



**Directorate for Planning, Growth & Sustainability**

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13<sup>th</sup> April 2022

Ref: Nash NDP Reg 16

Dear Sir/Madam,

**Nash Neighbourhood Plan – Regulation 16 Submission Consultation  
Town and County Planning (England) Neighbourhood Planning (General) Regulations 2012 (as amended)**

Buckinghamshire Council have reviewed the submission version of the Nash Neighbourhood Development Plan; the Basic Conditions Statement and the Consultation Statement. To assist the examiner, the council's comments are divided into two; comments that relate to the basic conditions and comments that help to improve and update the plan.

Should any of the comments be unclear or, if you would like further information in relation to points raised please contact us using the contact details at the top of the letter.

Yours sincerely,

Nina Merritt  
Senior Planning Policy Officer  
Buckinghamshire Council

### Comments relating to Basic Conditions

<u>Policy or paragraph</u>	<u>Page</u>	<u>Comments</u>	<u>Modifications</u>
Paragraph 5.9	20	The supporting text provides a definition of small scale development (no more than three dwellings). Policy D4: Housing development at smaller villages states five dwellings or fewer when referring to small scale development. The definition within this paragraph is therefore contrary to the definition within the Vale of Aylesbury Local Plan 2021.	Amend the supporting text to state 'no more than five dwellings' to ensure compliance with policy D4 within the Vale of Aylesbury Local Plan.
Policy NNP2: Housing Development	21	As it currently reads, the policy is unclear with regards to amenity space for existing and future occupants. To help shape and direct development proposals with regards to this matter, it is suggested that an additional word is inserted into the policy.	Insert the word 'provide' between the words 'and' and 'a'.
Polices NNP5: Landscape, NNP7: Biodiversity and NNP8: Employment	26 29 30	As currently written, these policies read more like objectives than policies. They do not shape and direct development proposals within the neighbourhood plan area as required by paragraph 13 of the National Planning Policy Framework. Instead, they state what the neighbourhood plan is wanting to achieve.	Suggest amending the wording to something similar to; Policy NNP5 – 'Proposals which seek to protect and enhance the following landscape features and characteristics of the village will be supported: <i>(List the features set out in paragraph 5.20)</i> ' Policy NNP7 – 'Proposals which seek to protect and enhance biodiversity features in and around the village will be supported.' Policy NNP8 – 'Proposal which seek to provide the facilities for better home working will be supported'

## Comments to improve and update the plan

<u>Policy or paragraph</u>	<u>Page</u>	<u>Comments</u>	<u>Modifications</u>
Foreword Acknowledgements Paragraphs 1.5, 2.2, 3.1, 5.3, 6.1, 6.2 & 6.3 Policy NNP6: Footpath and Bridleway Network Annex 6	3 4 7, 10, 13, 18, 31 & 32 27 46	In 2020, Buckinghamshire became a single unitary authority. The single authority replaces Buckinghamshire County Council, Aylesbury Vale District Council, Chiltern and South Bucks District Council and Wycombe District Council. As part of this, the Local Planning Authority is now Buckinghamshire Council. There are many sections within the plan which still refers to Aylesbury Vale District Council and Buckinghamshire County Council. Buckinghamshire Council is now the Local Planning Authority for the area and so these references should be updated to avoid confusing the reader.	References to Aylesbury Vale District should be changed to Buckinghamshire Council
Paragraph 1.3	7	There are parts within the plan that refer to the development plan for the Aylesbury Vale district. Following on from the comment above, this should now be the development plan for Buckinghamshire Council	References to the Aylesbury Vale Development Plan should be changed to Buckinghamshire Development Plan.
Paragraphs 1.3, 3.3, 3.4, 3.6, 5.5, 5.7, 5.8 & 5.12 Annex 5	7, 13, 14, 18, 19 & 22 44	The Vale of Aylesbury Local Plan was adopted in September 2021 and replaces the saved policies of the 2004 Local Plan. These paragraphs need to be updated to reflect the adoption of the Local Plan in 2021.	Remove reference to the saved policies and update reference to the Local Plan which has now been adopted.
The Pre-Submission Plan (Paragraph 1.7)	8	The pre-submission stage of the plan making process has now concluded. This section should be removed from the plan.	Remove or update this section as it outdates the plan.

Strategic Environmental Assessment (Paragraph 1.8)	8	Although it is acknowledged that it was the legacy district council that issued the screening report, it would be useful to add the word 'legacy' to demonstrate that this was pre-unitary.	Add the word 'legacy' before the word 'district' to distinguish that the district council no longer exists.
The Next Steps (paragraph 1.9)	8	This section needs to be updated as this stage of the plan making process has concluded. It could be updated to refer to the referendum stage of the process.	Update this paragraph to reflect the progress of the plan.
Regulation 14 Pre-Submission Consultation	8 & 9	This should be removed from the plan as this stage of the plan making progress has concluded.	Remove this section from the plan.
Policy NNP1: Nash Settlement Boundary Policy NNP2: Housing Development Policy NNP3: Design in the conservation area Policy NNP4: Important Views and Vistas Policy NNP5: Landscape Policy NNP6: Footpath and Bridleway Network Policy NNP7: Biodiversity	19 21 23 25 26 27 29	Policies should be clearly labelled and distinguishable from the supporting text. It is currently unclear what wording forms part of the policies and what forms part of the supporting text. This needs to be made clearer	Clearly distinguish the policies from the supporting text
Policy NNP1: Nash Settlement Boundary	19	The third sentence within the policy is better suited from supporting text as it does not provide direction but states an opinion.	Move this sentence into supporting text
Policy NNP3: Design in the Conservation Area	23	The second sentence of the first paragraph is better suited as supporting text.  The second point set out in the guidelines states that the conservation areas can be found on the policies	Move this sentence into supporting text  Either add the conservation areas to the policies map within annex 3 or refer to figure 2 within the plan.

		map. This is not correct. The maps in annex 3 do not show the conservation areas.	
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**Directorate for Planning Growth & Sustainability**  
Buckinghamshire Council,  
Walton Street Offices,  
Walton Street,  
Aylesbury  
HP20 1UA

1<sup>st</sup> March 2022

**FAO:** Neighbourhood Planning

Dear Rachael

**Proposal:** **Nash Neighbourhood Plan**

Thank you for your consultation dated the 24<sup>th</sup> February 2022 with regard to the consultation on the Nash Neighbourhood Plan.

Whilst the Highway Authority has no in-principle issue with the Neighbourhood Plan, and the aspirations to improve public transport links, including maintaining the existing community bus service, and improving walking and cycling links, we must be realistic regarding financial contributions that we can secure based on the amount of development proposed. It appears that only relatively small developments would be acceptable, therefore only relatively minor financial contributions and improvement would be justifiable.

Yours sincerely

Andrew Cooper  
**Senior Highways Development Management Officer**  
**Highways Development Management**  
**Planning Growth & Sustainability**



## Directorate for Planning, Growth & Sustainability

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archaeology@buckinghamshire.gov.uk  
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Rachael Riach  
Buckinghamshire Council  
The Gateway  
Gatehouse Road  
Aylesbury  
HP19 8FF

15 March 2022

Dear Rachael,

### Nash Neighbourhood Plan

Thank you for consulting with the Buckinghamshire Council Archaeological Service on the Nash Neighbourhood Plan. We maintain the local Historic Environment Record and provide expert advice on archaeology and related matters.

We have the following comments to make;

Comment from team	Policy or Para	Page	Comment
Archaeology	NPP3	23	There is no reference to archaeology, and limited reference to heritage outside of the impact of development on the Conservation Area. We would recommend that all heritage assets be considered within the Neighbourhood Plan. We would suggest that the NP should recommend that development proposals consult with the Historic Environment Record (HERO, as a minimum. This would be in accordance with paragraph 194 of the NPPF which states that in determining applications "As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."
Archaeology	NNP5	26	There is no mention of the Nash ridge and furrow earthworks, which were assessed as part of a project by English Heritage (now Historic England) in 1995 and were awarded the second highest level of importance, making them regionally important. As well as being a heritage asset, they can also help define the boundary between the historic settlement and the historic open fields and are a key part of the landscape of the area. The extent of the earthworks can be seen on the mapping tool of the Buckinghamshire Heritage Portal. <a href="https://heritageportal.buckinghamshire.gov.uk/map">https://heritageportal.buckinghamshire.gov.uk/map</a>

Archaeology	Annex 3		A map of Archaeological Notification Areas within the NP area could be included within this annex.
Archaeology			Buckinghamshire Council is currently compiling a local list of heritage assets, which will include archaeological sites. Any archaeological sites confirmed on the local list will be taken into consideration in the planning process. For further information, see <a href="http://local-heritage-list.org.uk">Home - Buckinghamshire's Local Heritage List (local-heritage-list.org.uk)</a>

If you have any queries regarding this advice please do not hesitate to contact me.

Yours sincerely

**Lucy Lawrence BA MCIFA**

Archaeology Officer  
Planning Growth and Sustainability  
Buckinghamshire Council

Walton Street Offices, Walton Street, Aylesbury, Bucks, HP20 1UA

**From:** [Sue Raven](#)  
**To:** [Neighbourhood Planning Mailbox](#)  
**Cc:** [David Waker](#); [David Broadley](#); [John Wickson](#)  
**Subject:** [EXTERNAL] Re: Nash Neighbourhood Plan Consultation 2022 - Submission  
**Date:** 25 March 2022 14:53:25

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Some people who received this message don't often get email from [REDACTED].

[Learn why this is important](#)

Good afternoon

Further to our submission emailed to you on 21 March 2022 (below), we now submit the following as an addendum to the extracts from Nash Parish Council meetings that we provided as evidence to support our comments (under item B.4 of our submission) that the proposed Neighbourhood Plan has no local green space policy yet the Parish Council is actively pursuing means for being able to compulsorily acquire our land for this purpose. At the same time the Minutes demonstrate the Parish Council's continuing strong opposition to planning for development of the land for housing despite it being found suitable for such purposes in the HELAA. We reiterate that as owners of the land we have not been consulted other than to be asked if we were willing to sell, and if not that would be an end to the matter (**which clearly it is not**). We understand that designating a local green space should not be used as a means of preventing development.

Extract from Minutes of Nash Parish Council Meeting held on Thursday 17 March 2022 at 7.30 pm in the Village Hall:

#### **6. Planning**

6.8 **Appeal 21/00115/REF** Against refusal of **21/02806/APP** Land North of All Saints Close, Nash, MK17 0ES. Erection of five dwellings with garages, new access road and all associated works. Appeal deadline - 11 April 2022.

6.9 NPC resolved to use the £1,250 (excl VAT) earmarked for planning consultant representation at Appeal 19/00061/NONDET (Nash Park), which was no longer required because that appeal had been withdrawn, to employ Walshingham Planning to prepare a response. **Action:** Clerk to take forward.

#### **Possible Planning Application for Community Amenity Between the High Street and Stratford Road**

6.13 At the January meeting Cllr Collins had volunteered to further explore the advice provided by Buckinghamshire Council when asked about the possibility of a compulsory purchase order.

6.14 Cllr Collins reported how he had consulted Buckinghamshire Council and was advised to take advice from a Planning Officer only to discover there would be a charge for the advice. Cllr Chilver undertook to raise the matter with the Cabinet member for Planning and Regeneration with a view to arranging a meeting. **Action:** Cllr Chilver to take forward.

6.15 The Chair asked whether the Winslow and Villages Community Board (W&VCB) would fund the planning advice and other costs arising from the planning application. In response to a question from Cllr Chilver, Cllr Williams explained there were residents who were willing to underwrite the land purchase cost if a compulsory purchase order was approved by the Secretary of State. Cllr Chilver undertook to support a funding application if NPC decided to apply for W&VCB funding and said going forward W&VCB was likely to place greater importance on match funding.

Kind regards

Susan Raven

(on behalf also of John Wickson and other members of our family co-owning land in

Nash)  
[REDACTED]

On Mon, 21 Mar 2022 at 13:52, Sue Raven [REDACTED] wrote:

Good afternoon,

Attached are our comments on the draft Nash Neighbourhood Plan. As they did not fit into box 9 of the Council's survey form, we have appended them together with our evidence to the form all as a continuous document, and used box 9 to summarise. We hope this is in order.

You will see that certain of our comments relate to a site in the village that we own. This site went forward in the HELAA as suitable for housing development (NSH003) but is excluded from the Plan. This site is currently the subject of a planning Appeal (21/00115/REF) progressing in parallel with this consultation. The Appeal is against refusal of a scheme for 5 houses (21/02806/APP). The final comments deadline is 26 April 2022.

We appreciated that David Waker was able to talk to my sister-in-law, Alyson Wickson, last Thursday to answer queries about the consultation and examination process.

Kind regards

Susan Raven

(on behalf also of John Wickson and other members of our family co-owning land in Nash)  
[REDACTED]

# Consultation survey

\*Indicates a Mandatory question

## Your interest in this consultation

### 1. What is your interest in this consultation? \*

Please tick (✓) one option

- Resident (**Go to question 4**)
- Organisation (**Go to question 2**)
- Agent (**Go to question 3**)

### 2. What is the name of your organisation? (Go to question 4)

Mr J L Wickson and Mrs S G Raven

Type text here

### 3. Which organisation do you represent in this consultation?

## Contact details

We need to ask for your name and address because planning law states that we cannot accept anonymous comments.

The information you provide here will only be used for the purpose of this consultation and will be stored securely in line with data protection laws. No personal information will be shared or published.

### 4. Full name\*

Susan Grace Raven  
John Leslie Wickson

**5. Address\***

If you are a resident, this is your home address. If you are an agent or organisation this is your business address.

[Redacted address field]

**6. Would you like to be notified of future progress with the Neighbourhood Plan?**

Please tick (✓) one option

Yes

No

**7. What is your email address?**

If you provide your email address and have asked to be notified of progress with the Neighbourhood Plan, we will contact you by email.

[Redacted email address field]

**Your views**

**8. Please indicate whether you support or object to the submitted Neighbourhood Plan.**

Please tick (✓) one option

I support the submitted Plan but do not wish to make any comments or suggest changes (**End of survey**)

I support the Neighbourhood Plan and would like to provide comments or suggest changes (**Go to question 9**)

I object to the Neighbourhood Plan and will provide comments and evidence to explain my reasons (**Go to question 9**)

## Your comments

Any comments you make in this section will be made available to the public on our website, as required by law. It is very important you don't include any personal details in your comments.

### 9. Please provide your comments, suggested changes or reasons for objecting.

If you comment on specific sections of the Neighbourhood Plan, please make it clear which sections these are.

If you have evidence to support your comments, please send it to us by email or post.

Our full submission and evidence are appended. In summary, our comments concern:

- the consultation process;
- modifications, updates and corrections, including proper cross-referencing to the current NPPF and the adopted Vale of Aylesbury Plan (VALP);
- sections of the Plan concerning:
  - settlement boundary (NNP1)
  - restrictions on housing development and delivery in a Smaller Village (NNP1 and NNP2)
  - protection of heritage and character (NNP3)
  - other matters (regarding green space policy and recreation land).

We have indicated where we believe the Plan does not support NPPF or VALP policies (principally S2 and D4).

**Note:** Part of this submission concerns a site in Nash that is the subject of an ongoing planning Appeal (Bucks Aylesbury Vale ref 21/00115/REF; PINS ref APP/J0405/W/21/3284696) which the Plan would affect.

## End of survey

### Thank you for completing the consultation survey.

Please return your completed survey by midnight on **Thursday 7 April 2022**. You can:

- Post it to Nash Neighbourhood Plan, Planning Policy Team, Buckinghamshire Council, Queen Victoria Rd, High Wycombe HP11 1BB.
- Take it to one of our three main council access points located at:
  - Walton Street Offices, Aylesbury, HP20 1UA
  - Queen Victoria Road, High Wycombe, HP11 1BB
  - King George V House, King George V Road, Amersham, HP6 5AW

**A. Is the draft Neighbourhood Plan in a suitable state for submission for Regulation 16 consultation and has the process been properly followed?**

1. Engagement with the local community during the process of preparing the plan/ Consultation Statement

The government's official guidance on the preparation of neighbourhood plans states that at the stage of developing the proposals, those living and working in the neighbourhood area and those with an interest in or affected by the proposals should be engaged and consulted with. The guidance and also the NPPF says landowners and developers should also be involved from the outset. Although clearly from the Consultation Statement residents were invited and encouraged to be involved in this initial process, we as non-residents but significant landowners in Nash were not and neither was our farm business tenant who operates from part of our land. Our family has had long-standing (since the 1950s) interests in the village.

We were able to participate in the Regulation 14 consultation (Response 18 date 4 Feb 2019 on page 55 of the Consultation Statement) but our concern has not been commented upon.

2. Plan and Basic Conditions Statement needs updating and errors corrected

Since the Regulation 14 consultation, the VALP has been adopted, there have been updates to the NPPF and Aylesbury Vale DC has been absorbed into the Buckinghamshire unitary authority. The Basic Conditions Statement and the Plan need updating to reflect these changes, correct errors and so clarify the Plan to avoid confusion – as it stands it is difficult for properly informed comment to be made. The Plan needs to remain flexible to future policy changes to avoid the risk of either being found unsound or being redundant – Buckinghamshire Council are already in the process of preparing a new Local Plan for the whole unitary authority, which will replace the VALP.

In the Basic Conditions Statement, some references are apparently invalid for the NPPF 2021 edition: for example, NPPF §183,184,185 refer to ground conditions and pollution; §170 and 172 (cited under NNP2 and NNP1 respectively) refer to coastal areas; there is no §79a (cited under NNP1) References to the now inapplicable AVDLP policies under NNP1 and NNP2 should be removed. All references to VALP policy D3 should be corrected to D4.

In the draft Plan,

The cover page still refers to this document as the pre-submission version dated October 2019 for Regulation 14 consultation, whereas inside it is labelled version 16, May 2021 but is not referred to as the submission version ready for Regulation 16 consultation (1.9 - 1.11) – it has apparently not been further updated to reflect adoption of the VALP and creation of the Buckinghamshire Council unitary authority (1.3, 3.1).

Some advice from the local authority screening (reproduced in the Consultation Statement), which would be of significance in ensuring the neighbourhood plan is sound, does not seem to have been adopted, such as the advice concerning the proposed limitation on and phasing of new development in NNP2 (see later). While we acknowledge that in general the Plan may be sufficiently in line with the VALP, in this and other instances where advice has not been accepted, it would seem to be too far removed.

The plan committee's annotations to the AVDC screening comments indicate an intention to re-write parts of the plan in line with the advice, but that doesn't appear comprehensively to have occurred. Is this the correct plan version being consulted on?

Continued.....

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3.2 Current NPPF (2021) should be cited. The sections mentioned as particularly relevant differ from those cited in the Basic Conditions Statement and the section references aren't valid for the current plan.

3.3/3.4 and 5.7 - Reference to the AVDLP policies should be removed as now obsolete and replaced by the VALP policies following its adoption.

All references to VALP policy D3 throughout should be to D4 being the relevant policy for "Smaller Villages" (5.7 and 5.11). (D3 applies to unallocated sites in strategic and larger "more sustainable" settlement categories).

Other suggested modifications:

2.4 - The description of the All Saints Close development as "executive" homes is subjective and could be perceived as somewhat prejudicial – it is not necessary and should be removed. (This is a development as advised by the LA to be an appropriate mix of housing ranging from 2- bedroom terraced cottages to 4-bedroom detached homes designed to be in keeping with the vernacular styles and character of the village. The site lies partly within and partly adjacent to the Conservation Area and so the highest standards of design and housing mix were applied – all approved by the Parish Council and the LA).

2.12/2.13 - The proximity of Winslow 4 miles away should also be mentioned as a strategic development settlement as well as the village's location in the Oxford/Cambridge arc together with proximity to mainline rail connections (East-West rail, etc). The Background section in the Consultation Statement notes its convenient location to major centres, making it popular for "commuters and retirees" to live. Nash is hardly a "remote" village (3.5) given the proximity to the 3 strategic settlements of MK, Buckingham and Winslow, as well as to the market town of Stony Stratford, the neighbouring "Medium Village" of Great Horwood and several other "Smaller Villages close by.

2.4 - Originally the village comprised more than "two ends" – poly-focal. "Two ends" is more a description of the village today – the southernmost Wood End remains separated from the other ends, the distinction between which has been blurred by mainly 20<sup>th</sup> century development ribbon development along High Street. The Conservation Area reflects the historic ends and strictly speaking comprises four parts rather than three (2.6), with the Stratford Road and Wood End areas joined by a strip along the Winslow Road that preserves the distinctiveness of Wood End.

**B. Is the Plan compliant with national and local planning policies?**

1. Settlement boundary (NNP1)

Rather than allocating specific sites, Nash has chosen to define a settlement boundary within which development can take place. (We note that the NPPF does not refer to settlement boundaries and the Council does not have guidance on defining them).

The boundary is tightly drawn around the existing built footprint of the village. While this accords with VALP policy D4 (a) to an extent, D4 (a) also allows for the inclusion of land that is "substantially enclosed by existing built development". The boundary arbitrarily restricts suitable edge-of-settlement land from coming forward and as such does not accord with the presumption in favour of sustainable growth required by the NPPF. It is overly restrictive and provides no flexibility.

The D4 (a) criterion if fully applied will protect Nash from a mass of development.. There is just one undeveloped edge-of-settlement site (out of seven sites put forward) identified and evaluated in the HELAA submitted with the VALP as suitable for development (NSH003- see appended HELAA extract and plan for Continued...

..

.....continued

Nash). This has been assessed as substantially enclosed and described as semi-rural, being more of the village than the open countryside (it also falls within the built-up area boundary of Nash defined by the Office for National Statistics (2011) dataset). Due to topography and screening by intervening built form and hedgerows, substantially it is not visible other than to those houses immediately bordering it. As such it is not a site that warrants exclusion as set out in D4 and in Annex 7 of the draft Plan, yet it remains excluded from the proposed Nash settlement boundary.

The HELAA allowed for up to 12 homes on this site of under 0.5 hectares, though in practice this is too dense for the shape and topography of the site and its location in relationship to surrounding housing and countryside. A scheme for 9 houses was refused at the appeal stage (APP/J0405/W/20/3253053; Aylesbury Vale ref 20/00029/REF) as, to quote the Inspector, having too much of an “undesirable urbanising effect on the local landscape” in this “semi-rural location” though “the level of harm which would arise is not significant and “the development of this site for residential purposes would not be significantly worse than any other undeveloped site at the edge of a built-up area”. The site is currently in the planning process for a much reduced, small-scale development for up to 5 homes. It is noted that in the Consultation Statement (p.23), at the meeting of the Nash Neighbourhood Plan Committee (NNPC) on 19 March 2019, to discuss the Settlement Boundary and Pre-submission Comments, it was recommended that land that had previously been refused planning permission be excluded from the settlement boundary. However, in this case it is not the land that has been refused but the proposed scheme.

It is illogical that land not considered suitable by the HELAA was included in the pre-submission settlement boundary and then had to be removed, yet suitable land continues to be excluded contrary to VALP policy D4.

NPPF §69 and §70 also identify the important contribution that small sites can make to meeting housing requirements (can Aylesbury Vale achieve 10% of its housing requirement from such sites?) and urges neighbourhood plans to particularly consider their allocation.

The boundary as drawn does not allow for natural organic growth of the village, which VALP policy D4 controls at a level appropriate to the assessed sustainability of Nash, having categorized it as a Smaller Village. There is little space within the boundary for further housing and the consequence is that new development will be on existing residential plots. NPPF §71 states that “plans should consider the case for setting out policies to resist inappropriate development of residential gardens”. Squeezing development into residential infill plots risks being detrimental to the valued “open and green” character/ “feeling of openness” of the village as expressed in 2.5.

## 2. Restriction on development (NNP1 and NNP2)

5.14 - The cap of 9 homes over 15 years is inconsistent with the NPPF and the reason for the phasing (3 homes every 5 years) unjustified. This rate of growth represents only a third of that the village has sustained and been able to accommodate, in terms of integration of new residents, in the last 30 years, according to the Aylesbury Vale Housing Completion statistics (23 homes in 15 yrs 2007 to 2021, 28 homes in preceding 15 years 1992 to 2006, an average 8 to 9 homes every 5 years in Nash).

104 property sales in Nash have completed over the last 15 years, 2007-2021 (Rightmove) - an annual mean of just under 7. What is the justification for claiming that development needs to be restricted in order to assimilate new people into the village when there is a level of mobility in Nash well above 3 homes every 5 years?

The approach followed by the Neighbourhood Plan Committee has sought to assess the level of housing that would be acceptable to the local community rather than that permitted and allowed for under VALP policies S2 and D4.

Continued.....

....continued

Although the VALP strategic policies set no specific housing targets or allocations for individual settlements in the Smaller Village category, it is expected that sites for small scale development will come forward through neighbourhood plan allocations or by individual ‘windfall’ planning applications. It therefore assumes an overall windfall allowance based on experience over previous years. Sites identified as suitable in the HELAA are expected to come forward during the period of the VALP. [The latest (Sept 2021) 5-year Housing Land Supply Position Statement targets 291 homes from windfall sites of up to 5 houses in Aylesbury Vale in the two years from 2023].

By restricting Nash’s growth to a lower level than previously and also omitting to include a suitable site from the HELAA, the Nash Plan stands to undermine and promote less growth than allowed for by VALP strategic policy S2 and strategic delivery policy D4, thereby being in conflict with NPPF §29.

Nash is in an area where there is a demand for housing that is likely to continue and probably increase (illustrated by the ready uptake of new housing and growth figures over the past 30 years and also by the turnover of homes) – it inevitably has to take its share of growth

VALP policy D4 (c) allows for development of up to 5 dwellings on sites in Smaller Villages. The tight drawing of the settlement boundary provides for only infill developments which are capped to no more than 3 homes (5.9). There is no justification of Nash being a special case that warrants different criteria to other Smaller Village settlements in terms of the scale of developments. This variation from the VALP strategic delivery policy D4 is counter to NPPF §13 that neighbourhood plans should support delivery of strategic policies in local plans.

### 3. Preservation of the form of the village (NNP3)

5.16 and 5.17 – The linear development of Nash is modern and not historic as stated. Originally Nash was a poly-focal village with the historic housing at its “ends” preserved in the Conservation Areas. The 1970s developments along High Street north from the Stratford Road end has made the linear form of the village seen today and has masked the original historic poly-focal form, where development was clustered at the former ends. (The fourth end, Wood End to the south has remained separated). There is some earlier, but still comparatively modern, linear development in the Stratford Road conservation area but this is already compromised by recent developments. (See appended map showing Impact of Modern Development on Nash from the Nash Conservation Area review (AVDC 2007)).

The linear development along the High Street is not in the Conservation Area. The rear gardens of these homes do not currently back on to other housing but preserving an outward open view “to protect the amenity” of residents is not a reason in planning terms for disallowing development. Such a policy would allow only continued ribbon development and sprawl.

For those members of the NNPC and the Parish Council who have rear gardens directly backing on to the excluded land NSH003 there is a potential conflict of interest.

### 4. Recreation land (Other “Non-Planning” Matters)

The Plan (NNP1) states that land outside of the defined settlement boundary will be treated as open countryside, where development will be restricted to recreational/leisure use and certain other specified uses. The Parish Council has openly declared and is pursuing its interest in acquiring the HELAA site NSH003 as another recreation area, thereby changing it from private land to open access community land. This is in parallel to planning consideration of the land for housing development, which the Parish Council opposes.

6.13 states that consideration of recreational land use beyond the settlement boundary is outside the scope of the Plan but development of this site whether for housing or recreational use is a planning matter and we submit that on either count the site should be included within the settlement boundary.

Continued....

.....continued

The Neighbourhood Planning Toolkit and Guidance states that sites should not be designated as green space in order to stop development on the edge of settlements and NPPF §101 and §102 that there must be justification that the site is demonstrably special and holds particular local significance or recreational value to the local community.

Given the Parish Council's interest in HELAA site NSH003 and its proposed use, shouldn't a local green space policy be included in the Plan?

As owners of the NSH003 site, we have not been formally approached by Nash Parish Council regarding its proposals for public use of the land. We have only information that is in the public domain through the minutes of its meetings, relevant extracts from which follow demonstrating it is actively exploring acquisition and use of the land for amenity purposes, although no justification is given. What is the evidence base for acquisition of this site? Public opinion is not appropriate to use as the base for decision-making and in any case only one respondent put forward the idea of the land being used for recreational purposes in the Reg 14 consultation.

1. Minutes of **NPC Remote Meeting Thursday 7 January 2021** at 7.30pm. Page 1  
**Refusal of Appeal 20/00029/REF Land at Church Farm, MK17 0ES**  
5.5 NPC **resolved** to press for a response if the landowner did not respond to the Clerk's enquiry about whether they would now be willing to sell the land to the Parish Council for recreational purposes.  
**Action:** Chair to take forward with the Clerk.
2. Minutes of **NPC Remote Meeting Thursday 18 March 2021** at 7.30pm. Page 2  
**Ongoing Planning Matters**  
5.4 NPC **noted** from the report about ongoing planning matters:  
(a) The Church Farm landowners had confirmed in writing the land was not for sale
3. Minutes of **NPC Meeting Thursday 23 September 2021** at 7.30pm in Nash Village Hall. Page 2  
6.5 **21/02806/APP** Land North of All Saints Close, Nash, MK17 0ES. Erection of five dwellings with garages, new access road and all associated works.  
6.6 NPC **resolved** to endorse the consultation response opposing the application.  
6.7 The Chair reported on the advice he had received from Buckinghamshire Council about the possible compulsory purchase of the land to which planning application 21/02806/APP referred. NPC **resolved** to update the Neighbourhood Plan and asked the Chair of the Nash Park Planning Committee [*sic*] to make the necessary alterations to the plan and confirm the changes with Buckinghamshire Council.  
**Action:** Chair of the Neighbourhood Plan Committee to take forward.
4. Minutes of **NPC Meeting Thursday 18 November 2021** at 7.30pm in Nash Village Hall. Page 2  
**Nash Neighbourhood Plan**  
5.8 The Chair of the Nash Neighbourhood Plan Committee talked about how he had unsuccessfully tried to contact the new Buckinghamshire Council Officer responsible for neighbourhood plans.  
5.9 In response to a question from the Chair about the changes approved at the September meeting,  
**Action:** Cllr Carter to provide the map

Continued...

....continued

5. Minutes of **NPC Meeting Thursday 20 January 2022** at 7.30 pm in Nash Village Hall. Page 2

**Nash Neighbourhood Plan (NNPC)**

6.10 NPC discussed the report prepared by the Chair of NNPC and resolved not to redraw the settlement boundary, so the Neighbourhood Plan could be handed over to the Officer who would commence the process of selecting an external examiner.

**Action:** Chair of NNPC to handover the Nash Neighbourhood Plan.

6.11 Cllr Collins volunteered to explore further the advice provided by Buckinghamshire Council and prepare a draft planning application for the land between All Saints Close and the High Street for use as a community amenity space.

**Action:** Cllr Collins to take forward.

6. Agenda for NPC Meeting Thursday 17 March 2022 at 7.30 pm in Nash Village Hall.

6 (b) Appeal **21/00115/REF** against refusal of **21/02806/APP** Land North of All Saints Close, Nash, MK17 0ES. Erection of five dwellings with garages, new access road and all associated works. Cllr Carter called in as major. Cllr Collins led with input from Cllrs Carter and Williams - **opposed**. The appeal deadline is 11 April 2022.

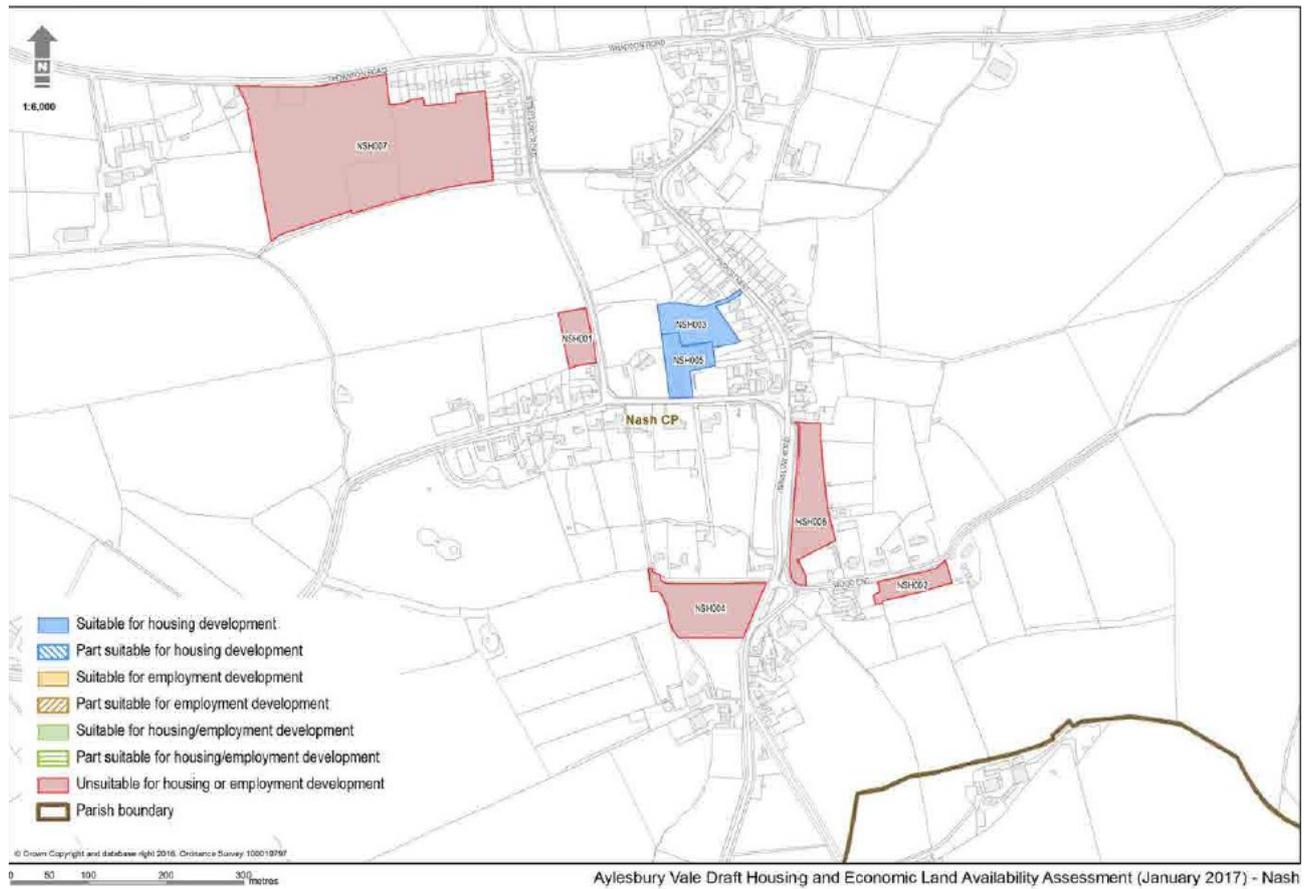
6 (e) Draft Planning application for community amenity on land between the High Street and Stratford Road

Appendices 1 and 2 follow overleaf

Appendix 1 - Extract from the Aylesbury Vale HELAA for Nash

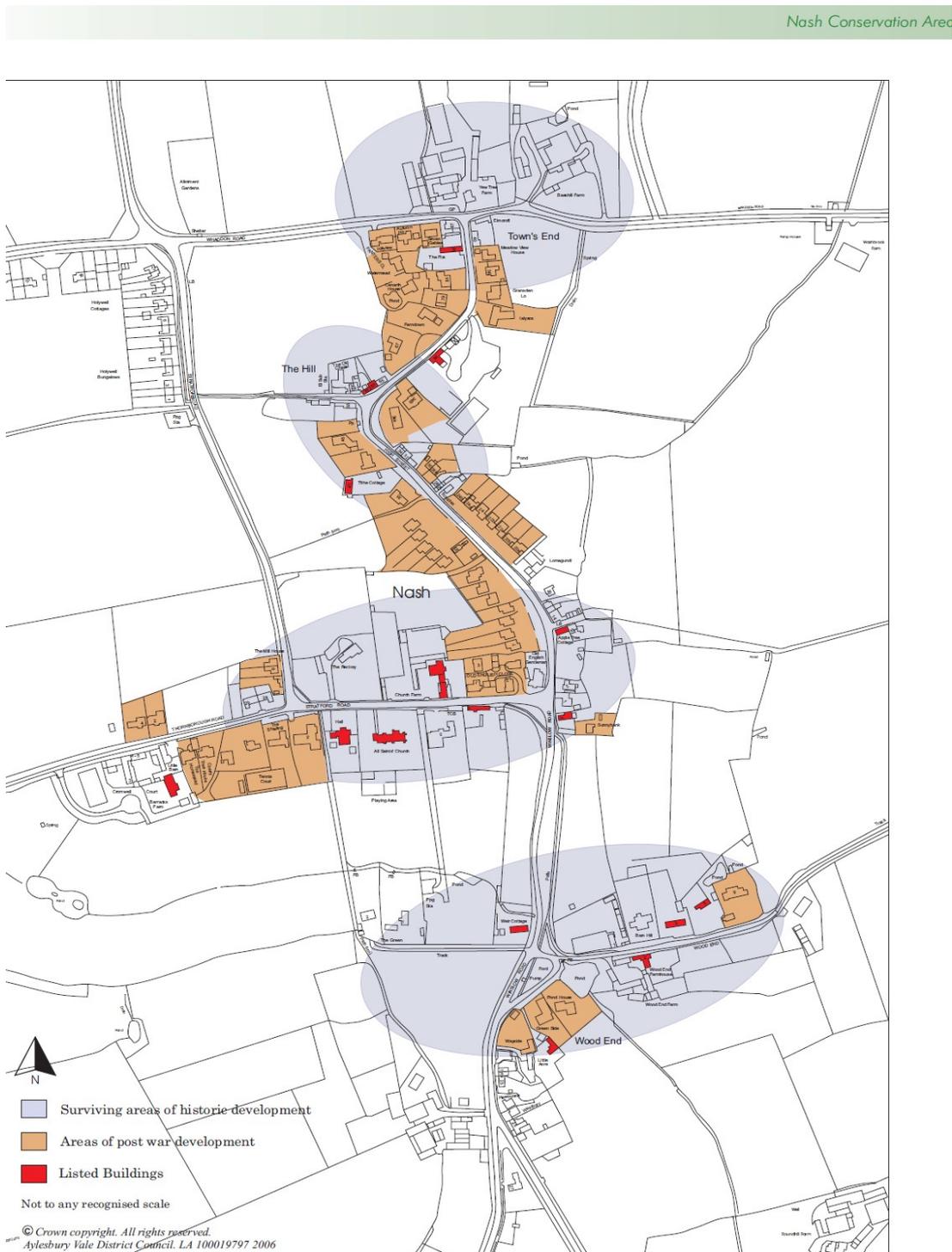
Nash

Reference	Site Address	Parish	Site Area (ha)	Site assessment	Achievability	Housing				Economic Development		
						Suitable	Capacity	1-5 Years	6-15 Years	Suitable	Capacity (sqm)	
NSH001	Home Field, Land to the west of Stratford Road	Nash	0.25	Unsuitable - development of this site would be out of character with the existing settlement and would result in encroachment into the countryside and likely have a significant impact on the Conservation Area. Restricted visibility at High Street/Whaddon Road junction.	No	No					No	
NSH002	Land to the south of Wood End	Nash	0.23	Unsuitable - development on this site would have a significant impact on the Conservation Area and Listed Buildings. Site has poor access via Wood End and development would also impact on the Local Landscape Area and ecology of the site. Single width carriageway. Restricted visibility at High Street/Whaddon Road junction.	No	No					No	
NSH003	Field to the north of Church Farm, Stratford Road	Nash	0.44	Suitable for housing - providing suitable access is provided via new housing development on Stratford allocated within the site. Restricted visibility at High Street/Whaddon Road junction. Subject to adequate access arrangements.	Yes	Yes	12	12			No	
NSH004	Land At Nicholls Wood Farm, Winslow Road	Nash	0.79	Unsuitable - Development of this site would result in harm to character and appearance of the area and would be likely to have significant impact on nearby heritage assets (opposite a conservation area and a listed building curtilage). Development of 9 dwellings was previously refused at appeal due to these reasons. Restricted visibility at High Street/Whaddon Road junction.	No	No					No	
NSH005	Land at Stratford Road	Nash	0.36	Suitable for housing – the site has planning permission for 9 dwellings and is <b>under construction with 2 remaining to come forward as at 31.05.2016</b>	Yes	Yes	2	2			No	
NSH006	Whiteways Paddock, Winslow Road	Nash	0.79	Unsuitable - site is elevated from road and development could result in an increase of prominence and could likely result in harm to the adjacent Conservation Area. Poor access currently via Wood End.	No	No					No	



Note. Site NSH005 completed development as All Saints Close in 2016 and provides road access to site NSH003.

**Appendix 2 – Extract from Nash Conservation Area document (AVDC 2007) showing post-war development in Nash**



Map showing impact of modern development upon Nash

Note. The label “Nash” is at the location of HELAA site NSH003. The map pre-dates the completion of All Saints Close (HELAA site NSH005) immediately to the south (9 homes with access road from Stratford Road to site NSH003)

## Response ID ANON-922A-8PBM-N

Submitted to Nash Neighbourhood Plan submission consultation  
Submitted on 2022-03-31 11:59:31

### About you

What is your interest in this consultation?

Resident

### Contact details

What is your full name?

Name:  
Steve Loxton

What is your address?

Address line 1:

[REDACTED]

Address line 2:

Nash

Village, town or city:

[REDACTED]

Full postcode:

MK17 [REDACTED]

Would you like to be notified of future progress with the Neighbourhood Plan?

Yes

What is your email address?

Email:

[REDACTED]

### Your views

Please indicate whether you support or object to the submitted Neighbourhood Plan.

I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes

### Your comments

Please provide your comments, suggested changes or reasons for objecting.

Comments:

A great deal of time and thought has obviously gone in to this report and I fully support it in all areas.

The only comment that I would make is the omission of the word "opposite" in Section 3.6 which comes under Planning Policy Context and refers to existing travellers' sites.

It reads as follows - "The largest site – land at Causter Farm - already has a planning permission for 11 pitches and this is the same amount that the VALP allocates the site for." This is an area of particular concern for residents and disturbed me somewhat until I checked existing planning applications and approvals and realised that it should read - "The largest site – land OPPOSITE Causter Farm - already has a planning permission for 11 pitches and this is the same amount that the VALP allocates the site for."

A really well put together document and congratulations to the authors.



Historic England

By email only to: [Neighbourhoodplanning@buckinghamshire.gov.uk](mailto:Neighbourhoodplanning@buckinghamshire.gov.uk)

Our ref: PL00768462

Your ref:

Main: 020 7973 3700

[e-seast@historicengland.org.uk](mailto:e-seast@historicengland.org.uk)

Date: 21/03/2022

Dear Ms Riach

## **RE: Nash Neighbourhood Plan**

Thank you for inviting Historic England to comment on the above neighbourhood plan. On the basis of the information currently available, we do not wish to offer any detailed comments at this stage.

We would refer you to our general advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer.

We may wish to make specific comments on proposals later in the planning process.

Yours sincerely

**Edward Winter**

Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

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



Date: 21<sup>st</sup> March 2022  
Our ref: 384614  
Your ref: Nash Neighbourhood Plan



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Buckinghamshire County Council  
County Hall  
Walton Street  
Aylesbury  
Buckinghamshire  
HP20 1UA

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Crewe  
Cheshire  
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T 0300 060 3900

**BY EMAIL ONLY** - [Neighbourhoodplanning@buckinghamshire.gov.uk](mailto:Neighbourhoodplanning@buckinghamshire.gov.uk)

Dear Sir/Madam

### **Nash Neighbourhood Plan – Regulation 16**

Thank you for your consultation request on the above dated and received by Natural England on date 24 February 2022.

At this time, Natural England is not able to fully assess the potential impacts of this plan on statutory nature conservation sites or protected landscapes or, provide detailed advice in relation to this consultation. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.

The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the deciding authority to determine whether or not the plan is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the impacts of the plan on the natural environment to assist the decision making process.

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

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

Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Yours sincerely

Sally Wintle  
Consultations Team