

Buckinghamshire Council Response to Stewkley Neighbourhood Plan Regulation 16 Consultation

General Comments

Rights of Way - The Stewkley neighbourhood plan should assess the connectivity of all available existing walking, horse riding, cycling and carriage driving opportunities locally, both within the vehicular highway network (footways, cycle ways, byways open to all traffic and quiet lanes) and public rights of way network (footpaths, bridleways, and restricted byways). What are the missing links and loops for public access in the community?

The Stewkley local neighbourhood plan must fully consider the current and likely future needs of users of rights of way for their community. The Buckinghamshire Rights of Way Improvement Plan 2020 – 2030 is useful in informing how this might be considered in producing each neighbourhood plan.

In particular, the plan should encourage or seek to locate new developments that provide improved connectivity for pedestrians and cyclists of all ages and abilities to access shops, work, schools and services, by the shortest, safest and most convenient route. Where possible these routes should be barrier-free and provide a continuous experience, for example, having few 'give-way' points, safe road and rail crossings and minimise fragmentation of public rights of way access networks. Plans should seek to encourage developments that contribute to:

- new and improved footpaths and cycle ways linked to the wider existing public rights of way network;
- more and improved bridleway links for cyclists and equestrians;
- improvements for pedestrian, horse rider and cyclist safety.

Schemes (such as "Slow Ways") should be encouraged that improve connectivity to the local public rights of way network so walkers and cyclists avoid having to mix with motorised vehicle users on local roads and with better connections to adjoining parishes and key destinations. local landowner or developer contacts can be invaluable to seek these improvements at pre-application stages. new public rights or additional permissive rights for cyclists and horse riders can be created where they don't currently exist.

The Stewkley neighbourhood plan should acknowledge the positive contribution that Public Rights of Way (PRoW) can make to sustainable transport, climate change, health and well-being, local economy, cultural assets and natural capital.

All references to 'AVDC' need replacing with 'Buckinghamshire Council' (BC) as the planning authority and 'Aylesbury Vale area' with 'the extent of the Vale in Buckinghamshire'. Where it is 1 April 2020 or later. Anything earlier than 1 April 2020 then it should be 'the former AVDC'.

Neighbourhood plan document sections where comments have been made

Foreword

1.Introduction to the Plan

Page Number 6 "Map shows extent of PRoWs in the designated area"

Relevant RoWIP 2020 – 2030 theme Theme 1: Mapping the Network

Community aware of extent of current PRoW network in the Parish

Paragraph1.6 - this paragraph needs updating

Replace strike through with bold underlined text as follows:

~~AVDC~~ **Buckinghamshire Council** (BC) is **at an advanced stage** in the process of producing a new development plan, known as the Vale of Aylesbury Local Plan (VALP). The VALP ~~has~~ is ~~been undergoing~~ independent examination, and ~~AVDC~~ are in the process of **a Further Modifications consultation taking place December 2020-February 2021** ~~responding to the Examiner's findings~~; once adopted it will replace the 2004 Local Plan (AVDLP). Details of the plan can be found on AVDC's website www.aylesburyvaledc.gov.uk.

Planning Context

Community Involvement

Stewkley Parish Geography

Population

Stewkley Questionnaire (2016)

Page Number 10 - "Over half 65+ residents keep fit and walk at least weekly - increasing the likelihood of longevity"

Relevant RoWIP 2020 – 2030 theme Theme 5: Access for Everyone

Community values contribution PRoW can make to health and well-being for residents.

Conservation and Heritage

Thank you for consulting the Buckinghamshire Council Archaeological Service on this proposed plan. We maintain the local Historic Environment Record and provide 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 National Planning Policy Framework. Neighbourhood Plans will eventually require examination by the Local Planning Authority (LPA) to ensure their conformity with this National framework. Understanding the heritage value of a Neighbourhood Planning Area is an important part of developing the Plan.

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 Buckinghamshire 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, archaeological sites 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.

Whilst we welcome the Conservation and Heritage section, we would have like to have seen the two Scheduled Ancient Monuments within the parish included, the medieval hamlet of Littlecote and the moated site 200m south west of St Michael's church. We would recommend that the Buckinghamshire Historic Environment Record (HER) for the plan area is consulted to get a greater understanding of the history and especially the archaeology contained within the plan area. The Buckinghamshire 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 the NPPF especially Section 16.

It is pleasing to see the NP focusing on Conservation and Heritage at an early stage and rightfully referencing the adopted Conservation Area Appraisal. Section 1 includes information on the Conservation and Heritage context of the village but makes no specific reference to the contribution of non-designated heritage assets e.g. locally listed buildings or the setting of the conservation area. Important that these are considered and framed given the objectives and goals emerging within Section 5.

Housing

1.34 At the time of writing this Plan the Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) assessed the need for new jobs and homes across Buckinghamshire and identified a target of 27,400 new homes for Aylesbury Vale.

Buckinghamshire Council have set ~~AVDC allocated~~ a target of 141 homes for the **village** ~~Parish~~ of Stewkley and although this was subsequently reduced to 101, then 100 homes, **and now 98 in the VALP Further Main Modifications** it has influenced the development of the plan.

VALP as Further Modified at paragraph 3.13 sets out that the HEDNA gives a total of 28,600 dwellings to be accommodated in the Aylesbury Vale area 2013 -2033. The VALP on top of this adds a 5.4% buffer so provides for 30,134 dwellings over the plan period.

Para 1.34 of the neighbourhood plan needs amending to take account of the above.

Roads and Infrastructure

In respect of roads and infrastructure, paragraphs 1.35 to 1.40 of the Stewkley Neighbourhood Plan identify existing bus service provision as inadequate; and whilst responses to the Stewkley Questionnaire indicate that the demand for bus use may well increase, there is a doubt whether a commercial operation could be sustainable. Cycling to and from the nearest rail station at Leighton Buzzard is not out of the question, and improvements to cycling infrastructure to encourage non-vehicular trips to the station would be greatly appreciated.

Vehicle speeds are a concern to the local community, and on-street parking is considered a significant issue; as well as the inadequate provision within the village for wheelchair or pushchair access to local amenities. Also, the consultation responses indicate that the community consider the roads to be too busy at peak times, and that more traffic-calming measures are required.

Page Number 14 “Improvements to cycling infrastructure to encourage non-vehicular trips to the station would be greatly appreciated.”

Relevant RoWIP 2020 – 2030 theme Theme 3: An Evolving Network

PRoW network can contribute to sustainable transport and climate change.

Page Number 15 “Although Stewkley is fortunate to have a wide network of footpaths leading out of the village across the surrounding countryside, there are few suitable paths or footways in the Parish for wheelchair or pushchair users except along the main spine of the High Street and Soulbury Road. Access to amenities via footways generates particular issues for the elderly and disabled.”

Relevant RoWIP 2020 – 2030 theme Theme 5: Access for Everyone

Community has concerns about inclusive access on wider PRoW network.

The Natural Environment

It is pleasing to see that many of the matters relating to ecology have been accepted and incorporated into the developed Stewkley Neighbourhood Plan from the previous ecological consultation response (12/07/2019).

Community, Leisure and Open Spaces

Page Number 16 “these key open spaces are well used with over half of Stewkley’s residents visiting the Recreation Ground, Sports facilities, Nature Reserve, Spinney and public footpaths at least weekly”

Relevant RoWIP 2020 – 2030 theme Theme 4: Knowing Where to Go

Community recognises that PRow network contributes towards outdoor access.

Amenities, Sport and Recreation

Schools

Youth

Employment

2.Vision for Stewkley

Page Number 18 “Protect enjoyment of the open Buckinghamshire countryside”

Relevant RoWIP 2020 – 2030 theme Theme 1: Mapping the Network

Community recognises that PRow network is integral to enjoyment of the countryside.

3.Introducing the Policies

4.Planning, Landscaping, Housing and Environment (PLHE)

Objectives

Goals

Policy STK1: Settlement Boundary

Need to define ‘isolated’ and ‘well-designed’ to be able to be consistently used in development management. What is the justification for the figure of 5 houses being appropriate for infill and 0.20ha size? The final line of the policy says barn conversions ‘may be acceptable in principle’ - this is ambiguous: what do applications have to do to be fully acceptable?

Para 4.14 reads as follows:

Housing Associations.

AVDC has a number of partners who specifically help to deliver sustainable affordable housing in rural areas on sites which would not normally be granted planning permission for market housing:

- English Rural Housing Association
- The Guinness Trust
- Hastoe Housing Association
- The Buckinghamshire Housing Association

Stewkley Parish Council would welcome any of these Housing Associations to provide Affordable Homes on any of the allocated sites.

It is considered that this was taken from the website some time ago and we query whether they would want to include this as it is quite out of date. We haven't partnered specifically on a rural exception scheme now for some years. It also implies (not strongly, granted) that the allocated sites maybe 'sites which would not normally be granted planning permission for market housing' (aka Rural Exception Schemes) but also refers to the HAs being welcome on any of the allocated sites. An allocated site would not normally qualify as a rural exception scheme. The meaning and purpose of this paragraph just seems a bit ambiguous.

At Para 4.23 the Plan states that 'Southern Gateway East will provide some affordable housing on this development, and sections 4.13 and 4.14 are therefore of relevance to this development'.

To clarify here the position is, if both sites are to be treated separately:

Pre VALP

A scheme of 10 -24 dwellings, or 0.5-0.999 hectares - At least 10% affordable home ownership. This may be possible on both Wing Road East & Wing Road West

Post VALP

11 or more dwellings gross or sites of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site. So ...

Wing Road West would fall below the threshold for affordable housing and

Wing Road East could provide for 25% affordable housing (c4 homes) at c75% affordable rent & c25% affordable home ownership

If the Wing Road East & Wing Road West come through as one scheme or are deemed to be cumulative sites then:

Pre VALP

10 -24 dwellings, or 0.5-0.999 hectares At least 10% affordable home ownership. Shared ownership is preferred.

25 or more dwellings or 1 hectare and above 30% affordable housing with a tenure split of 75% affordable rent and 25% shared ownership

Post VALP

11 or more dwellings gross or sites of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site

This is provided as information should they choose to consider how they could implement the allocated sites.

Page Number 21 “access to country views is critical,”

Relevant RoWIP 2020 – 2030 theme Theme 5: Access for Everyone

PRoW network enables access to local countryside views and vistas.

Policy STK2: Housing Type

Page Number 22 “some 50% enjoy walking on the village footpaths at least once a week.”

Relevant RoWIP 2020 – 2030 theme Theme 5: Access for Everyone

Local PRoW network is regularly enjoyed by half of local residents.

Policy STK3: Housing Allocations

Within policy ‘STK3: Housing Allocations’ and any other mention in regards to planting trees, scrub or hedgerows through the document should ‘**of local provenance**’.

Policy SKT3: Housing Allocations

Need to define what is meant by ‘complimentary planning applications’ and ‘cojoined sites’ – the terms are ambiguous

Both site allocations - the pallet of building materials to be approved in the event of a successful planning application would be determined by the local planning authority not the

parish council. So best just leave it saying what materials the parish council would be seeking that is fine but the approval is a decision by Buckinghamshire Council.

Both site allocations– To what extent has the local highway authority been involved in drawing up the highway access requirements? The appropriate highway response will be dependent on the planning application the Council has before it to be considered.

Both site allocations – The appropriateness and form of a ‘village gateway’ in urban design terms will depend on the detail in the planning application that comes forward. Have the Council’s urban design officers been involved in this idea of a village gateway? It is unclear for development management what this is going to be - an urban design solution such as layout or public and private space or an architectural feature or a form of landscape?

Page 23 - Figure B The Southern Gateway sites block plans

The plans are still too small to be usable – as we suggested at Reg 14 it’s better to make them A4 landscape and have section breaks or put in as appendices either way they need to be large enough to be usable.

5.Conservation & Heritage

Section 5 sets out broad ‘Objectives’ and ‘Goals’ in relation to heritage.

Objectives

The first objective is to ‘Conserve and enhance local heritage features and minimise the effects of development on the historic character of the village’. The wording here around ‘minimising effects’ is somewhat ambiguous and carries no grounding in current policy or legislation. It might be better framed around promoting high standards of design or ensuring new development makes a positive contribution to local character and distinctiveness.

Goals

The first goal to ‘Protect the Conservation Area and control future development within both the Conservation Area and its adjoining borders’, might be more effectively framed around management or shaping development and should specifically site ‘setting’ rather than borders as setting carries weight in terms of policy context.

The third goal to ‘Ensure historic assets and important buildings are not damaged by inappropriate building or alterations’ might better referencing designated and non-designated heritage assets (NDHA’s) rather than important buildings and would recommend

the use of 'harmed' rather than damaged. Again, this would carry weight in terms of policy grounding.

The fourth goal 'Consider the countryside and spaces around buildings as being as important as the buildings themselves in creating Stewkley's character and to ensure this is also protected'. Could consider using this goal to articulate settlement pattern, morphology and grain.

Policy STK4: Village Character

Policy STK4 picks up on the locally distinctive features and materials which is positive but fails to fully drawdown upon the objectives and goals set out at the start of the section. This section on new development should reference high quality design, settlement pattern and grain rather than being too prescriptive.

The policy is missing some bullets and should be broken into the elements relevant to the conservation area and setting and all other areas of the parish. The policy seems to only be aimed at the Stewkley village - what about development outside the village coming forward?

Policy STK5: Buildings of Local Historic Interest

The plan is thin on the reasons why the particular buildings have been included. They would also be better named in the policy itself like the community assets have been. Were some of these buildings identified in the Stewkley Conservation Area Appraisal by the former AVDC? If they were this should be set out as it gives an external expert stakeholder scrutiny of what the parish council are proposing.

Community Actions and Projects

6. Roads and Infrastructure

Objectives

Page Number 27 "Improve the safety of all road users including drivers, cyclists, and pedestrians including wheelchair users"

Relevant RoWIP 2020 – 2030 theme Theme 3: An Evolving Network

Community recognises that different classes of user have different needs though safety on roads and connections with PRowS is universal.

Goals

Page Number 27 “Improve the accessibility around Stewkley for pedestrians including wheelchair users”

Relevant RoWIP 2020 – 2030 theme Theme 5: Access for Everyone

Community understands need for inclusive access.

Policy STK6: Car Parking

Does this policy take account of the latest Aylesbury Vale standards of parking provision in the VALP as Proposed to be Modified (2019) ? The standards are in Appendix B . The standards already will be requiring 1.5 spaces for 1 bed house, 2 spaces for 2 bed, 2.5 spaces for 3 bed, 3 spaces for a 4-bed and 3.5 spaces for a 5 bed or more beds.

What is the justification going beyond these standards in requiring visitor space 0.5 spaces?

The policy needs something about what happens in the event the car parking spaces can't be accommodated due to physical site constraints. It might include measures in a Transport Assessment and Travel Plan setting out local circumstances that can enable deviating from the standards.

Policy STK7: Cycle and Pedestrians

In respect of residential development sites NP07, NP09 and NP11, minimising the number of vehicular accesses and retention of hedgerow, subject to adequate visibility splays being provided is acceptable. Also, new pedestrian provision to connect to existing pedestrian infrastructure and to improve existing pedestrian infrastructure is required.

Page Number 27 “Policy STK7: Cyclists and Pedestrians Development proposals will, where relevant to their location, retain or improve existing pedestrian and cycle access routes that either pass through or adjoin the site. They will make an appropriate financial contribution towards projects in the Parish aimed at improving or creating pedestrian and cycling routes and facilities, including contributions to establishing safe wheelchair access throughout the village, and improvement or enhancement of Rights of Way footpaths.”

Relevant RoWIP 2020 – 2030 theme Theme 3: An Evolving Network

Community would like to see new inclusive access and multiuser routes as an outcome of planned developments.

Page Number 28 “Design layout of any new development should therefore, where appropriate, seek to optimise and improve on the existing footpath network to improve pedestrian and cycle safety and encourage a reduced vehicular dependence when accessing services in the locality.”

Relevant RoWIP 2020 – 2030 theme Theme 5: Access for Everyone

Community would like to see new inclusive access and multiuser routes as an outcome of planned developments linked to the current PROW network.

Page Number 28 “future developments look to improve pedestrian and cycle access and linkages around the village.”

Relevant RoWIP 2020 – 2030 theme Theme 3: An Evolving Network

Community seeks to maximise improvements to the PRow network in response to planned developments.

Page Number 28 “Although Stewkley is fortunate to have a wide network of footpaths leading out of the village across the surrounding countryside, there are few suitable paths or footways for wheelchair or pushchair users except along the main spine of the High Street and Soulbury Road.”

Relevant RoWIP 2020 – 2030 theme Theme 5: Access for Everyone

Community would like to more safe inclusive access on PRow network.

Page Number 29 “provision of protected crossings at several points given the ‘Red Route’ would have to change sides of the road a number of times to use the best available pavement.”

Relevant RoWIP 2020 – 2030 theme Theme 5: Access for Everyone

Community would like to more safe inclusive access on road crossings to reduce fragmentation of the PRow network.

Community Actions and Projects

The Stewkley Neighbourhood Plan identifies the following community action and projects:

- Pedestrian improvements focused on High Street, Stewkley.
- The introduction of a 40mph buffer zone on the main approach routes to the village.
- Investigation into the potential delivery of a village wide traffic calming feasibility study, including; the potential for physical traffic calming measures, use of advisory white lines in parking hot spots where there is a risk or danger and 20mph speed limits in high risk areas.
- Deter parking on verges and green spaces by use of discrete low bollards.
- Consider the feasibility of installing a cycle path to safely allow students / commuters the option to cycle to school in Wing or Leighton Buzzard, and offer access onto the National Rail Network.
- Encourage the introduction of community bus schemes.

The proposed pedestrian improvements along High Street, Stewkley as shown in Figure C are generally acceptable. However, pedestrian kerb crossing points should avoid areas of existing on-street parking, or consider how parking will be displaced elsewhere, and crossing points will need to be safe and suitable. Also, the positioning and type of raised table at the War Memorial Junction ought to consider the potential impact of noise and disturbance on nearby properties. In addition, parking on footways, e.g. on the west side of High Street to the south of the War Memorial Junction should be removed; to enable footways to be used by pedestrian including those with mobility impairments.

The Parish Council has identified transport and highways issues of local concern, and transport policies aimed at new developments to avoid these issues being further exacerbated; as well as identifying a number of community actions and projects to address these transport and highways issues. Highways Development Management therefore considers that the Stewkley Neighbourhood Plan provides an acceptable approach to improved highway safety, improved access to local amenities by non-car modes and increased accessibility including cycling and public transport for journeys further afield.

7. Amenities, Sports and Recreation

Objectives

Goals

Policy STK8 - Community Assets

Page Number 30 “Policy STK8 Community Assets”

Relevant RoWIP 2020 – 2030 theme Theme 1: Mapping the Network

PRoW network is not listed as a Community Asset. Serious omission.

The justification to the policy needs to have some commentary on what is special about each community asset that has come out of the community consultation - there must have been some kind of assessment criteria as to which assets made the grade and which didn't?

Are the final two paragraphs to apply to any community facility in the parish regardless of if it is one of the 7 listed?

Community Actions and Projects

8. The Natural Environment and Biodiversity

It is welcomed to see the use of biodiversity within the chapter title (*'The natural environment and biodiversity'*) and *'Policy STK12: Biodiversity'* recognising biodiversity net gain is compulsory.

Chapter 8 'The natural environment and biodiversity' describes the diversity of habitats being 'random'. It is recommended to describe the habitats to be a 'matrix'. Furthermore, it is recommended to describe the interconnecting hedgerows as 'wildlife corridors'.

There is no mention throughout the document referring to features to be incorporated to enhance biodiversity in means of development. The Aylesbury Vale Green Infrastructure

Strategy states that development in suitable areas should provide bat or bird roosting provision within the fabric of the buildings.

Objectives

Page Number 32 “Protect and where possible enhance visual and physical linkages to the local countryside”

Relevant RoWIP 2020 – 2030 theme Theme 1: Mapping the Network

Community recognises the contribution the PRow network makes towards access to the countryside.

Goals

Page Number 32 “Protect the countryside and Public Rights of Way from inappropriate development”

Relevant RoWIP 2020 – 2030 theme Theme 2: Looking after the Network

Community has identified the risks to fragmentation of the PRow network through inappropriate or poorly planned developments.

Page Number 33 “These tentacles firmly adhering it to the surrounding environment with immediate physical access for all via well-established, dense network of Public Rights of Way (PRow), reinforce their combined roles as being vital to the health and wellbeing of the whole community.”

Relevant RoWIP 2020 – 2030 theme Theme 5: Access for Everyone

Community notes the important contribution the PRow network makes to the health and well-being of local residents.

Page Number 33 “Environmental designations across Stewkley, including Public Rights of Way, also showing those important linkages between the villages and countryside which should be protected.”

Relevant RoWIP 2020 – 2030 theme Theme 2: Looking after the Network

Community understand value of the PRow network and the important contribution it makes to joining up surrounding villages and countryside.

Policy STK9 Local Green Spaces

The policy should refer to a Local Green Space Report setting out how the particular sites have been selected, what criteria were applied and how many sites were in the pool before sieving down. A summary of the special qualities to meet the criteria for LGS designation in the NPPF should be in the justification to the policy.

Each Local Green Space needs to be identifiable in the Policies Map.

Policy STK10 Local Amenity Land

What is the local amenity 'value' of each space? The plan needs to define the 'value' so the policy can be used in development management.

There needs to be some reference to the NPPF 2019 here as Local Amenity Land isn't Local Green Space so for general conformity under which paragraph are these designations being introduced?

Policy STK11 Important Views

There needs to be commentary in the justification to the policy of what makes each view important, what was the exercise/assessment in defining views presumably there were alternatives that didn't make the grade.

Policy STK12 Biodiversity

- In regards to the policy stating the *"Development proposals located within or adjacent to the designated Site of Special Scientific Interest at Warren Farm, Stewkley will be resisted."* **It should be noted that development on or adjacent to non-statutory sites should also be avoided.** The Local Plan Policy 'NE1 Biodiversity and Geodiversity' of the emerging Vale of Aylesbury Local Plan 2013-2033 states: *"Development which would result in damage to or loss of a site of biodiversity or geological value of regional or local importance including habitats of principal importance or the habitats of species of principal importance will not be permitted except in exceptional circumstances where the need for, and benefits of the development significantly and demonstrably outweigh the harm it would cause to the site, and the loss can be mitigated and compensation provided to achieve a net gain in biodiversity/geodiversity."*
- Within the same Policy STK12, the use of 'significance' described within "Development proposals must demonstrate that they will have no significant adverse effect on existing biodiversity", should not be portrayed to in regards to the adverse effects on the biodiversity. **There should be no adverse impacts on biodiversity, significant or not.**

- Maps provided within Figure D and E incorporate the statutory and non-statutory designations, also priority habitats as recommended by the previous ecological response (12th July 2020). To follow on from this it is recommended in section 8.5 when discussing figure D to mention that many of these priority habitats are considered 'irreplaceable' (NERC Act, 2006).
- Protected habitats located within the Parish of Stewkley, are well represented within the neighbourhood plan (especially within figures D and E), however there is a limited scope in regards to the notable and protected species. It is required to give material consideration in planning applications to protected and notable species. This should be fully assessed and mitigated for as part of any development application. This was recommended to incorporate with the neighbourhood plan from the previous consultation and has not been performed.

Page Number 34 "Map shows current extent of PRoW network"

Relevant RoWIP 2020 – 2030 theme Theme 1: Mapping the Network

The current extent of the PRoW network has been illustrated in the SEA.

The policy needs a threshold for where the net gain will be applied otherwise it will apply to householder development such as a home extension that needs planning permission. The VALP says all minor and major development as its threshold in Policy NE1.

Community Actions and Projects

9. Education

Objectives

Goals

Community Actions and Projects

10. Employment

Objectives

Goals

Policy STK13: Local Employment

Policy STK14: Broadband

Community Actions and Projects

11. Youth

Objectives

Goals

Community Actions and Projects

12. Delivering the Neighbourhood Plan

Implementation

The Role of Stewkley Parish Council

The Role of Aylesbury Vale District Council

Monitoring and Review

13. Policies Map and Inserts

Appendices

Appendix 1 – List of Heritage and Non-Heritage Properties

Extremely pleasing to see the buildings of local interest identified within Appendix 1 and enshrined by policy SKT5. It is unclear whether these buildings have been measured/defined by Historic England criteria (or those in the emerging VALP policy), some level of benchmarking and consistency is required. It would also be useful if these buildings were photographed, described and plotted on one of the accompanying maps to aid identification and ensure they're not overlooked.

Strategic Environmental Assessment Document

The former AVDC had some concerns about this document at regulation 14 stage however there has been some further detailed explanation and there is coverage of reasonable alternatives in some detail and reference to the Natural England advice on agricultural land.

Buckinghamshire Council has no further issue.

Page Number 6 “SEA - GP84 – Public rights of way”

Relevant RoWIP 2020 – 2030 theme Theme 1: Mapping the Network

The Stewkley NP SEA has a policy for PROWs.

Page Number 6 “SEA - Protect enjoyment of the open Buckinghamshire countryside”

Relevant RoWIP 2020 – 2030 theme Theme 4: Knowing Where to Go

The Stewkley NP SEA seeks to protect enjoyment of and access to the countryside.

Page Number 7 “SEA – improve the safety of all road users including drivers, cyclists, horse riders and pedestrians. Seek to support a modal shift from driving to more sustainable travel choices.”

Relevant RoWIP 2020 – 2030 theme Theme 3: An Evolving Network

The Stewkley NP SEA identifies the possible contributions the PRoW network can make to enable a modal shift in sustainable travel choices.

Page Number 7 “SEA - Protect and where possible enhance linkages to the local countryside, including the Stewkley Rights of Way.”

Relevant RoWIP 2020 – 2030 theme Theme 3: An Evolving Network

The Stewkley NP SEA identifies the need to protect the PRoW network and enhance links to communities beyond the Parish.

Basic Conditions Statement

Some of the work for Table A - references to the NPPF sections could have been used to add to the justification of the plan policies such as the Policy on Local Amenity Land or Local Views. Once the plan is made and being used it will be the plan itself that needs to be fully clear and justified rather than going back to other documents like the BCS important in its examination.

The VALP policy references in brackets in the table in section 5 do not reflect the 2019 Modifications for example there is reference to NE2 which was deleted whilst T6 is now car parking and T7 is cycling pedestrians. The policy conformity with Local Green Spaces is more closely VALP’s NE6 which is specifically on Local Green Spaces rather than I1 which is any type of green infrastructure.

