

# **West Bletchley Neighbourhood Plan**

# Summary of responses received to Regulation 16 publicity period

Paul Gibson, Housing	Policy BNH1
Strategy, Milton Keynes Council	With the first bullet point, take out the words in brackets '(to be checked)' With the third bullet point, omit the words 'Consideration of'.
	Opportunity Area: Redeveloping the garage courts  The following paragraph on page 48 needs to be reworded as it is a little bit out of date – suggest it be reworded as follows:
	'We have supported the principle of redevelopment of courts in Berwick Drive, Kenilworth Drive and Whaddon Way for council housing. Planning permission was granted for new homes in Kenilworth Drive & Whaddon Way and they were built in 2017.
	Milton Keynes Council has also prepared and consulted on a Development Brief for 19 homes on Berwick Drive.'
	Policy BNH2 – Wellington Place Car Park, Bletchley Is this site SAP2 in the MK Site Allocations Plan? Only I thought that this site had been removed from the Site Allocations Plan following the suggested modifications made by the Inspector in February 2018 (reference MM9)?
	Section 10.3 - Bletchley Station Quarter Opportunity Area The paragraph mentions that East West rail services are to be reintroduced in 2019. Is this correct? Only the East West Rail Consortium's web site says that Phase 2 of the Western Section (the route from Bicester Village to Bedford) is due to open in 2022: <a href="http://www.eastwestrail.org.uk/east-west-rail-route/">http://www.eastwestrail.org.uk/east-west-rail-route/</a>
Canal & River Trust	Thank you for consulting the Canal & River Trust on the West Bletchley Neighbourhood Plan. The trust has no comment to make on the plan at this time.
Historic England	Welcome sub-sections 2.3 on the history of Bletchley and 2.10 on Heritage.  Is there a list of locally-important buildings and features? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. Has the Buckinghamshire or Milton Keynes Historic Environment Record

been consulted for non-scheduled archaeological sites, some of which may be of national importance.

Is there a Conservation Area Character Appraisal and/or Management Plan?

The National Planning Practice Guidance states "... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions".

Is the condition of heritage assets in the parish an issue? Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include grade II buildings.

Has there been any or is there any ongoing loss of character, particularly in the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc?

Welcome sub-section 3.6 on Bletchley Park and its recognition as a strength and opportunity.

Also welcome the reference to respecting and protecting important historic places in the Vision for West Bletchley and Key Objectives 3 and 8, although we would prefer Objective 3 to apply to all the heritage assets in West Bletchley.

Objective 8 refers to "character". Has any characterisation study been undertaken of West Bletchley? Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan.

Characterisation studies such as Parish Design Statements can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change. If no characterisation study has been undertaken, we would be happy to provide further advice.

Welcome Section 9 and Policies BP1 and BP3. Also welcome Policies D1 and D2 in principle, although question whether they add anything to Saved Policies HE2 – HE6 of the Milton Keynes Local Plan 2001-2011. We have noted above that National Planning Practice Guidance states "... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale". More detailed, West Bletchley-specific policies would therefore be better. We welcome Policy D3.

Welcome, in principle, Policy D4, particularly criterion 7, as paragraph 58 of the National Planning Policy Framework states "...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics."

However, we do not consider that Policy D4 is really either robust or comprehensive. "We will to ensure that......" could be more robust by making it clear that planning applications that do not meet the criteria will be refused and the policy could contain more detail on building form and design and materials etc. In addition, the policy should be based on an "understanding and evaluation of [the plan area's] defining characteristics", such as the characterisation study of the parish to which we have referred earlier in these comments.

#### **Anglian Water**

Policy BNH1: Meeting Residential Development and Policy BNH2: Wellington Place - Policies BNH1 and BNH2 outlines the criteria for residential development proposed within the plan area. However the scale of residential development is not specified within the Neighbourhood Plan.

We would comment on any proposals for housing which include proposals for 10 or more dwellings as part of the planning application process.

**Policy GC1 – GC5** - Policies GC1 – GC5 outlines the criteria for residential development following the redevelopment of the existing garage courts for a range of uses. However the precise mix of uses is not specified within the Neighbourhood Plan.

We would comment on any proposals for housing which include proposals for 10 or more dwellings or 0.5ha or more for employment proposals as part of the planning application process.

Therefore for the above reasons Anglian Water has no comments relating to the content of Neighbourhood Plan.

#### **Notifications**

We would wish to be notified of the outcome of the examination and any subsequent decision made by the Council relating to the Neighbourhood Plan

## Natural England

Natural England has reviewed the Neighbourhood Plan and has made the following comments:

## 7.0 Protecting & renewing our Parks, gardens and Public spaces

**7.1** Natural England notes that the overflow car park identified for new housing is a suitable site for the proposed new housing as it is brownfield land which has been previously developed, and is not of high environmental value (see paragraph 111 of the NPPF).

## 8.0 Policies of the Neighbourhood Plan

- **8.2 PR2.** This is great. Please consider the amount and location of greenspace in line with the Accessible Natural Greenspace standards (ANGSt) (see paragraph 114 of the NPPF).
- **8.2 PR3.** Please use the areas of lowest environmental value for the public spaces, preserving the areas of higher environmental value (in line with paragraph 110 of the NPPF).

Within the Opportunity Area of Rickley Park, please plant indigenous trees to the UK – deciduous trees such as oak, horse chestnut, beech and hawthorn provide significant net biodiversity gains, and are also ornamental.

**8.2 PR4 and 5.** These two policies are good, especially the ensuring that mature existing landscape is protected. It will also provide further connectivity between the green spaces within your parish, in line with paragraph 113 of the NPPF.

#### D Clarke, resident

I would like to request minors changes to parts 4 & 5 of the character assessment.

#### Section 8, Otters.

- a) Paragraph headed "Character of open spaces". It says, "It does have a small young children's play area off Otter Close and direct access to a play area on the northern edge of Sunningdale.". I do understand that the reference to Sunningdale means the Sunningdale subdivision of the report (section 9), but this is easily confused with meaning the park off Sunningdale Way. That park is not directly accessed from the Otters division. Please change it to "It does have a small young children's play area off Otter Close and direct access to a play area south of Dunbar Close on the northern edge of the Sunningdale division."
- b) Paragraph headed "Building Type". Please indicate that the houses on Otter Close and Tweed Drive are predominantly selfbuild houses and as such are all of different design, providing welcome relief from the cookie-cutter designs of other divisions. This fact contributes significantly to the character of the northeastern part of the division and therefore deserves mention.
- "Some planting in front gardens has again, unfortunately, been removed to create large expanses of hard surfacing." The report presents and can infer no evidence that planting has been removed; it cannot be assumed that these hard surfaces have not been present since the road's inception. More accurate would be, "Some front gardens have been landscaped as large expanses of hard surfacing".
- d) Under "Layout", please correct the statement, "The layout of the area consists of three distinctive sections on the south western side. The residential housing is positioned on short cul-de-sacs off Muirfield Drive." It should read, "The layout of the area consists of three distinctive sections. On the south western side, the residential housing is positioned on short cul-de-sacs off Muirfield

- *Drive.*" The period is moved to make a large difference in meaning that is now correct.
- e) I challenge claim that "Elements of public realm in poor condition". There are a few potholes, that's about it. The 7<sup>th</sup> photo, of a manhole, is perhaps what is meant, but it appears to me that that manhole is well maintained.
- f) The balance of photos doesn't do justice to the "well-designed homes" found in the north-eastern section. A third of the photos show homes in the south-western half, but only one sixth of photos show these homes in the north-eastern end

### Section 10, Windmill Hill.

- g) On page 56 the reference to photo 11 is made twice, but photo 11 doesn't show "views from the edge of Turnberry Close south to the Buckinghamshire countryside", it shows only Turnberry Close and the trees on the adjacent Formby Close.
- h) Again I feel that a mention of the self-build nature and differing designs of the houses on Wentworth Way is a significant fact in the area's character and deserves a mention.