

Responses to the Consultation on the Nash Neighbourhood Plan

(Names of individuals redacted. Corporate names retained. Dates are dates of the comments provided)

Date: 20th December 2018

This is not intended as a formal comment for the consultation on the Nash Neighbourhood Plan, but is rather a comment about the layout.

Paragraph 5.6 says "5.6 Each policy is numbered and titled, and it is shown in bold italics.". However the policies are not, as far as I can see, shown in bold italics. The heading of each policy is shown in bold (and with a larger point size), but the text of the policy is in the same font as the remainder of the text. It is therefore hard to see where the policy ends and the accompanying text begins.

Of course the accompanying text has paragraph numbers, and so may be distinguished in that way. For example, paragraph 5.7 immediately follows Policy NNP1. However, Policies NNP7 and NNP8 appear not to contain any text at all. For example, the policy heading "NNP7: Biodiversity" is followed immediately by accompanying text paragraph 5.25. It is possible that the words in paragraph 5.28 were intended to form the text of the policy, but at present they do not do so. Similarly, the policy heading "NNP8: Employment" is followed immediately by accompanying text paragraph 5.29, although in this case it is hard to see any wording at all which could form the basis of a policy.

Perhaps it is the case that I have been given a defective copy of the Plan? The version I have been reading is labelled v12, and dated 15 November 2018. (Though it is the same as the version on the AVDC website.)

Date: 23rd December 2018

After receiving the latest Nash Pre-Submission, It has come to Our attention that a number of changes have been made where new properties and land have been included. Therefore, we enquiring as to why our property still remains excluded from this plan. Could this be a simple mistake or is there a valid reason for this decision. We would appreciate your speedy response to this matter, so we know how to proceed. The property in question is the only dwelling that resides at Nichollswood farm, Winslow Road.

Date: 24th December 2019

I have much enjoyed reading the Nash Parish Neighbourhood Plan and would like to congratulate the authors. I particularly enjoyed the history chapter eg. the Princes in the Tower and Richard III. The problems about Western Power are somewhat worrying.
But, generally I have no comments other than, as I have already said above,, what a good and detailed document.

Date: 28th December 2018

Thank you for the letter in regards to the parish plan. I'm probably too new to the area to give any opinions to anything raised as yet but i certainly look forward to being involved with village life. If I can help with anything, please let me know. I will tend to keep my head down working as there is quite a lot to do to the house, to bring it up-to the surrounding standard.

Having lived in Nash from 1982 until 2014 I agree with the ideas and the principles of the document, however I have to say the proof-reading and editing of the document is very shoddy and makes me wonder that, if the basics are not correct, then why should I trust the more complex material?

Specifically:

Section and relevant text	Comments
Table of Contents	Pages 4 and 29 are incorrectly numbered; where are Annexes 3 to 6?
List of Policies	Pages 18, 20, 22, 24 and 25 are incorrectly numbered.
Table of Figures – figure 3	Nash is spelt with an 'N'.
Section 1.5 starting “These requirements will be tested”	... is almost exactly the same as section 1.6 “In addition. The Parish Council”
Section 2.1 “Nash has not been able to sustain commercial facilities, such as shops, restaurants or pubs.”	Restaurant is a strange choice given that Nash has never had one – how about a Post Office that we’ve had and lost?
Section 2.3 “in 1891 a remaining 35% in textiles.”	Incorrect. The 1891 census shows 1 dressmaker and 6 lacemakers in Nash, hardly 35%.
Section 5.6 “ and is shown in bold italics.”	No it’s not.
Section 5.6 “ shown on the Policies Map attached”	I would suggest this is confusing and stating it’s in Annexe 3 is clearer.
Policy NNP1 “Proposals for small scale developments”	Small scale is not defined and thus can be argued about; is it the same small scale as mentioned in section 5.9 (i.e. no more than 3 dwellings).
Section 5.17 “... as shown in Plan B.”	Should read Fig 2.
Policy NNP4 “Development proposals must”	Is repeated word for word in the next paragraph.
Section 6.5 “..... been identified in this process:”	The colon suggests there is more which might be missing, but if ‘Transportation Links’ is one of the opportunities identified then it should be better signposted.
Annexe 2: The History of Nash (the title)	A misnomer since half of this is actually a History of north Bucks and south Northamptonshire.
Annexe 2: The History of Nash (text on the first page)	This reads as if the author has failed to find any meaningful history of Nash and feels it necessary to fill a page of text by employing an image of the locals in Nash, standing on the ridge overlooking Beachampton and watching the rest of the world go by – Boudicca and Paulespurry; scholars and Beachampton; ‘Princes in the Tower’ and Stony Stratford (note spelling of Stony); Tudors (well that’s wrong, Elizabeth Woodville was queen before that) and Grafton Regis; Elizabeth I and the forests of

	Whaddon Chase (wrong again, it was woodland, heath and common land); canal and Buckingham; railways and Wolverton.
Annexe 2: The History of Nash (text on the first page) "... crossroads of England."	Having used the examples above to rub in the fact that Nash has no history of local, county or country importance, the term 'crossroads of England' is laughable. On the same definition Great Horwood, Beachampton, Whaddon and many more could also give themselves this title.
Annexe 2: The History of Nash (references to Nash)	<ol style="list-style-type: none"> 1. Barracks Farm – frequently repeated but no written evidence. 2. Nash bigger than Whaddon during the War – wrong, Whaddon had 440 entries and Nash 269 entries in the 1939 Register of Residents. 3. Nash had three churches during the War – oh yes? CofE, Strict Baptist, and ???? 4. 'Few are likely to match ... one farming couple and most of their 11 children living in one house' – well how about the 16 living at Whiteways at Wood End in the 1911 census?
Annexe 6: Gypsies and Travellers	End of the last but one paragraph, don't you mean 'any interaction or assimilation IS non-existent.

Thank you for your consultation on the above dated 19 December 2018. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made. In our review of the Nash Neighbourhood Plan we have a few comments to make which are outlined below. ☐ The parish area contains an area of Lowland Fen Priority Habitat (South West of the parish area), which is required to be promoted, conserved, restored and enhanced under the NPPF, paragraph 174 (b), in addition to the requirement to “identify and pursue opportunities for securing measurable net gains for biodiversity”. Please include policy wording within Policy NNP7 – Biodiversity, aimed at aligning with the above. ☐ The parish also abuts an area of Ancient Woodland (College Wood, South West of the parish area), which is classed as irreplaceable habitat under the NPPF. We would welcome wording within Policy NNP7 – Biodiversity, to ensure any development does not cause loss or deterioration to this habitat. Further information can be found in Annex A. We would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework). Please ensure that any development policy in your plan includes wording to ensure “all development results in a biodiversity net gain for the parish”. The recently produced Neighbourhood Plan for Benson, in South Oxfordshire provides an excellent example. We are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplar. We would recommend you considering this document, when reviewing yours. Further Recommendations Natural England would also like to highlight that removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change. We recommend that the final neighbourhood plan include: ☐ Policies around connected Green Infrastructure (GI) within the parish. Elements of GI such as open green space, wild green space, allotments, and green walls and roofs can all be used to create connected habitats suitable for species adaptation to climate change. Green infrastructure also provides multiple benefits for people including recreation, health and well-being, access to nature, opportunities for food growing, and resilience to climate change. Annex A provides examples of Green Infrastructure; ☐ Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A;

Annex A provides information on the natural environment and issues and opportunities for your Neighbourhood planning.

Annex A - Neighbourhood planning and the natural environment: information, issues and opportunities Natural Environment Information Sources

The Magic1 website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here2.

1 <http://magic.defra.gov.uk/>

2 <http://www.nbn-nfbr.org.uk/nfbr.php>

3 <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx> 4

<https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making> 5

<http://magic.defra.gov.uk/> 6 <http://www.landis.org.uk/index.cfm> 7

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> 8

<http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/> **Priority habitats** are those

habitats of particular importance for nature conservation, and the list of them can be found here³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here⁴.

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

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

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic⁵ website and also from the LandIS website⁶, which contains more information about obtaining soil data.

Natural Environment Issues to Consider

The National Planning Policy Framework⁷ sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance⁸ sets out supporting guidance.

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

Landscape

Paragraph 109 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. Your plan may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

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

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here⁹), such as Sites of Special Scientific Interest or Ancient woodland¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas> Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.

¹⁴ <http://www.environmentbank.com/impact-calculator.php> , and http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwj7vcbl0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usg=AFQjCNFfkbJIJQ_UN0044Qe6rmiLffxckg

Priority and protected species and habitat

You'll also want to consider whether any proposals might affect priority species (listed here¹¹) or protected species. Natural England has produced advice here¹² to help understand the impact of particular developments on protected species. Consideration should also be given to the potential environmental value of brownfield sites, often found in

urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland and veteran trees-link to standing advice

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forest Commission have produced standing advice for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances

Biodiversity net gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve biodiversity. The NPPF section 109 states *“the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible”*. Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric¹³ and the environment bank biodiversity impact calculator¹⁴. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land¹⁵.

¹⁵ <http://publications.naturalengland.org.uk/publication/35012>

¹⁶ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Green Infrastructure, Improving Your Natural Environment.

Inclusion of Green Infrastructure (GI) in to development plans can provide multifunctional benefits to the area. These can include opportunities for recreation, health and wellbeing and access to nature as well as providing connected habitats for wildlife.

Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of GI. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:

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

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

- ☐ Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy in your community.
 - ☐ Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
 - ☐ Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this¹⁶).
 - ☐ Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
 - ☐ Planting additional street trees.
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- ☐ Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
 - ☐ Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Green Roofs

Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <http://livingroofs.org/> for a range of innovative solutions.

Date: 9th January 2019

Unfortunately to date we still have no response to the questions we put forward regarding the Nash neighbourhood Plan. We need your response ASAP due to the coming deadline and our time frame for instructing a solicitor.

Nash Neighbourhood Plan Consultation

SUBMISSION ON BEHALF OF NATIONAL GRID

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Date: 15th January 2019

I have a couple of comments to make regarding the above plan:-

1. On page 35 there is a listed building shown in Thornborough Road which I believe may be incorrect and should be Barracks Farm a little further down.
2. If the settlement boundary to the west of Stratford Road is as proposed then Vista 7 would be lost which is considered undesirable.

Date: 17th January 2019

Please find attached our representation of the NNP settlement boundary the way in which we are included. Please could you forward this to the appropriate departments in AVDC to resolve this situation.



Date: 18th January 2019

Now that the 'excitement' of the Christmas/New Year period has finally subsided have been able to read through the 'Plan' and must compliment those involved in it's research and preparation for their sterling work.

Particularly pleased to see reference to the local Footpaths/Bridleways and thoughts/proposals as to their maintenance and improvement to give additional amenity opportunities and to encourage people 'out of cars'. Also for possible access to nearby urban amenities, am thinking not only to the East and South, as mentioned, but to the North through Beachhampton and Calverton and on to Stony Stratford.

With reference to the various 'maps' shown, am I right in thinking that our immediate neighbours at Basshill Farm are within the Conservation Area but outside the Settlement and we at Nine Lands are outside both.

Date: 22nd January 2019

Thank you very much for sending me a copy of the plan for review.

I very much enjoyed reading a very comprehensive and coherent document which will hopefully see the village keeps its character and appeal well into the future. Well done and a big thank you to all involved in producing the plan.

Date: 23rd January 2019

Thanks for this. Thornborough Parish Councillors were very interested in this issue and wondered whether you could tell us how much the plan cost to produce and who were your consultants? So far Thornborough Parish Council have considered the average cost of producing a Neighbourhood Plan to be prohibitive on a small Precept.

Date: 23rd January 2019

I would like to thank all those involved in preparing and developing our draft Neighbourhood Plan. It looks and reads very well, and we were very impressed with the quality and comprehensive nature of the document. Clearly a considerable amount of time and effort has been invested in this project, and we hope that all goes well to implementation. Just a few points/comments for you:

There is a minor typo on page 5. Last line reads Ash , instead of Nash!

I do not agree with the 2nd objective on page 17. This reads that the objective is to 'encourage' some new housing development, ideally suited to all generations, including local people wanting to build their own homes. Clearly at a national level our country needs much more housing, and that Nash is required to contribute towards this effort, albeit in a small way. That does not mean that we have to go out of our way to actively encourage new development. In an ideal world I feel certain that the majority of villagers would like to keep our lovely village exactly as it is, and that a small number of new developments are accepted only under 'sufferance' because it is the right thing to do. Furthermore, the plan doesn't give any indication as to what form such encouragement would take?

Page 25, paras 2 & 3: May I propose that the word 'strongly' be inserted in front of 'resisted' ?

With regard to Employment on page 30, would it be worth including a few words about signage relating to local businesses? (not sure how the planning process deals with this).

Referring to our old friends, the travelling community, I would suggest a slight amendment to Annex 6, page 44, para 5, line 4 to read 'the Neighbourhood plan states that no gypsy traveller pitches should be permitted, whether or not temporary or permanent, within the parish boundary', etc.

Date: 24th January 2019

Being asked to reply, I will say I am glad the village is part of a Neighbourhood Plan although I have no particular comments at this time.

Date: 26th January 2019

Firstly, I don't understand the reason for a hand delivered paper inviting residents to view the proposed plan on a website where the link didn't work correctly. This also precluded people with limited or no internet access and although there were other methods of viewing the plan I feel that they were not as simple as they could have been. Indeed it would have been just as easy to include a copy of the neighbourhood plan with the paperwork that was posted through our doors.

I've now had a chance to study this proposal and my other concern is the inclusion of the piece of agricultural land adjoining my home.

Initially I could make no sense of trying to partially join Thornton Road with Thornborough Road, until my research revealed that this piece of land is owned by Buckinghamshire County Council.

In my opinion, this whole Neighbourhood Plan and "consultation" process appears to be flawed.

Unfortunately, in my humble opinion this consultation is not as transparent as it should be.

I understand that this is far too long to be read at a meeting but please could it be noted that I strongly object to the proposed plan.

Date: 31st January 2019

Nash is surrounded by farmland, with many beautiful views. To the west of Stratford Road, between Thornborough Road and council houses, is a view toward Buckingham, over a landscape of trees and fields, which make part of the setting for the village. This view is most peaceful, and I feel that it should be protected from any sort of development, as a priceless treasure for our future inheritance. Skylarks and hares are some of the wild inhabitants who dwell in that landscape as well as foxes and badgers which are frequently seen.

I have lived in Nash for twenty-two years and would be so glad to know that this view could be protected for future generations, where they might find peace in troubled times.

Date: 4th February 2019

Thank you for the opportunity to comment on the proposed Nash Neighbourhood Plan (NNP1). We object to the Plan as follows:

We note that in the NNP1, the settlement boundary has been extended to include agricultural fields along Stratford Road at Town's End and Wood End, but has failed to include the field at Church Farm, Stratford Road. We point out that this field, at Church Farm, was identified as a developable site for up to 12 houses by AVDC in the HELAA. As such, we would expect this field to be included within the NNP1 settlement boundary and see no evidence for its exclusion.

We see that in section 2.2 of the NNP1, following from footnote 1, the last sentence should be clarified to indicate that the actual number of houses added to the village between 2010 and 2019 is 15 not 30.

Thank you for the opportunity to comment on the Nash Neighbourhood Plan Pre-submission consultation. The following comments are submitted on behalf of Anglian Water.

I would be grateful if you could confirm that you have received this response.

Policy NNP2: Housing development

Reference is made to housing developments incorporating Sustainable Drainage Systems (SuDS). Anglian Water support the requirement for applicants to include the provision of SuDS so as not to increase flood risk and to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface water and sewer flooding.

Should you have any queries relating to this response please let me know.

Nash Neighbourhood Plan (v12) comments

Page 15. 2.7, the Village Hall is no longer used as a nursery.

Page 19. The term is 'Policies Map' is not used later. It may be better to describe it as the Nash Settlement Boundary Map (or Plan) in Annexe 3.

Page 25. NNP4: Important Views & Vistas. Note what is said in paragraphs 2 and 3*. I agree with this.

Page 38. Annexe 2: The History of Nash. The first paragraph would benefit from rewording.

In second paragraph I suggest 'predates William the Conqueror' comes at the end of the sentence after the brackets.

Page 35. I suggest another view is added which should be '8' looking from Stratford Road east towards the High Street.

Page 35. I found the text in the Legend confusing by the use of 'West' against Vista and Street views. I appreciate it is an example but of course the Vistas and Street views are not only west. Therefore suggest deleting 'West' against both.

Page 36. View 5 should read 'Winslow Road', not 'Whaddon Road'.

Page 40. Annexe 3. Nash Settlement Boundary Map. Taking account of what is said earlier* regarding important views at page 25 the Map anticipates development along the western part of Stratford Road where there is an important view from the Stratford Road west to Buckingham. This view is in my view one of three important long-distance views in Nash. To allow development here would mean the view is lost. Moreover, it contradicts what is said at page 25* and is therefore against one of the policies of the Plan. At present there is a green corridor into the heart of the village running from the paddock behind All Saints Close and out west to Stratford Road and over on the other side. This was one of the points made by the Parish Council in its opposition to the current planning application on the Church Farm paddock. To allow development on the western side of Stratford Road would mean that this corridor would be lost. Development to the west of Stratford Road would also effectively enclose the fields on the eastern side of Stratford Road and the High Street and thereby encourage future building on these fields. If some development needs to be considered along Stratford Road then an alternative option would be to consider instead a smaller area further south and being the field adjacent to The Mill House and The Old Bakery on the Stratford Road which currently affords a limited view as it is enclosed with trees on the Stratford Road.

It should be noted that AVDC's HELAA document for Nash January 2017, a copy attached for reference, states that the extended area for development along Wood End as shown in the Boundary Map is not suitable for development. In my view a much better area for development (and replacing any development along the Stratford Road or Wood End) would be the area of land to the east of the recreation ground. At present that land is land-locked and has been left to deteriorate for many years. It detracts from the recreation ground and surrounding areas.

At present the recreation ground is relatively isolated from the rest of the village. If future development on any scale is to be allowed then developing land to the east of the recreation ground would balance out development within the village and provide more of a critical mass to the village. Access would probably need to be on to eastern side of Winslow Road but it would not mean that all of the frontage along the eastern side of Winslow Road would need to be developed but rather only part so as to afford access to the land to the west and adjacent to the recreation ground. It could also provide access to the recreation ground to that part of the village (ie, around Winslow Road) where access is not immediate.

I think that the view looking west from Stratford Rd should be protected as it is one of the finest in the village, furthermore allowing development here, on what is a large piece of land, would allow a case to be put for future development on the eastern side of the Stratford Road which would then directly affect a large number of residents. Development next to the Old Bakery could be put in the field next to it without spoiling the view west from Stratford Rd, also the size of any development here would be much more in keeping with the aims of the plan. If the settlement plan is defined as being inside the 30mph signs the Basshill Farm and Ninelands should be included. The gardens of the houses at the northern end of the High St on the eastern side should be included in the settlement boundary.

Date: 6th February 2019

Having gone through the plan again I have reflected on the settlement plan in particular and my views are as follows: The land on the western side of the Stratford Road which I think is owned by Bucks CC, has always been favoured as a site for development, however I think development here would spoil one of the best aspects of the village and the splendid view to the west enjoyed by all, and given that maintaining views and vistas is a key part of the plan I think that this site should be **removed** from the settlement area.

The size of this area is quite large and therefore the scale of potential development here would probably exceed the scale of development that the plan seeks to limit.

I also agree with the view expressed that any development on the western side of Stratford Road would inevitably result in pressure to develop on land on the eastern side of Stratford Rd which would affect a large number of residents on the High Street.

Early on in the process we discussed including the land next to the Old Bakery this is much more suitable for inclusion into the settlement area as its development does not affect the views, it is also much smaller and therefore more appropriate in terms of the scale of development envisaged for Nash, I believe therefore that this area should be **included** into the settlement area.

Finally if the limits of the settlement plan are to be defined by the 30 mph area then Basshill Farm and Ninelands should also be included and also the rear gardens of the properties on the eastern side of High Street between Whaddon Road and The Three Horseshoes.

Given how critical the settlement plan is, I think its important to look at these points,

Date: 7th February 2019

Thank you for consulting me re the neighbourhood plan. I have read through it ,and it I don't have anything to add.
The copy I read had an extra word in the sentence which needs removing to make sense.

2] Neighbourhood area

2.1 line 8 needs (are) taken out.

Could I please be included in any correspondence that goes out to Nash residents.

Date: 8th Feb 2109

Thank you for the opportunity to comment on the Draft Neighbourhood Development Plan for Nash

1. The first point we would like to make is that your map of the existing settlement area does not represent the village accurately. In particular, Barracks Farm, which is one of the oldest houses in Nash, if not the oldest, is shown without 50% of its garden and the permanent structures within it such as the hard tennis court, which has been a feature for around 30 years, long before the conversion of the former stable yard and main farm buildings along the Thornborough Road into residential units. Our main drive entrance and the entirety of the garden is within the village boundary as denoted by the Nash village sign and the 30 mph limit - the location of which, by the way, is inaccurately marked on your plan. Please amend it to include our main entrance and drive adjacent to the tennis court, together with the area of garden to the side of the upper terrace. The present plan shows only a small upper terraced area of our garden, which is only part of it's approximately 2 acres. We can provide an accurate plan to assist you if required.
2. Another obvious anomaly is that Bass Hill Farmhouse, again one of the oldest houses in the village, and sited within the village boundary inside the 30mph limit along Whaddon Road, is not included in the plan, nor is its neighbour 'Ninelands'. On the other hand, at the very far end of the lane leading up from Wood End, some large modern barns, which, with one exception, did not exist when we came to the village in 2000, are included, together with an area of farmland behind them. This seems strange considering that none of our own land is included. Similarly, a plot of grass land belonging to Yew Tree Farm is included, although it lies well beyond the village boundary on Stratford Road,
3. A number of other houses in Nash appear to have their curtilages reduced for no apparent reason, including some larger gardens along the lower section of the High Street. The plan does resemble an earlier one showing the conservation areas of the village, which was drawn up with the buildings, rather than their curtilages in mind. For this purpose, however, and bearing in mind the plan is intended to stand for the next 15-20 years, it is important to be as accurate and as comprehensive as possible.
4. It is not clear whether the plan shows areas of possible future development, or how these have been chosen. We assume that the area of existing arable farm land along the Stratford Road, the freehold of which is currently owned by Buckinghamshire County Council, and which is shown outlined on the plan is being proposed for development, but it has no structures on it at present and so should not appear on the plan of existing settlement. If this is proposed for future development, it seems anomalous that the land immediately adjacent to it, also with an entrance on the Stratford Road, and in private ownership, is not.
5. We also assume that the large field opposite, below the The Rectory, on the corner of Stratford Road and Whaddon Road, which is also outlined on the plan is not being proposed for development, but this is not explicitly stated, and there is no indication of the method by which such decisions have been made, or by whom.

More generally, while most people would agree that the housing developments on a massive scale we have seen spreading like a rash across the fields outside Buckingham, a.k.a. 'Lace Hill', near Newton Longueville and around Stony Stratford are something Nash needs to avoid, it is important to look at the advantages some judicious and well thought out development would bring.

Your comment that more than nine new houses built over the next 15 years would be difficult for the village community to absorb, is absurd. The majority of houses in the village, and including all along the Thornborough Road with the exception of Barracks Farm, were built after the First World War and most of them in the latter half of the 20th century or early 21st. Consequently, the greater part of the existing population would have been unable to live here at all, had former parish councils been similarly opposed to village expansion.

Small scale, flexible, expansion would bring additional financial benefits to the village too, and help to provide further facilities for the community.

Our view is that, over the next 15 to 20 years, an expansion of the village of up to 50 houses would be more reasonable, provided they are in small developments of no more than 10 or so houses each, and tucked around the periphery rather than infill, if it is wished to preserve the existing open style centre of the village. Provided proper care is taken to oversee the design and style of such houses, to avoid the soulless uniformity of developments nearby, the village could even be enhanced.

At present, the prices of existing housing stock are far too high for most young couples or people on lower incomes to afford, so that young people who have grown up in the village and may wish to live in the countryside close to family are unable to do so. Similarly, older residents who may wish to downsize but stay a part of their community and close to friends, are unable to do so. There is no housing suitable for people with disabilities, or those who may become less able with age. The countryside and villages like Nash should aim to be more inclusive, and offer opportunities for people of all ages and differing needs to enjoy rural life and communities.

Date: 8th February

Thank you for the copy of the Map that you gave to us.

Thanks also to you and the NDP committee for all the work done so far.

I am writing to you in my maiden name because the land included in NDP is owned in my maiden name and not my married name (Amanda Collings) and should anyone wish to confirm this they will need to give my maiden name to the land registry.

I thought it would be easier to put my points in a numbered format. Please can you confirm that you received this document.

1. The field outlined by Holywell Cottages is owned by Bucks CC. I am not at all comfortable with it being identified as a future development plot. This was an arable field up until 2017 and is only grassed now because of a decree from Bucks CC. Bucks CC is about to become a powerful council who will then control this site from both a planning and development point of view. They also have the option to sell this site. The site at the moment is safe because it is being safeguarded by me (I have a 5 year lease) but once this lease is up 2022 then we give full control back to Bucks CC. If we then allow it to be outlined on our NDP then we are giving the biggest building plot in Nash to Bucks CC. There has been a lot in the press about councils doing this and I think its an example of a council hanging on to the most beautiful view (it is down on your plan as an official "vista") and plot in the village. I think this should be just mapped as a field. In addition on reading the NDP I noted that we are not obliged as we are a "small village" to allocate sites for development and yet we have done so in this case?
2. This field in 1. above is on the side of a gentle hill that leads to miles of stunning rural countryside as far as the eye can see. There are no trees in the hedge line at all. Many villagers walk these fields and many walk them with their dogs. Mr Bonner who has farmed this arable field for decades has been extremely kind in maintaining this footpath through. I now maintain the first part of it and have installed and paid for a wooden kissing gate for the villagers to use. I know many villagers really appreciate this beautiful walk being on their doorstep.
3. I also own the land next to this "Holywell" field (Dixies field) and I noticed that for some reason the NDP draws a consistent line all the way down the field next to Holywell and stops at the top of mine (Dixies field) which I find bizarre. Logically the field nearer to the village and which already has buildings on its boundary should be included on the NDP. This field has 12 really mature trees around its hedges and it is flat so much more ideal for future building and also it will not block anyone's view unlike the proposed field which will have a massive impact on Holywell Cottages, the houses at the back of the high street, the houses along the Thornton Road etc all of whom will not fail to see it because it is on a hillside. If the field in 1. Above remains in the NDP but Dixies field does not, I would be grateful to know the reason for doing this? If the field in 1 above does not remain in the NDP, but Dixies field is **not** included in the NDP, I would be grateful to know the reason why not?
4. I think I would like to see transparency/disclosure of any utility council ownership from the Dev Committee of all the land that lies within the settlement boundary area so that villagers can be informed as to who owns the land that they are including in the NDP. I became aware from my dealings with Bucks CC's agent over my leased land that there are quite a few other pockets of land owned by councils in the Nash area and I think these need to be revealed. Similarly I think that villagers could benefit from knowing if any of the land is actually leased (as part of mine is) or owned outright because this has an impact on future plans.
5. Turning to the Subject of farm buildings. I noticed that not all the farms and equestrian buildings though within the village boundary are included as within settlement area and wondered what the process for arriving at this conclusion was?

I have been told that planning permission was applied for on the fields in the centre of Nash (opposite Mr Young's Farm) and that it was granted but subject to a private road and I wondered if this is true (?) If it is true, it should be noted on the map because this has a bearing on Hollywell Cottages field and if its true would I think make villagers wish to avoid another development immediately next to it albeit over the road. Personally I knew nothing about this until a villager mentioned it to me in passing.

6. On my land there is an ancient double cow byre, it sits just about 6 feet from the boundary of Sycamore House on the Thornborough Road. A further 40 feet from this I have a traditional wooden hay barn for hay and a stable yard (20 years old) and a manege (20 years old). Although this is all continuous to the Thornborough Road it has been left out of the settlement boundary and I think this is probably a mistake? However I do notice on the far side of Thornborough Road that part of Barracks Farm Garden has been left off as well which is a bit strange as everyone else's gardens are included.

This letter provides Gladman Developments Ltd (Gladman) representations in response to the draft version of the Nash Neighbourhood Plan (NNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation of numerous plans across the country, it is from this experience that these representations are prepared.

Legal Requirements

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

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
- (d) The making of the order contributes to the achievement of sustainable development.
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

Revised National Planning Policy Framework

On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper.

§214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans. Given that submission will occur after 24th January 2019, the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018.

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

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

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account of and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. §16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

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

§184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements of the wider area as confirmed in an adopted development plan. The Framework requirements have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG, providing clarity on the measures a qualifying body should take to review the contents of a neighbourhood plan where the policy evidence base becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying body's anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the NNP's ability to meet basic condition (a) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

To meet the requirements of the Framework and Neighbourhood Plan Basic Conditions, neighbourhood plans should conform to the strategic policy requirements set out in the adopted Development Plan. That relevant to the preparation of the NNP is the Vale of Aylesbury Local Plan (VALP) 2013-2033. The Memorandum of Understanding signed before adoption of the Local Plan determined that Aylesbury Vale would be required to deliver 27,400 homes between 2013 and 2033.

To meet the requirements of the Framework the Council is reviewing the Core Strategy and is currently consulting on the New directions for Growth document. It is therefore important that the NNP provides flexibility to ensure that the policies contained in the NNP are not overridden upon the adoption of any future Local Plan; as section 38(5) of the Planning and Compulsory Purchase Act 2004 states:

'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'

Nash Neighbourhood Plan

This section highlights the key issues that Gladman would like to raise with regards to the content of the NNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of modifications to the plan to ensure compliance with the basic conditions.

Policy NNP1 – Nash Settlement Boundary

Policy H1 identifies a settlement boundary for Nash and states that land outside of this defined area, will be treated as open countryside, where development will be carefully controlled.

Gladman object to the use of settlement boundaries if these preclude otherwise sustainable development from coming forward. The Framework is clear that sustainable development should proceed. Use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).

As currently drafted this is considered to be an overly restrictive approach and provides no flexibility to reflect the circumstances upon which the NNP is being prepared. Greater flexibility is required in this policy and Gladman suggest that additional sites adjacent to the settlement boundary should be considered as appropriate.

Policy NNP4 – Important Views and Vistas

This policy identifies 19 'panoramas' which the plan makers consider important for the setting of Nash where development proposals having an adverse impact upon them would be resisted. Gladman suggests that this is a subjective issue and the policy does not provide support for a decision maker to apply the policy predictably and with confidence.

Identified views must ensure that they demonstrate a physical attribute elevating a view's importance beyond simply being a nice view of open countryside. Aside from those views *within* the village, the evidence base to support the policy does little to indicate why those outward views should be protected, other than providing a nice view of the surrounding fields. Gladman consider that to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations

contain physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support. Gladman therefore suggest this element of the policy is deleted.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relationship of the NNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic condition (a). The plan does not conform with national policy and guidance. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

This letter sets out AVDC's formal response to the Nash Neighbourhood Development Plan pre-submission consultation. This builds upon the ongoing dialogue between AVDC and Nash 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 Development Management (DM), Planning Policy, Design, Landscape, Heritage, Housing and Biodiversity teams.

The Neighbourhood Plan provides policy direction for how the community wish to see Nash develop to 2033. We commend the Neighbourhood Planning Steering Group on the hard work in getting to this stage.

As there has been on going correspondence between AVDC and Nash Parish Council we have been able to address some of the issues at earlier stages in preparing the plan. Nevertheless it will be very important for the Parish Council to work very closely with AVDC in making revisions to the Pre Submission document following this representation period. We have reviewed the plan to ensure it meets the 'basic conditions' but also to help ensure the final adopted plan will be effective when used to help make 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 NNP progress through to a successful examination and referendum to then play its part in determining the future development of Nash.

Next Steps for the NNP

As you are aware, the next formal stage is to submit the Neighbourhood Plan 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.

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/uk/join/member-accreditations-list/dispute-resolution-service/neighbourhood-planning-independent-examiner-referral-service-npiers/>

Date: 8th February 2019

I have been provided with a letter that went round to the Nash residents but for some reason living on the Thornborough Road and classed as Nash we didn't get this letter or plan.

I don't have any comment on this but I do think it's a shame to get rid of grass land with lovely views to put up expensive houses.

I've also noted that on Amanda Maine tucker land some of her buildings have been missed of this plan? By the 30 sign.

From: Mrs Emily Brown - (BCC – Senior Strategic Planning Policy Officer)

Date: 8th February 2019

Thank you for consulting Buckinghamshire County Council (BCC). BCC welcomes the opportunity to comment on the Nash Neighbourhood Plan (NP) consultation.

Our comments are set out below:

Highways

The NP reflects the emerging Vale of Aylesbury Local Plan and does not contain any housing allocations for the Parish. As such the impact of the NP upon the local highway network would be limited however as the Highways Authority we have the following comments.

The NP does state in paragraph 6.6 that "the link from Nash to the planned Winslow station is to be welcomed but must be regular to be of use." This point is noted in addition to the request that consideration should be given to sustainable transportation links. Paragraph 6.7 goes on to state that "proposals to deliver a path and/or cycle route from the village to College Wood ... would be strongly supported", in addition to the creation of a footway/cycleway to Winslow and/or linking Nash to the network of 'Redways' around Milton Keynes.

It is important to note however, that potential to raise sufficient funding for such improvements by means of S106 as suggested will be limited as a result of the limited proposals for development in the area.

Ecology

Whilst the scope of this document is limited, there are a number of omissions with respect to biodiversity, details of which are provided below:

In addition to productive farmland and woodland (Paragraph 5.25 of NPP7) the Parish of Nash encompasses several non-statutory sites of nature conservation importance, including Fen North of College Wood Local Wildlife Site (LWS), Crabtree Leys Brake LWS and Nansley's Brake LWS. The boundary of the Parish is also directly adjacent to a number of other nonstatutory sites of nature conservation importance. It is recommended that a map of existing biodiversity assets within and adjacent to the Parish is incorporated into the Neighbourhood Plan using records from BMERC (Buckinghamshire and Milton Keynes Environmental Records Centre). Development on or adjacent to non-statutory sites should be avoided.

There are areas of Priority Habitat within the Parish (NERC Act 2016) including ancient woodland and fen, both of which are considered 'irreplaceable'. Priority Habitats are a material consideration in the planning process and development on or adjacent to them must be avoided. An additional policy should be included that specifically relates to the protection of biodiversity assets from development proposals. BMERC should be contacted for a detailed list of Priority Habitats within the Parish.

BMERC also holds a number of records of legally protected and notable species for the Parish, including great crested newt, otter, bats, badger, protected and notable birds, notable invertebrates and plants. Again, protected and notable species are material considerations in planning applications and should be fully assessed and mitigated for as part of any development application.

The majority of the Parish is located within the Whaddon Chase Biodiversity Opportunity Area (BOA). BOAs are the most important areas for biodiversity in the county and represent the regional priority areas of opportunity for restoration and creation of Priority Habitats. This information should be included within NPP7 of the Neighbourhood Plan.

The NERC Act (2006) states that with regard to Section 40 “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity includes restoring and enhancing species populations and habitats as well as protecting them.” This responsibility extends to town and parish councils.

It is recommended that text from the NPPF is incorporated into NPP7, specifically (Paragraph 170) “Planning policies and decisions should contribute to and enhance the natural and local environment by...d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures...” and that a mandatory requirement for demonstrating biodiversity net gain as part of any development application is included in NPP7.

The NP should promote role that biodiversity and green space plays in promoting human health and well-being.

Archaeology

Buckinghamshire County Archaeological Service maintains the local Historic Environment Record and provides expert advice on archaeology and related matters. 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 NPPF. The historic environment is the physical legacy of thousands of years of human activity in the county, in the form of buildings, monuments, sites and landscapes. It gives every place its character and identity. A neighbourhood plan may help to guide how heritage can be conserved whilst adapting to modern needs. It is often a place’s heritage that makes it special. That distinctiveness not only gives local people a sense of belonging or identity and a feeling of pride, but it can help to attract investment to an area. Heritage can also be a powerful tool for delivering regeneration and providing space for business, community facilities and other activities. By its very nature local heritage in the neighbourhood plan can help protect those areas which are valued locally and ensure that they remain in productive use where appropriate. It may help to ensure that potential new development is properly integrated with what is already there and does not result in the loss of local distinctiveness. It can also identify opportunities for improvement and the challenges that will need to be faced.

Addressing how best to integrate new development into an existing place can encourage people to be innovative.

Taking into account what is special about a place often demonstrates that off the shelf design and construction might not be appropriate. It encourages sensitive development of historic buildings and places that can invigorate an area, stimulating investment, entrepreneurship, tourism and employment.

It is for the local community to decide on the scope and content of a neighbourhood plan; however, there could be benefits in setting out a specific historic environment section drawing on the evidence from Historic England and the Bucks County Historic Environment Record.

Investigations could include:

- ☐ An analysis of the historic character of the area highlighting its contribution to the development and appearance of the place
- ☐ The identification of any listed buildings, scheduled monuments, registered parks and gardens, battlefields or local heritage assets.
- ☐ The environmental issues the plan seeks to address.
- ☐ Opportunities to repair, conserve or bring heritage assets back into use, especially those at risk
- ☐ Policies to protect, conserve and/or mitigate impacts on the historic environment
- ☐ Policies to manage the settings of heritage assets or important views
- ☐ Policies to promote locally distinctive development in terms of scale and materials
- ☐ Particular historic environment considerations to be taken into account when seeking to develop specific sites
- ☐ Opportunities for investment into the historic environment alongside delivery of new development
- ☐ As part of the process of preparing a neighbourhood plan opportunities could be identified to protect buildings and spaces.

We would recommend that the Historic Environment Record for the plan area is consulted if not already done so to get a greater understanding of the history and archaeology contained within the plan area. The Buckinghamshire County Historic Environment Record is a public record and we would welcome the opportunity to share our information with the local community. Guidance on taking the historic environment into consideration in neighbourhood plans has been published by Historic England and includes:

- ☐ Neighbourhood Planning and the Historic Environment August 2014
- ☐ The Historic Environment in Local Plans

There is also Section 16 of the NPPF.

Thank you for this opportunity to comment, we look forward to further opportunities to engage with you.

Date: 9th February 2019

Page 19 – NNP1 development outside the boundary; the category “exceptionally well designed new buildings”. We fail to understand the need for this category and the justification for it. Why does it warrant development outside the village boundary? The other categories are self-explanatory but this one we consider unnecessary.

Page 33 s6.9 relating to bridleways. Currently there is only one linear bridleway traversing Nash Parish. Has the practicality of extending this bridleway into a circular route, for example, been explored? A significant proportion of the current bridleway, within the parish, is along green lanes not open fields. To extend this bridleway would require it to traverse open fields, to make new “horse friendly” accesses between fields and to gain the agreement of existing landowners. My experience of recent walkers who appear to believe there is a “right to roam” across our fields would not make me amenable to welcoming a new bridleway across our property!

Page 36 Item 11. We were not aware that we have a listed brick wall! I’ve looked on the National Heritage List and tried to find it as a “local heritage asset” without success. Could you tell me where I might find this listing please

Date: 11th February 2019

We are writing to offer our strong objection to the section of land between Holywell Cottages and the Houses at the top of the hill on Stratford Road being included as a potential site for development on the proposed neighbourhood plan. The strip of land in question allows for scenic views across the local countryside, and allowing houses to be built there would deprive villagers of this stunning view and damage local flora and fauna. Furthermore, any developments on said land would put more strain on the villages already overburdened infrastructure. Creating any form of development here will likely cause traffic issues and a potential accident blackspot. The road it would be situated on is already prone to speeding vehicles and accidents, and this would only cause more. There is also potential that any works on the site would effect a well used scenic footpath, which again would be detrimental to the villagers as a favourite dog walk and used regularly by ramblers. We are also exceptionally worried that sale of the land could lead to a person or persons taking residence and illegally building on the site, something which the village is already struggling with.

We would also like public clarification on how the sections of land were decided upon for inclusion within the plan, why more suitable locations were excluded, whom may benefit from the areas included, along with any potential conflicts of interest regarding parish council members and the committee members that may own land agreed upon for inclusion. I would also request an independent review of these points, so as to maintain the integrity of the parish council and the committee, as an unbiased assessment is most definitely needed.

We also wish to complain about the poor public awareness regarding recent leafleting about the proposed plan. Very few people in the village received the paperwork detailing the area and the appropriate links to offer comments or objections. No one in our street recieved one, and from talking to others, very few elsewhere in the village have either. I find this obfuscation (Accidental or potentially wilful), to be appalling and damages trust in the parish council and committee.

Date: 11th February 2019

I would like to protest about the use of the land alongside my house and extending down Stratford Road towards Holywell Cottages. It would spoil the view towards Beachampton and beyond and would damage the infrastructure of the village

Date: 22nd February 2019

Without prejudice

For the sake of clarity and now having had ample time to take professional advice (your stated time scales didn't allow enough time to get the advice I required) I **do require** all or part of my land (e.g. enough for three luxury homes) as referred to on your email below to be included in the parish plan for potential development and not to be excluded due to my ownership or because of previous applications made which I understand is occurring and not legal.

I would suggest very careful consideration is made as I would prefer to go down the route of three luxury homes than twenty five affordable homes which is my other option you would push me towards if you keep my land outside the plan.

As you know affordable homes are desperately needed and should be relatively easy to agree even if not part of the village plan due to the rules here. If you look at my previous planning application many things including access has already been agreed. This would not be difficult to get.

Please confirm receipt of this email and keep me updated on any developments

Please also provide a written explanation of why Nash Parish Council do not wish to include my land that is perfect for new family homes as part of the future expansion plans

Thank you for consulting Buckinghamshire County Council (BCC). BCC welcomes the opportunity to comment on the Nash Neighbourhood Plan (NP) consultation.

Our comments are set out below:

Highways

The NP reflects the emerging Vale of Aylesbury Local Plan and does not contain any housing allocations for the Parish. As such the impact of the NP upon the local highway network would be limited however as the Highways Authority we have the following comments.

The NP does state in paragraph 6.6 that “the link from Nash to the planned Winslow station is to be welcomed but must be regular to be of use.” This point is noted in addition to the request that consideration should be given to sustainable transportation links. Paragraph 6.7 goes on to state that “proposals to deliver a path and/or cycle route from the village to College Wood ... would be strongly supported”, in addition to the creation of a footway/cycleway to Winslow and/or linking Nash to the network of ‘Redways’ around Milton Keynes.

It is important to note however, that potential to raise sufficient funding for such improvements by means of S106 as suggested will be limited as a result of the limited proposals for development in the area.

Ecology

Whilst the scope of this document is limited, there are a number of omissions with respect to biodiversity, details of which are provided below:

In addition to productive farmland and woodland (Paragraph 5.25 of NPP7) the Parish of Nash encompasses several non-statutory sites of nature conservation importance, including Fen

North of College Wood Local Wildlife Site (LWS), Crabtree Leys Brake LWS and Nansley's

Brake LWS. The boundary of the Parish is also directly adjacent to a number of other non-statutory sites of nature conservation importance. It is recommended that a map of existing biodiversity assets within and adjacent to the Parish is incorporated into the Neighbourhood Plan using records from BMERC (Buckinghamshire and Milton Keynes Environmental Records Centre). Development on or adjacent to non-statutory sites should be avoided.

There are areas of Priority Habitat within the Parish (NERC Act 2016) including ancient woodland and fen, both of which are considered ‘irreplaceable’. Priority Habitats are a material consideration in the planning process and development on or adjacent to them must be avoided. An additional policy should be included that specifically relates to the protection of biodiversity assets from development proposals. BMERC should be contacted for a detailed list of Priority Habitats within the Parish.

BMERC also holds a number of records of legally protected and notable species for the Parish, including great crested newt, otter, bats, badger, protected and notable birds, notable invertebrates and plants. Again, protected and notable species are material considerations in planning applications and should be fully assessed and mitigated for as part of any development application.

The majority of the Parish is located within the Whaddon Chase Biodiversity Opportunity Area (BOA). BOAs are the most important areas for biodiversity in the county and represent the regional priority areas of opportunity for restoration and creation of Priority Habitats. This information should be included within NPP7 of the Neighbourhood Plan.

The NERC Act (2006) states that with regard to Section 40 “*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of*

conserving biodiversity. Conserving biodiversity includes restoring and enhancing species populations and habitats as well as protecting them." This responsibility extends to town and parish councils.

It is recommended that text from the NPPF is incorporated into NPP7, specifically (Paragraph

170) "*Planning policies and decisions should contribute to and enhance the natural and local environment by...d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures...*" and that a mandatory requirement for demonstrating biodiversity net gain as part of any development application is included in NPP7.

The NP should promote role that biodiversity and green space plays in promoting human health and well-being.

Archaeology

Buckinghamshire County Archaeological Service maintains the local Historic Environment Record and provides expert advice on archaeology and related matters. 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 NPPF.

The historic environment is the physical legacy of thousands of years of human activity in the county, in the form of buildings, monuments, sites and landscapes. It gives every place its character and identity. A neighbourhood plan may help to guide how heritage can be conserved whilst adapting to modern needs. It is often a place's heritage that makes it special. That distinctiveness not only gives local people a sense of belonging or identity and a feeling of pride, but it can help to attract investment to an area. Heritage can also be a powerful tool for delivering regeneration and providing space for business, community facilities and other activities. By its very nature local heritage in the neighbourhood plan can help protect those areas which are valued locally and ensure that they remain in productive use where appropriate. It may help to ensure that potential new development is properly integrated with what is already there and does not result in the loss of local distinctiveness. It can also identify opportunities for improvement and the challenges that will need to be faced