Maids Moreton Neighbourhood Development Plan Consultation Statement V1.4 March 2023

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1. Introduction

This Consultation Statement accompanies the submission of the Maids Moreton Neighbourhood Plan (March 2023). It summarises the community engagement programme and then provides detailed analysis of the Regulation 14 statutory consultation that was undertaken in the late Summer and Autumn of 2022. The statement shows how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) have been satisfied.

Chapter 2 describes the community engagement undertaken throughout the neighbourhood plan process. Chapters 3 and 4 are focused on the Statutory Regulation 14 Consultation, including detailed analysis of responses received and amendments made to the Neighbourhood Plan as a consequence.

2. Summary of Community Engagement

2.1 What was done?

Community and stakeholder publicity and engagement have been undertaken as part of the process of preparing the Plan. Engagement has included a public exhibition, questionnaires, a footfall survey and liaison with various stakeholders.

At the very start of the Neighbourhood Plan process, an extensive community engagement exercise was undertaken in September 2016. This informed the aims, issues and policies of the plan and is summarised in 4.2.

Scott's Lane questionnaires and footfall survey took place in 2018 – 2019.

There have been regular briefings on planning matters through various media, including quarterly newsletters. In addition, there have been various local meetings in the past few years, mainly dealing with specific planning matters, which have informed the Neighbourhood Plan. There has been an ongoing dialogue on planning matters.

Owners of potential Local Green Space were contacted.

2.2 Outcomes/Feedback

Outcomes from engagement indicate that people valued or highly valued various village characteristics, including:

- Small distinctive village;
- Separate from Buckingham;
- Community facilities, such as the allotments, playing fields, village hall;
- Quiet and peaceful environment;

- Open countryside, rural feel, footpaths;
- Character of old buildings.

Concerns included:

- Creeping urbanisation;
- Danger of loss of Scotts Lane Fields;
- Inadequate infrastructure to support development;
- Traffic and speeding and limited public transport.

In terms of housing, people supported a mix of accommodation, including affordable housing. People did not want large-scale generic housing estates.

These issues, in addition to analysis of evidence, informed the themes and policies for the Neighbourhood Plan.

3. Regulation 14 Consultation

3.1 How the Consultation Was Undertaken

The Regulation 14 Consultation Version Neighbourhood Plan (V 9.2) and the Heritage Assessment V2 were posted on the Maids Moreton Parish Council website. Hard copies were made available in Buckingham Library and the Wheatsheaf Public House from 13 July 2022 until 24 August 2022.

The consultation was advertised on the Parish Council's Facebook page and its notice board, and circulated to all subscribers on the Mailchimp list. In addition, the Parish Council's July 2022 Summer Newsletter gave details and was delivered to every house in the village and also posted on the Parish Council's website.

Comments were invited in writing by email or in hard copy.

Electronic copies of the two documents were submitted to Buckinghamshire Council through their Neighbourhood Planning Coordinator. Copies and links to the website were sent out to all statutory consultees, and relevant matters were drawn to the attention of landowners.

With the exception of Buckinghamshire Council, few comments were received from statutory consultees and none of significance. There were only comments from two members of the public. At the request of the Buckinghamshire Council Neighbourhood Planning Coordinator, the consultation period was extended to 2 September 2022 as they had issues with people being away on vacation.

3.2 Legal Compliance

The consultation was undertaken fully in compliance with *The Neighbourhood Planning (General) Regulations 2012*. The Plan was made available (on-line and physical versions) and there were clear details on how to make representations (on-line or by printed form) and by what date. The duration of the consultation was 6 weeks, from 13 July to 24 August 2022.

Statutory consultees in Schedule 1 and the local planning authority were consulted (see Chapter 4 of this statement).

The consultation complied with the four Gunning Principles (consultation case law), as follows:

1. proposals are still at a formative stage

The consultation was pre-submission, so the plan could still be changed (and was changed).

2. there is sufficient information to give 'intelligent consideration'

Both summary and full versions of the Plan were made available, together with relevant background evidence.

3. there is adequate time for consideration and response

The 6-week duration of the consultation is set out in planning legislation, and was communicated in consultation materials. Materials made clear how to respond and by what date.

4. 'conscientious consideration' must be given to the consultation responses before a decision is made

This statement is evidence that the consultation responses have been considered conscientiously. Numerous changes have been made the Plan as a consequence of representations received.

4. Statutory Consultees

The following statutory bodies were consulted:

Organisation	Response		
Adjoining Parish Councils			
Buckingham Town Council	None received after acknowledgement		
Radclive-cum-Chackmore	No response received		
Stowe	No response received		
Akeley	No response received		
Foscote	Positive response but no other comments other than Gracewell is now Maids Moreton House (amendment made)		
Leckhampstead	Replied no comments		
Thornborough	No response received		
Thornton	No response received		
Utilities			
Water & Sewerage: Anglian Water	Passed internally to Spatial and Planning Team, no further comments received		
Electricity: National Grid	Responded with a map of their high-tension assets, no other comments.		
Western Power Distribution	No response received		
Gas: SGN	Contact made, no further response		
Homes England	No response received		
Fairhive (formerly VAHT)	No response received		
Other Statutory Consultees			
Natural England	No comments on MMNP Sent copy of their Guidance Annex (which had already been taken into account).		
Environment Agency	Passed to local customer team, no further response		
English Heritage	No response received		

Network Rail	Not relevant		
Highways England	Reviewed plan but no comment required		
BT Openreach	No response received		
Gigaclear	No response received		
NHS Commissioning Group	No response received		
Religious	Included through MMPC newsletter		
Business Groups	None within Maids Moreton		
Represent the interests of different racial, ethnic or national groups	All residents given information through MMPC quarterly Newsletters		
Represent the interests of disabled persons	All residents given information through MMPC quarterly Newsletters		
Landowners			
Scott's Lane Fields (HELAA site MMO001)	Informed them about LGS proposal by email and in person at their presentations in village hall in summer 2022 – no response or comments received.		
Tessa's Field (HELAA site MMO004)	No response.		
Former workshop site, northern corner of HELAA site MMO004	No response.		

5. Detailed Responses to Representations

The following table includes a summary of all representations received (representation column), with details of whether or not the plan was amended as a consequence, and why (Response column).

The references to pages and policy clauses relate to the Regulation 14 version of the plan. To avoid confusion, it should be noted that some of these have changed in the submission version of the plan, as a consequence of modifications made.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
Buckinghamsh	nire Counc	il, 2 Sept	ember 2022	
	Various		Are blank pages intentional.	Blank pages are added to ensure that new chapters are on an odd number page, for those that wish to print the plan. No change necessary.
	Various		We were unable to locate evidence documents referred to – background document, LGS evidence, traffic surveys.	All are on the website, but the links have now been moved to the same page as the Plan, for ease of access. The plan submission will include details of where evidence documents can be accessed.
	5		Records show that the area designation was June 2016, not September 2012.	Date corrected to June 2016.
	11		The NP covers the parish, not just the village.	Text amended to refer to Maids Moreton Parish.
	15		What does NSO stand for?	Text amended to Office for National Statistics.
			Reference to figure 1 should be Plan 1.	Reference changed to Plan 1.
			Typo in spelling of Milton Keynes.	Spelling of Milton Keynes corrected.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
			Para 2 and 3 – all roads are not too narrow – college road can accommodate 2 way traffic. Second para line 2 replace 'is' with 'can be'.	Text amended, in response to suggestions.
			Para 3 – there is already coalescence between Buckingham and maids Moreton (VALP Inspector), but not reflected in the text.	The paragraph deals with distinctive character and identity, which is clearly valid, not coalescence as suggested.
			Last para – refer to historic assets, rather than just buildings.	Text adjusted to widen scope.
	17		Figure 2 not clear, requires further explanation.	Maps have been updated for clarity.
	18		Is reference to ancient boundary correct?	Wording adjusted to 'historic' boundary.
	21		A Consultation Statement will need to accompany submission.	MMPC is aware of this.
	27		It would be useful to add the outcomes of the SEA and HRA screening.	Reference to outcomes added to text.
	28		Typo – missed closing bracket.	Missing bracket added.
	31		Date of NPPF should be 2021.	Error on date corrected.
			Remove full stop after 'affordability'.	Full stop removed.
			Policy title to VALP D2 should be 'D2 Delivering site allocations in the rest of Aylesbury Vale'. Reference to D2 should be added. Also S1 and S2.	Changes made, as suggested.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
			LLA could be typed as Local Landscape Area, for clarity.	Change made, as suggested.
	32		Justification may be required for exclusion of buildings at end of Walnut Drive, and also buildings at Church Farm.	The buildings at the edge of Walnut Drive are separated from the main built area. Also, inclusion in the boundary could suggest that more intensive development would be accepted, despite the obvious potential harm to historic buildings and their settings. It would be difficult to identify a sensible boundary to buildings at Church Farm, which are anyway in agricultural use. Both changes would result in an irregular settlement boundary.
			Should explain why site D-MMO006 has not been included in settlement boundary.	Site D-MMO006 is undeveloped at present. It would be inappropriate for the Neighbourhood Plan to include it in the settlement boundary at this time. However, the plan can include it on a plan as a site with planning permission.
			3 rd Para – inadequate access could be addressed – mitigation could provide potential expansion.	The Comment on access reflects the existing situation. No changes necessary.
	34	MMG1	Policy appears to conflict with D2 and D-MMO006 of VALP. Plan does not include MMO005 in settlement boundary.	The policy enables development in specified sustainable locations. It does not address strategic site allocations, which are a matter for the Local Plan. It is unclear how the Policy conflicts with Policy D2 and the sites mentioned.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
			References to LGS land are not required and should be removed. These references conflict with MME2, which allows for small scale development.	Removal of reference to LGS would bring the policy into clear conflict with NPPF policy on LGS. Agree that there is conflict with Policy MME2, so wording amended to cross reference to MME2. LGS reference now in separate clause 3, for clarity.
			What is the justification for excluding B2, B8 and limiting development in the settlement to E.	The policy enables Use Class E. It would be inappropriate to enable B2 or B8 uses in the settlement, due to likely conflict with the concentration of residential properties and also impacts on the historic centre. These uses are not specifically excluded, but clearly should not be supported or encouraged within the settlement. Any such proposal would need to be considered on its merits.
			Point 3 wouldn't allow conversion of agricultural buildings not linked to agricultural diversification. Wording could add 'significant' loss of high-grade agricultural land.	Order of wording changed, to place greater emphasis on development 'to support the rural economy'. Wording adjusted to add 'significant' and refer to 'best and most versatile agricultural land'.
			Point 4 (now 5 in amended plan) would preclude development between existing development and settlement boundary.	This is not the case. The clause refers specifically to infill. Other development in the settlement boundary would be subject to general policies on design, character, etc.
			Point 5 (now 6 in amended plan) should be changed to 'Development proposals should demonstrate no significant harm will be caused to the open rural landscape'.	Wording adjusted, replacing 'must' with 'should'.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
			Point 6 (now 7 in amended plan) can't require provision of superfast broadband. Wording should be tweaked to refer to 'infrastructure'.	The intention was to require infrastructure within the site, so wording changed to reflect this.
	34		Remove reference to loss of views in MMG1 interpretation.	Reference to views removed.
	35		Fifth Paragraph HEDNA Addendum was developed in 2017.	Text amended, including reference to Policy H6a.
			Lack of reference to rural exception schemes.	Interpretation to Policy MMG2 changed, to refer to rural exception sites.
	36	MMG2	Housing mix will be determined though Policy H6a of the VALP. The strong wording of MMG2 (1, 2, 3 bedroom) is not justified by robust evidence.	Reference to 1, 2, 3 bedroom housing removed. Reference to Policy H6a added to policy rationale.
			Reference to First Homes – useful to refer to Buckinghamshire First Homes Position Statement.	Reference added to policy rationale.
			Repetition between points 2 and 5.	Repeated clause removed.
			Point 5 should be removed. Ministerial statement March 2015 makes clear that Neighbourhood Plans should not be used to apply national technical standards.	Clause amended to refer more generally to layouts. Reference to technical standards now made in the interpretation, for information.
			In point 3, does reference to sheltered accommodation include an affordable element.	The clause does not address affordability. This is left to the Local Plan.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
	37		Community facilities rationale - Policy I3 should read '13 Community facilities, infrastructure and assets of community value'. Should also reference Policy I1 of the VALP.	Changes made, as suggested.
	38	MMI1	For clarity, in interpretation, add word 'existing' between 'the' and 'use'.	Wording adjusted.
			Not clear if policy applies to community facilities listed in the rationale, or additional facilities, or extent of protection (for example car parks).	Wording added to the interpretation to clarify application of the policy.
			Reference to loss of views in the interpretation should be removed.	Reference to loss of views deleted.
	39		Refer to Plan 3 in supporting text. Plan 3 could show other designations, including protected sites and priority habitats, etc.	Maps have been updated for clarity.
	42	MME1	May be worth mentioning Biodiversity Net Gain SPD.	Reference to SPD added to both rationale and interpretation.
			Replace 'overall' with 'significant' to allow flexibility and conformity with VALP NE1 and NPPF.	Clause 1 amended, as suggested.
			Point 2, development should follow mitigation hierarchy in CIEEM guidelines.	Mitigation hierarchy added into the interpretation, to guide application of the policy.
				Correction made.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
			Typo in point 3 – remove 's' from 'clauses'.	
				Merged clause drafted.
			Merge points 4 and 5, as they address the same	
			point.	Statement on application of policy on trees added to interpretation. Wording 'higher service value'
			Policy does not allow for removal of low quality,	replaced by reference to 'amenity or environmental'
			dead dying or dangerous trees, or trees that are not indigenous, so potentially not in conformity with VALP NE8. What is meant by 'higher service value'? It may not be practicable to replace lost trees with similar maturity and level of coverage.	value.
				Word added, as suggested.
			Add 'significant' to point 6.	
				Clause extended to refer to non-statutory sites and
			Add 'Development on or adjacent to non-statutory	priority habitats.
			sites and priority habitats should be avoided'.	
				Policy amended to refer to local native species.
			Point 8 planting should be of local provenance.	
			In accordance with policies NE1, NE2 and NE3 of VALP, ecological buffer required to watercourses, hedgerows, woodland and avoid fragmentation of wildlife corridors.	Reference to Local Plan requirements added to interpretation.
			Interpretation includes need for landscape details to be submitted with schemes, rather than leaving to conditions. This is unreasonably burdensome and not a matter for the interpretation of policy.	Interpretation amended to remove reference to submission requirements.
				There is clearly a close correlation between the area's natural environment and historic character, as made

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
			Interpretation makes reference to special heritage duties, which is of questionable relevance.	clear in the heritage report (part of the NP evidence base). However, reference to special duties for heritage removed, to avoid confusion.
			Avoid confusion of habitat enhancement and specific species enhancement. Incorporate separate point into policy.	This appears to go beyond the scope of the Neighbourhood Plan.
			No mention of notable or protected species within the parish, including bats, hedgehogs, red kites, great crested newts.	References added to policy (additional clause) and rationale, as suggested.
	46		Recommend contacting landowners for proposed LGS.	Landowners have already been contacted.
			Reference is made Policy NE7 of the VALP. This should now be NE6.	Policy reference updated.
			In point 3, need to interpret small-scale.	Text added to interpretation.
	44		LGS5 Church Green – not clear if this includes land required for traffic calming works.	It does not. No change necessary.
	48	MME3	Policy uses 'must' rather than 'should', so more onerous than VALP.	Policy wording amended. This should not be interpreted as downgrading the importance of design. The purpose of the policy is to significantly lift design standards over those in some recently approved schemes, in response to the National Design Guide.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
			3 – does this relate to new dwellings or all new development.	The dwelling specific requirement has been moved to a separate clause 4. Otherwise, the policy applies to all development.
			Point 4 (now 5) requires low walls or hedges, so is too prescriptive.	Wording and structure of clause amended, to avoid being too prescriptive.
			Point 6 (now 7) should include cycles.	Wording and structure of clause amended to include reference to cycles.
			Point 8 should be positively rather than negatively worded.	Wording adjusted in response.
			Point 12 – Question need for bin storage in back gardens.	The clause seeks to ensure that bin storage space is provided, whether to the front or the rear. If storage was in a back garden, with no visibility from the public realm, then it would meet the requirements of the policy. No change necessary.
			Point 13 – Interpretation refers to 2 metres – this is not something we can require and would preclude new terraced housing.	Space for maintenance is a land-use matter, so a legitimate subject for planning policy. The reference to 2 metres was in the interpretation, rather than the policy. However, the interpretation has been amended to remove any specific figure and to clarify that gaps would be between properties rather than individual dwellings (so clearly would not preclude terraced housing).

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
	50/51		Welcome inclusion of heritage assets. Note, development proposals may require archaeological evaluation and mitigation. HER identifies a number of significant sites, including scheduled Iron Age Hillfort.	Archaeology is dealt with sufficiently in the Local Plan, so there is no need for Neighbourhood Plan policy. However, to be helpful, the interpretation to Policy MME4 now makes reference to Local Plan requirements for archaeology.
			Refer to Plan 5 within the text. Could scheduled monuments and viewpoints be added to the Map?	Reference to Plan 5 added to the rationale.
			Text missing from last paragraph (frame and infill).	Text amended - 'frame' added.
	53	MME4	Wording could include reference to new-build, extensions and alterations, for completeness.	Policy amended as suggested.
			Key characteristics could also include setting of heritage assets and identified views within the conservation area.	The policy already addresses key views. Reference to settings made in the interpretation. Obviously for listed buildings, there is already a special statutory duty relating to settings.
			Point 3 could include 'other highway infrastructure, making it consistent with MMI2.	Point 3 amended for clarity.
			The policy needs to take into account the significance of the asset including setting and level of any harm consistent with VALP BE1 and NPPF.	The policy has been drafted against the context of national policy and the special heritage statutory duties. There is no need for the Neighbourhood Plan to repeat what is already in national policy and strategic local policy (indeed the NPPF is clear that it should not do this). However, text has been added to the interpretation, for clarity.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
			Point h does not identify where the views are from. A plan to show the views would be required.	In the case of any development proposal, the view would be from the development site.
			Part 3 – how is structural integrity of historic buildings to be assessed.	The interpretation has been amended to clarify that this refers to the proximity of highway works and traffic movements.
	55		Should include reference to Policy T8. There is also the Aylesbury Vale Highway Protocol for Conservation Areas.	Reference to Local Plan Policy T8 and Highway Protocol added.
			Reference made to inadequate provision of infrastructure, not supported by evidence.	Wording amended to make clear this statement is based on engagement with residents.
			Reference to Maids Moreton streets being used as routes for speeding vehicles, but no evidence to support this statement.	Evidence will be submitted with the Plan.
	57	MMI2	Pedestrian and cycle requirements fit Buckingham Council's Local Transport Plan and Climate Change and Air Quality Plan.	Reference to these plans added into the policy rationale.
			No mention of public transport within the policy.	Public transport is supported by references to sustainable modes of transport, but developers have little direct influence. Financial contributions have only supported very temporary services, rather than longer-term solutions.
				Reference added to the interpretation.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
			Point 3 – Parking provision will need to accord to policies in Buckinghamshire Parking Guidance. It would be beneficial to mention this in the policy.	
			Point 4 – requires infrastructure works to cause no harm the historic and rural character. This is not consistent with the NPPF or VALP. Would it be better to say 'Highway infrastructure works should have regard to the historical and rural character of the area in terms of materials'.	This comment directly contradicts the LPA's comment on Policy MME4. The clause has been drafted against the context of national policy and guidance, with the special heritage statutory duties also in mind. The suggested wording would limit consideration to materials, but the main issue is expansion of highway infrastructure into landscape and impact on character. For the LPA in decision-making, limiting considerations to materials only would certainly fail to meet the requirements of national policy and guidance and the application of heritage statutory duties.
			Point 5 – there are tensions between highway safety and character of rural lanes.	The policy has been reworded, to recognise this tension, but to ensure that character is not destroyed through inappropriate highway works.
			Interpretation – the words 'such as roundabouts' is not appropriate, especially where one of the VALP allocated sites proposes this kind of junction.	The harm caused by the VALP proposal is acknowledged, but the intention of the policy is to ensure that such harm is avoided in the future. It is unclear why this advice on interpretation is inappropriate, especially against the context of national policy and guidance and the special heritage statutory duties.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
	61		Green design - The policy appears to relate to new development, but there could be conflict with preserving the significance of heritage assets.	This is guidance, rather than policy, though related to some of the policies. Wording has been added at the beginning of the guidance to clarify the application to heritage assets.
Local Residen	ts (two pe	eople)		<u> </u>
		LGS1	Point 3 contradicts point 2. Development involving housing, roads, pavements, street lighting automatically negates the open nature of the space.	The development described would not meet the requirements set out in point 3 (which are also clarified in the Interpretation). No change necessary.
	7 and 41		Both maps have the title Neighbourhood Area, but the blue outline on p7 needs to be clarified.	All maps have been updated for clarity.
	44		Buckingham Rugby Club owns rugby pitches and these should be included as LGS.	The pitches did not meet the criteria for LGS and also, such designation could be over-restrictive for operational sports facilities. The Plan recognises and protects the pitches in Policy MMI1, which is a more appropriate approach.
		MME3	The vision statement highlights 'global climate change', yet there is nothing planned in the document e.g. amenities will need shelter and shade against summer heat, structures and clusters of trees.	Climate change and sustainability are factors in pretty much all of the policies, which address mixed use, active travel, environmental protection and other issues. The Green Guidance Notes adds detail, but has been amended to include specific example given.
			Various typos were highlighted.	Document checked and typos corrected. The use of 'life/work' was intentional, so not corrected.

Organisation	Page No.	Policy/ Site Ref.	Representation	Response
	18		The Plan does not address where housing should go, quantity of housing, where it is not desirable to build.	Policy MMG1 does set out suitable locations for development. Two extant planning permissions surpass housing need and there is a more-than 5-year land supply. The NP accommodates growth, with a focus on the settlement, but does not need to provide a specific quantity of housing to meet local need. MMG1 and other policies set constraints for development, including MME1, MME2, MME3, MME4.
	32	MMG1	Paragraph 2 is not specific about where infilling could be appropriate or quality. No mention is made about where residential is to take place for the quantity.	The Plan has a settlement-based approach. The policy sets out requirements for infill and the wording has been adjusted (now in clause 5), together with additional text in the interpretation.
	6.2		The need for housing need analysis is a necessary tool.	Paragraph added to the policy rationale, to explain that sites already granted planning permission would cover local need and partly address wider strategic need.
	5.1		Meeting the Basic Conditions – surely there are no EU obligations?	There is now an equivalence in UK law.
	38	MMI1	Amenities to be sold – what amenities could possibly be in this category?	This is a fairly standard test in planning policies and could refer, for example, to shops and pubs.
	46	LGS1	LGS1 should be described as 'Fields on both sides of Scot's Lane', and on the map on Page 45.	LGS1 includes the lane and land on both sides (the lane is part of the community value). The existing wording is more accurate, so no change.

Organisation	Page	Policy/	Representation	Response
	No.	Site		
		Ref.		
	46	MME2	Clause 3 is nonsensical, as any development compromises the green character of the space, so should be removed.	Clause 3 has been drafted to work with Clause 2 and national policy. No change necessary.