horwood Road. The following section of the Neighbourhood Plan Pre-Submission Proposal reads as follows:

Section 4: Land Use Policies,
Policy 1: Spatial Plan & Sustainable Development

The Neighbourhood Plan designates a Great Horwood Settlement Boundary (GHSB), as shown on the Proposals Map, for the purpose of containing the physical growth of the village over the plan period.

The Neighbourhood Plan will support development proposals on land within the GHSB provided:

i. they comprise no more than 15 dwellings and land of no more than 0.5 Ha;

The proposal to develop 30 dwellings on the designated site in Little Horwood Road clearly contravenes the NPT's own stated policy to restrict development to a maximum of 15 dwellings. We would question why a development of greater than 15 dwellings is considered to be acceptable on a site adjacent to Townsend Cottages and yet unacceptable in other parts of the village.

We would also question the process by which "approval" for the plan has been reached.

- The promulgated approval for the plan is based upon the results of a single questionnaire circulated at the events in the village hall on 29th & 30th April 2014 (3 hours on Saturday and 2 hours on Sunday).
- Detailed information about the Neighbourhood Planning Teams proposals was not made available prior to the event.
- No paper based information was made available at the event for village residents to take away for study and consideration.
- The questionnaire upon which the approval is based had to be completed at the event and could not be taken away for consideration and returned at a later date.

* We would further point out that subsequent to the event, details of the plan have *only* been made available online, placing at a disadvantage village residents who do not have internet access.

A detailed explanation of the plan has *not* been published in the village's newsletter.

Taking these issues into consideration, we the undersigned feel we have no choice but to voice our opposition to the NPT's proposals in the strongest possible terms.

***Note reference item top of page 2:** This point was included when the letter of objection was drafted based on the fact that the May edition of Great Horwood and Singleborough Focus which carried the announcement of the publication of the NPT's proposal, contained *no* detailed description of the sites proposed and made no mention whatsoever of paper copies of the plan being available.

[A second submission from this resident:]

I am a signatory to the letter of objection to the current Neighbourhood Planning Team's proposals signed by 49 other residents. However, I would like to register the additional following objections to the current proposals:

- **Further development:** The current plan identifies two sites (Nash Road and Horwood Road). These two sites are part of much larger well defined sites and should approval be given for development of these sites, it is highly likely that a developer would successfully challenge any restrictions which the NPT have attempted to impose upon them and we would be faced with a much larger scale of development that envisioned by the NPT. I would quote from an e.mail sent to me by David Saunders on 14th April: *"the idea of proposing a Neighbourhood Plan with a single development that includes our "quota" of houses – as though we could then say that "we'd done our bit" – is a non-starter. The chances of achieving that objective are precisely zero".* Why does the NPT think that *part* developing two sites would offer any better protection from further development than developing a single well defined site? I would contend that it wouldn't, it would make further development even more likely!
- **Sight lines:** The site proposed in the Little Horwood Road would have a massive visual impact on views of open countryside from this part of the village.
- **Amenity value:** Little Horwood Road is extensively used for recreational purposes by village residents (walking, dog walking, cycling etc..). Although not officially footpaths, the fields designated for development are used extensively for dog walking and during the summer are occasionally used by children for ball games. One reason for rejecting development of the site identified in Pilch Lane was that it would adversely affect the amenity value of that area and I would contend that the adverse affect on amenity value of this part of the village would be even more pronounced.
- **Expansion of the village boundary:** The proposed development of the site in Little Horwood Road would of necessity considerably expand the village boundary.

I hope you will take these additional issues into consideration.

[A letter from this resident to AVDC, forwarded by them to the Parish Council:]

Dear Ms Morris

I am unsure whether you are the correct person to be contacting regarding this matter, but if you are not I must apologise and would be grateful if you would be kind enough to advise me as to whom the relevant person/s are.

Please find the attached letter of objection signed by Great Horwood residents expressing their concern in respect of the plan being promoted by Great Horwood's Neighbourhood Planning Team.

The main basis of the objections are as follows (details of the objections are in the attached letter):

- Great Horwood's Neighbourhood Planning Team have proposed limiting development to a maximum of fifteen dwellings per site. However, the plan which is currently being promoted proposes development of a total of thirty houses on a site in Little Horwood Road adjacent to Townsend Cottages, directly contravening the NPT's own declared strategy.
- We would also contend that "approval" for the plan being promoted, is based on

	<p>responses to a single questionnaire which could only be filled in at an event in the village hall on 29th and 30th April 2014. No detailed information about the proposals was made available prior to that event.</p> <p>The lack of clarity as regards what is being proposed by the Neighbourhood Planning Team is reinforced by the following extract from the minutes of the Great Horwood Parish Council Meeting on 14th April 2014:</p> <p>“Cllr Margerrison also liked the document but questioned whether the bigger sites which are currently being proposed by large scale developers should be included. Cllr Mayne added to this by stating the plan was discounting the most obvious site within the village.</p> <p>Cllr Gilbey explained that the landowners of the proposed large development weren’t prepared to reduce the number of houses being built to 15 and therefore these sites hadn’t been included as they weren’t deliverable”.</p> <p>I would contend that if even members of Great Horwood Parish Council are unclear as to the detail of what the NPT are proposing, this must call into question whether the proposals were adequately publicised to village residents generally.</p> <p>Further to this, I feel I need to make the following observation. As you may be aware Great Horwood’s Neighbourhood Planning Team was suspended in 2013 because of the considerable opposition to it’s proposals to recommend Weston Road and two other sites in Horwood Road as the preferred sites for development.</p> <p>The NPT was restarted in the Autumn of 2013 (with a number of new members), coincident with the revelation that Taylor Wimpey was proposing development of forty five houses on a site in Weston Road. Subsequently a second developer (AVHT) proposed development of a site in Willow Road. At a very early stage, the NPT vigorously promoted a policy of restricting development to fifteen dwellings per site. The promoters of the Weston Road and Willow Road sites made it clear from the outset that they were not prepared to reduce the number of dwellings on their proposed sites to fifteen. This effectively meant that these two sites could not be included in the Great Horwood Neighbourhood Plan and therefore if the Neighbourhood Plan were to be adopted, those developments would be unlikely to proceed. The question has been raised by a number of residents as to why the NPT would promote a policy which would invariably exclude the proposed Weston Road and Willow Road developments?</p> <p>I must apologise for contacting you directly on this matter, but I did feel that I should make you aware that there are a number of people in Great Horwood who are rather unhappy with the process currently being undertaken.</p> <p>Should you feel that you need further clarification on any of these issues, please do not hesitate to contact me.</p>
035	<p>I am writing to express my support for the Great Horwood Neighbourhood Plan. I strongly believe that the village should be in control of its own destiny and be able to manage how the land surrounding it is developed to benefit local families. Great Horwood is a beautiful place to live and the building of large 20+ housing estates to raise money for large building corporations will diminish the character of this picturesque example of village life!</p>
036	<p>Just a quick note to give my full support to the Plan. Keep up the good work.</p>
037	<p>I apologise for not being very helpful, but I neither support or object to the current plan. I thought the previous idea of houses from Weston Road to a new development next to Townsend</p>

	<p>Cottages was much better. I worry that any developer might not be interested in building three smaller areas and the planning gain would be diminished. Also, is there a minimum number of dwellings to qualify for some to be 'social housing'?</p> <p>I can only guess at how hard it must be for you to try to 'please' all those who complain, but I would like to thank you all for your commitment, energy and hard work.</p>
038	<p>I wish to support the proposed Neighbourhood Development Plan for Great Horwood for the following reasons :-</p> <ol style="list-style-type: none"> 1. I consider that the proposed size of developments (maximum 15 houses) over a period of years will allow a gradual development of the village which will enable proper integration into the village and for a managed and sustainable development of the necessary services and facilities. It is also likely to provide properties suitable for first-time buyers and also for those wishing to downsize but remain in the community. 2. It is important that the local community should have a say in the development of the village and not be subject to the whims of large commercial developers. 3. It is good that the historic centre of the village designated as a conservation area is respected and that the proposed locations do not detract from the setting of listed buildings or impinge significantly on views of and from the village. 4. It will be of benefit to the village that the proposed location north of Little Horwood Road will be separated from the existing properties by a green space which can provide play facilities in this part of the village. <p>It is regrettable that due to circumstances it is not possible to include the field at the end of Weston Road in the sites proposed in the Neighbourhood Development Plan.</p>
039	<p>XXXXXX and I support the neighbourhood Parish Plan.</p>
040	<p>Having now thought about it for a while, I do have some comments about the proposed Neighbourhood Plan.</p> <p>Firstly, I think it is a shame that the proposal is to extend the boundaries of the village by building on several plots of greenfield land. If there were no alternatives I guess this would be more acceptable. But I think there are alternatives.</p> <p>I think the Willow Road site (proposed as 'The Meadows' - VAHT) offers a better solution because although it is a greenfield development it is also partly infill. And the fact that it is partly infill in my view makes it far less intrusive and damaging than the proposed Neighbourhood Plan sites which purely extend the reaches of the village and in each case are adjacent to existing buildings on one side only. In other words, the Neighbourhood Plan proposed sites really are developments on pure greenfield land and in that sense are more intrusive and a bigger encroachment on our ever-diminishing countryside.</p> <p>The boundaries of the Willows site on the other hand would largely be adjacent to existing developments and utilise an area of land that, in a way, is partly blighted by dint of being largely surrounded by that existing development. And I think it is a far more natural fit as it fills in a gap at the southern end of the village.</p> <p>At the Community Event held on the 29th of March I did take the opportunity to speak to the developer of Willows Road in order to better understand the proposal and I know that he is open to discussions about the number of proposed houses on the site. So I think there is a real</p>

	<p>possibility of the Great Horwood Planning Team working closely with him to deliver something which is in keeping with the wishes of residents. Perhaps it could comprise 30-35 houses, with the remainder (to get to 40 within the 2031 plan period) completed by ad hoc private developments (from information in the pre-submission document about historical developments in the village over recent years, this will be easily achievable).</p> <p>I also think for village residents, this would adversely impact fewer people than the combined effect of the Neighbourhood Plan sites.</p> <p>In summary, I think The Willows Road site is:</p> <ul style="list-style-type: none"> a) less intrusive on the countryside b) would adversely affect fewer people than the combined effect of the proposed Neighbourhood Plan c) is a more natural fit to the village boundary by largely infilling two outlying parts of the southern boundary. <p>And the fact that (unlike the Taylor Wimpey proposal which itself is far far more intrusive on the countryside) the developer appears to be happy to work with the local community and take into account it's needs and wants, in my view makes this the best solution for the village.</p> <p>Lastly, and as an aside, I have always been a strong advocate of development of The Old Mill site next the Horwode Pece at the bottom of Spring Lane. However, having heard a very clear and eloquent explanation by XXXXXX at the annual Parish meeting on the 29th of April, I understand why this is not possible.</p>
041	<p>I would like to register my wholehearted support for the latest plan put forward by the Great Horwood Neighbourhood Planning Team. The plan has clearly been developed with an understanding of the obligation to provide new housing in the village, but has dealt extremely sensitively to the interests of current residents, unlike the current applications put forward by developers, which would have multiple and severe negative effects for a large proportion of the village.</p>
042	<p>I would like to voice my support for the Great Horwood neighbourhood plan and the need for development in the village to be decided by people living in the village. Keep up the good work guys and gals! Thank you for all your hard work on this difficult task.</p>
043	<p>I would like to voice my support for the neighbourhood plan and prefer this of all options.</p> <p>It seems reasonable that those who live in the village ought to be heard when determining its future going forward.</p>
044	<p>i am just writing to say that I am extremely happy with the process and proposal for the Great Horwood Neighborhood Plan that has been established in consultation with all villagers over previous weeks.</p> <p>I do hope that the proposal is accepted.</p>
045	<p>I am writing to advise my approval/ support for the Great Horwood Neighbourhood plan 2014 (three smaller sites), as indicated in the Parish Council website.</p> <p>However I would like to express my one concern for the development entry/ exit road proposed for the Nash Road B4033 site. It is situated right on a deep bend which in my opinion would be a very dangerous location as any car turning right from the exitway would have a complete left blind spot. Plus anyone traveling along the B4033 would not be able to see them entering the road. Also at this location the road markings are presently double white lines for no overtaking, so surely this would not be allowed either under the Highway Code.</p>

	<p>Please also note that right now these double white lines from the roundabout through into Great Horwood are very faded and in need of repainting. As we are trying to calm down the traffic in the village (especially as the mobile speed camera is located on this road) I believe it would be a good safety idea to repaint them urgently. Anyone driving along the road for the first time would find it very difficult to see the road markings in their current condition.</p>
046	<p>We would like to make the following comments re. The suggested housing development on Site G.</p> <ol style="list-style-type: none"> 1. The speed (no effective traffic calming) & volume of traffic in Nash Road would make vehicular access onto the road extremely dangerous. 2. The suggestion of a roundabout would be equally hazardous as it would be on a bend & a hill. 3. A new “contemporary” vista on approaching the village is surely more akin to Milton Keynes than our beautiful village. The view we have of our 14th century Church is surely the view that the majority of residents & villagers would wish to see. 4. The last NPT spent two years meticulously researching the project & Nash Road was always considered to be most unsuitable for the above reasons. When surveys of the village were carried out by reputable builders they also concluded that it was not viable. The new NPT seems to have decided within a matter of a few weeks that it is now firmly in the equation. 5. A “buffer” area has been proposed for Little Horwood Road residents affected by any development but not for the residents of Nash Road who are directly affected. <p>We would urge the NPT to seriously consider these objections.</p>
047	<p>Summary</p> <p>I object to the GHPNP on 2 main counts:</p> <ul style="list-style-type: none"> • Policy 4 is unsuitable as <ul style="list-style-type: none"> ○ The access for both pedestrians and vehicles is very unsafe. ○ There is no consideration given as to the ownership or maintenance of the proposed buffer space. ○ There is a question mark over whether the land actually is available. • The Plan is too prescriptive <ul style="list-style-type: none"> ○ Weston Road and other sites that would be suitable are completely ignored. <p>Detailed comments</p> <p>General</p> <ol style="list-style-type: none"> 1. The site at Weston Road is the only one that does not change the character or appearance of the village. It is completely invisible from the road. Whilst the size of development proposed by Taylor Wimpey is too big, if planning permission is not granted for the 45 dwelling, at some point in the duration of this plan the option on the land will probably expire and the landowner may well be willing to consider a smaller development. The plan as it stands totally excludes any site other than the three proposed. This cannot be

right and it must leave the door open for other eminently suitable sites like this one.

2. In 2.1 the document states that the North Bucks Way/Midshire Way is to the southeast of the village. In fact it enters the village from the north in Nash Road, by the proposed development, and then runs through the centre of the village, leaving from Winslow Road going to the southwest.

Policy 1 – Spatial Plan and sustainable Development

3. The summary says “*New development in the countryside should avoid reducing open land that contributes to the form and character of Great Horwood and Singleborough.*” Policy 4 flies in the face of this.
4. This greenfield site is ridge and furrow, and elsewhere the document comments “*Great Horwood’s historic plan-form has survived well, and the pattern of medieval openfield farming has been preserved in ridge and furrow evident in the fields surrounding the village core.*” Part of this would be lost forever were Policy 4 to be pursued.
5. The summary also says that developments are supported provided “*they sustain or enhance the significance of the special architectural and historic interest of Great Horwood Conservation Area and its setting;*” Policy 4 does neither of these. The field offers open views from Nash Road to the Church and the Conservation area and also affords similar views from the North Bucks Way. Building on this field would destroy the northern approach and setting of the village.

Policy 2 – Land South of Little Horwood road

6. No comment

Policy 3 – Land North of Little Horwood Road

7. It is proposed that the 0.5ha site be used for up 15 dwellings **and** a new public park. This would result in a higher building density than on the other sites.
8. The need for a public park is not demonstrated. The village already has a cricket pitch, a football pitch, a splendid large play area for children in the Pece, there is a village green and open countryside all around.
9. 4.28 says “*The land will be transferred to the Parish Council along with a commuted sum, to secure the ongoing management of the park as provided for by saved Policies GP87 and GP88.*” It is not clear from whom this land and the funds will be transferred. Given the mix of housing proposed it cannot be presumed that it will come from the developer.
10. If the funding for this land and its ongoing maintenance has not been secured, it should not be presented as a done deal in this consultation.
11. 4.26 says “*The development will be located to leave a gap between it and the existing houses in the Great Horwood Conservation Area to the west to sustain the significance of the setting to the Conservation Area and for the visual amenity of the houses around The Close and Townsend Cottages.*” Why has this visual amenity of views over open countryside not been afforded to the houses overlooking Policy 4? Some might say that the excessive consideration being afforded this site reflects where the majority of the NPT live. These proposals **must** be even handed and apply the same principles to all the Policies.

12. It would be far better if the housing in Policy 3 were instead located to the western end of this site, leaving a small gap between it and existing housing for access to the field behind. The development could then stop in line with the eastern boundary of Townsend Cottages and truly provide a gateway to the village.

Policy 4 – Land off Nash Road

13. The consultation says that the land has been made immediately available for development by the landowner, but I am not sure this can be correct.

14. The note of the 14th NPT meeting records that the landowner of Site G is Paul Fello, and the note of the 15th meeting states *"It was agreed to chase Neil Homer again, to request the documentary evidence from Site owner G, stating that his land has been removed from the control of Suffolk Life and that he holds the unencumbered title to the land for residential development."* There is no further note of this having been done, or its resolution.

15. The land Registry entry on 18 May 2014 records the registered owner as SLA Property Company, who bought the land from Mr & Mrs Fello on 25 May 2012. There are two Charges on the title. The first refers to a conveyance of 8 February 1982 and the restrictive covenants therein. I have a copy of this conveyance and it states that one single storey dwelling shall be erected (Russets) and that *"No other building shall be erected on the land hereby conveyed without the previous consent of the Vendors."*

16. The second charge relates to the transfer of the land in 2001 to Mr & Mrs Fello, and says that it contains provisions relating to the payment of additional moneys (to the vendor) as therein mentioned.

17. It would thus appear that Mr Fello does not hold unencumbered title to the land for residential development.

18. A major flaw in the proposed development of this site is access. The proposal has given no consideration to the safety of access for either vehicles or pedestrians. As is stated in the consultation, the *"B 4033 through the village causes traffic, speed and noise problem as it can be used by all classes of vehicles and forms a shortcut between the A413 and A421 avoiding Buckingham"*. This road is at its busiest at the rush hour, which is exactly when people will be leaving in cars to commute and by foot or bicycle to get to the village for the schools.

19. To the north of the site there is a sharp bend in Nash Road that means that cars leaving the site will not be visible to cars and lorries travelling south until very late. Likewise, cars waiting in the road to turn right into the site will be extremely vulnerable. The mini-roundabouts in the wish list of infrastructure proposals will do nothing to reduce this hazard, and accidents are sure to happen.

20. Pedestrians will be even more vulnerable. They will have to cross this very busy road not once but twice to get into the village for access to the school, the pubs and the Village Hall. There is no footpath on the west of Nash Road and even if one were built alongside the site it would come to a halt at the curtilage of the existing buildings 15 Nash Road and Russets, both of which extend right to the roadside. A pavement built outside their curtilage would project out into the road, causing a dangerous constriction and putting pedestrians into the path of the traffic.

21. Thus to get into the village pedestrians would have to leave the site at a blind point, cross

over to the Ernie Ridgeway path, and then cross back over Nash Road again at Chapel Cottage. The crossing point here is equally vulnerable to fast traffic coming round a blind corner from the south.

22. Turning to the actual proposal, 4.30 recognises the trees lining Nash Road to the north of the site, but not those to the south. The proposal calls this *“an embankment along the verge”*. This too is lined with mature trees rather than the grassed embankment suggested.
23. In 4.34 it says *“A new landscaped edge to Nash Road will be created along the embankment and integrated with the design of the buildings”*. These mature trees are an integral part of the rural character of the village along a principal approach, and far more appropriate for the rural setting of the village than new landscaping. It is not necessary to remove them for the housing, and this should be revisited.
24. In addition the Archaeological Notification Area around Manor Farm extends over this tree lined embankment.
25. 4.30 also says that, given the topography of the site, it *“could have elevated views.”* This could only be achieved by having buildings with high rooflines, which would be completely out of keeping with surrounding buildings. The planning permission for Russets explicitly said that it had to be a single storey building, so as not to obstruct views into the village from Nash Road. The principle of low elevations must be observed with any new housing.
26. 4.31 says that the development has the potential to create an attractive informal entrance to the village. As pointed out in the Conservation Area review, 15 Nash Road already forms an attractive entrance to the built area. Unlike Policies 2 & 3, where there are already modern houses, a modern housing development here will not improve on the existing entrance.
27. 4.34 says *“A landscape buffer will be provided between the development and the existing houses to sustain the significance of the adjoining Great Horwood Conservation Area.”* There are several issues here.
28. Firstly there is no mention of who will own this (cf the PC involvement for Policy 3) or who will maintain it. This cannot be left hanging and must be addressed in the consultation.
29. Secondly buildings to the south of this site will overlook every habitable room in Russets, and most habitable rooms in 15 Nash Road. Loss of privacy is given by the Planning Inspectorate as a ground for objection to a planning application. This buffer would have to be substantial and not be used as a play area or public park affording close views into the existing properties.
30. Likewise it is proposed that *“The remaining land to the north will be designed as a landscaped amenity to serve the development and the local community.”* Again, why are the proposals, so explicit for Policy 3, silent as to who will own this and who will pay for its maintenance? There needs to be clarification of what is intended for both these parcels of land.
31. 4.34 also says *“Site layout to consider views; to protect privacy and amenity of existing dwellings and back gardens; and to maximise benefits of south facing gardens and building orientation.”* It is not possible to have south facing gardens and building orientation **and** to protect the privacy of the existing dwellings. Buildings would need to be orientated east west to achieve this, as in the drawings presented on 29/30 March 2014. There needs to be more thought given to this section.

Draft Sustainability Appraisal

32. As in the Pre-Submission Plan, the document states that the North Bucks Way/Midshire Way is to the southeast of the village. In fact it enters the village from the north in Nash Road, by the proposed development, and then runs through the centre of the village, leaving from Winslow Road going to the southwest.
33. There is no indication as to how the traffic light impact assessments were arrived at. They appear to be completely arbitrary. There should be supporting text to explain the assessments.
34. 6.11 says *“Their respective landowners have all committed to delivering development in the form proposed in the policies, including meeting the District Council’s affordable housing policy.”* I fail to see how the landowners can commit to this unless they are all undertaking all the building work as well rather than just selling their land to a developer. This needs to be clarified.
35. 6.21 says , in relation to Policy 3, *“However, given the close proximity of the site to the Conservation Area, the policy proposes that a village park is created on part of the site to separate the development scheme from the eastern edge of the village, thus preserving the setting of the Area. It is also makes clear the need for a future planning application to demonstrate its design will by (sic) in line with heritage asset policy of the Local Plan and NPPF.”*
- The parallel statement in relation to Policy 4 merely says *“However, given the close proximity of the site to the Conservation Area, the policy makes clear the need for a future planning application to demonstrate its design will by (sic) in line with heritage asset policy of the Local Plan and NPPF.”*
36. Why are these two Policies given different treatment? 6.26 must also mention the necessity of a buffer zone to separate the development scheme from the northern edge of the Conservation area, and preserve the character of the conservation area.

In view of the above, I am unable to support the GHPNP in its current form. I am happy to discuss my comments.

048 I am writing to say that we consider that the Neighbourhood plan for housing development in the village is excellent and has my support – and also has my wife, XXXXXX’s support

049 I would like to voice my support for the neighbourhood plan

I believe that the neighbourhood plan is attempting to get the vote of the village people to define a housing development that fits in with the village and fulfills the need of the village for affordable houses.

This plan also attempts to take heed of the governments need to increase housing development but in a way that does not damage a community in the process.

050 I am writing to register my support for the Great Horwood Neighbourhood Plan. I think it is a very well thought out plan and I particularly like the way that green spaces have been incorporated into the plan in such a way that most houses near the proposed development sites would still retain their views of the countryside. I am also very pleased to see that the plan would see new housing split over two areas of the village, rather than all of it being at the east

	end.
051	<p>I would like to take this opportunity to comment on the neighbourhood plan.</p> <p>I do not support the development of any housing above 15 units on any one site. I would support two sites being used for development, but preferably brown field sites rather than green field sites. It seems a shame not to be able to use areas in the village that are currently run down and disused. Additionally, traffic level is a major issue if development were to take place at the end of Weston Rd. If Taylor Wimpey were to develop at the end of Weston Road then it is only reasonable to assume that they would seek additionally to extend their building onto neighbouring land, potentially Nook Park were that to be sold.</p> <p>I strongly oppose the adulteration of this beautiful village and surrounding countryside. This is only happening because of greed rather than need. If we could be assured that a good number of truly affordable properties would be built for the use of local residents' children etc, then the idea would be more acceptable.</p> <p>A large development would necessitate further development to local infrastructure, probably also larger school premises and other buildings required by an expanding community.</p> <p>I trust my comments will be taken into consideration.</p>
052	<p>Whilst we live in Singleborough and area distance away from the proposed developments, we do value the present association with Great Horwood .</p> <p>The extensive work carried out by the Team is to be greatly applauded and the outcome is clearly what we all want and we strongly support the Neighbourhood Plan developed by the Team and are certainly against the extensive developments proposed by Taylor Wimpey and others.</p>
053	<p>My wife and I agree with your neighbourhood plan in its entirety and would much prefer smaller developments than what the developers propose.</p>
054	<p>XXXXXX and I would like to express our concerns over the development of housing access via Willow Road.</p> <p>This building plan is not practical, as Willow Road is mainly for retired people. Willow Road is a very narrow Road with limited parking for people who live here and to have heavy work traffic going through it all day would be extremely dangerous for the residents who live here, also with extra housing in this road it would be nigh on impossible to park and cause heavy traffic on a very small village due to people trying to access their homes.</p> <p>We do not think that there is enough infrastructure in Great Horwood to accommodate this amount of extra housing due to</p> <ul style="list-style-type: none"> Not enough school places No Gp access Very limited bus availability No local shops No piped gas in the village Internet access extremely poor <p>With more cars on the village roads this will cause major congestion from side roads to meet main roads and put more pressure on local people when trying to cross roads, especially for the older generation and families with young children.</p> <p>We just want to say again that extra housing off of Willow Road is totally impracticable</p>
055	<p>Having been residents for 13 years we are very proud of the special village we are a part of. The difficulty we face is being responsible in the way we choose to develop the village over the</p>

coming years. This has to be achieved whilst maintaining the delicate balance of what we have now (the reasons so many of us are very happy with where we live, the environment and the structure of the village) and what we have to encourage to be built over the coming years. If we are not capable of making these difficult decisions ourselves, the decision will be taken out of our hands and decided by others, who will not have the same views or concerns over our village. This is why the NPT was formed and whatever is said or the eventual outcome, it needs to be recognised again that the people who are prepared to stand and undertake this role deserve the thanks of us all. Someone has to do it or it will not be undertaken.

If we only take a short term view, as is the case today, 10-15 years, we are likely to have different decisions to those that we would make if we took a longer term view, say 40 years. If we are concerned about ensuring the village is maintained for the future we should be looking longer term than merely ourselves, shouldn't we?

The danger of the path that has been recommended in encouraging multiple small developments (15 properties) is that we shall have development in the village going on for the next 10 – 15 years and thereafter. This will affect many if not all of us, with earth moving vehicles, delivery trucks, vehicles for all the site workers and so on. This has not been highlighted so far. The other aspect that strikes us is the fact that the two small developments on the Little Horwood Road (opposite sides of the road) at the same location add up to 30 properties – not so small.

If we then take a logical view that the fields stretching from Little Horwood are one of the most beautiful views as one enters our village, this will be irreparably destroyed, for 15 houses. This is very much the thin end of the wedge. It is clear the NPT are stating that they have drawn the "black" line denoting where it permits development within the village boundary. Unfortunately the NPT does not have the authority to follow this through and prevent any construction on any sites around our village, black lines on maps or not. In truth, nor is the Parish Council. So we are effectively encouraging an area of outstanding beauty, we have the benefit of and are responsible for, to be developed for housing. Once permission is given, we are certain that developers will then make a strong and cogent case, for the rest of the fields to be outlined for development. The precedent will have been made and green belt land, pasture land, has been encouraged by our Parish to be developed. It is not realistic to consider we can stipulate that only the small area identified in our plan (about 1/20th off the total) is to be developed, indefinitely. The rest of the fields, owned by the same farmer, will provide in excess of 300 additional properties. This represents approximately 80% of the existing number of properties in Great Horwood.

None of the developments are desirable. So if we were to consider a 40 year plan and accept that over that period of time, to take a responsible view and permit development of properties at a rate of 10% every 10 years in forty years the village would have grown to somewhere in the region of 600 properties. The areas of development could be spread around the village, thus spreading the both the responsibility and the hardship. If we were to focus on reasonable developments at each stage accommodating the majority of the 10% target, we would then concentrate the building work to one of two years in every ten. In taking such an approach everyone contributes, everyone has a share of the pain and we are more likely to retain the landscape that is one element of the beauty of our village. There have been more than five sites considered and debated, many of which could still be possible, if the NPT and the Parish council amended their 15 property guideline.

If we wish our village school to continue to provide a good education for our children and allow them the privilege of walking, cycling to school, safely, if we wish to have the community that has old style village pubs and not large Harvesters you can find in any large town or city, if we wish to maintain the agricultural land surrounding us, we would strongly argue the route we are being taken (many small developments of no more than 15 properties) will not achieve many of these desired outcomes. These decisions will be taken away. We can already see the beginnings of this as Taylor Wimpey and other developers continue to pursue planning permission, despite the lack of support from the NPT. With the new planning laws we are not in a position to prevent

	<p>this from happening. We are therefore encouraging more development than is needed and fighting some of the people we should be managing/working with.</p> <p>The current proposal from the NPT of the two fifteen property sites either side of the Little Horwood Road is not appropriate for the short, mid or long term responsible development of the village.</p>
056	<p>Firstly, we would like to thank you all for the hard work you have put into the preparation of the Neighbourhood Plan, which for the most part we support.</p> <p>We do, however, have one major concern with regard to the Nash Road "site" and that is the access and egress to any proposed housing. The entrance would be on a dangerous bend in an area where vehicles entering and leaving the village and known for high speeds. The pavement stops before Russets and doesn't start up again on that side of the road until way past the proposed development area, thus any children (or for that matter adults) wanting to come into the centre of the village would be placed in danger from the traffic. The road there is too narrow to enable a pavement to be constructed without placing people and property in danger.</p>
057	<p>We support the neighbourhood Plan.</p>
058	<p>As a member of the Neighbourhood Planning Team I fully support the Neighbourhood Plan. I believe it is fulfilling the wishes of the village residents, collected by means of a number of consultations. The majority of the villagers have said that they want small developments of housing, (with a number of affordable houses for the benefit of local village people), spread throughout the village. I believe the plan fulfils these wishes given the number of viable sites available. I also support the fact that through this plan two more green spaces will become of public amenity.</p>
059	<p>I totally support the proposals of the Neighbourhood Plan, or any modification thereto, which restricts development to sites no larger than 15 homes where, whenever possible, the landowner is encouraged, without any financial detriment, to break the development land into portions that enable local builders as well as self-builders and a Community Land Trust to purchase and develop the sites</p> <p>Such development would therefore have local long-term commitment enabling a more naturally diverse development and expansion of the village which is how all villages developed their unique characters. This contrasts completely with the impersonal and short term financial objectives of PLC's whose projects tend to totally change the character of an area and are not suited to gradual development of a village community such as Great Horwood whose plan equates to 45 houses over a 17 year period.</p>
060	<p>This email is to confirm my support for the Great Horwood Neighbourhood plan.</p>
061	<p><i>[Includes comment about an unrelated matter.]</i></p> <p>Regarding the support for the Neighbourhood Plan I am in favour of it and would like to thank you & the rest of committee for the hard work that has gone into it.</p>
062	<p>We would like to register our views about the current proposals for the Neighbourhood Plan and the sites for building new housing. We live on Nash Road and are very concerned to see the latest proposals include building on a greenfield site on Nash Road.</p> <p>The reasons for our concerns about the proposals are:</p> <ul style="list-style-type: none"> * this will change the shape and feel of the village as having the green pastures on the edge of the village gives it a much more rural feel than a growing spread of housing into our precious greenfield sites; * Nash Road is a very busy road and despite recent deployment of the mobile speed monitors, the traffic goes very fast beyond the 30 mile limit. Adding additional traffic and complexity (from

	<p>the entrance to the new housing)will increase the risks from the road; * the scale of the development on Nash Road looks a significant size and bigger than that proposed in other parts of the village, which is a shame as it is one of the most visible and open parts of the village; and * it seems likely that the proposals for just 15 houses will not be the end of the proposals for Nash Road and developers will look to keep extending the development as there is space to keep extending.</p> <p>We would add that we were surprised to see how strongly the proposals are being put forward as the only viable option when we have never seen any previous proposals for Nash Road and have not had a chance to consider this idea before now. We believe there are other options to build on Winslow Road or off Little Horwood Road, which are preferable options.</p>
063	<p>If the south side of the Little Horwood Road is to be developed [Weston Rd, Nook Park, Willow Rd] then a loop road from Townsend to the Winslow road will become necessary as the existing Little Horwood road is too narrow to provide safe access to and from the village. If this road is built, why not continue it across the derelict RAF site and around Pilch lane. Given that the brown field site of the old airfield will one day be developed, Great Horwood will then become a suburb of Winslow.. ETC ETC</p> <p>If we wish to remain a village community support for our neighbourhood plan is essential.</p>
064	<p>The prospect of a possible 150+ houses being built in the village is just crazy! Where is all the infrastructure to support these houses. The school couldn't cope , we can't get an appointment at the doctors at present , so what is happening about a new doctors surgery? Are the bus routes going to run more often through the village? The sewage works struggle now, so with additional housing it would be like going back to the dark ages. I also think any future development in the village should be spread around the village and not just on one site. As a long time resident of the village I appreciate the need for extra housing, but is this going just a bit to far! Great Horwood is and should remain a village for those wanting to live a quiet, peaceful existence. If 150 houses are to be built, Great Horwood will become a small town, with busy roads and noise, forcing the elderly and those people wanting a quiet, peaceful existence to leave their homes of many years. The community spirit will be gone forever. Do the planning team know what is happening in the surrounding villages regarding extra housing or is it just Great Horwood that has been earmarked for building?</p>
065	<p>Please accept this email as confirmation of my support to the Great Horwood Neighbourhood Plan as this is in keeping with the results to the responses and intent to the surveys of the original Parish Plan. These responses should be referred to and considered as the primary needs of the village, including the duration of the growth and required supporting improvements to utilities and amenities.</p> <p>The Parish should also consider the downgrading of the village that is assumed by the district planners as the facilities, utilities and amenities are completely unsuitable for large scale development and therefore unattainable.</p>
066	<p>I would like to register by support for the neighbourhood plan. I strongly believe the local community are the only people who can make the correct decision about where new house can be placed and how many, to maintain the integrity of the village and it's future.</p>
067	<p>I am emailing you to confirm our entire family's support of the Great Horwood Neighbour Development as submitted.</p> <p>Proposals now submitted for Taylor Wimpey would be a disaster for everyone - increased</p>

	<p>housing would drastically change the landscape and negatively effect the lives of the community who have diligently and lovingly brought together a rare village of great character.</p>
068	<p>I am writing to register my support for the draft Neighbourhood Plan - although it is not completely unqualified:</p> <ul style="list-style-type: none"> · I do recognise as valid (vis a vis the 'only 15 houses per site' claim) an objection already raised – that the two sites off Little Horwood Road are close enough to each other to be considered one site (and therefore a development of 30 houses). However, if the Spatial Plan can be adopted to reduce the risk of further development of these areas, I support these two sites. · I am quite concerned about the likely problems of increased traffic congestion and parking that the two Little Horwood Road sites pose for the Little Horwood Road. I can only anticipate a difficult and dangerous situation getting worse. I would certainly want to see the imposition of strict parking restrictions along the Little Horwood Road. However, I do recognise this as a general village problem. <p>I would like to thank all of those responsible for developing the Plan on behalf of the village residents.</p>
069	<p>Although ideally I would rather there was no further development within and around Great Horwood, I wish to declare my support for the Neighbourhood plan for the following reasons.</p> <ol style="list-style-type: none"> 1. A fifteen house limit per site will mean there won't be mass development or large estates. 2. Having sites in different parts of the village will help to spread the traffic flow. 3. The village will be kept compact. <p>Thank you for all the work the Parish Council is doing on behalf of the village .</p>
070	<p>I would just like to mention that I support the 3 designated areas, proposed by the Great Horwood Neighbourhood Plan, suggested for a maximum of 15 dwellings each on sites of no more than 0.5 ha with a mixture of affordable homes.</p> <p>I realise that we will have to build a few more houses in Great Horwood, but I strongly disagree with any sites having in excess of 15 dwellings, particularly the one which was suggested off Willow Road with many more than 15 houses. This will lead to a complete excess of traffic movements in this narrow lane and on to the Little Horwood Road, with far too many vehicles in this part of the village. Willow Road already has cars parked all along one side of the road, only allowing for one way traffic.</p> <p>These proposed developments should be on the edges of the village, thus taking the vehicles out of the main Conservation Area and so as not to retain the Conservation area as just that. I do not wish the heart of the village to be ruined and we need to keep this area safe for children and elderly residents.</p> <p>This village cannot support huge influxes of inhabitants. The village school will not be able to take in all the children. The local doctor's surgery cannot cope currently, let alone with many more local residents. There is no village shop.</p>
071	<p>I would like my strong support for the Neighbourhood Plan for Great Horwood to be registered. Having reviewed the plans in detail I believe that it has sensitively considered and balanced the need for future housing provision with the wishes of villagers. The plan has considered the stresses that additional housing will put on the village and has attempted to overcome this by creating smaller developments at different locations within the village. Within the plans, there is also obvious concern for creating spaces (such as recreation areas) which will benefit the village</p>

	<p>as a whole, and care has been taken to ensure that the impact on surrounding properties is minimised. I think this plan is an excellent one in terms of balancing the needs of new housing requirements with the villagers desires to preserve Great Horwood as a rural community. As such, I give our full support to this plan and will definitely vote for the plan when it goes to referendum. Please note, that my wife (XXXXXX) has already registered her support for the Plan and noted that I support the plan too. I write this note to ensure that both my wife and I's support of the plan is registered separately.</p>
072	<p>Please accept this email as confirmation of my support for the proposed Neighbourhood Plan for Great Horwood. The plan of three relatively small development plots in the locations proposed is the most pragmatic and reasonable approach to the development of the parish over the next few years that I have seen thus far. By contrast, the proposal for such a dense development of houses by Taylor Wimpey in one location at the West end of the village is, in my view, ill-conceived and certainly not in the best interests of the community as a whole.</p>
073	<p>Further to the information provided at the recent Community Events, I wish to express my strong support for the proposed Neighbourhood Plan. The three smaller, less obtrusive developments of about 15 houses make much more sense than one (or more!) major developments such as the one proposed by Taylor Wimpey, or a hotch-potch of ad hoc opportunistic "garden filling" by landowners. The latter will result in the village losing its identity and character.</p>
074	<p>We would prefer houses to be built on the Nash Road site and Opposite the Close off the Little Horwood Road.</p> <p>We oppose the Taylor Wimpey Development behind the Close.</p>
075	<p>We confirm that we are in support of the Great Horwood Neighbourhood Plan.</p>
076	<p>We would like to register our opinion, that as a family who have lived in Great Horwood for nearly 20 years, we do not wish to see the village character changed significantly. Great Horwood is a wonderful village, with a great community. Whilst supporting the view that the village must grow and move on, we believe that this should be achieved within the context of a small village, and not with any development which would fundamentally change the village culture.</p> <p>Therefore, we would add our support to the view that the Neighbourhood Plan (a well researched and thought through proposal) is the best route forward for the village and not any alternative plans, put forward by large scale developers.</p> <p>Village in fill must surely be the best way forward, and not the construction of a small estate in one part of the village.</p>
077	<p>We would like to voice our concern about the proposed plans for the village extension.</p> <p>We are aware the the village will have to grow however it should not be to the detriment to the feel of the village.</p> <p>It is already seeing more cars coming through from Winslow and if we put more houses in the village the traffic will be terrible. Therefor we think the best place for more houses would be on Nash road as the traffic would go directly onto the already busy A421. We moved here eight years ago because we liked the small quiet village, we along with everyone else want it to continue to be just that.</p>
078	<p>The comments below form my considered response to the Pre-Submission Plan ("the Plan") and to the Draft Sustainability Appraisal ("the Appraisal") together with their evidence bases and supporting maps.</p>

SUMMARY

The Plan is clearly the result of an intensive effort, and has many merits. However, while many of the Plan's arguments are cogent and valid, the resulting conclusions are not. The Plan suffers from several blind spots, particularly relating to potential housing sites and the virtual absence of proposals to address community matters other than housing. In particular, the perverse exclusion of the site to the south of Weston Road substantially undermines the credibility of the Plan and denies Great Horwood an opportunity to contain and define future village development.

GENERAL

The team is to be commended on the production of the Plan and Appraisal under many difficulties. Comments on both Plan and Appraisal are set out below. Where no comment appears the relevant paragraph(s) are at least acceptable. Other than in relation to the site to the south of Weston Road I make no comment on possible development sites not listed in the Plan, the implication being that none are believed to be suitable. Also, I make no comment on the conformity of the Plan or the Appraisal with current regulations or guidelines. The Plan documents would benefit from more stringent proof-reading e.g. Plan para 2.8 line 3, and Appraisal para 6.26 line 3, and also from a clearer paragraph numbering scheme (especially in Chapters 4 and 5 of the Plan, where the policy numbering interferes with the paragraph numbering).

THE PRE-SUBMISSION PLAN

1 Introduction

1.11 The process appears not to have been entirely open or transparent. The "Groups of local residents" which were "established to review and agree which issues should be addressed by the plan" were not the result of any public invitation; the selection process for these groups has not been specified; their views cannot be treated as representative of the community at large.

2 State of the Village

2.1 The North Buckinghamshire Way and the Midshires Way continue to the north of the village. The former runs for 35 miles (56km) from Wendover to the Northamptonshire boundary north of Milton Keynes. The latter is a long-distance footpath and (in parts) bridleway that runs for 230 miles (370km) through the Midlands from Bledlow to Stockport, Greater Manchester.

2.7 The "special history" of Great Horwood includes highly detailed and extremely rare (because almost complete) manorial records that have allowed the village to be used as an exemplar of national importance relating to medieval life and governance. These records relate, among many other matters, to medieval and later land use patterns, evidence of which is preserved in today's landscape. For example, the land to the north of Little Horwood Road formed part of Stocking Common, one of the parts of the lord's demesne which (in a remarkably early act of community solidarity) the villagers of Great Horwood collectively leased on 13 May 1320 and which remained in community ownership until the enclosure of 1842. It would be a widely-regretted tragedy if these landscape relics were to be put at hazard.

2.8 These comparisons are not always useful. A rural village is bound to differ substantially from the English average, encompassing as that does cities and towns of very different character. This point should be made when introducing this demographic data since such comparisons should not be used to compel Great Horwood to descend to the average.

2.16 It would be helpful to indicate which part of the SHLAA is referenced.

2.17 The Strengths section should emphasise more strongly the built and natural environment, since these are high among the factors that draw people to Great Horwood. Instead of “rural location” the entry should say much more about the countryside, the fauna and flora (in non-technical terms), the footpaths and walks, the peace and quiet. Instead of “well defined conservation area with many listed buildings” the entry should say much more about the architectural heritage, both in building terms and in terms of the historic links, and about the townscape and overall atmosphere. Great Horwood Past & Present has much material which could be used. Overall, this section should “sell” Great Horwood by emphasising those aspects that are special or even unique rather than those that can be obtained in many other places.

The Opportunities for the GHPNP section should not give the impression that the community is waiting for planning-related or development-related funding before considering village investment to improve community facilities and amenities. This would indicate that Great Horwood would welcome large-scale development because it would bring funds to the village, which is not true, and that the Parish Council does not intend to devote any attention to other ways of funding improvements, which may or may not be true.

The Challenges for the GHPNP section mentions public transport in connection with a possible Winslow station on a possible East-West rail link. This matter does not appear to be addressed in the Plan.

2.24 The objection to Great Horwood’s designation as a “large village” is a long-standing one. I wrote at length on this in 2007, putting forward the identical arguments used in the quoted document Aylesbury Vale Settlement Hierarchy Assessment: A Critique (2014).

3 Vision & Objectives

3.1 I am pleased that the Plan includes a version of my Parish Plan vision from 2006.

3.2 Measures can be applied to all activities or projects. To say that “No targets have been set for these indicators” implies that there is no clear idea of what the indicators, or even the objectives, are.

3.2.1 I applaud the inclusion of the phrases “small village” (see above) and “future housing needs of the parish”. It is not the responsibility of the GHPNP or the Parish Council to provide for anyone else’s housing needs.

3.3 No objectives are in fact specified in the Plan to address “economic, social and environmental issues” other than housing. In this respect the Plan is seriously deficient.

4 Land Use Policies

Policy 1

It is difficult to avoid the conclusion that the detailed content of Policy 1 (the extent of the boundaries of the GHSB area) was devised to accommodate Policies 2, 3 and 4 rather than the other way round. The boundary goes well beyond the current settlement boundary to the east; this could have been encouraged by the SHLAA designation of land to the south of Little Horwood Road (SHL/GHW/014) although this may in itself be mistaken (see below), but the extension to the north of Little Horwood Road satisfies neither the SHLAA criteria nor the clear opinion of almost 50% of the villagers.

It has been clear for a number of years that the most eligible site within the village for housing development of more than a handful of houses is the field immediately to the south of Weston Road (SHL/GHW/013). Yet the Plan wilfully ignores this site, excluding it from the GHSB and not proposing a development policy for the site. Please refer to the Great Horwood Community View document of November 2011, which reflected the views of the community as ascertained through the October 2011 door-to-door survey. This states at Q2.c “Almost half the residents (48.8% of respondents) believe that any new housing should be inside the village perimeter”. At that time it was also clear that the Parish Plan Steering Committee, the forerunner of the Neighbourhood Planning Team, and the Parish Council saw “... sites such as the end of Weston Road as appropriate and concur[red] that new housing development should where possible be within the present village perimeter, without creating crowded “back garden” developments due to over-intense infilling. The exception to this is that the present open space to the south of the High Street should be retained.” These statements have not, to my knowledge, been refuted. The fact that a commercial developer is at this time seeking planning permission for this site should not be seen as a bar to its inclusion in the Plan, although not necessarily to the same extent or dph density as sought by the developer. A failure to include this site within the GHSB and to prepare a policy comparable to Policies 2, 3 and 4 for the site is likely to lead to the Plan being viewed as no more than an attempt to prevent commercially-led development of this site. The Planning Inspector will rapidly see that the evidence base and the layout of the village lead inevitably to the conclusion that the site is by some margin the most suitable development site in Great Horwood, and may therefore view the remainder of the Plan as nimbyism and not in the interests of the community as a whole. In order to avoid charges of nimbyism it might be sensible for the Neighbourhood Planning Team to make it clear whether or not they have any interest (in terms of adjoining or neighbouring properties) in site SHL/GHW/013 or in any of the sites covered by Policies 2, 3 and 4 or in any other site that may currently be the subject of formal or informal development proposals. However, having said this, the Plan should include conditional proposals to address the possibility of the commercial proposal at SHL/GHW/013, or any other large-scale proposal, being approved so as to downgrade or eliminate other proposed sites (as per Policies 2, 3 and 4). This would be designed to avoid the Plan being seen as a licence to burden Great Horwood with the number of new dwellings suggested by the policies in addition to those consented to elsewhere.

4.6 The point should be explicitly made that a 10% growth in the number of households is likely to be substantially in excess of that deriving from intrinsic (within the parish) population increase and that the excess will be absorbed by extrinsic (persons moving from elsewhere) growth. The community of Great Horwood must not be put at risk by extrinsic growth.

4.9 Although I agree that the settlement hierarchy is incorrect (see above), it would be unwise and unsafe to rely upon AVDC altering the present designation of Great Horwood as a “large village”. The Plan should therefore include a contingency element to allow for the possibility of the current designation being upheld. Heads in the sand do not help vision.

Policy 2

Although shown as “suitable” in AVDC’s 2013 SHLAA, this site is in fact distinctly undesirable on several counts. It extends the natural built boundary towards the east, creating an unsightly ribbon development. It would show up as a mass on the ridge in longer-distance views (it’s important to remember the views looking into the village as well as those looking out). It would create an enormous temptation to put in place a link between this area and the likely development south of Weston Road.

Policy 3

This suffers from the same ribbon development and long-distance views defects as Policy 2. However, because the western half of it complements the existing building south of Little

Horwood Road it does not obtrude as much. More acceptable would be to allow a squarer space based on the western segment, with no eastern segment at all. A modified Policy 2 would be acceptable. The “village park” element is unnecessary and only included to satisfy the criteria for acceptability of the Plan. An additional structured open space would place a further burden on the Parish Council and divert available funds away from the established Horwode Pece.

Policy 4

It has been suggested that the area proposed is too far out of the village. In fact it is close to the area (on the opposite side of Nash Road) occupied by cottages until their post-war demolition. This site is certainly suitable.

5 Implementation

5.2 It is important to be clear about the difference between “proposals” that are simply aspirations (merely hopes, with varying degrees of vagueness), and those are intentions (real plans, with defined deliverable end products and time-scales). The Plan should include intentions and exclude aspirations.

Proposal 1

Please note my comments at 2.17 above in connection with Opportunities for the GHPNP. In more detail -

- (i) The School currently has adequate unfilled places to accommodate the population increase that would result from the Plan;
- (ii) What evidence is there that mini-roundabouts “improve traffic flow”?
- (iii) How is this to be enforced?
- (iv) How is this to be provided, given the multiplicity of landowners?
- (v) There have been many such proposals over the years. The key lies in persuasion of the landowners; the expenditure is small;
- (vi) This is not something that any Great Horwood entity can deliver.

It would be good to see more proposals that would benefit the community e.g. measures to enhance employment opportunities, to encourage the provision of additional or revised public transport links, to facilitate improvements to the Village Hall, etc, etc. There are doubtless many other possibilities; refer to the Parish Plan.

5.12 This would provide too much latitude to the Parish Council to infringe the GHSB or any modified version thereof.

Annex A: Schedule of Evidence

It seems odd not to have taken account of the Whaddon Chase Community Green Infrastructure Plan (2010).

THE DRAFT SUSTAINABILITY APPRAISAL

4 Overview of the Parish & its Environment

4.6 (Box 9) The statement that “Great Horwood is within the top 50% of most deprived areas ...” is essentially meaningless. The “top 50%” includes half the country. There would be little shame in being in the top 49% but much in being in the top 5%. The statement doesn’t tell us. (Box 10) The question of adequate infrastructure to support local businesses is not addressed in the Plan, apart from a superficial reference to broadband.

	<p>5 Developing a Sustainability Appraisal Framework</p> <p>5.3 (Box 5) As noted, matters related to employment are not addressed in the Plan. (Box 11) There are no proposals related to biodiversity in the Plan.</p> <p>6 Predicting & Evaluating the Effects of the Plan</p> <p>6.9 This acknowledges that the GHSB extends beyond the existing settlement area. It also claims the "... strong desire of the local community in accepting development is for the Neighbourhood Plan to allocate a number of small sites ..." yet ignores the equally strong desire of the local community that development sites should remain within the village perimeter (see the comment relating to Policy 1, above).</p> <p>6.15 What is a "stronger gateway"? And why is it a good thing? (same comment at 6.19)</p> <p>6.21 Great Horwood does not need a village park. See the comment at Policy 3, above.</p>
079	<p>In response to the newsletter 4 we would like to voice our objection to building by Taylor Wimpey at the bottom of Weston Road.</p> <p>We feel that if we have to have further building, of more than individual houses, in the village then the preferred site would have to be at the end of the village on the Little Horwood Road.</p>
080	<p>We confirm that we are FULLY SUPPORTIVE of the overall NEIGHBOURHOOD PLAN. We have no wish to be dictated to by large housing developers !</p>
081	<p>I write to express my support for the Great Horwood Neighbourhood Plan. As a resident of Weston Road, I strongly feel that the plan to build an estate of 45 houses at the end of a road which currently only has 16 houses is wholly inappropriate. The Plan outlines several sites around the village which could be developed with smaller pockets of housing which would be far more in keeping with the village layout. I would be in support of smaller developments – let's not destroy another section of our ever-diminishing green and pleasant land.</p>
082	<p>We are writing to express our objection to Taylor Wimpeys planned application to build 45 houses at the end of Weston Rd. After attending a meeting in the village hall and speaking to a representative from Taylor Wimpey we were left with the impression that the proposed development has not been conceived with the interests of the village or village residents in mind.</p> <p>We would however be very much in favour of adopting the neighbourhood plan developed by the Gt Horwood Neighbourhood Planning Team. Their proposal has been formulated after close consultation with the village residents and is therefore indicative and sympathetic to the views of the majority of the village residents.</p>
083	<p>Regarding the Neighbourhood Plan for Great Horwood we believe that the number and types of homes should be decided by the wishes of the residents rather than the developers and all alternatives should be looked and given due consideration, including any genuine brownfield sites that are available in the vicinity of the village.</p>
084	<p>Please note that I support the current proposals for The Great Horwood Development Plan as described in the Planning Team Newsletter 3 distributed in May 2014.</p> <p>I think the three specified locations, offering mixed housing in limited numbers, allow reasonable village development with good access to exiting through roads. The provision of park areas appear to provide a sensible buffer to the existing households that back on to the new proposed developments.</p>

085	<p>I don't want to go into enormous detail but would like to make a few comments on the current proposed plan.</p> <p>Firstly I feel that some of the proposals are based on hypothesis. For instance there is no firm decision on the East-West rail link, there is no possibility at the moment of there being any extra bus services through the village and although some villagers have expressed an interest in there being a shop it will be very much in the future. As for local residents being able to get jobs on any of these new developments I think that this is unlikely to be the case except perhaps in exceptional circumstances.</p> <p>Secondly I feel that some of the proposed sites would encourage more ribbon development. I am happy with the more central site (western section only), marked in blue on the north side of Little Horwood Road but not the site marked in red on the south side of Little Horwood Road as it is extending the current building line of the village. I do however appreciate that these sites would cause much less disruption and traffic nuisance within the village.</p> <p>The site in Nash Road is also outside the current village building line but in the past there have been cottages there. Again this site, although its entrance would have to be carefully designed so as to make it easily seen by traffic coming in both directions along the B4033, would cause less disruption within the village. The only thing that worries me about this site is its proximity to the A421 should Milton Keynes expand in this direction. Not likely at the moment I know but who knows what could happen in the future.</p> <p>I feel that the site at the bottom of Weston Road should not be entirely discounted. It has been ear-marked for development for many years but obviously not on the scale that Taylor Wimpey are proposing. On the scale that Taylor Wimpey have in mind it would not only ruin the character of the village but cause enormous traffic and environmental problems for the residents during its construction. I realise that the Neighbourhood Planning Team is between a rock and a hard place on this!</p> <p>Finally I would just like to thank the members of the Neighbourhood Planning Team for all their hard work. I trust that the vicious rumour that has been spread around the village regarding the sale of Nook Park has not had the desired effect of undermining their efforts. I find it extremely sad that anyone in the village has sought fit to cause such upset to Mr and Mrs Tapsell and the residents of Nook Park.</p>
086	<p>I am disappointed with the current neighbourhood development plan for Great Horwood. It appears that the majority of the preferred development space is at the eastern end of the village around the Little Horwood Road. This is complete madness, as all access, both for construction traffic and eventually (God Forbid) the Occupiers (2.2 vehicles per household) will be via a severely constricted village street. This proposal is a slap in the face for those residents that pointed out to the NPT that there were brown field sites in the village, i.e. the Spring Lane Mill, and the old Nissen Huts on the Winslow Road, as well as other sites off Pilch Lane which were better suited to development – with all of these sites having better access to the main thoroughfare through the village. Really the problem here has been the fear in the past of the PC allowing infill development, including objections to houses near to the village hall and objections to development behind 12 The Green. The answer it seems was just to add these two sites into the village conservation area – really why! It is shamefully that greenfield sites off the Little Horwood Road have been put forward by the NPT as preferred options before more suitable brownfield sites. Should any of these developments go ahead then the damage to the environment and wildlife, as well as traffic congestion will simply not be acceptable. The NPT should be identifying and putting forward development of low-density housing on brownfield sites before greenfield sites.</p>

087	<p>I support the Neighbourhood Plan as houses should be built where and when our community thinks is right for us.</p> <p>A large development of possibly 150 or more houses will ruin the village.</p>
088	<p>I've accessed the website and reviewed the Plan. In principle, I agree to it, as the restriction to sites of max 15 houses is preferable to larger Milton Keynes-type developments. It is important to retain the rural character of the village and not overcrowd accesses and roads. I am concerned that, particularly on the Nash Road site, any development would end up extending across the whole property as it is owned by a developer, who has previously obtained approval for inappropriate housing.</p>
089	<p>My wife and I support the Neighbourhood Plan.</p>
090	<p>I wish to declare by support for the Neighbourhood Plan for the following reasons:</p> <ol style="list-style-type: none"> 1) 15-house limit per site means we won't get large estates; 2) Sites in different parts of the village will help to spread traffic flow; 3) Village boundary means we'll keep the village compact. <p>I do feel with the NP, Townsend Cottages need some kind of landscaping and buffer zone between the new houses.</p>
091	<p>I am in full agreement with the Neighbourhood Development Plan as shown on the Proposals Map of 3rd May 2014</p>
092	<p>I was disappointed to see that the only proposals to be put forward were (a) to elongate the village towards Little Horwood and (b) to destroy the setting of the village by building in the field opposite "The Manor". The swath of green countryside either side of the Nash Road is a very attractive entrance to the village centre which sits on the brow of the hill. A view enjoyed by those living in the village and those passing through. The only possible reason for putting the proposed sites forward is that they are not in too many people's back yard and therefore not so much opposition. Was that perhaps also the "consultant's" reasoning?</p> <p>The obvious place for the housing required is the field at the bottom of Western Road or better still the brownfield sites referred to by Alan Marlow in his article in "Focus".</p>
093	<p>I wish to declare my support for a Neighbourhood Plan for the village of Great Horwood.</p> <p>1) 15-house limit per site means we won't get large estates; No:- site size will change 2) Sites in different parts of the village will help spread traffic flow; No:- "red herring" 3) Village boundary means we'll keep the village compact. A village boundary or conservation area is fine until a Gov't changes its mind. 4) Villagers and local communities should decide their development needs.</p>
094	<p>Given the national need for additional housing – and, in particular, affordable housing – it is inevitable that Great Horwood will be under pressure to accept some new build development. That said, if new houses are to be built in the village, we would prefer to see them spread over a number of small sites, rather than have a single large housing estate that will almost certainly change the character of Great Horwood. This principle appears to be a basic tenet of the Great Horwood Parish Neighbourhood Plan 2014–2031, and, as such, we support it.</p> <p>In supporting the plan, we also recognise the dangers of not having a Neighbourhood Plan integrated into Aylesbury Vale's Local Plan. Without an accepted plan for the village, the risk of a building free-for-all, with developers gaining approval to build large developments on a range of sites, would be significantly increased – which is another reason to support the Neighbourhood Development Plan.</p>

095	I support the neighbourhood plan as it appears to be the least disruptive to the village as it exists.
096	<p>My husband and I live at 12 Nash Road, our main objection to the proposed Nash Road site for development are the bends in the road. The entrance and exit to the above proposed development site is situated between a left hand and right hand blind bends. The visibility would be greatly restricted for vehicles entering and exiting the development and indeed for vehicles passing and as a large number of vehicles break the speed limit regularly it will be very dangerous.</p> <p>I walk my dogs at 6:30am along Nash Road and have to cross the road on the bends to get to the footpath and it can be a challenge even at that time of the morning, one car had me diving in the hedge so fast was his speed.</p> <p>Thank you for listening to ,my objection.</p>
097	<p><i>[A standard letter, submitted by 65 residents]</i></p> <p>I wish to declare by support for the Neighbourhood Plan for the following reasons:</p> <ol style="list-style-type: none"> 1) 15-house limit per site means we won't get large estates; 2) Sites in different parts of the village will help to spread traffic flow; 3) Village boundary means we'll keep the village compact.
	<p><i>[The following two submissions were received after the closing deadline but are included here for completeness.]</i></p> <p>Thank you for the opportunity to comment on this. I will keep my comments to bullet points as I am hoping that makes them easier to assimilate with all the others.</p> <ul style="list-style-type: none"> · Under Section 4. Policy 1: Spatial Plan & Sustainable Development The plan states that - The Neighbourhood Plan designates a Great Horwood Settlement Boundary (GHSB), as shown on the Proposals Map, for the purpose of containing the physical growth of the village over the plan period. As far as I can tell there is no such plan in the documents. Might you mean the black edged area on the Proposal Map Insert A, which is merely labelled "Policy 1: Spatial Plan" ? I suspect this is the case as the black edged area roughly follows the edge of the major part of the developed area but it's difficult to tell. · I believe it is very important to resist all urges to compromise such boundaries under the philosophy of infilling. The nature of villages is their development through incremental growth, and depends on a balance of uses. Their appeal may well rely heavily upon the very fact that they aren't solid masses of housing developments, and that the green fingers of the countryside and greens paces which naturally fit between groups of dwellings are very much a local character, leading to a feeling of space and comfort for local inhabitants. In many ways new discrete blocks of development perpetuate this mixed landscape, whereas strict infilling does not.
	<p>I do hope that I am not to late to voice my opinion of the development plan.</p> <p>We have recently, 4 weeks ago purchased XXXXXX. Although the searches completed by our solicitor did not highlight the proposed development we had been informed so we started making enquiries with our vendor. She said that the houses were to be built at the bottom of Western Road, if not there were other proposed sites which would not affect this property. Imagine to our horror that we have now found out that after paying a premium for a property with views over fields they now want to build houses opposite AND next to our property.</p>

<p>After further investigation by us we now realise that there are two potential development sites (The old Mill & grounds on Winslow Road) which would be perfect for this development due it seems that they would not effect anyone in the village as it is and also the access road from new development onto the Winslow Road is more of a major road than the little Horwood Road that we are on.</p>

2. Responses from owners of land promoted in the Neighbourhood Development Plan

2.1 Mr Paul Fello (Land off Nash Road)

2.2 Mr John Grainge (Land North of Little Horwood Road)

Response 2.1

Mr Paul Fello
Beeches
Radclive
Buckingham
MK18 4AB

2nd June 2014

Great Horwood Neighbourhood Plan: Policy 4 - Land off Nash Road

I submit this representation for the attention of the Parish Clerk, in support of Policy 4 of the Great Horwood Parish Pre Submission Neighbourhood Plan 2014 - 2031 as the landowner of the site known as 'Land off Nash Road'.

I am pleased that the policy proposes to allocate the land for a housing redevelopment scheme.

I confirm that the land will be made available for the purpose of delivering a housing scheme in the plan period 2014 – 2019 and that there are no known designations, constraints or technical issues that would prevent the delivery of the development of this site as set out in the plan.

Mr Paul Fello

Response 2.2

Mr John Grainge
Redfield Farm
Buckingham Road
Winslow
MK18 3LZ

2nd June 2014

Great Horwood Neighbourhood Plan: Policy 3 - Land North of Little Horwood Road

I submit this representation for the attention of the Parish Clerk, in support of Policy 3 of the Great Horwood Parish Pre Submission Neighbourhood Plan 2014 - 2031 as the landowner of the site known as 'Land North of Little Horwood Road'.

I am pleased that the policy proposes to allocate the land for a housing redevelopment scheme.

I confirm that the land will be made available for the purpose of delivering a housing scheme in the plan period 2020 – 2031 and that there are no known designations, constraints or technical issues that would prevent the delivery of the development of this site as set out in the plan.



Mr John Grainge

3. Responses from statutory consultees

- 3.1 Aylesbury Vale District Council (David Broadley, Senior Planning Officer – Forward Plans)
- 3.2 Buckinghamshire County Council (Phil Markham, Senior Archaeology Planning Officer)
- 3.3 Buckinghamshire County Council (Samuel Dix, Policy, Strategy & Development Officer)
- 3.4 English Heritage (Martin Small, Historic Environment Planning Adviser)
- 3.5 Environment Agency (Cathy Harrison, Planning Advisor)
- 3.6 Natural England (Charles Routh, Lead Advisor on behalf of Sustainable Development and Regulation)
- 3.7 Winslow Town Council

Response 3.1



Planning Monday 9 June 20140

Karen
Francis
Clerk to
Great
Horwood
Parish
Council
2

AYLESBURY VALE DISTRICT COUNCIL

Please ask for: David Broadley
Direct Line: 01296 585866
Switchboard: 01296 585858
Text Relay: prefix telephone number with 18001
Email: planningpolicy@aylesburyvaledc.gov.uk
Our Ref: 03/04/Neighbourhood Panning/Great Horwood

Spring Close
Great Horwood
Buckinghamshire
MK17 0QU

Sent by email to clerk@greathorwoodpc.org.uk

Dear Karen,

Re: Great Horwood Neighbourhood Development Plan – Pre Submission consultation

This letter sets out AVDC's formal response to the Great Horwood Neighbourhood

Development Plan (GNDP) pre-submission consultation. This builds upon the ongoing

dialogue between AVDC and Great Horwood Parish Council since the plan started to be developed. The tables overleaf set out comments for each part of the plan and for the supporting evidence. This is a collective response from the relevant officers at AVDC including Housing, Design and Conservation, Development Management and Leisure Teams.

The GHNDP provides policy direction for how the community wish to see Great Horwood develop to 2031. We commend the Neighbourhood Planning Steering Group on the hard work in getting to this stage and welcome the general approach and direction given in the plan.

As there has been on going correspondence between AVDC and Great Horwood Parish Council we have been able to address most issues at earlier stages in preparing the plan. We have reviewed the plan to ensure the plan meets the 'basic conditions' but also to help ensure the final adopted plan will withstand scrutiny when applied to planning application decisions. Our comments relate to improvements that could be made to strengthen the plan in justification, delivery, clarity, and usability. We hope this will ultimately help the GHNDP progress through to a successful examination and



referendum. The key points raised in the detailed tables are:

- Currently AVDC is not in a position to identify the objectively assessed housing needs for the district or the apportionment of these housing needs across the district, including the provision for Great Horwood. This will be done through the Local Plan process which is timetabled to be adopted in summer 2017. Therefore the Neighbourhood Plan is likely to be made before the Local Plan and may need an early review to remain in general conformity with the Local Plan which could potentially require a higher housing need for Great Horwood.
- The neighbourhood plan cannot change the 2012 settlement hierarchy assessment done by AVDC or pre-empt what the assessment will conclude for the Vale of Aylesbury Local Plan which will be undertaken in due course. AVDC does not agree that Great Horwood should have previously been considered a 'smaller village' as it's sustainability credentials put it more similar to other 'larger villages' in the district.
- Whilst we are supporting neighbourhood plans, you should be made aware that paragraph 49 of the NPPF stipulates that where local planning authorities do not have a 5 year housing land supply, policies on housing growth automatically become out of date. As we do not know what our objectively assessed housing need is we cannot demonstrate a 5 year supply of housing against this therefore the adoption of a neighbourhood plan does not guarantee full control over development. It is important to understand this, we can discuss this in more detail. Currently only a few neighbourhood plans have been made where there is no up to date local plan in place, so we will be monitoring the situation carefully and keep you informed in due course.
- As a local planning authority we have a duty to support affordable housing provision which currently the allocation process is undertaken by AVDC's Housing Allocations Policy. This essentially gives priority to affordable housing needs to those who live in the parish and then wider afield. We are not supportive of a community land trust in rural villages as we do not want to weaken our influence in providing affordable housing to those who are in greatest need.
- In the state of the parish report a number of land use issues have been identified by the community, however these issues do not seem to be addressed in the plan policies but instead have been narrowed down to just the provision of houses. Whilst this is up to the parish council, as to what the plan contains, we would want to highlight the benefits of having a more comprehensive plan.

Next Steps for the GHNDP

As you are aware, the next formal stage is to submit the GHNDP to AVDC for a publicity period of at least six weeks. Before doing so it is important that the comments made are addressed, to ensure we can fully support the plan at the Examination stage. In the interest of efficiency and making it clear how comments have been addressed, please detail beside each comment in the table your response. This will help AVDC see how our comments have to the plan have been addressed.

You may also wish to apply to NPIERS for an independent review of the Neighbourhood Plan before the plan is officially submitted to AVDC. This is not something which AVDC can do on your behalf because it must be led by the Neighbourhood Planning group but

we are happy to help with this process if required. Details of applying for the support can be found here:

<http://www.rics.org/ga/join/member-accreditations-list/dispute-resolution-service/neighbourhood-planning-independent-examiner-referral-service-npiers/>

If you wish to discuss any of the above please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "David Broadley". The signature is written in a cursive style and is positioned to the left of a vertical line.

David Broadley
Senior Planning Officer (Forward Plans)

Appendix -Table of AVDC Comments on the Great Horwood NDP Pre Submission documents , June 2014

Table 1: Pre Submission Neighbourhood Plan - Comments to Improve the understanding and usability of the plan and supporting documents

Page	Para/policy No.	Issue and Recommended Change	Reason
Pre Submission Plan			
General		There are quite a number of topics and issues raised at the beginning of the plan but these aren't carried through and addressed in the plan policies. It is queried why this is and why there are not further policies to take forward the issues, vision and objectives.	To understand the scope of the plan and its policies.
General		For awareness, paragraph 49 of the NPPF states that housing policies should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites. AVDC doesn't have a Local Plan setting out objectively assessed housing requirements in line with the NPPF so it is likely the policies in this neighbourhood plan will automatically be out of date and therefore there is no guarantee of having development control through the neighbourhood plan.	For awareness.
	Paragraph 1.11	Could say full details of the Consultation process will be set out in the Consultation Statement.	To be comprehensive.

Plan B	The circle doesn't cover all of the village, increase the size to make it more accurate. Copyright reference should be updated to 2014.	To increase accuracy.
Para 2.8 section on transport	It is queried what the year is of these figures? Please check and provide details.	For clarity and robustness.
Para 2.8 section on health	It is queried what the source is of this data? Please check and provide details.	For clarity and robustness.
Para 2.8 section on Biodiversity	Suggest removing the bullet referring to Biological Notification Sites. BNSs are in the process of being reviewed to bring them up to date with the Local Wildlife Sites designation. All previous Biological Notification Sites will be reassessed by the Local Wildlife Sites review.	To bring the bulleted section up to date with the relevant biodiversity constraints affecting the village to inform the plan.
Para 2.10	'identifying sites for the minimum of 40 dwellings' – need to make it clear this figure of '40' is not an assessment of the housing need in the parish that takes account of strategic growth needs.	This implies the need is 40 dwellings but this is no longer what is required, this could be misleading.
Table A	Figures for 2013 are – total completions = 3 and total commitments = 3, Figures for 2014 are – total completions = 3 and total commitments = 2.	
Policy Omission and paragraph 2.17	It is considered the plan could be improved by including as a policy and an objective the need to ensure that all dwellings are within 300 metres of green space over 2 hectares in size.	Great Horwood at present does not meet the Natural England Accessible Natural Green Space Standards (ANGSt) which are a national benchmark model setting standards of provision by defining four tiers of green space by size and distance from dwellings. Green infrastructure provides multifunctional spaces with a wide range of environmental and quality of life benefits, including improved public health.
Policy Omission and paragraph 2.17	It is considered the plan could be improved by including as a policy and an objective the need to ensure play space is provided through new development to help remedy existing deficiencies in play space provision.	From the Aylesbury Vale Leisure and Cultural Facilities audit of 2013, Great Horwood at present does not meet play space standards set by the Fields In Trust which are a national benchmark model setting standards of provision.

	Policy Omission and Paragraph 2.17	The plan could be improved to consolidate the strength of 'good footpath network' by making provision for a footpath from the centre of the village to the Recreation Ground in Spring Lane.	The recreation ground is located to the south of the village so connectivity to this community asset should be a requirement of the GHNP and consolidate the good footpath connections to the countryside.
	Paragraph 2.17	It is queried why one the listed 'Challenges for the GHNP' is to identify suitable and acceptable sites to deliver at least 40 dwellings? If this has come from, for example, the public's Community View response (2011) then this needs to be stated in the plan.	To be clear on the basis for what is in this part of the plan to help users understand.
	Paragraph 2.21, omission in the Vision and Policy Omission	It is considered the plan could be improved by referring to the NPPF paragraphs 58, 73-78, 99,109, 114, 117-118 and 126-141 on providing Green Infrastructure. Also consideration should be given to having a specific policy on Green Infrastructure in the NDP and reference to providing green infrastructure in the Vision	The plan as drafted does not make reference to Green Infrastructure (GI). Green Infrastructure helps to deliver conservation and enhancement of biodiversity; create a sense of place and appreciation of valuable landscapes and cultural heritage; increase recreational opportunities and support healthy living; improved water resource and flood management as part of sustainable design; positively contribute to combating climate change through adaption and mitigation of impacts; sustainable transport, education and crime reduction; production of food, natural fibre and fuel.
	Paragraph 2.24	Suggest deleting the last half of the final sentence after ', although the Parish Council maintained a strong objection...'	The neighbourhood plan cannot change the 2012 assessment done by AVDC or pre-empt what the assessment will conclude for the Vale of Aylesbury Local Plan. AVDC do not agree that Great Horwood should have been considered a 'smaller village' in VAP as it's sustainability credentials put it more similar to other 'larger villages' in the district. However this was the context of VAP which was withdrawn in February 2014 and is no longer the context for which the NDP is operating. It is premature to say that Great Horwood is expected to be a 'smaller village' in a review of the settlement hierarchy and could be misleading. AVDC have not yet started work on this document so the criteria for deciding the village status or even the categories has not been decided.

	Policy 1	Please provide a justification for the Settlement Boundary and state that it will not prevent any strategic growth needs or allocations (to be identified in the Vale of Aylesbury Local Plan). The plan needs to include a commitment to reviewing Policy 1 and settlement boundary in line with paragraphs 3.5-3.6 of the NDP.	Justification on compliance with AVDLP is provided in 4.4-4.6 of the neighbourhood plan. However justification is also needed in paras 4.4-4.15 about how the policy would be reviewed to account for development needs of VALP which may identify a higher growth level needed in the parish.
	Policy 1 (v)	Recommend changing the wording of the criterion to: 'they preserve the significance of the architectural and historic interest of Great Horwood Conservation Area and where possible enhance or better reveal the significance of the asset and its setting	The suggested wording would better reflect the wording of the NPPF and Planning (Listed Building and Conservation Areas) Acts.
	Policy 1(vi)	The policy criterion could be improved by adding 'provision of new green infrastructure'. Furthermore it is queried why there is no mention of allotments and community gardens – is there a need for more of these as a result of growth identified in the plan?	Great Horwood at present does not meet the Natural England Accessible Natural Green Space Standards (ANGSt) which are a national benchmark model setting standards of provision by defining four tiers of green space by size and distance from dwellings. Green infrastructure provides multifunctional spaces with a wide range of environmental and quality of life benefits, including improved public health.
	Policy 1 and Paragraph 4.13	The policy and justification in paragraph 4.13 regarding the percentage of affordable housing needs amending as AVDC no longer requires 35% affordable housing and does not use the Affordable Housing SPD. Need to update Policy 1 once the AVDC affordable housing position statement is agreed concerning saved AVDLP Policy GP2.	The affordable housing SPD from 2007 is now considered out of date and no longer being used. AVDC are currently taking legal advice on a position statement on affordable housing and saved Policy GP2 of AVDLP.

Policy 1	Redraft the final sentence that begins 'New development in the countryside should avoid reducing...'	It is unclear the intention of this part of the policy – the intention may be to prevent the loss of openness that contributes to the character of Great Horwood and Singleborough but it could also be interpreted the sentence is referring to preventing coalescence between the two settlements.
Policy 2, 3,4	It is recommended that the detailed site specific criteria in paragraph 4.20, 4.36, 4.34 are brought into Policies 2/3/4 themselves.	To give the criteria a policy basis for have a stronger bearing on planning applications and appeals.
Paragraph 4.6	Suggest adding at the end of the paragraph: 'The figure of 'up to 45 new dwellings' may need to be reviewed subject to the housing target and distribution to be identified in the Vale of Aylesbury Local Plan (see paragraphs 3.5-3.6 on the Plan Review clause).	To ensure the plan is sufficiently flexible to respond to the district strategic growth requirements to be identified.
Paragraph 4.9	Recommending deleting the paragraph.	It is not considered the paragraph adds anything to the NDP and is really a comment on the withdrawn Vale of Aylesbury Plan and its evidence base rather than justification or explanation of the NDP. VAP is withdrawn and is not part of the development plan and therefore the NDP does not need to justify Great Horwood in terms of the VAP Settlement Hierarchy. It is also too early to speculate what the approach will be in VALP regarding growth to sustainable settlements.
Paragraph 4.20, 4.26, 4.34	Recommend adding a bullet to retain the better quality hedgerows (working with the AVDC Trees Officer)	To safeguard hedgerows which, although outside the conservation area, might be important historically, visually or ecologically.
Paragraph 4.20, 4.26, 4.34	Recommend adding a bullet requiring development proposals to use the habitat impact assessment metric contained within the DEFRA biodiversity offsetting mechanism to assess ecological value, achieve no net loss to biodiversity and where possible enhancement.	In accordance with the NPPF on biodiversity (paragraphs 114-119)

	Paragraph 4.20	<p>It is considered the first three bullets in paragraph 4.20 could be consolidated by adding that:</p> <ul style="list-style-type: none"> • The building on the front boundary of the site (Adjacent Little Horwood Road) will provide an opportunity to also give the impression of linear development on that side of the street 	<p>To preserve the significance of the architectural and historic interest of Great Horwood Conservation Area and where possible enhance or better reveal the significance of the asset and its setting</p>
	Paragraph 4.26	<p>It is considered the first bullet in paragraph 4.26 could be consolidated by adding that:</p> <ul style="list-style-type: none"> • The future housing scheme will be a linear development which would follow the established historic pattern of this part of the Conservation Area. Such a development might add to the richness and variety of homes in the Conservation Area • It will also be important for houses on this site to maintain the variety of built form, materials and details found elsewhere on the street, and that the form and scale of these new houses should reflect that of the nearby buildings within the Conservation Area 	<p>It is considered there would be harm to the Conservation Area by extending the village eastwards on Little Horwood Road. However it would be possible to accommodate this development without causing significant harm if it is sensitively designated as suggested.</p>

	Paragraph 4.28	It is queried if there has been any viability assessment of the proposed village park and also whether the land owners are happy to complete the park prior to the occupation of any dwellings on the site. Please provide further commentary in paragraph 4.28 to reflect this point.	To be clear on how the proposal for a village park will be implemented.
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	<p>Policy 4</p>	<p>AVDC is concerned about the allocation of Land off Nash Road on the basis that</p> <ul style="list-style-type: none"> • Developing the site for housing would harm the open character of the land beyond the existing edge of the settlement • There is a clear definitive boundary on the northern edge (north of 15 Nash Road) with the current building serving as a gateway into the village, therefore development would lead to a clear extension to the village and could make other land around it vulnerable to development too. • The site is adjacent the conservation area and currently the open land makes a significant and important contribution to the character being visible from public vantage points, public rights and way and residential properties. • The topography of the land is sloping down to the river valley making the part where the development is the higher area of the site. <p>If these concerns are outweighed by the public benefits then it should require careful design to preserve the setting of the conservation area.</p> <p>Suggest if this site is to be brought forward it should be later in the plan period as the least appropriate site of the three proposed and bring the others forward into the first 10 years of the plan period.</p>	<p>Development of this site has potential to lead to the significant harm identified and could potentially be contradictory with AVDLP Policies RA14 (b) and GP 35 and the NPPF (Paragraphs 126-141)</p>
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	Proposal 1 and paragraph 5.17	Need to amend the policy as the Aylesbury Vale CIL is not anticipated to be adopted until Winter 2017 (post adoption of the VALP). Also suggest moving the Core Priorities bulleted out of the policy and into supporting text.	To be clear on when CIL is anticipated to come in, how projects are intended to be secured in the meantime and also provide for greater flexibility for the Core Priorities in case they change in the early years of using the NDP.
	Proposal 1	It is queried why Part v) outlines a circular path around village so why not include Green Infrastructure within this definition?	So that new green space can be provided with associated facilities for the community.
	Proposal 2	AVDC would not support the use of a Community Land Trust to implement the affordable housing element of policies 2,3 and 4 of the NDP. Rather affordable housing should be allocated to people on the basis of AVDC's affordable housing lettings policy.	AVDC seeks to ensure that affordable housing is provided to meet the priority needs in Northern Aylesbury Vale.
	Proposal 2	The proposal could be improved further by mentioning the CLT also potentially covering the maintenance of Public Open Space being proposed within new developments through outlined by policies in GHNP.	To cover the issue of the maintenance of public open space as part of the delivery of the plan's vision, objectives, policies and proposals.
	Annex A	Subject to agreeing the suggested amendments to include green infrastructure in the plan, the evidence base would need updating to refer to the following studies: <ul style="list-style-type: none"> • AVDC Green Infrastructure Strategy (2011), • Buckinghamshire Green Infrastructure Strategy (2009), • AVDC Leisure and Cultural Facilities Evidence (2013) 	To be comprehensive about technical studies informing the plan

Draft Sustainability Appraisal (incorporating a Strategic Environmental Assessment)

2/8	Non Technical Summary and para 4.3	Suggest identifying the statutory woodland designation of Natural England that covers College Wood and part of Little Horwood Airfield	To improve the clarity of this part of the SA.
6-7	Section 2	Need to add the National Planning Practice Guidance and also make reference in paragraph 2.1 to the Vale of Aylesbury Local Plan that will replace AVDLP. Also in paragraph 2.1 please clarify that rather deeming VAP unsound the Inspector was 'likely to deem the plan unsound' from his Interim conclusions of January 2014. Finally, in paragraph 2.4 please state for completeness that the listed AVDLP policies were saved in 2007.	To be comprehensive on the planning policy context and clear to users of the SA regarding VAP and VALP.
6	2.2	This paragraph outlines NPPF that would shape GHNP and AVDC considers it could be improved by making reference to Green Infrastructure and biodiversity which do shape the places where we live as recognised by NPPF. The following policy principles should be included in this list to give more material weight to these subjects in the GHNP. NPPF paragraphs 58; 73-78; 99; 109; 114; 117-118; 126-141.	To be comprehensive on how all relevant parts of the NPPF will influence the neighbourhood development plan.
7	3.2	Consideration should be given to having the Vision in the NDP cover Green Infrastructure and therefore refer to this in the SA	The plan as drafted does not make reference to Green Infrastructure (GI). Green Infrastructure helps to deliver conservation and enhancement of biodiversity; create a sense of place and appreciation of valuable landscapes and cultural heritage; increase recreational opportunities and support healthy living; improved water resource and flood management as part of sustainable design; positively contribute to combating climate change through adaption and mitigation of impacts; sustainable transport, education and crime reduction; production of food, natural fibre and fuel.

15	6.1	The key to the SA scoring is queried. Is the scoring in orange 'neutral' or is it 'minor adverse'? Is the red scoring 'minor or major' adverse?	Need to be clear in the SA as to how the relevant parts to the plan have been scored. There is a difference between neutral and negative predicted impacts and this should be reflected in the scoring or clarifies in the key on page 15 paragraph 6.1
19-21	6.13-6.23	Please can the scoring of the three allocated sites be checked as it is surprising all three allocations are scored identical, for example Policy 4 (Land at Nash Road) would have a different impact on the Conservation Area (SA Objective 10) than the other two sites, particularly Land South of Little Horwood Road which is not in proximity to the Conservation Area.	Please check the scoring as it is surprising all three sites are scored the same. Sites for Policies 2 and 3 may well have similar impacts given their proximity. However Policy 4, Land North of Nash Road, is in a different setting and the site forms an important part of the character, appearance and setting of the Conservation Area.
	Omission	It is considered the SA could be improved by having a conclusion or recommendation for the neighbourhood development plan regarding green infrastructure provision within the village? The report needs to establish green spaces as an integral component of the village but does not highlight the common understanding of the role and importance (economic, environmental, social) of green infrastructure on how it can be delivered through the planning system or how external funding for its creation can be secured in partnership with landowners or long term maintenance.	To address the NPPF paragraphs 58, 73-78, 99,109, 114, 117-118 and 126-141 on providing Green Infrastructure and benefits of green infrastructure listed above to the SA paragraph 3.2

Site Assessments

	Section 3	It is suggested details on deliverability (availability and achievability of development) of each site would add to the robustness of the site assessments as evidence in the neighbourhood plan.	There is some discussion in sections 1 and 2 of the deliverability of each site however this could be clarified for each alternative site in Section 3
Pre Submission Proposals Map Inset A			
		It is queried why the northern half of the 'Land at Nash Road' and western half of the 'Land North of Little Horwood Road' sites are shown outside the settlement boundary whereas the other allocated site is entirely within the settlement boundary. Isn't the settlement boundary meant to show the boundary after the allocations have been built out?	To understand whether the proposals map is deliberately showing the intended boundary details for the Land off Nash Road/Land North of Little Horwood Road and the Settlement Boundary.
Spatial Policy – Site Size			
	1.2	Please provide a justification for the Settlement Boundary and state that it will not prevent any strategic growth needs or allocations (to be identified in the Vale of Aylesbury Local Plan). The plan needs to include a commitment to reviewing Policy 1 and settlement boundary in line with paragraphs 3.5-3.6 of the NDP.	Justification on compliance with AVDLP is provided in 4.4-4.6 of the neighbourhood plan. However justification is also needed in paras 4.4-4.15 about how the policy would be reviewed to account for development needs of VALP which may identify a higher growth level needed in the parish.
	Sections 3 and 4	It is recommended checking the 'review clause in para 3.3' and consistency with the Winslow NDP Examiners report recently published.	Support the statement in paragraph 4.5 of the importance that the GHNDP does not compromise the ability of AVDC to set appropriate strategic policies in the VALP however it is recommended the review clause is made more explicit and clearer on how this would be implemented.

	Appendix A	Need to acknowledge clearly that the technical studies referred to in A.2 and A.3 including the GL Hearn UDPP are being updated and superseded in 2014-15. Also the 2011 DCLG household projections will be superseded during 2014. Therefore there needs to be a health warning on Appendix A.	It is understandable how the projection has been calculated and why it is provided but it needs to be made clear to users of the NDP that the information and estimate is a 'snapshot' in time and by both the technical work on VALP and on from DCLG projections.
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Table 2: Typo's, minor word and format corrections

Page	Para/policy No.	Issue and Recommended Change	Reason
Pre Submission Plan			
		Please can page numbers be provided.	So users can clearly refer to specific parts of the plan.
	Foreword	In the last paragraph, need to change 'up to 2 years away' to 'around 3 years away'	Factual accuracy based on the May 2014 Local Development Scheme http://www.aylesburyvaledc.gov.uk/planning-policy/
	1.4	The first paragraph from the NPPF should be para 16 not 17.	Accuracy.
	1.5	The heading to this paragraph would be better titled Sustainability Appraisal/SEA.	For improved clarity.
	2.8 section on Heritage	Please in the first line of the first bullet add reference to paragraph 2.1.2 where the greater analysis can be found	To provide a clear link for the reader to the corresponding section.
	2.9	Could refer to the website that has been set up where people can access the neighbourhood plan documents and comment.	To make the section on community views even more comprehensive.
	2.13	The 2013 figures for Table A were – completions – 3 and commitments - 3	To bring the table more up to date.
	2.20	The Adoption of VALP is now programmed for 2017 – the timetable was revised in May 2014.	To update the stated figure for the current timetable for VALP.

	2.23	Please can the words 'considered to be' be inserted between 'is' and 'out of date'	There is no definitive ruling on relevant sections of AVDLP saved policies being out of date in terms of conformity with the NPPF.
	2.24	VAPs plan period was 2011-2031, rather than 2014-2031. It would add to the robustness of the plan to make it clear the Winslow NDP Examiner accepted that NDPs can use the technical evidence behind the withdrawn Vale of Aylesbury Plan.	To further add to the justification regarding the evidence sources behind the neighbourhood plan listed in Annexe A.
	2.25	Issues and options stage of VALP isn't now planned to be published until summer 2015.	
	3.1	Insert 'for Great Horwood Parish' between "It therefore forms the basis on which the strategic objectives' and 'and proposed policies have been formulated'.	To make it clear the strategic objectives are for the parish area rather than those of the district.
	3.5	Please delete the reference to AVDC carrying out 'Annual' Monitoring Reports. AVDC will publish reports on a periodic basis but not necessarily full reports annually as it has done historically.	To update for the position of AVDC regarding producing monitoring reports.
	Policy 1	Please have a look at the font used for the bullets – the one currently used makes the roman numerals unclear.	To clearly understand the plan for all users.
	Policy 1 (vi)	Need to define 'Public Open Space'	To clearly advise users of the plan.
	Policy 2,3,4	It is recommended inserting into the policies the site area (no. of hectares) for the development on the sites and also in Policy 2 deleting 'no.' after '15'.	To be clear on what is intended in the plan.
	Paragraph 4.16	Recommend adding at the end of the paragraph from which year this development will be made available in the plan e.g. from 2020.	To be clear on what is intended in the plan.
	Paragraph 4.21	Insert the word 'affordable' between 'these' and 'homes' in the last sentence.	To clearly advise users of the plan.
Draft Sustainability Appraisal (incorporating a Strategic Environmental Assessment)			
8	4.1	Please update the data to the parish having 1,049 people (2011 census) and 427 homes (2013 AVDC monitoring)	Factual update.
9	4.5	Please state that the Fact Pack was published by AVDC in 2013	To add the date reference and clarify that the document has been published by AVDC.

16-21	Strategic Objectives, Policy 1, 2,3,4	It is considered the formatting of presenting the SA scoring of the different policies could be improved by changing the colours for letters i.e. green change to '+' positive, '0' for neutral and '-' for negative.	This would help users by not having to print out in colour and avoid any confusion between orange and red. The suggested format was in the Winslow Submitted SA.
Site Assessments			
	1.2	Please add a 'then' between 'the' and 'current AVDC Strategic Housing Land Availability Assessment'	To be clear that the 2009 SHLAA was at the time of the initial work on the NDP 'the current' SHLAA. Of course this has since been superseded by the 2013 version and the one to be prepared in 2014-15 to inform VALP.

Communities &
Built Environment

Buckinghamshire County Council

Place Services

Planning, Advisory and Compliance Service

New County Offices, Walton Street
Aylesbury, Buckinghamshire HP20 1UY

Place Services

Interim Service Director: Gill Harding

Telephone 0845 3708090

www.buckscc.gov.uk

The Neighbourhood Plan
Parish Clerk
2 Spring Close
Great Horwood
Bucks MK17 0QU

Date: 04/06/2014

Our Ref: CBC 10889

Dear Sir/Madam,

Great Horwood Parish Neighbourhood Plan 2014-2031 – Pre-Submission Plan

The Buckinghamshire County Archaeological Service would have appreciated being formally consulted on this consultation. We have read through the Great Horwood Parish Neighbourhood Plan Pre-Submission Plan and we support the broad approach. We trust the following comments are useful:

The historic environment is recognised as a non-renewable, outstanding and distinctive resource that contributes to Buckinghamshire's economy, tourism, education, and culture and community identity. This approach forms a core planning principal of the National Planning Policy Framework. Neighbourhood Plans will eventually require examination by the Local Planning Authority (LPA) to ensure their conformity with this National framework. Understanding the heritage value of a Neighbourhood Planning Area is an important part of developing the Plan. We recommend that due to the inherent significance of the historic environment of Great Horwood that an "archaeology statement" is included with the plan when submitted for examination.

The Neighbourhood Planning (General) Regulation 2012 (2012 No.637) includes: Regulation 21 provides for pre-submission consultation and publicity by a qualifying body. Schedule 1, paragraph 2, lists bodies that should be consulted if the qualifying body considers that body has an interest that may be affected by the order proposal and also certain other bodies who must be consulted if the development falls with any of the categories in the Table in Schedule 1. Regulation 22 sets out the information that must accompany a neighbourhood development order or community right to build order proposal when submitted to the local planning authority; this includes a consultation statement and, where appropriate, an archaeology statement.



INVESTOR IN PEOPLE



The Neighbourhood Planning Regulations 2012 Regulation 22 states that an archaeology statement should have 3 objectives. It should:

- confirm that the information in relation to archaeology contained in the Historic Environment Record for the neighbourhood area has been reviewed;
- set out the findings from that review for the area to which the order proposal relates; and
- explains how the findings have been taken into account in preparing the order proposal.

Should the LPA find, during examination, that the archaeological statement is insufficiently robust, it may require further assessment. We would advise that professional expertise may be required in support of the development of an archaeology statement. Contact details of suitably qualified professional organisations are available from the Institute for Archaeologists <http://www.archaeologists.net/ROsearch>.

Great Horwood Neighbourhood Plan Heritage Assets General

We are pleased to see that the ‘historic village’ is considered to be a key strength of the parish (para 2.10), as well as the “well-defined Conservation Area and listed buildings” (para 2.17). We are also pleased to see that the County Archaeological Service’s Historic Town Assessment Report for Great Horwood was used as an information source, however ‘Heritage’ could feature more prominently at the start of the Plan, broadening its scope beyond historic buildings. In general planning terms a heritage asset is “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)” (NPPF 2012). The neighbourhood plan needs to look beyond the historic buildings of the village centre to the landscape, settlement pattern and buried archaeology of the wider parish. For example, there is no recognition of the pre-Roman archaeology of this area. Recent archaeological trial trenching to the south-east of the village has identified a probable Iron Age site. Consultation of the Historic Environment Record (HER) would ensure that the authors have all the relevant detail relating to the heritage of the parish and would form part of the Evidence Base (Annex A). The Historic Environment Record includes **46** listed buildings within the parish, which is correctly noted under ‘Heritage’ in section 2.8. However, there are also numerous undesignated heritage assets in the parish.

Great Horwood Archaeology

As noted above archaeology is an important consideration in Neighbourhood Planning and is a material planning consideration. It would be useful to consult the Historic Environment Record (HER) to obtain details of the known heritage assets in the plan area. The NPPF specifically mentions Historic Environment Records as the key evidence base on the historic environment for plan making and local plans (NPPF paragraphs 169 and 170).

The Aylesbury Vale Local Plan 2004

Policy GP59 ‘Preservation of archaeological remains’ should be included.

Vision and objectives



INVESTOR IN PEOPLE



Part of the vision of this document is “to conserve and enhance the rich architectural and environmental heritage” of Great Horwood. We suggest that this could be re-phrased, ‘... conserving and enhancing its rich architectural, historic, archaeological and natural environment heritage ...’ We welcome Objective 2; “to conserve the special historic character of the village” makes a strong reference to the significance of the village’s historic character.

Policy 1: Spatial Plan & Sustainable Development.

The Neighbourhood Plan will support development proposals on land within the GHSB provided: This could have one or two further points:

vii. An historic environment desk based assessment and walk over survey has been undertaken and its findings taken into consideration.

viii. Advice has been sought from the Buckinghamshire County Archaeological Service.

Policy 2: Land South of Little Horwood Road

From our current information we have no comments on this proposal

Policy 3: Land North of Little Horwood Road

This includes the development of an area of well-preserved ridge and furrow earthworks. A Desk-based Assessment including a walk over survey considering the impact of the development on the heritage asset should be prepared for this site.

Policy 4: Land off Nash Road

This includes development of an area which partly falls within an Archaeological Notification Area for a medieval moated site. It is likely that buried archaeological remains could survive on this site and therefore archaeology will need to be a material planning consideration in any development plans.

4. Overview of the Parish & its Environment

We welcome the inclusion of Box 6: ‘Key Historic Environment issues for Great Horwood’ and this could be made a policy.

5. Developing a Sustainable Appraisal Framework

We welcome 10. ‘Landscape and Heritage’ and this could be made a policy.

We recommend that the Neighbourhood Development Plan includes a policy along the following lines:

Development proposals will sustain Great Horwood’s local distinctiveness and character and protect or/and Great Horwood’s historic environment and assets according to their international, national and local significance through the following measures:

a. Protect, conserve and enhance the historic environment of designated and undesignated heritage assets and their settings, including historic landscapes, Conservation Areas, archaeological sites and historic buildings.



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Overall the neighbourhood plan is well-written and clear in its objectives. Our concerns lie in the narrow view of 'heritage' and we would encourage consideration of other heritage assets within the plan. The Historic Environment Record is a public record and we would welcome the opportunity to share our information with the local community in Great Horwood.

For HER information please contact:

Julia Wise
HER Officer
t. 01926 382072
e. juwise@buckscc.gov.uk

We trust this is helpful and if you have any queries please do not hesitate to contact us.

Yours sincerely,

Phil

Phil Markham MA MIfA
Senior Archaeology Planning Officer
t. 01296 382705
e. pmarkham@buckscc.gov.uk



INVESTOR IN PEOPLE



Response 3.3

Place Service

Service Director (interim): Gill Harding

[delivered by email]
cc. AVDC Forward Planning

Buckinghamshire County Council

County Hall, Walton Street
Aylesbury, Buckinghamshire HP20 1UY

Telephone 0845 2302882
www.buckscc.gov.uk

05 June 2014

Dear Sir/Madam

Great Horwood Neighbourhood Plan

Thank you for consulting Buckinghamshire County Council on the pre-submission draft of the Great Horwood Neighbourhood Plan. Please accept our sincere apologies that your request in February for highways advice was not addressed prior to the plan's publication. We trust that the information herein provides a belated resolution. We are happy to provide a further formal statement of our oversight if the Parish Council considers this would benefit the plan's own consultation statement or basic conditions statement.

With regards to the plan itself, we commend the Parish Council for their efforts in reaching this stage. We have no substantive comments to make on any of the actual policies but the following points of information on highways matters may be helpful in finalising the plan's supporting text or when implementing the policies in future. As the District Council will be the authority that both 'makes' and uses the plan in determining applications, we have copied this letter to them for information.

Policy 2 concerns land south of Little Horwood Road – this site is identified as suitable in AVDC's SHLAA and therefore already has our in-principle highways support. Policies 3 and 4 allocate sites that the County Council had not previously considered from a highways perspective. In summary, all sites would be acceptable although would be subject to varying requirements at the Development Management stage. I have included the full comments of our engineers below if you do indeed wish to reference them in the plan's supporting text. To clarify, it is not necessary that any of this high-level advice is incorporated into the policies themselves since the County Council will give due consideration to the full details of each site at the Development Management stage:

The site north of Little Horwood Road (Policy 3) lies on the outside of a shallow bend, which is a positive, and therefore to promote maximum visibility splays, access to the site ideally needs to be just east of the Townsend Cottages access on Little Horwood Road. It should be noted that minimum spacing between opposing accesses is 15m. From a pedestrian perspective, a frontage footway is required that links in with the footway on the opposite side of Little Horwood Road at Townsend Cottages. The site is served by bus stops along its frontage and is therefore acceptable in this respect.

The site on Nash Road (Policy 4) lies on the inside of a bend so to achieve the required minimum visibility splay requirement of 2.4m x 79m, any access onto Nash Road would need to be at the southern end of the site. From a pedestrian perspective, a frontage footway is required that links in with the footway on the opposite side of Nash Road. To achieve the minimum visibility splay requirement and to accommodate the frontage footway, the tree belt



fronting the site would require removal. The site is served by bus stops within 120m walking distance and is therefore acceptable in this respect.

Finally, although helpfully distinguished as a 'non-statutory' proposal in the plan, BCC must advise that the provision of mini-roundabouts at the site entrances of new developments (as described in section 5.5) would be resisted by the Highways Authority if traffic flows were not roughly equal on each arm. This will be a matter for assessment with individual applications but is unlikely to be achieved given the sites are only allocated for a maximum of 15 dwellings each.

I trust these comments are insightful – please do not hesitate to get in touch should you require any clarification. Once again we congratulate the Parish Council on their work and apologise that the County Council's advice was not forthcoming at an earlier date.

Yours sincerely

Samuel Dix
Policy, Strategy & Development Officer
sdix@buckscc.gov.uk | 01296 387484





ENGLISH HERITAGE

SOUTH EAST

The Neighbourhood Plan
Parish Clerk
2 Spring Close
Great Horwood
Bucks MK17 0QU

Our ref: HD/P5132/01/PC4
Your ref:
Telephone 01483 252040
Fax

23rd May 2014

Dear Ms Francis,

**Great Horwood Parish Neighbourhood Plan 2014-2031
Pre-Submission Plan and Draft Sustainability Appraisal**

Thank you for your e-mail of 24th April advising English Heritage of the consultation on these documents. We are pleased to make the following general and detailed comments.

The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance <http://www.english-heritage.org.uk/caring/get-involved/improving-your-neighbourhood/>.

The Neighbourhood Plan

English Heritage welcomes the description of the historical development of the parish in paragraphs 2.3 – 2.7, 2.11 and 2.12 and the list of designated heritage assets under paragraph 2.8. We feel that these given a reasonably good overall picture of the historic significance of Great Horwood.

However, we would like to see a little more about the character of the village. English Heritage considers that Neighbourhood Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan, which can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change. The Historic Town Assessment and Great Horwood Conservation Area Appraisal provide excellent information on the character of the village.

Cont'd

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Correspondence or information which you send us may therefore become publicly available



We would also like to see a reference to non-designated heritage assets, such as locally important buildings, which can make an important contribution to creating a sense of place and local identity: is there a list of locally important buildings and features in the parish ? There should be a reference to any non-scheduled archaeological remains, information on which is available from the Buckinghamshire and Milton Keynes Historic Environment Record. Reference could also be made to the Buckinghamshire Historic Landscape Character Assessment.

Paragraph 2.12 should mention the Great Horwood Conservation Area Management Plan - the Neighbourhood Plan could perhaps include policies and proposals for the implementation of the recommendations in the Management Plan. Although having a designated Conservation Area, the Plan has very little information about Singleborough.

It would also be helpful to indicate the current state of the historic environment in the two settlements: our current Heritage at Risk Register does not show any higher grade designated heritage assets at risk in the parish, but consideration should be given to threats to and vulnerability of the Grade II listed buildings: has there been any change in their condition in recent years, particularly for the worse ? Has there been any or is there any ongoing loss of character, particularly within the Conservation Areas, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc ?

English Heritage is pleased to note that “attractive historic village” is one of the key strengths of the Parish identified by the local community, and that a “well defined conservation area with many listed buildings” is listed as one of the strengths of the parish under paragraph 2.17.

We welcome the recognition of the key policy principle in the National Planning Policy Framework of “Conserving and enhancing the historic environment” and of saved Policy GP53 of the Aylesbury Vale Local Plan (2004) in paragraphs 2.21 and 2.23 respectively.

English Heritage also welcomes the inclusion of “*conserving and enhancing its rich architectural and environmental heritage for the benefit of current villagers and for future generations*” in the Vision and Objective 2 “to conserve the special historic character of the village”, although that should be “villages” or “village and hamlet” in order to recognise the historical significance of Singleborough. Also “no. of planning permissions affecting designated heritage assets” needs refinement as the effect on the asset could be negative or positive.

Cont'd

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We welcome requirement v of Policy 1: “Spatial Plan & Sustainable Development” for development proposals to “*sustain or enhance the significance of the special architectural and historic interest of Great Horwood Conservation Area and its setting*”, although there should also be a requirement for development proposals not to adversely affect the significance of listed buildings, of which there are many within the proposed Settlement Boundary, and their settings.

According to our records, there are no designated heritage assets on any of the three proposed development sites. However, as recognised in the Plan, the sites “Land North of Little Horwood Road” and “Land Off Nash Road” are close to the Great Horwood Conservation Area. We welcome the requirement for development proposals to “demonstrate how they will sustain and enhance the setting of the adjoining Great Horwood Conservation Area”.

We also welcome the principles in paragraph 4.26 that the development on Land north of Little Horwood Road will be located to leave a gap between it and the existing houses in the Conservation Area and in paragraph 4.34 that a landscape buffer will be provided between the development on Land off Nash Road and the existing houses to sustain the significance of the Conservation Area and its setting.

However, we note that the Conservation Area Character Appraisal identifies views of St James Church from Little Horwood Road across the land allocated in Policy 3, and it is desirable that the form of development on this site retains those views if possible. The Appraisal also identifies panoramic views from this site, but we note that it does not indicate that these views are significant to the special architectural and historic interest of the Conservation Area.

The northern end of the site identified as Land off Nash Road lies opposite the Grade II* Manor Farm, and any development on this site should respect the setting of the farmhouse. We also note from the Historic Town Assessment that this site contains ridge and furrow which has “fossilised” the ancient open-field strip farming system. The Buckinghamshire Historic Landscape Character Assessment notes that ridge and furrow is fossilised under grassland, which tends to be unimproved and of some ecological significance and that ridge and furrow has landscape, cultural and educational value. The Assessment also notes that such earthworks are at risk.

Paragraph 2.7 of the Neighbourhood Plan itself notes that the “ridge-and-furrow markings in the fields surrounding the village are ancient, and part of the field pattern is a relic of the former Great Field of medieval times”. It continues “The survival of both is highly unusual and results from Great Horwood’s special history”.

Cont’d

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We have not undertaken any further study into the presence or significance of ridge and furrow earthworks on the site Land off Nash Road, but it would appear that there is a danger that the development of this site would lead to the loss of these disappearing but important relics of a historic farming system. Advice on this matter should be taken from the Buckinghamshire County Archaeologist. The Historic Environment Record should also be consulted for each of the three sites for any records of non-scheduled archaeological remains.

We should also make it clear that these comments are based solely on a desk-based assessment: we have not visited the proposed sites at this stage. Our comments are without prejudice to any comments we may wish to make on any future applications for the development of any of these sites, should they be taken forward.

English Heritage considers that the preparation of the Plan offers the opportunity to harness a community's interest in the historic environment by getting the community to help add to the evidence base in other ways too, perhaps by preparing a list of locally important heritage assets or the undertaking a survey of Grade II buildings at risk from neglect, decay or other threats. These could be included as "Proposals".

We welcome the identification of the Great Horwood Conservation Area Review and the Great Horwood Parish Historic Town Assessment as part of the evidence base for the Plan in Annex A. However, we would also like to see the Buckinghamshire Historic Environment Record and Historic Landscape Character Assessment listed.

Strategic Environmental Assessment

In paragraph 4.3 it would be clearer to insert the word "natural" between "statutory" and "environmental" as there are, of course, as indicated in paragraph 4.4, a number of statutory historic environment designations in the Plan area.

When commenting on the SEA Scoping Report in March 2014, we commented that the Key Historic Environment Issues for Great Horwood in Box 6 were good, but could perhaps be a little clearer. We suggested that the second issue and the second half of the second sentence of the third issue could be combined, along the lines of "*Ensure that listed buildings, of which Great Horwood has a significant number, are maintained and their historic settings are not adversely affected by new development, as their quality, character and significance can easily be destroyed by unsympathetic or inappropriate renovation, repair, extension and redevelopment, or simply by neglect.*" We also suggested that the third issue could be separated into two, one for the Archaeological Notification Areas and one for the conservation area.

We welcomed the inclusion of heritage in an objective in the Sustainability Appraisal Framework, but we queried why the objectives and means set out for landscape and heritage starts with "Through development". The conservation and enhancement of the landscape, heritage and the built character of the villages and countryside will also be achieved through restricting development in inappropriate locations.

Cont'd

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As a sustainability objective, it should simply read "Conserve and enhance the landscape, historic environment, heritage assets and their settings and the built character of the villages and the countryside". In fact, it would be better to separate landscape from heritage.

We previously commented that the bullet points setting out the means by which this objective is to be achieved were also good, but perhaps could be slightly rephrased as sub-objectives through which to assess the accordence or otherwise of the policies and proposals in the Neighbourhood Plan with the main objective e.g. "*Will the policy or proposal protect and enhance designated and undesignated heritage and landscape assets ?*" etc.

Other sub-objectives could be "*Will the policy or proposal respect, maintain and strengthen local character and distinctiveness ?*" and "*Provide for increased access to and understanding and enjoyment of the historic environment ?*"

We note that, for "Predicting & Evaluating the Effects of the Plan", the Assessment uses three levels of effect: "likely positive", "likely neutral or minor adverse" and "likely minor or moderate". We do not consider this satisfactory: it is unhelpful and potentially misleading to combine "neutral" with "minor adverse" and "minor" with "moderate". We therefore suggest "major positive", "minor positive", "neutral", "minor negative" and "major negative", perhaps with "unknown" as well.

It is also here that combining landscape and heritage in one objective can also lead to confusion: we note that Policies 2, 3, and 4 are all assessed as "likely neutral or minor adverse", but as well as not being clear whether it is "neutral" or "minor adverse" it is not clear whether this assessment reflects the predicted effects on landscape, heritage or both.

We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Great Horwood parish, please do not hesitate to contact us.

Thank you again for consulting English Heritage.

Yours sincerely,



Martin Small
Historic Environment Planning Adviser
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)
E-mail: martin.small@english-heritage.org.uk

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Parish Clerk
2 Spring Close
Great Horwood
Bucks
MK17 0QU

Our ref: WA/2006/000227/OT-
06/PO1-L01

Your ref:

Date: 04 June 2014

Dear Sir/Madam

Great Horwood Neighbourhood Development Plan

Thank you for consulting us on this development plan.

We have reviewed the following documents:

1. Great Horwood Parish Neighbourhood Plan 2014--2031 Pre-Submission Plan
2. Great Horwood Parish Neighbourhood Plan 2014--2031 Proposals Map
3. Great Horwood Parish Neighbourhood Plan 2014--2031 Proposals Map (Inset A)
4. Great Horwood Parish Neighbourhood Plan 2014--2031 Draft Sustainability Appraisal.

We are pleased that none of the allocated sites lie within the floodplain.

We welcome the sustainability objectives with regard to flooding; and water, energy and climate change.

In particular, when considering the provision of foul water infrastructure, we would recommend that prior to any development on the sites identified, Anglian Water should be consulted in order to confirm whether there is capacity within the existing foul sewerage network, or if upgrades will be required. This will be especially important for the site to the North of the village as the sewage works is located to the South.

Yours faithfully

**Mrs Cathy Harrison
Planning Advisor**

Direct dial 01491 828515

Direct e-mail planning-wallingford@environment-agency.gov.uk

Cont/d..



Response 3.6

Date: 23rd May 2014

Our ref: 119265

Your ref: -



clerk@greathorwoodpc.org.uk

Clerk to Great Horwood Parish Council

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Sir/Madam,

Re: Great Horwood Neighbourhood Development Plan.

Many thanks for the above consultation. 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.

Having looked at the policies in the plan, Natural England does not consider that this plan poses any likely significant risk to internationally or nationally designated nature conservation or landscape sites and so does not wish to make specific comments on the plan.

The lack of more detailed comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may make comments that will help the Parish Council to fully take account of the natural environment in the plan-making process.

For any correspondence or queries relating to this consultation only, please contact Charles Routh on 07990 773630. For any new consultations or issues, please contact consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Charles Routh

Lead Adviser

On Behalf of Sustainable Development and Regulation, Thames Valley Team, Natural England.

Response 3.7

From: Winslow Town Council <clerk@winslowtowncouncil.gov.uk>

Date: 5 June 2014 18:26:22 BST

To: Great Horwood PC Clerk <clerk@greathorwoodpc.org.uk>

Subject: Re: Great Horwood Neighbourhood Development Plan

Dear Karen,

Thank you for your email outlining the Great Horwood Neighbourhood Plan (GHNP). In response, Winslow Town Council (WTC) pleased to provide the following representation:

- WTC strongly supports the the Vision and approach taken to the GHNP, in particular:
 - the creation of a settlement boundary to retain the character of the village
 - a policy of a ordable housing to ensure the village retains a broad social culture and mixed community.
 - a focus on several smaller developments that can fully integrate into the community rather than a single large development that could create a "sub culture" in the village.
 - Leveraging the Community Infrastructure Levy to support the creation of infrastructure and facilities in the village.
- WTC supports the need for a Neighbourhood Plan in Great Horwood to ensure the village supports future expansion and to support the planning of future developments, while retaining the village's inherent qualities .
- WTC recognises and commends the considerable e ort that has been committed to develop the plan to this stage and to maintain the momentum of the planning progresses.
- WTC o ers its ongoing support and good wishes to the Great Horwood Community as they progress their plan.

If you have any questions or would appreciate any additional support please let me know.

Kind regards,

Karen

Clerk

Clerk - Charles Loch

Deputy Clerk - Karen Oddey

Winslow Town Council

Tel: 01296 712 448

clerk@winslowtowncouncil.gov.uk

4. Responses from other landowners, developers or their agents

4.1 Armstrong Rigg Planning, on behalf of Taylor Wimpey South Midlands

4.2 Gladman Developments Limited

4.3 Progress Planning

Ref: 05713/L008rw

9 June 2014

The Neighbourhood Plan
Parish Clerk
2 Spring Close
Great Horwood
Buckinghamshire
MK17 0QU

By E-mail

Dear Sir/Madam

Representations to the Great Horwood Neighbourhood Plan

I write on behalf of our clients Taylor Wimpey South Midlands to provide our representations to the Pre-Submission version of the Great Horwood Neighbourhood Plan (GHNP) 2014-2031.

Our comments relate to the overall approach to the GHNP, which we consider to be fundamentally flawed, and to policies 1-4, which we believe to be non-compliant with national or local policy. Thus it is our view **that the GHNP fails to meet the 'basic conditions' as required by law.**

Background

The legislative requirements set out in the 'basic conditions'¹ together with the approach to Neighbourhood Planning advocated in national policy in the form of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) emphasise the positive support which Neighbourhood Plans should

¹ Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended)

provide to support local development and should be aligned with the strategic needs and priorities of the wider area. In achieving this paragraph 184 of the NPPF highlights the need for Local Planning Authorities to ensure that an up to date Local Plan is in place as quickly as possible which will enable the Neighbourhood Plan to reflect these policies and positively support them. It continues by confirming that Neighbourhood Plans should not promote less development that set out in the Local Plan or undermine its strategic policies.

In summary the starting point and fundamental impetus for the creation of a Neighbourhood Plan should be to ensure that the Plan encourages development that is sustainable, consistent with the strategic policies of the development plan, and is not used as a vehicle to restrict sustainable development.

Overview

The GHNP is being progressed in advance of an up to date Local Plan. While relevant legislation does not prevent a neighbourhood plan being developed before an up to date Local Plan is in place, in this case the adopted Local Plan is time expired, having been prepared to cover the period to 2011. As such its strategic policies concerning the future supply of housing are out of date.

Furthermore the evidence base which was being used to inform the now withdrawn Vale of Aylesbury Plan (VAP) was found by the Inspector to be fundamentally flawed. In respect of housing the Inspector found that the VAP had not been positively prepared, was not justified or effective and was not consistent with national policy. It was therefore not sound. He found that significantly more housing would be required to deliver the level of housing needed over the plan period and a substantial amount of additional work would be required before the deficiencies identified by the Inspector could be addressed. This will inevitably take some considerable time.

AVDC are only just starting to embark on this process and at present have no clearly identified timescale within which to prepare a new Strategic Housing Market Assessment, which will be the first step towards producing a robust objective assessment of future housing needs.

As a result the withdrawn VAP's policy that larger villages such as Great Horwood should usually be limited to 50 dwellings can no longer be afforded any weight. Indeed in the absence of a robust evidence base which justifies the allocation of 3 sites for up to 45 dwellings the GHNP is not consistent with national policy, is not sound and does not comply with the basic conditions.

Contrary to the fundamental principles highlighted above of positively supporting the strategic needs of the area in a manner which is in accordance with national and local planning policy, the GHNP makes no commitment to embrace the future development needs of the area which are to be expressed by the new Vale of Aylesbury Local Plan (VALP). **Nor does it embrace the NPPF's presumption in favour of sustainable development.** Instead it aligns itself with the out of date Local Plan and the evidence base for the VAP, which as highlighted above has been found to be deficient.

Rather than embrace sustainable development the language used throughout the GHNP indicates its purpose and intention is to control development and maintain the status quo. Its reference to Great Horwood as a small village² is inconsistent with the District level assessment which categorises it as a Large Village.

It also misrepresents the latest 2013 AVDC Strategic Housing Land Availability Assessment (SHLAA).³ The SHLAA does not indicate that 'there may be land suited to housing development in Great Horwood', as alleged. It specifically identifies two sites in the village as suitable and part-suitable for housing. The site it confirms as 'suitable' for housing with no significant constraints is the site to the south of Weston Road which is being promoted for housing by our clients. The site identified as 'part suitable' is the subject of GHNP policy 2.

These deficiencies of the GHNP are continued throughout the document which we now go on to consider further in relation to each policy.

Policy 1: Spatial Plan and Sustainable Development

This policy designates a Great Horwood Settlement boundary with the express intention of containing the physical growth of the village over the plan period. It indicates that development such as housing outside the settlement boundary will not be permitted.

Within the settlement boundary the policy is supportive of new development but only where they meet a number of restrictive criteria. These include that: the development must comprise no more than 15 dwellings; that 35% of the total dwellings are affordable irrespective of the size of the development; a proportion of plots are made available for self build; and a proportion of dwellings are suited to occupancy by older persons.

The policy is unduly restrictive imposing an effective bar on development beyond the settlement boundary irrespective of individual site circumstances and therefore will not contribute to sustainable development nor does it include the necessary degree of flexibility to adapt to changed circumstances. This is particularly important given that these needs and priorities have not yet been established at District Level.

These shortcomings of the policy are exacerbated by the restrictive criteria against which development proposals would be judged including an arbitrary restriction of no more than 15 dwellings on each site, irrespective of site circumstances and affordable housing requirements which are inconsistent with Local Plan policy and the affordable housing SPG. No doubt the emerging VALP will include an affordable housing policy to apply across the District on a consistent basis to ensure some parts of the District are no more attractive to developers than others due to affordable housing requirements.

² GHNP paragraph 3.1 & 3.2

³ GHNP paragraph 2.16

There is no clearly expressed basis for requiring custom build plots or older person households which will serve to make development in Great Horwood more onerous than in other parts of the District, rendering development less viable. Imposing these unnecessary and arbitrary burdens on development in the absence of a sound evidence basis which justifies them is clearly contrary to paragraphs 16 and 184 of the NPPF, the adopted Local Plan and in turn the basic conditions.

We note that the arbitrary and onerous restrictions imposed by GHNP have been recognised by a local resident who provides comments to that effect in objecting to the GHNP in the June edition of the Focus magazine.

The supporting text to the policy indicates it has been informed by a restrictive approach to plan making which fails to embrace the positive approach to plan making advocated in the NPPF. It indicates at paragraph 4.6 that allocations over the full plan period will deliver up to 45 new dwellings, a figure which has presumably been informed by the withdrawn and discredited VAP to which no weight should be attached.

Its claim at paragraph 4.8 that the policy makes provision for a total of 15 affordable homes over the plan period fails to recognise the onerous requirements of the policy which are likely to inhibit rather than encourage development including the provision of affordable housing in an area of identified need. No evidence of viability testing has been provided to demonstrate the requirements of the policy are workable.

Paragraph 4.9 of the GHNP repeats the contention that the village should be classed as a small village in direct contradiction with the assessment of the village made by AVDC. Indeed it assumes that this modified status will be confirmed in the future. By pre-empting and prejudging the settlements position in any future hierarchy which may be confirmed through the emerging VALP has the effect of seeking to restrict future housing development, contrary to the aims of national policy.

The policy is considered to be contrary to policy GP2 and GP53 of the adopted Local Plan.

Policy 2: Land South of Little Horwood Road

This site corresponds with site reference SHL/GHW/014 from the latest AVDC SHLAA, in which it was considered part-suitable for housing, subject to following the existing building line and being low density. Yet despite the findings of the SHLAA, the development of the site, which is bordered on only one side by development at the far edge of the existing settlement would result in an undesirable linear extension of the village into open countryside and impact on uninterrupted views of the countryside from the north, south and east as one enters and leaves the village via Little Horwood Road. It would also require the extension of existing infrastructure to provide footways along Little Horwood Road and move the 30mph zone further east extending the building settlement away from the village centre.

Having sought **AVDC's views on our clients proposals at the end of Weston Road** officers recently confirmed the need to minimise the prominence of any new development in views from the east from Little Horwood

Road. Clearly the development of this site would have a far greater visual impact in these views than our clients proposals.

The policy is considered to be contrary to policy GP35 of the adopted Local Plan.

Policy 3: Land North of Little Horwood Road

This site was not considered by the latest AVDC SHLAA. As for the site on the opposite side of Little Horwood Road (Policy 2) it would be prominent in views from the east and lead to an undesirable extension of the village into open countryside, which would necessarily include an extension of existing footways or a crossing to the southern side of Little Horwood Road along with the extension of the existing 30mph zone. In this case the policy advocates a number of principles to guide future development which includes leaving a gap between the edge of the existing settlement to provide a public park with housing beyond which would be on higher land. Any such development would therefore be particularly prominent in views from the east and south and would be in an insolated position with no existing development surrounding it.

The prominence of the development in this case will be particularly detrimental to the existing panoramic views as one enters and leaves the village which have been identified as of particular value in the Great Horwood Conservation Area Appraisal.

The development of this site would also destroy very good quality ridge and furrow earthworks.

The site is also very sensitive to change by virtue of its location at the edge of the conservation area adjacent to a semi-detached pair of dwellings which are identified in the Conservation Area Appraisal as being of particular interest by virtue of being located in a prominent position at the entrance to the village from the east and signals the edge of historic core of the village. Development of this site would result in the loss of this important aspect of the village and impact negatively on the setting of these historic buildings of architectural interest. This site is therefore considered unsuitable for residential development.

In any case the requirement for this single site of no more than 15 dwellings to provide, complete and transfer a completed park to the Parish Council along with a commuted sum to fund its ongoing management is likely to render any such redevelopment unviable. Furthermore a planning obligation such as this one should only be sought where it meets the statutory tests from the Community Infrastructure Regulations 2010. These confirm that planning obligations should meet all the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

No evidence supports the GHP which demonstrates that a planning obligation such as this one meets these statutory tests.

The policy does not therefore accord with the Community Infrastructure Regulations or NPPF paragraph 204.

The policy is considered to be contrary to policy GP35 of the adopted Local Plan

Policy 4: Land off Nash Road

The site is located on the western side of Nash Road in a prominent location as one enters/leaves the village to the north. The site abuts the edge of the conservation area. As such any development of the site would result in an undesirable extension of the village in a northerly direction with an adverse impact on landscape setting adjacent to the conservation area.

The site is not well served by existing infrastructure with no footway provided along the western edge of Nash Road and only a narrow footpath in the grass verge on the opposite side of the road. The site would need to be accessed from Nash Road which is a busy road with 60mph speed limit, which provides a direct link with the A421 to the north and Winslow to the south. In addition to which the site is located on the inside curve of the road where visibility from a new site access would be poor. For these reasons the site is not suitable for new housing.

The policy is considered to be contrary to policy GP35 of the adopted Local Plan.

Omission of Weston Road Site

The shortcomings of the sites described under policies 2-4 (above) are set out above. The omission of the site to the south of Weston Road is unexplained by the GHNP.

The plan making process is required to be underpinned by a sound evidence base. Although the PPG does not set out a definitive list of the evidence required for Neighbourhood Plan preparation, it does say that the evidence base should be one that is robust and which supports the choices made and the approach taken.

The Council's SHLAA is one such document.

In seeking to justify the allocation of the sites chosen, a sites assessment does form part of the evidence base. We do not consider this document is one that is sound and robust as it does not appear to be informed by any sort of technical assessment of the identified sites. Furthermore it discounts the site to the south of Weston Road purely on the basis that the owner of the site was not willing to make the site **available for a 'small development'**. It does however indicate **that 'a** small development would be possible' at the site.

Omitting the site from the GHNP on this basis is flawed in that it misunderstands the role of the Neighbourhood Plan which is to shape and direct sustainable development in the area⁴, rather than deliver it. If successful the Neighbourhood Plan would form part of the Development Plan for the area. In

⁴ NPPF paragraph 185

considering whether to allocate sites choices should be guided by whether sites are sustainable, indicate preference for land of lesser environmental value and whether they are deliverable and developable⁵. It should not be determined by the number of dwellings which the land owner may wish to deliver at the site. The number of units which a site will accommodate is ultimately determined through the planning process.

The Weston Road site clearly represents a deliverable and developable site evidenced by the detailed application which has been submitted for 45 new dwellings on the land, supported by a comprehensive suite of technical supporting documents. Furthermore it is the only site in Great Horwood considered 'suitable' for housing by AVDC's latest SHLAA, with no significant constraints.

Turning to the Draft Sustainability Appraisal (SA) which accompanies the GHNP it is apparent that a more detailed assessment of the relative merits of alternative development sites, from that which informed the sites assessment (described above) has not taken place. The Weston Road site is dismissed on the basis that access would be via an existing residential road from a junction with Little Horwood Road not well suited to servicing new development of the scale being promoted on the site. This conclusion has **apparently been drawn without any expert highways advice. In contrast Taylor Wimpey's highways advisors** have confirmed the acceptability of the proposals on the local highway network including the junction with Little Horwood Road. Furthermore Bucks County Council as the Highway Authority have considered proposals for 48 units on the site and confirmed the acceptability of the proposals. Indeed they confirmed by letter that the necessary visibility splays along Little Horwood Road can be achieved and Weston Road is more than adequate to serve a site with an additional 48 dwellings.

Despite the shortcomings of the access arrangements for the three allocated sites highlighted above, no such assessment has been conducted to confirm the acceptability of access arrangements. Nor indeed is any evidence provided which indicates that the impact of the allocated sites on the conservation area or the existing landscape have been properly considered despite their far more prominent locations at the entrances to the village in close proximity to the conservation area and the historic core of the village.

Conclusion

We consider that the GHNP is fundamentally flawed in its approach and that its policies do not seek to achieve sustainable development and do not comply with national or local planning policy, such that the **Plan does not meet the 'basic conditions' as set out in law. This is on the basis** that:

- The policies of the GHNP seek to restrict development at three sites, which is at odds with the fundamental purpose of neighbourhood planning, which is to plan positively for sustainable development in accordance with local strategic housing development policies and needs, which have yet to have been identified;
- The GHNP is informed by and aligned with an out of date Local Plan and an evidence base which has been found to be deficient. It is therefore in conflict with paragraphs 16 and 184 of the NPPF which

⁵ NPPF paragraph 47 footnote 11 & 12

require Neighbourhood Plans to be aligned with the strategic needs of the area and plan positively to support local development;

- The restrictive approach of the GHNP fails to embrace an overarching presumption in favour of sustainable development as required by the NPPF;
- The policies of the GHNP do not comply with local strategic affordable housing policy and the onerous requirements are likely to inhibit the delivery of affordable housing contrary to national and local planning policy;
- The GHNP seeks obligations yet it has not been demonstrated that the three tests of the Community Infrastructure Regulations 2010 have been met;
- The choice of allocated sites and the omission of the site at Weston Road is the result of a flawed process, uninformed by technical assessment and a misunderstanding of the role of the Neighbourhood Plan to shape and direct sustainable development.

We trust that this information is acceptable and that our comments are duly considered. Should you have any further queries then please do not hesitate to contact either myself or my colleague Roger Welchman.

Yours faithfully



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Great Horwood Parish
Neighbourhood Plan 2014-2031
Pre - Submission Plan

Consultation Response

Gladman Developments Limited.



June 2014

1 EXECUTIVE SUMMARY

1.1 Context

1.1.1 These representations are made in response to the current consultation of the Pre-Submission version of the Great Horwood Neighbourhood Plan (GHNP) 2014-2031.

1.1.2 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. Gladman are currently promoting a number of residential sites within Aylesbury Vale, notably within the neighbouring area of Winslow. Gladman are working with the land owners of a land east of Great Horwood Road (from here on referred to as Winslow North). (Site plan included as Appendix 1) to promote this site for residential development.

1.1.3 Gladman Developments have previously submitted numerous representations to the Vale of Aylesbury Plan (VAP) (withdrawn following the Inspectors interim conclusions), the Winslow Neighbourhood Plan (adjacent to the GHNP area) and most recently the scoping consultation for the Vale of Aylesbury Local Plan (VALP) (representations included as Appendix 2 to this submission).

1.2 Neighbourhood Plan Process & Basic Conditions

1.2.1 In its current form the GHNP would not meet the Basic Conditions as set out in Paragraph 8(2), of Schedule 4B of the Town and Country Planning Act 1990.

1.2.2 In particular, Gladman consider that the GHNP does not meet basic conditions 8(2) (a), (d), (e) and (f) of Schedule 4B of the Town and Country Planning Act 1990.

1.3 Comments on policies

1.3.1 This section of the representations provides comments on the policies contained within the Neighbourhood Plan, highlighting specific areas of the Plan which are not compliant with the basic conditions and require removal and/or significant amendment.

1.3.2 Gladman raise particular concerns with Policy 1; which is restrictive in nature and would have negative implications for growth not only for Great Horwood, but also growth to the north of Winslow which is one of the largest and most sustainable settlements in the District and a natural target for growth. The Plan cannot include policies which seek to restrict growth where there is no up-to-date strategic policy for housing within the Local Plan (paragraph 8(2)(e). Equally, the Plan fails to have regard to national policy on the provision of housing and neighbourhood plan-making (paragraph 8(2)(a)) and does not contribute to sustainable development (paragraph

8(2)(d). There are also serious flaws in the SEA exercise that has been conducted in relation to this Policy and the Plan as a whole (paragraph 8(2)(f)).

1.4 Critique of Evidence Base

- 1.4.1 Gladman note that although the Plan acknowledges that the VAP has been withdrawn following the Inspector’s recommendation on 7 January 2014, a significant proportion of the evidence base for the GHNP still derives from the VAP evidence base, the VAP was found to have been prepared without lawful regard to the duty to cooperate and unsound. Consequently the Parish Council and District Council, in preparing the GHNP, should not be relying upon this to provide sound, robust justifications for policies.
- 1.4.2 The GHNP also refers extensively to the Vale of Aylesbury Local Plan (2004) within the list of evidence base documents, this plan is now very significantly out of date, and should not form the basis for decision making moving forwards.
- 1.4.3 The Site Assessment Document and Spatial Policy: Site Size Document, both published in 2014 are very limited in detail and do not provide adequate justification for the proposed policy approach. There has been a failure to comply with the NPPG, “Housing and Economic Land Availability Assessment” (contrary to paragraph 8(2)(a)).

1.5 Conclusions

- 1.5.1 The GHNP is not sufficiently growth orientated or aspirational. The proposals through the neighbourhood plan would effectively restrict any growth to the north of Winslow, as well as around the settlement of Great Horwood itself. This directly contradicts the policy “imperative” within paragraph 47 of the Framework to boost significantly the supply of housing (*Gallagher Homes Ltd v Solihull MBC* [2014] EWHC 1283 (Admin), 31(ii) and *Bloor Homes East Midlands Ltd v Secretary of State for Communities and Local Government* [2014] EWHC 754 (Admin), [108])
- 1.5.2 The GHNP currently looks solely within its boundary and has been prepared in isolation from the neighbouring areas (notably Winslow). As it stands the neighbourhood plan would have a significantly restrictive approach to growth to the north of Winslow, an area with significant growth potential linked to the East-West rail and the proposed new railway station. Winslow should be considered as a strategic location for growth within the emerging Vale of Aylesbury Local Plan and the GHNP should not be used as a tool to restrict growth.

2 INTRODUCTION

2.1 Context

2.1.1 These representations are made in response to the current consultation of the Pre-Submission version of the Great Horwood Parish Neighbourhood Plan (GHNP) 2014-2031.

2.1.2 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. Gladman are currently promoting a number of residential sites within Aylesbury Vale, notably within the neighbouring area of Winslow. Gladman are working with the land owners of a land east of Great Horwood Road (from here on referred to as Winslow North). (Site plan included as Appendix 1) to promote this site for residential development.

2.1.3 Gladman developments have previously submitted numerous representations to the Vale of Aylesbury Plan (VAP) (withdrawn following the Inspectors interim conclusions), the Winslow Neighbourhood Plan and most recently the scoping consultation for the Vale of Aylesbury Local Plan (VALP) (see Appendix 2).

2.1.4 This submission identifies fundamental concerns with the GHNP, which directly contradicts with the whole ethos of the Framework and would fail to meet the required basic conditions.

2.2 Structure

2.2.1 The remainder of this representation is structured as follows:

- Chapter 3 – The Neighbourhood Plan Process & Basic Conditions
- Chapter 4 – Comments on Policies
- Chapter 5 – Critique of Evidence Base
- Chapter 6 - Conclusions

3 NEIGHBOURHOOD PLAN PROCESS & BASIC CONDITIONS

3.1 National planning policy establishes the Government's expectations as to the contents and role of Neighbourhood Plans and their relationship with wider development plan documents. §16 and §184 of the National Planning Policy Framework (the Framework) clearly underline that Neighbourhood Plans cannot be in conflict with a Local Plan's strategic policies or those contained within National Policy. Gladman's position is that a neighbourhood plan that contains housing policies that seek to constrain housing delivery cannot lawfully be recommended for referendum and be "made" in advance of adoption of up-to-date strategic policies at the local plan level.

3.2 Paragraph 8(2), of Schedule 4B of the Town and Country Planning Act 1990 sets out that *"only a draft Neighbourhood Plan that meets each of a set of basic conditions can be put to a referendum."* This is also supported by Paragraph 065 of the Neighbourhood Planning chapter of National Planning Practice Guidance (NPPG). The basic conditions are outlined as:

- (a) Having regard to **national policies and advice** contained in guidance issued by the Secretary of State, is it appropriate to make the order;
- (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;
- (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;
- (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**; and
- (g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

- 3.3 In section 4 of this representation Gladman test the Vision, Objectives and Policies proposed by the GHNP against the basic conditions listed above in order to determine whether the plan in its current form can be considered compliant with the basic conditions.
- 3.4 To proceed with the plan in its current form would represent a waste of Parish Council and local planning authority's resources and it is Gladman's view that the pre-submission plan requires substantial amendment and reconsideration prior to any submission for examination.
- 3.5 The current Aylesbury Vale Local Plan (2004) covered the period up until 2011. The Plan period has now passed and this Plan is significantly out of date. The Council prepared a new Local Plan the Vale of Aylesbury Plan (VAP), but this was recently withdrawn following the Inspector's stated conclusions on soundness and Duty to Cooperate at the stage 1 Examination hearings. The Inspector made significant criticisms of the deficiencies in the preparation that had been undertaken; see notably paragraphs 27-28, 35-42, 43-45.
- 3.6 The Council are now at the very initial stages of preparing the Vale of Aylesbury Local Plan (VALP), having only very recently concluded a scoping consultation. In addition to detailed representations made to the VAP, Gladman submitted further representations the VALP scoping consultation and call for sites exercise (see Appendix 2).
- 3.7 Due to the new plan being at such an early stage, and with so much ground to make up to meet the requirements of soundness and the duty to cooperate, it is unclear what the preferred spatial strategy will be, or the scale of growth that the VALP will seek to accommodate. The GHNP is therefore "premature" in that the strategic priorities for the District are yet to be determined. The Parish Council are proceeding under a fundamental misapprehension that the GHNP can be used to fill the gap, see Foreword and paragraph 2.20 of the Pre-Submission Plan.
- 3.8 The document seeks to make policy judgements that have yet to be determined through the Local Plan. Furthermore the GHNP as proposed is inflexible and provides a restrictive approach to growth within the area. This is contrary to the whole ethos of the Framework and the presumption in favour of sustainable development.
- 3.9 Having regard to the points set out above, if progressed and submitted in its current form the GHNP would be in conflict with basic conditions 8(2) (a), (d), (e) and (f).

4 COMMENTS ON POLICIES

4.1 Vision & Objectives

- 4.1.1 The GHNP outlines the plan's vision for the period 2014-2031 and therefore forms the basis on which the objectives and policies have been formulated.
- 4.1.2 The vision and objectives of the GHNP should be aspirational and growth orientated in line with the key objectives of national policy, especially the requirement under paragraph 47 significantly to boost the supply of housing. Where, as here, a Plan is constructed solely around policies which seek to constrain the total supply of housing within the neighbourhood plan area, paragraphs 14, 16, 47, 49 and 184 are principal policy considerations for the purpose of assessment of basic condition 8(2)(a).
- 4.1.3 Gladman note that paragraph 3.4 of the GHNP states "*accept and welcome change that will enable the community to grow in a sustainable manner.*" However Gladman contend that the way the GHNP has been drafted and the policies within this (particularly Policy 1) will act to restrict sustainable development within the neighbourhood plan area. This permissive approach to growth could result in negative implications for the community in the future preventing the community from growing in a sustainable manner as desired.

4.2 Land Use Policies

4.2.1 Policy 1: Spatial Plan and Sustainable Development

- 4.2.2 Policy 1 sets out the following framework for sustainable development within the neighbourhood plan area:

The Neighbourhood Plan designates a Great Horwood Settlement Boundary (GHSB), as shown on the Proposals Map, for the purpose of containing the physical growth of the village over the plan period.

The Neighbourhood Plan will support development proposals on land within the GHSB provided:

- *They comprise no more than 15 dwellings and land of no more than 0.5 Ha;*
- *35% of the total dwellings are provided as affordable homes, subject to viability;*
- *A proportion of open market dwelling plots are made available, if desired for custom build;*
- *A proportion of open market and affordable dwellings are provided that are suited to occupancy by older person households;*
- *They sustain or enhance the significance of special architectural and historic interest of Great Horwood Conservation Area and its setting;*
- *They do not result in loss of any public open space*

Development proposals on land outside the GHSB will not be permitted unless it is necessary for the purpose of agriculture or forestry, or for enterprise, diversification or recreation that benefits the rural economy without harming countryside interests...

- 4.2.3 Policy 1 actively seeks to constrain housing and is contrary to the ethos of the Framework. Greg Clark, in the Ministerial foreword to the Framework stated *“sustainable development is about positive growth – making economic, environmental and social progress for this and future generations... Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision.”*
- 4.2.4 The Framework lists a number of Core Planning Principles, one of which states *“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.”*¹
- 4.2.5 Gladman note that through the supporting text to Policy 1 that the GHSB has been defined to include land that is proposed for allocation for housing development in policies 2, 3 and 4 of the GHNP. Over the plan period these allocations will deliver 45 new dwellings, in addition to any ‘windfall’ schemes that are consented. The evidential basis for this is unclear. The references to the AVL and VAP clearly no longer provide a sound basis. Appendix A within the Spatial Policy: Site Size is, with respect, very basic: relying on an assumption that the village will remain the same proportion of the total population, and with further assumptions on the basis of the VAP evidence base and other statistical inputs that are focussed entirely on the Parish. There is no attempt to consider the role that this area plays within the wider District, especially its relationship with Winslow.
- 4.2.6 The Plan is premised on a settlement boundary which restricts all development except in very narrow circumstances. Gladman contend that the GHNP should not be setting a settlement boundary, as this provides no flexibility for sustainable growth and effectively restricts any development from coming forward which lies outside of this. This restrictive approach to growth will not only limit and constrain the settlement of Great Horwood from sustainable growth but will have a restrictive effect on the northern edge of Winslow. Policy wording that equated to a settlement boundary was expressly rejected by the Examiner of the Tattenhall Neighbourhood Plan as a mechanism that would not be compliant with the basic conditions. That conclusion was endorsed by the High Court in *R(BDW Trading Ltd) v Cheshire West and Chester Council* [2014] 1470 (Admin), [32]-[34], [72], [87]-[89].
- 4.2.7 A settlement boundary as proposed would actively restrict growth. This is contradictory to the objectives of the Framework and the Government generally, as contained in paragraph 47 and the NPPF as a whole. Proposed residential sites should be judged on the basis of their individual merits and in the context of the presumption in favour of sustainable development. Paragraph 14 of the NPPF: *“at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as the golden thread running through both plan-making and decision-taking.”*

¹ Paragraph 17, bullet point 3, NPPF

- 4.2.8 The GHSB should be removed from the GHNP completely.
- 4.2.9 In preparing the neighbourhood plan the Parish Council need to be aware and consider the neighbouring areas, the potential for growth in these areas and the implications that policies within the Plan may have on these locations, notably Winslow. The GHNP should not be used as a mechanism to stifle development on the northern edge of Winslow. As submitted through representations to the Winslow Neighbourhood Plan, this location offers significant opportunities for growth linked to the proposed railway station and the East West rail link. To arbitrarily restricts this growth potential and this significant opportunity for sustainable development is contrary to the whole ethos of the Framework and would, Gladman contend, result in basic condition 8(2)(a) not being met.
- 4.2.10 The combination of the GHSB and the 15 dwelling limit for development proposals effectively results in a cap on development for the area. Gladman object to this approach as contrary to basic conditions 8(2)(a), (d) and (e).
- 4.2.11 Gladman do not consider there to be a robust evidential basis for the 15 dwelling cap proposed for housing sites within the GHSB. This is a somewhat arbitrary figure, which could act to prevent otherwise sustainable development from coming forward. Gladman note the Spatial Policy: Site Size document (2014) included within the identified list of evidence base documents. This document refers to the benefits of smaller scale sites in terms of phasing development over the plan period resulting in greater flexibility in matching supply to demand. At a community consultation event there was preference for small scale sites rather than sites of circa 50 dwellings. Whilst Gladman acknowledge that this type of evidence and community consultation should be considered when setting policies, Gladman do not believe that this provides sufficient, robust evidence to justify the 15 dwelling cap on housing sites proposed through Policy 1.
- 4.2.12 The Spatial Policy Site Size document states that initial work on the GHNP was based upon the strategic development needs outlined in the emerging Vale of Aylesbury Plan (VAP). This was found to be unsound in terms of the overall provision for housing and jobs and therefore should not be the basis for the GHNP.
- 4.2.13 **Draft Sustainability Appraisal**
- 4.2.14 The Parish Council have prepared a Draft Sustainability Appraisal (incorporating an SEA) to accompany the pre-submission version of the GHNP. This document acknowledges that *"Policy 1 carries the most importance as it establishes the key principle within which the policies that allocate land for development have been designed. This policy establishes and defines the Great Horwood Settlement Boundary to distinguish the consideration of planning applications within the village settlement from those outside the boundary."*

- 4.2.15 Within the draft Sustainability Appraisal, Policy 1 is considered against three other policy options.
- Option A – allocate the chosen sites plus land off Weston Road and land off Willow Road, resulting in an approximate total of 115 dwellings in the plan period;
 - Option B – allocate land off Weston Road and south of Little Horwood Road, only resulting in an approximate total of 60 dwellings in the plan period;
 - Option C – allocate only land off Weston Road, resulting in an approximate total of 45 dwellings in the plan period.
- 4.2.16 The document concludes that none of the other options deliver as strong sustainability performance as the proposal in the GHNP. All three additional options considered would deliver housing growth, but the scale and location of that growth has consequences for local amenity and effects on the setting of the Conservation Area and wider landscape. Gladman consider that there has been a major error in the failure to identify increased levels of growth across the neighbourhood plan area and development at Winslow North as reasonable alternatives under Article 5(1) and Annex I(h) of the SEA Directive and Regulation 12 and Schedule 1 of the see Environmental Assessment of Plans and Programmes Regulations 2004, in accordance with the established case law in this area: *Save Historic Newmarket v Forest Heath DC* [2011] EWHC 606 (Admin), [40]; *Heard v Broadland DC* [2012] EWHC 344 (Admin), [71], as approved in *Cogent Land LLP v Rochford DC* [2012] EWHC 2542 (Admin), *R (Chalfont St Peter Parish Council) v Chiltern District Council* [2013] EWHC 1877, [29]) and *Ashdown Forest Economic Development LLP v SSCLG and Wealden DC* [2014] EWHC 406 (Admin), [95]-[97]).
- 4.2.17 In relation to the specific options which have been chosen, whilst Gladman accept that these additional options may result in increased implications on the conservation area and wider landscape, the SA is limited in its analysis and narrative and consequently any detail of these implications are unclear. The SA is an overly simplistic and crude assessment and appears to ignore the sustainability benefits that could be gained from planning for and delivering an increased scale of growth within the neighbourhood plan area, especially at a time when following the Inspector's Report and the withdrawal of the VAP, the District and Parish Councils are well aware that much more will have to be done to provide for objectively assessed need sufficient to meet the requirement of soundness, and to comply with the duty to cooperate. Sustainable growth is a key driver for the Government, as highlighted through national policy, and it is fundamental that the Parish Council recognise the benefits that could be gained from an increased scale of growth in terms of ensuring the viability and vitality of the services and facilities within the locality. The GHNP should not propose housing constraint policies which would act to close off the growth potential of the area.
- 4.2.18 Gladman do not consider the SA adequately explores and justifies the restrictive approach to growth proposed through the GHSB and proposed allocations, and whether a more growth orientated strategy would be detrimental in sustainability terms. The Parish Council need to be

able to clearly justify the proposed approach to growth, which in its current form the GHNP and supporting documents does not.

4.2.19 Gladman query some of the decisions/assessments made in relation to the impacts on the SA objectives and how the scoring/weighting of these elements have been applied. For example the village centre objective states *“support and enhance the role of the village centre by:*

- *Encouraging vitality and viability;*
- *Maximising potential to meet the needs of the community;*
- *Enabling improvements to the village centre;*
- *Enable opportunities for retail provision”*

The GHNP policy and the three alternative options all score the same in relation to this SA objective, however Gladman would contend that the options with increased housing growth should potentially score more favourably as they will help to sustain an enhance the vitality and viability of the village centre and would also result in increased community benefits.

4.2.20 The SA tests a number of objectives and ranks these in terms of green, amber and red (likely positive effect, likely neutral or minor adverse effect and likely minor or moderate effect respectively). The SA provides only limited narrative, so there is no clear justification for the assessments that have been made. The Parish Council need to ensure that the SA is robust and justified and provides a balanced judgement on the implications of the proposals and alternative options. In its current form, Gladman contend that the SA has a number of fundamental flaws deficiencies and the EU obligations have not been met. As SEA/SA must inform the production of the plan from the outset, NPPG “Strategic environmental assessment and sustainability appraisal” 028 and 029 and this has not been achieved to date. These defects cannot be addressed at the VALP level, in circumstances where the Parish acknowledge that that plan preparation process is already substantially delayed. There has been a failure to comply with basic condition 8(2)(f), and the connected conditions 8(2)(a) (policy and guidance on SEA) and 8(2)(d)(sustainable development).

4.3 Policy 2, 3 and 4 – Housing allocations

4.3.1 Gladman note that through policies 2, 3 and 4 the GHNP proposes to allocate sites for residential development. These proposals are summarised as follows:

- Policy 2 – Land south of Little Horwood Road, up to 15 dwellings over the period 2020-2031
- Policy 3 – Land north of Little Horwood Road, up to 15 dwellings over the period 2020-2031
- Policy 4 – Land of Nash Road, up to 15 dwellings over the period 2014-2019

4.3.2 Gladman consider that the Site Assessment process underlying this process is flawed and contrary to the NPPG guidance (and thus basic condition 8(2)(a) (see further below). As the GHNP is proposing site allocations, the plan needs to be subject to a full and adequate Strategic Environmental Assessment (SEA) (as stated above).

4.3.3 In respect of this the NPPG highlights that:

“In some circumstances, where a neighbourhood plan could have significant environmental effects, it may fall within the scope of the Environmental Assessment of Plans Programmes Regulations 2004 and so require a Strategic Environment Assessment. One of the basic conditions that will be tested by the Independent examiner is whether the making of the neighbourhood plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).”

4.3.4 This section of the guidance goes on to state “A strategic environmental assessment may be required, for example, where:

- A neighbourhood plan allocates sites for development
- The neighbouring area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- The neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.”²

4.3.5 Gladman note that the Parish Council have prepared a draft sustainability appraisal (incorporating an SEA) published to accompany the pre-submission version of the GHNP. This document concludes that there are no significant adverse effects resulting from the policies in the Neighbourhood Plan. Further critique of the SA is provided in the earlier section of this representation. There has been a failure to comply with basic condition 8(2)(f), and the connected conditions 8(2)(a) (policy and guidance on SEA) and 8(2)(d)(sustainable development).

4.4 Implementation

4.4.1 Proposal 1: Infrastructure Projects

4.4.2 The GHNP does not make any reference to East-West Rail, which is a major flaw. This is a significant infrastructure project which will have major strategic planning and sustainability implications on the surrounding area. The Plan needs to acknowledge the impact of important committed investments in the rural parts of Aylesbury Vale, not least the East-West rail link, and specifically the new railway station proposed to be delivered to the northern edge of Winslow, which will support improved accessibility for this locality. The Plan must consider the need to make further provision for housing linked to the economic growth potential in this area, in the text of the Plan, the Evidence Base and the Sustainability Appraisal.

4.4.3 Proposal 2: Community Land Trust

4.4.4 Proposal 2 sets out how the Parish Council intends to investigate the use of Community Land Trusts (CLT), and how a CLT may be used to implement the affordable housing element of policies 2, 3 and 4. Whilst in principle Gladman have no objection to this approach, the proposal as it stands lacks clarity and cannot be considered deliverable or achievable. This element of the

² ID 11-027-20140306

neighbourhood plan is something which the Parish Council will be exploring further and as such this proposal seems a bit premature within the GHNP.

5 CRITIQUE OF EVIDENCE BASE

5.1.1 Annex A of the GHNP sets out the evidence base used when preparing the plan. The evidence base is as follows:

- Great Horwood Parish Housing Needs Survey (2014)
- Great Horwood Parish Community Event (2014)
- Great Horwood Parish Plan (2006)
- Great Horwood Community View (2011)
- Great Horwood Parish Neighbourhood Plan Site Assessment (2014)
- Great Horwood Parish Neighbourhood Plan Spatial Policy: Site size (2014)
- Great Horwood Conservation Area Review (2012)
- Great Horwood Parish Historic Town Assessment (2012)
- Aylesbury Vale Settlement Hierarchy Assessment: A Critique (2014)
- Aylesbury Vale Settlement Assessment (2012)
- Vale of Aylesbury Plan: Great Horwood Fact Pack (2012)
- Vale of Aylesbury Plan: Pre-Submission (2012)
- Aylesbury Vale Strategic Housing Land Availability Assessment (2013)
- Aylesbury Vale District Local Plan (2004)
- Aylesbury Vale Strategic Flood Risk Assessment (2012)
- Vale of Aylesbury Plan - Pre-Submission Sustainability Appraisal (2012)
- Aylesbury Vale Landscape Character Assessment: Horwood Claylands (2008)
- Buckinghamshire & Milton Keynes Environmental Records Centre

5.1.2 Gladman note that a number of the evidence base documents listed within the GHNP formed part of the evidence base of the now withdrawn VAP. The Parish Council should no longer be relying upon the Vale of Aylesbury Plan– Pre-Submission (2012) as the later iterations of this document were considered to be unsound, and as such following the initial stage of the Examination the VAP was withdrawn.

5.1.3 The evidence base also includes the Aylesbury Vale District Local Plan (2004). This is now significantly out of date as the plan period has passed. The Aylesbury Vale District Local Plan covered the period 2004-2011, this time period has now elapsed and the position in the District is likely to have changed significantly. The GHNP should not be relying on this document as a key part of the evidence base.

Site Assessment (2014)

5.1.4 When selecting housing site allocations, sites should be judged on their own merits and objective decisions should be made through the SHLAA and plan preparation process. The NPPG “Neighbourhood Plans”, paragraph 042 makes clear that a qualifying body must carry out an

appraisal of options and an assessment of individual sites against clearly identified criteria, in accordance with NPPG, “Housing and economic land availability assessment”. Gladman note that as part of the Site Assessment document (2014) five sites were considered by both the SHLAA and the Great Horwood neighbourhood plan team, and from this assessment three sites were selected as proposed allocations.

- 5.1.5 The Site Assessments document is limited in detail and as such it is unclear how in depth the site assessment process which informed the decisions was. There has been no reasonable effort to identify an appropriate range of sites, including Winslow North, (Stage 1), then properly to assess the locations, and thereby to construct a sound evidence base.

Spatial Policy: Site Size (2014)

- 5.1.6 The GHNP Spatial Policy: Site Size document (2014) provides limited evidence and justification for the site size cap that Policy 1 proposes. This is a key element of Policy 1, is restrictive in nature and the evidence base does not sufficiently warrant its inclusion within the GHNP.

6 CONCLUSIONS

6.1.1 In conclusion Gladman are concerned that the GHNP is not sufficiently growth oriented and would effectively act to restrict growth. The GHNP is contrary to the whole ethos of the Framework and fails to meet a number of the basic conditions required for neighbourhood plans. Specifically, Policy 1 is fundamentally flawed and would result in significant constraints to development.

6.1.2 Gladman contend that this neighbourhood plan cannot be looked at in isolation as it would effectively restrict growth to the northern edge of Winslow, an area with significant growth potential linked to East-West Rail and the proposals for a new railway station to the north of the settlement. The GHNP should not be used as a tool to restrict housing growth in sustainable locations such as this.

6.1.3 In conclusion the GHNP is fundamentally unsound and does not meet the basic conditions. The GHNP is a plan which concentrates on housing policies but is predicated on restricting new development around Great Horwood and within the neighbourhood plan area. As outlined through this representation, the GHNP contains a number of flaws which contravene the following basis conditions:

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

- Policy 1 seeks to constrain development, around both the Great Horwood settlement and the neighbourhood plan area as a whole (including the northern edge of Winslow). This is in conflict with national policy as established by the National Planning Policy Framework and Planning Practice Guidance

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

- The approach taken by Policy 1, imposing a cap on site size and a tightly drawn settlement boundary is overly restrictive to new development and is not supported by a sufficient evidence base. Policy 1 as proposed could restrict otherwise sustainable development from being delivered.

(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),

There is no sound or up-to-date local development plan against which the GHNP could be prepared. The Vale of Aylesbury Plan (VAP) was recently withdrawn and preparation of the Vale of Aylesbury Local Plan (VALP) is in the very early stages (having recently undertaken a Regulation 18 scoping consultation). Production of the neighbourhood plan ahead of the examination and adoption of the VALP pre-

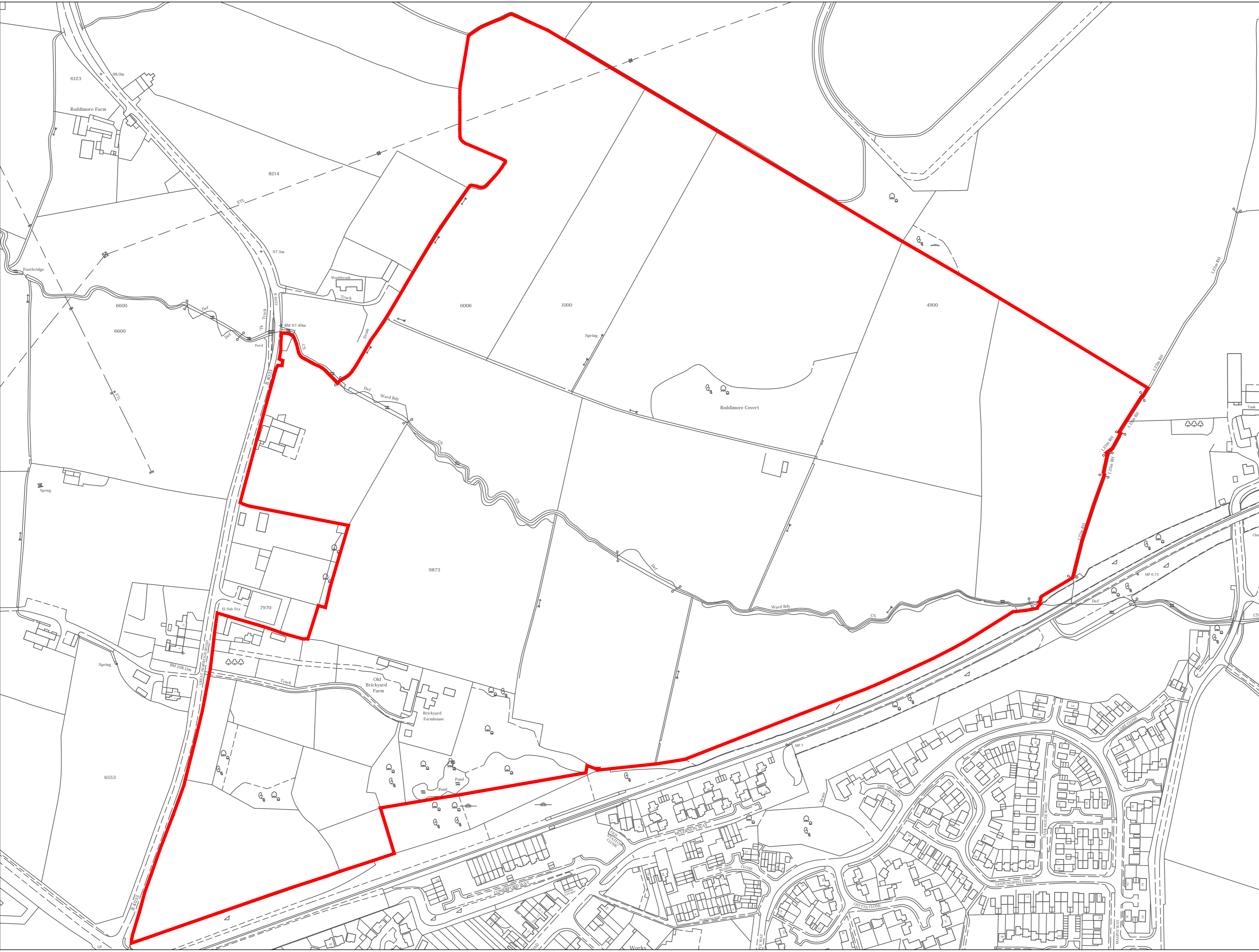
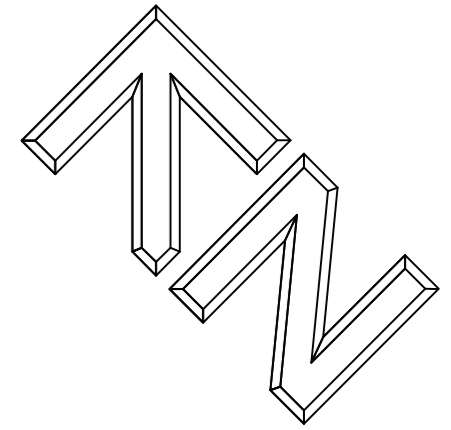
determines a strategic policy approach. This is a fundamental error of law, and for as long as the plan seeks to constrain housing in circumstances where there are no up-to-date strategic housing policies the Neighbourhood Plan cannot lawfully be examined with a recommendation that it proceed to referendum or lawfully be made.

6.1.4 In addition, Gladman have raised serious concerns with the SA (and SEA) and highlighted a number of deficiencies within this document, as such basic condition (f) relating to EU obligations has not been met.

6.1.5 If the GHNP in its current form was submitted for examination, Gladman believe the plan should be found to have failed to comply with the basic conditions and would not be recommended to proceed. In relation to the significant objections raised Gladman would wish to participate in the relevant hearing sessions.

APPENDIX 1

Site location plan, Winslow North



Rev	Date	Revision notes	By		
*	*	*	*		
DO NOT SCALE					
STATUS					
INFORMATION					
Project					
WINSLOW NORTH					
Title					
LOCATION PLAN					
		GLADMAN Gladman House Alexandria Way Congleton Business Park Congleton Cheshire CW12 1LE Tel: 01260 288800 Fax: 01260 288801 www.gladman.co.uk			
		Drawn By	Publish Date	Scale(s)	
mah		Aug 2013		1:2500 @ A2	
Project no.		Drawing no.		Revision	
2013 - 069		100			

APPENDIX 2

The Vale of Aylesbury Local Plan, Scoping Consultation – Regulation 18 Consultation response made by Gladman Developments (May 2014)

The Vale of Aylesbury Local Plan

Scoping Consultation – Regulation 18

Consultation Response

Gladman Developments Limited.



May 2014

1 INTRODUCTION

- 1.1 The Vale of Aylesbury Plan (VAP) was withdrawn on the 5th February 2014, following the Inspector's letter of the 7th January 2014 which outlined a failure to comply with the Duty to Cooperate and in relation to 'soundness' identified that there would be a need for a substantial amount of additional work to rectify the plans deficiencies.
- 1.2 We hope that the Council will now take the opportunity to engage proactively with the development industry to establish the full objectively assessed need for housing and avoid the mistakes of the past which have resulted in two previous versions of the local development plan being withdrawn before the examinations were completed.
- 1.3 The Inspector considered the Duty to Cooperate in detail, looking at the evidence base prepared, the timing of this, any engagement with neighbouring local planning authorities and how strategic issues such as unmet housing needs were being addressed. Paragraph 27 of the Inspector's letter states *"As it stand there are significant issues in terms of potential unmet needs from other authorities and how they will be accommodated. There are particular issues concerning the relationship of Aylesbury Vale to Milton Keynes and its future growth. These issues have been left unresolved. The Council has been aware of these issues from early in the Plan preparation process, if not before..."* Paragraph 28 goes on to conclude *"On the basis of the above assessment I consider that the Council has not engaged constructively, actively and on an ongoing basis and that this has undermined the effectiveness of plan preparation in dealing with key strategic issues. It is with regret therefore that I must conclude that the Council has not complied with the duty to cooperate."*
- 1.4 Specifically, in relation to the proposed housing target, the Inspector concluded in paragraph 42 *"Taking all of the above into account, I consider that in relation to the overall provision for housing and jobs, the Plan has not been positively prepared, it is not justified or effective and it is not consistent with national policy. It is therefore not sound."*
- 1.5 The Council have now started work on a new Plan, the Vale of Aylesbury Local Plan (VALP). Instead of the previous two part plan, the Council are now progressing with a plan that will include both the overall strategy for the District alongside the site allocations and development management policies.
- 1.6 Gladman welcome the opportunity to comment on the content and scope of the new Local Plan, having previously submitted written representations to various stages throughout the VAP preparation and having participated at the VAP Examination in December 2013. Gladman also welcome the Council's approach to combine the strategy for the district and the site allocations and development management policies into one Local Plan for the District.

- 1.7 Gladman note that alongside the current consultation the Council are undertaking a Call for sites exercise. Gladman are promoting a number of sites for residential development within the District and will be submitting site specific information as part of this exercise.
- 1.8 Through the preparation of the VALP, the Council need to ensure that they do not encounter the same issues and deficiencies as with the VAP. Gladman believe that the Withdrawal of the VAP provides an opportunity for the Council to prepare a Plan that meet the full needs and aspirations of the District as a whole, and addresses any cross boundary issues.
- 1.9 The Council are now in a position where they can approach plan making positively and ensure that the Plan reflects the guidance set out through the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).
- 1.10 Of fundamental importance when bringing forward the VALP, the Council need to recognise the significance of the rural area within the District. The previous plan did not sufficiently grapple with the issues of the rural areas and did not provide a positive approach to growth. The Council need to understand the implications on these locations (and the services and facilities within them) if the Plan does not propose the scale of growth needed to meet their needs.
- 1.11 Gladman made detailed submissions to the VAP, concerning the restrictive approach to growth particularly in the rural areas of the District. Gladman also made detailed representations highlighting concerns over the robustness of the evidence relied upon by the Council.
- 1.12 Gladman urge the Council to refer back to these submissions which provide detailed evidence, including an Objective Assessment of Need (OAN) for housing and a Local Plan for the rural area setting out how this need could be accommodated and providing evidence to support this approach.
- 1.13 In particular, we urge the Council to ensure that the new Local Plan maximizes the opportunities presented by valuable and important infrastructure which the Government has funded to assist in the economic recovery of the country. The previous VAP singularly failed to grasp the opportunity presented by East West Rail and this must be addressed positively in the new Local Plan.
- 1.14 In addition to the detailed suit of representations and evidence submitted to the various stages of the VAP consultation, Gladman have also been involved in the Winslow Neighbourhood Plan, having made a number of written submissions and taken an active role at the Examination hearing. Gladman will be submitting representations to the Great Horwood Neighbourhood Plan pre-submission consultation in due course. In October 2013 Gladman submitted representations in response to the VAP Delivery Policies Scoping Consultation, these comments remain and should be considered as part of the current VALP consultation.

- 1.15 As the Council will be aware, Gladman have significant interests within Aylesbury Vale, and consequently will be monitoring closely the preparation of the VALP, seeking to ensure that this follows national guidance and provides a positive policy framework for the District as a whole.

2 CONTENT AND SCOPE

2.1 Gladman note that the scoping document outlines six key elements which will be covered in the VALP

- Spatial strategy and vision for the district and key settlements (Aylesbury and Buckingham)
- Housing and jobs numbers for the local plan period (through to 2031)
- Site allocations (if required) for housing, employment, retail and G&T sites
- Community facilities and criteria for their implementation – may include retail, crematoria, leisure and other community facilities
- Development management policies – including design policies, affordable housing, housing mix, employment, infrastructure delivery, Green Belt policy / criteria for assessing proposals within, tourism, gypsy and travelers, change of use, renewable energy, climate change,
- Infrastructure delivery plan (including policy basis for Community Infrastructure Levy (CIL))

Question 1 – Are all of the policy topic areas above appropriate for inclusion? (If not, please say why and where else should they be considered)

2.2 Gladman support the inclusion of the six key topic areas as identified above, however remind the Council of the need to ensure that these are approached in a positive and ambitious manner and are based on robust, up-to-date evidence, as required by paragraphs 158 and 159 of the NPPF.

2.3 The robustness of the proposed housing requirement was a key area of contention with the VAP and significant deficiencies were identified by the Inspector and numerous objectors. The Council need to ensure that through the VALP they are identifying a strategy which, as required by the NPPF and NPPG, seeks to meet the full objectively assessed needs for market and affordable housing¹ and in doing so ensures that any unmet need from neighbouring areas is accommodated where reasonable to do so².

Question 2 – Is there anything missing from the list above that should be included within the VALP?

2.4 Having reviewed the brief consultation document and through previous involvement in plan preparation in AVDC, Gladman consider there to be some fundamental omissions from the proposed content and scope of the VALP, which if they continued to not be recognised could

¹ Paragraph 47 of the NPPF

² Paragraph 182 of the NPPF

result in a Plan which again does not meet the tests of soundness identified in paragraph 182 of the Framework.

- 2.5 One of the key areas that Gladman feel has been omitted from the content and scope of the VALP is in relation to the rural areas and ensuring sufficient growth is directed to these types of settlement. Reference is made specifically to Aylesbury and Buckingham, but the rural area and settlements such as Winslow appear not to be given the same degree of focus.
- 2.6 It is of paramount importance that the Council have a clear understanding of the issues affecting all elements of the District including the rural areas, and clarity over the scale of housing growth needed in these areas. Linked to this the Council should assess the impact that delivery of a lesser scale would have on such settlements in terms of the vitality of existing services and communities.
- 2.7 Through the VALP the Council need to ensure that they do not restrict the rural areas from achieving their potential. The rural areas offer viable and sustainable development locations and require sustainable growth moving forwards. The rural areas have their own element of housing need within the District and the Plan should be looking for this need to be accommodated within these locations.
- 2.8 As noted within the Sustainable Development Plan for Rural Aylesbury Vale (submitted to the Council as part of representations to the VAP), the rural area of Aylesbury Vale makes up the majority of the spatial area and contains well over 100 settlements. The Plan submitted by Gladman recognises both the current distribution of people, services and infrastructure as well as the impact of important committed investment in the rural parts of the district, not least the East-West rail link. This links to a further omission in the scoping consultation, the lack of any reference to east west rail and the opportunities and growth potential that this will create for settlements within the District, for example Winslow following the planned new railway station.
- 2.9 Opportunities such as east west rail and the growth potential this may result in should be a key feature of the Local Plan strategy. If the Council fail to recognise factors such as this there would a significant missed opportunity. The whole ethos of the NPPF is focused around sustainable development and growth. To be found sound when it reaches the examination stage the VALP needs to be prepared in a positive manner in accordance with these objectives.

Question 3 – Do you have any specific suggestions about what the strategy or policies should contain (please provide as much detail as possible).

- 2.10 Gladman refer the Council to previous submissions made in response to the VAP (letter to John Byrne, Head of Planning 12th March 2013, Consultation response to the Vale of Aylesbury Plan

Strategy May/June 2013, EiP Hearing Statements, November 2013) Within these submissions Gladman provided the Council with the following:

- Alternative Strategic Housing Market Assessment / OAN (prepared by Regeneris Consulting)
- Sustainable Development Plan for the rural areas of Aylesbury Vale (prepared jointly by Gladman Developments, GVA, Hourigan Connolly, Development Economics and Simon Turner Consulting).

2.11 The OAN report prepared by Regeneris outlines the scale of housing need within the District and was consistent with the published national policy at the time. Gladman note that this OAN may need further updates to reflect the recently published NPPG and the increased emphasis placed on market signals and the need for upwards adjustments to housing requirements when these point to a worsening trend in any of these indicators. This OAN does provide a good starting point in terms of the scale of growth the Council should be looking to deliver.

2.12 Linked to this the Council need to properly assess the unmet need from neighbouring authorities and should work in collaboration with these areas to ensure the housing needs of the wider area are capable of being met.

2.13 Through the VAP the Council were found to have not sufficiently discharged their duty to cooperate. It is fundamental that this mistake is not made again through the VALP. The Council need to ensure that through the Plan preparation they are thinking not just of the District in isolation but the impact of neighbouring authorities regarding cross boundary strategic issues and the growth potential linked to these areas,

2.14 The Sustainable Development Plan for Rural Aylesbury Vale responds to current challenges and opportunities and provides a detailed framework to ensure the sustainable futures of these settlements and the attractive environmental and built context in which they exist.

2.15 The Sustainable Development plan for the rural areas of Aylesbury Vale provided a detailed plan for the rural area of the district, with an up-to-date and robust evidence base to support the proposed strategy.

Question 4 – Do you have any other comments?

2.16 The Council need to ensure that the development industry is engaged with proactively throughout the plan preparation process to avoid a further repeat of the problems encountered in the last two attempts to produce a local plan.

3 CALL FOR SITES

3.1 Alongside the current consultation on the VALP the Council are also undertaking a call for sites exercise. Gladman have completed the call for sites proformas and submitted these along with site plans separately to the Council. For clarity below is the list of sites, submitted by Gladman as part of the call for sites exercise:

- Land south of Leeches Way, Cheddington
- Land off Station Road, Ivinghoe
- Land East of Little Horwood Road, Winslow
- Land off North End Road, Steeple Claydon
- Land south of Verney Road, Winslow
- Land off Great Horwood Road, Winslow

3.2 Gladman are actively promoting the above sites on behalf of the landowners. If the Council require any further information regarding these sites please do not hesitate to contact Gladman directly.

Response 4.3

The Neighbourhood Plan
Parish Clerk,
2 Spring Close
Great Horwood
Bucks
MK17 0QU

5 Emenio
Station Road
Beaconsfield
Bucks
HP9 1AU

9 June 2014

T: 01494 671960
M: 07816419779

Dear Sir/Madam

RE: *GREAT HORWOOD PARISH NEIGHBOURHOOD PLAN 2014-2031 – PRE-SUBMISISON PLAN INCLUDING THE PROMOTION INCLUSION OF LAND TO THE REAR OF 10-12 HIGH STREET, GREAT HORWOOD, MK17 0QL*

Firstly there are a number of comments regarding the strategic and overarching policy of 'Policy 1: Spatial Plan & Sustainable Development' which states:

"The Neighbourhood Plan will support development proposals on land within the GHSB provided:

they comprise no more than 15 dwellings and land of no more than 0.5 Ha;

35% of the total dwellings are provided as affordable homes, subject to viability;

a proportion of open market dwelling plots are made available, if desired, for custom build;

a proportion of open market and affordable dwellings are provided that are suited to occupancy by older person households;

they sustain or enhance the significance of the special architectural and historic interest of Great Horwood Conservation Area and its setting; and

they do not result in the loss of any public open space"

Turning to the Spatial Plan and specifically the named site of Land to the south of Little Horwood Road, what is abundantly clear is significantly greater than 0.5 hectares, from our calculations this is considerably over 1 hectare in size. Furthermore, the site will have a significant impact upon the character of the settlement given its location on the edge of the village and countryside setting contrary to the 5th and 6th criteria.

If you were still going to consider 'land to the South of Little Horwood Road' the boundary will need to be amended to ensure it relates to your policies reducing the amount of land within the Spatial Plan/Village Boundary. However it is contested that sites within the village itself should be utilised in the first instance.

Turning to the Spatial Plan as identified on the proposal map, this too stands as being contrary to national policies within the NPPF. The plan needs to be amended (as illustrated by our submission) to include the Previously Developed Land/rear gardens, of the properties that front the High Street, where policy aims to concentrate new development.

Further to the above, if land on the periphery of the village is being included within the plan there should be no reason why similar parcels of land, which are substantially enclosed and located in the center of the the village should be included within the Spatial Plan to take account of the strategic need for housing.

This leads us into the introduction of our clients land at 'Land to the rear of 10-12 High Street Great Horwood. The Councils SHLAA submission has been included with this representation, which outlines the site in more detail.

To respond to a previous comment made, it is acknowledged that the site forms a larger area of 1 hectare and the statement with the SHLAA of the potential provision of circa 20 units, this is anticipated its maximum capacity and discussions with the Parish Council with respect to its quantum of development and design are welcomed. With respect to its size beaching 0.5 hectares this is not considered a concern as it falls within the heart of the village and being substantially enclosed. As a result the village boundary/spatial plan (as illustrated) continues the natural and physical form of the settlement. It is considered the Spatial Plan as submitted is contrived and unsound on this basis.

It is appreciated the site has a planning history which has raised concerns surrounding Conservation Area views. These are acknowledged, however these were raised under previous applications in 1999 (for four unit) and on balance at the time the LPA had a deliverable and sound 5 year supply, thus considered this site was not appropriate/required to deliver housing at that time, thus the need for housing was not a material weighted factor.

AVDC policy and housing needs position has now substantially moved on, that being there is not a plan to base a strategic delivery of housing, this has opened the gates to speculative and premature applications, such as the Taylor Wimpey Scheme for (45 units assigned reference 14/01540).

The TW application along with the site identified as 'Land South of Little Horwood Road' individually will be harmful on their own grounds, however combined will have a compounding impact on the character of the settlement, substantially impacting upon its setting due to the quantum of new development when entering from the east. Sites such as these attached to rural village settlements should only be considered where all existing sites within the village have been exhausted.

My clients land falls within the heart of settlement, tantamount to be enclosed on all sides and where policy aims to focus development. It is also in the most sustainable location and as close to village amenities as possible. As stated above

we acknowledge the importance of the views and character of its surroundings and any development coming forward will address these accordingly, with the applicant happy to enter into discussions with the Council, by way of addressing layout, scale and design including the careful use of natural materials etc.

The pervious VAP identified Great Horwood as 'larger Village' to deliver housing and thus required to provide a strategic purpose for housing delivery. It is clear sites of this size are warranted to deliver the future need for housing for the District and specifically Great Horwood.

Given the foregoing it is clearly apparent a balanced approach with respect to the future delivery of housing is essential and not basing strategic allocations on historic and unparalleled past decisions. Specifically when assessing the potential harm of alterative/combined sites currently being proposed. All of which clearly promote this site as being the most appropriate and sustainable development for the village.

Identifying this site will assist in removing the opportunity of speculative development proposals encroaching into the open countryside outside of the settlement such as the TW site, which should be resisted to ensure the protection of the countryside for its own sake as policy prescribes.

If you have any questions please get back to me.

Yours faithfully,

Mr S Tiffin MRTPI
Progress Planning