

Summary of representations made on the Woughton Neighbourhood Plan at the Regulation 16 publicity stage

Respondent	Comments
Virginia Bell	<p><u>Policy WN4</u> Neighbouring nature reserves and SSI's should be protected from development (2), (3), (4)</p> <p><u>Policy WN4</u> Discourage high maintenance of landscapes (eg constant mowing, using bedding plants) for the following reasons:-1)helping wildlife 2)lower costs 3)the contrast of a mowed 3-6 feet next to the road , with the rest left uncut, is very attractive and looks neat and tidy (1)</p> <p><u>Policy WN6</u> Bucks and Milton Keynes Environmental Records 2016 shows that the Woughton Neighbourhood Plan area contains:- 1 Local Wildlife Site 83NO1 Bleak Hall Railway Cutting 2 Five of the Wildlife Corridors are overlapped by the WNP area 3 Biological Notification Site Grand Union Canal in Tinkers Bridge Of the 3 areas, only the Grand Union Canal in Peartree Bridge/Tinkers Bridge is listed as a WN6 Designated Local Green Space to be protected. Please list Bleak Hall Railway Cutting and the 5 Wildlife Corridors for protection in the Neighbourhood Plan.</p> <p><u>Policy WN8</u> Emphasise the need for wild areas which need little or no management. In allotments, community gardens and orchards, discourage chemical sprays and encourage organic methods of cultivation.</p> <p><u>Policy WN9</u> Mears Group plc (or whomever) should be asked to source their building materials as greenly as possible, for sustainability and for good ethical practice.</p> <p><u>Policy WN9</u> Mears Group plc should avoid causing suffering to wildlife before and during development. Also they should not pile topsoil high as this kills all life in the soil.</p> <p><u>Policy WN9</u> Mears Group plc should be told to plant according to sustainability (ie less need for maintenance and resources), so plant native, hardy species of flowers and plants</p> <p><u>Policy WN9</u> A maximum building height is not very important compared to the efficient use of land obtained by building upwards</p> <p><u>Policy WN13</u> Air pollution can be a problem on some days for people waiting at the bus stops on the V7 Saxon Street dividing Beanhill and Netherfield. This should be monitored</p> <p><u>Policy WN15</u> Can we have a shop selling healthy and ethical and sustainable food?. Such a shop could be merged with another facility to save costs, eg a healthy living facility</p> <p><u>Policy WN18 and Policy WN3</u> Rather than have people dependent on the health services, set up a community project based at a community centre or meeting place in Woughton which educates about basic healthy living.</p> <p><u>Policy WN20 and WN21 and WN22</u> Solar power could be used for street lighting, or white LED lights, or no lighting where possible.</p>
Emberton Parish Council	Emberton Parish Council has no objection to the Woughton Neighbourhood Plan.
Neighbourhood	Aylesbury Vale District Council has no comments to make on this

<p>Planning Officer Aylesbury Vale District Council</p>	<p>Neighbourhood Plan. We wish you every success at Examination.</p>
<p>Natural England</p>	<p>Disappointed to see that none of our suggestions made at the pre-submission stage have been taken on-board. As a result the Woughton Community Neighbourhood Plan is likely to result in a loss of biodiversity and green space within the parish.</p> <p>Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve biodiversity. Under Section 109 of the National Planning Policy Framework (NPPF) the planning system is required to contribute to, and enhance, the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible. CS19 of the Milton Keynes Core Strategy (2013) is to maintain and increase Green Infrastructure as potential mitigation for climate change.</p> <p>While some of the existing green grid system has been protected, not all of the current green space within the grid has. It has instead been allocated as suitable for development. Section 3.17 states; <i>“There is a considerable area of current open land within those Grid Squares that is not considered essential to the functioning of the network and which has therefore not been identified [for protection against development] on the Policies Map”</i>. This ‘considerable area’ will now be lost without suitable mitigation or alternative green infrastructure being provided.</p> <p>The development and re-development schemes (Policies WN9-11, WN 20-22) do not have a requirement for the conservation of biodiversity (i.e. no net loss). There is no statement to say that “development providing a biodiversity net gain will be supported”, as previously requested by Natural England.</p>
<p>Peter Hobson</p>	<p>We bought our bungalow in good faith in September 2014, totally unaware of the planned redevelopment of Beanhill, based on its size, location and price, and proceeded to spend a great deal of money refurbishing the property so that it would could be our last home, however since we learnt of the councils redevelopment plans we have now had to stop investing in our home.</p> <p>Parking is already an issue especially during home games for the MK Dons and the through route from Neapland to Tandra is sometimes nearly impassable. Wider roads will mean less garden space of which there is currently very little.</p> <p>WN9 claims you will maintain the character of the Woughton grid squares, but it goes on to say you will build 2 & 3 storey dwellings with a few bungalows. Beanhill IS bungalows.</p> <p>WN21 says households required to relocate must be given the opportunity to return to a smaller dwelling in the same grid square.</p>

	<p>This ignores the 29.6% of owned property, what will happen to them? When the announcement is made on the redevelopment of Beanhill and the regeneration of other squares, the privately owned properties will become blighted and the values will be artificially depressed by the council's actions. How then can homeowners find equivalent properties when their homes start losing value by the day, where do we find the extra capital requirement and the moving costs and legal fees that the council is imposing upon us? WN22 says there will be a community vote which will have no effect if it goes against you (3.80) so what is the point.</p> <p>This has been thrust upon us and we feel that we will be badly treated as nothing has been said to the contrary and we will not be able to get further mortgages on our pension.</p>
Milton Keynes Council	<p>Thank you for the changes you have made to the Woughton Neighbourhood Plan in line with our comments on the pre-submission version of the Neighbourhood Plan. This response incorporates comments from colleagues in Housing, Planning and Urban Design.</p> <p>One overall comment is that it appears that the Plan seems to be seeking the self-sufficiency of each grid square, which, realistically could only happen if densities considerably increase.</p> <p>Para 1.5, page 6, bullet point 4: Has the process of making of the Plan met the requirements of European obligations, including environmental standards and human rights?</p> <p>Sub heading Design, Page 8 "To maintain a 'classic MK' appearance..." What does classic MK appearance mean?</p> <p>Policy WN1 Distinctive Grid Squares Whilst this policy clearly identifies the primary land use for each grid square as sought in the first objective of para 3.5, it is not clear how the policy achieves the second objective. The policy wording itself does not explain that future development proposals will be expected to maintain the '<i>distinctiveness of each Grid Square from its neighbours</i>' in terms of anything other than the primary land use. Is it intended to mean separation and a clear boundary/ visual difference between grid squares?</p> <p>Para 3.7 – The proposed protection of the Moated Site and Fishpond at Old Rectory Farm as well as the grade II listed Old Rectory Farm, and how these meet NPPF 77 Local Greenspace designation criteria are included in Annex D.</p> <p>Policy WN3 Self-Contained Grid Squares Para 3.12 What is defined as appropriate? Para 3.13 Is there potential for some flexibility so that a commercial,</p>

business or community use could be replaced in an adjoining grid square, especially where this might allow it to be of a size that creates a more viable unit? The policy and supporting text could be made more flexible so as not to rule out a well-located facility, accessible to several grid squares as a solution to a situation where a smaller unit would not have a sufficiently large customer base in one grid square to be viable.

Policy WN4 – Green Grid Squares

Page 14, para 3.16 This policy appears to suggest the redevelopment of an entire grid square might be acceptable and seems to contradict other parts of the NP.

Page 14, para 3.16 “...New Town Character...” What is the New Town Character? Needs definition to provide clarity.

WN5 – Play & Activity Areas

Page 13, para 3.20 - It might help to define what a safe and accessible place is.

Policy WN6 – Local Green Spaces

The retention of these Local Green Spaces could negatively impact upon the viable redevelopment of a grid square.

The table in Annex D demonstrates how each open space meets the criteria set out in the NPPF, and sets out the justification in a clear way for the examiner to consider.

Policy WN7 Trees in the Public Realm

We were pleased to see that Policy WN7 was reworded as we suggested with regards to the loss of trees.

Policy WN9: Housing Design

It is recommended that the first sentence of the policy be amended to say: ***“Subject to viability, proposals for new homes should seek to maintain a distinct Milton Keynes appearance and character , as defined by the Milton Keynes New Residential Development Design Guide, and should have specific regard to the following design principles:”***

We welcome the reference to maintain a distinct Milton Keynes appearance and character, as defined by the Milton Keynes New Residential Development Design Guide.

Bullet point “b. Building heights should generally be of 2 storeys and occasionally of 3 storeys...” This policy could have negative implications for redevelopment scenarios where higher densities are sought for development to be viable.

Bullet point “f. Housing plots should generally provide front and rear gardens, with the frontage providing at least one off street space per

house..." We suggest that this policy states instead of "frontage" it should say with the "plot", this gives a little more flexibility as to parking location.

Page 16, Para 3.29 "The Design Guide..." should be "New Residential Development Design Guide SPD".

Policy WN10 Housing Mix in Regeneration Grid Squares

There is still a slight concern around Policy W10.

It is recommended that the first sentence of the policy be amended to say:

"Subject to viability, proposals for the refurbishment and redevelopment of existing housing in one or more Grid Squares designated for regeneration should have full regard to the following...". The policy wording should reflect the requirements of the NPPF.

Query about Item E of this policy which states that:

All existing social rented homes will either be retained or refurbished or will be replaced by another social rented home in the same Grid Square so that there will be no net loss in the total number of social rented homes

Is this actually a planning matter within the definition of the Neighbourhood Plan process?

The text that accompanies the policy states that '.....the regeneration schemes must be economically and technically viable if they are to succeed' and we support this statement, so we would prefer it if item E could be re-worded slightly as follows:

All existing social rented homes will either be retained or refurbished or will be replaced by another social rented home in the same Grid Square so that there will be no net loss in the total number of social rented homes. Any departure from this principle will only be allowed if it can be satisfactorily demonstrated & supported on economic and technical viability grounds.

Policy WN11 Houses in Multiple Occupation

However, we do have a query regarding para 3.45 of this policy. Whilst we do not have a problem per se with the aim expressed in that paragraph, we would query whether this is actually a planning matter within the definition of a Neighbourhood Plan process.

Policy WN16 Grid Square Precincts

"Proposals for a change of use to create a new hot food take-away or a betting shop in a primarily residential Grid Square where such a use already exists, will be resisted." The term "resisted" is used a number of times in the NP, does this equate to "will not be permitted?"

	<p>Policy WN19 Community Facilities “Proposals that require the redevelopment of an existing community facility will only be supported if a new facility is provided in an accessible location in the same Grid Square of at least an equal floor area.” This would depend upon demand for an existing community facility.</p> <p>Policy WN22 Regeneration: Masterplanning Whilst the approach to the preparation of a masterplan for a regeneration scheme would normally follow the stages outlined in the policy (evidence gathering, informal consultation, draft , formal consultation and final plan), the requirement for an independent examination and community vote is not a recognised approach. There are no provisions in the planning legislation for this hybrid approach. Furthermore, there would be cost implications of both the examination and the vote – it is assumed that the implication is that Milton Keynes Council would carry this cost, but there is no budgetary provision for this.</p> <p>However item 14.1 of the Action Plan that accompanies the Council Plan 2016 states as follows: <i>“14.1 Ensure community-led plans for every priority regeneration estate, and hold a referendum for every individual plan, as a “double lock” for communities.”</i></p> <p>It is therefore recommended that the reference to the examination and community vote be removed and replaced with reference to the commitment to a referendum in the Council Plan.</p> <p>In terms of the process to prepare masterplans, the emphasis should be on early and continuous engagement with the local community as a way of ensuring that they have a full and effective role in the master planning of their area.</p> <p>Para 3.80, in acknowledging that <i>“The precise arrangements of this process, including how the examination and referendum are carried out and resourced, can be determined at a later stage.”</i> recognises that the cost and practical implications of the examination and vote proposal are unknown at the time of preparing the plan and could therefore represent an onerous requirement for Milton Keynes Council and Your:MK. This statement could be removed if the changes recommended above are implemented.</p> <p>Bullet point 2, “Each Regeneration Plan should comprise an illustrative masterplan establishing the key development principles and proposals, phasing, environmental effects, transport assessment, heritage assessment (as appropriate) and S106 Heads of Terms)”. This would normally happen as part of an outline application not a Community Regeneration Plan.</p>
Campbell Park	The Planning & Policy Committee of Campbell Park Parish Council at

Parish Council	its meeting on the 5th April 2017 considered the Neighbourhood Development Plan and complimented Woughton Community Council on the structure of their Plan and their foresight at looking at regeneration and encouraging sustainable development in line with the NPPF.
Your MK, Milton Keynes Council	<p>YourMK welcome the opportunity to formally comment on the WNP Submission Plan.</p> <p>It is encouraging to see the principles highlighted within the vision; the variety of homes, self-sustaining communities, improved open spaces. This is echoed in the housing policy objectives, to broaden the range of new homes for benefit of existing and new homes. This socio-economic vision is positive and in line with regeneration priorities.</p> <p>However, it is key that policies help to realise this vision, and do not restrict the variety and complexity of solutions needed to achieve this. The delivery of regeneration or significant housing refurbishment to the scale needed in Woughton, will only be possible if there is a significant amount of private housing development. YourMK has previously advised against policies that may significantly restrict development as they may result in making future regeneration economically unviable, to the detriment of those areas.</p> <p>Proposed height restrictions on future developments are unhelpful and may impact on viability.</p> <p>The plan mentions development of land for different uses. Statements made relating to developable land are misguided, as there has been no viability assessments made of such sites. Where the plan mentions custom build plots, it is important to recognise that Milton Keynes Council owns this land and will have to ensure that best consideration is achieved for any sale thereof. It would be helpful to indicate which sites have been identified for development within the Policies Map, which currently does not indicate sites for development.</p> <p>YourMK has commented previously, on the over focus on the regeneration programme and priority estates and the under representation of the non-regeneration priority areas in the plan. Although the plan does outline how the WNP will feed into the development of regeneration plans, there is consistent unhelpful language that proposes the direction that regeneration should take. This is not backed up by appropriate or substantial resident engagement and so is misleading.</p> <p>YourMK has previously expressed concern about the lack of community engagement during the development of this plan. For any community plan to have validity it must reflect the views of a statistically significant proportion of the community it represents. Much of the evidence has come from community group consultation</p>

	<p>on regeneration, without accurate information. Statements such as ‘preferred by the local community’ when referring to refurbishment, is not evidenced, and has not yet been verified as being economically viable.</p> <p>In addition to this, within the list of ‘Evidence Base documents’, 2 of these were surveys carried out by residents, about regeneration, with no knowledge of the options available within the regeneration programme. This engagement has also served to further confuse what the Neighbourhood Plan is and how it links to regeneration. Including these as evidence bases is not helpful, particularly when no options appraisals have been undertaken.</p> <p>YourMK recognises the plans principle of maintaining the identity of grid squares and notes the policies that support this, however it is important to consider how this affects the principle within the plan of increased connectivity. The plan emphasises movement, access and improvement to redways and under passes. In order to increase connectivity, it would be helpful to have more flexibility of redways and footpaths outlined within the plan, instead of restrictions on this. The restrictions mentioned contradict the policy of increased connectivity by preventing movement or change of these connections.</p> <p>Recognising the importance of green space and green networks is important, however consideration needs to be given to the sustainability of such policies. Restrictions on cutting down of trees should be considered alongside the current and future context of landscape maintenance and council budgets. The paving within Woughton is damaged significantly in some areas by large tree roots and this has also caused subsequent parking issues. The plan would benefit from a more strategic approach to how trees are maintained, taking in to account responsibility of sustainable improvements. Ultimately the overall quality and long term financial sustainability of the public realm is vital to the future success of the area.</p>
<p>Governing Body of New Chapter Primary School</p>	<p>1. The Plan sets out a vision for the neighbourhood in which it is stated that <i>“Woughton is no longer considered a deprived community.”</i> We fully support this statement as an aspiration, but it is far from being true now as is evidenced by the analysis in Annex A of the Plan. The statement should be redrafted to reflect the current reality and the Plan reviewed to ensure it facilitates the considerable enhancements in economic and social wellbeing required. 93% of children coming to our school at the age of 4 have a level of development below national average. The Plan is largely silent on how the needs of children should be met other than through the education system. Yet children spend 83% of their lives outside of school.</p> <p>2. New Chapter Primary School occupies a large site at the centre of the parish. The plan includes use of part of the New Chapter school site (playing field) for community use. We should point out that the</p>

	<p>site is owned by the Milton Keynes Education Trust (MKET) and that any disposal, or exclusive use for purposes other than as a school, of part or all of the site would require the consent of the Secretary of State for Education. We also have our own plans regarding the development of this area.</p> <p>3. We affirm that we intend New Chapter to remain a community based school and would welcome discussion on the development of the school to increase capacity to serve an increase in demand for places within the catchment through regeneration and the use of the site as a community asset, consistent with our core purpose, for example to include nursery and other pre-school provision, sports, leisure and health facilities and safer parking and access. The central location and large site gives considerable scope for the development of a community Hub.</p> <p>4. We support the proposal that any increase in need for primary school places should be met through expansion of existing institutions. With construction of additional buildings, there is scope to educate more children on New Chapter's site and any expansion should be planned to facilitate upgrading of the current inadequate building infrastructure. A holistic review of educational and wider community needs in relation to the site should be undertaken as the Plan progresses.</p> <p>5. We urge caution in planning for any expansion of secondary education as the experience of MKET suggests that current and future supply and demand for places is poorly understood by the local authority.</p> <p>6. We would welcome the opportunity for dialogue as this Plan and the regeneration plan takes shape.</p>
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