

Woburn Sands Neighbourhood Plan
Publicity responses, October 2013

Publicity Response number	Respondent
PR1	Terence O'Rourke on behalf of O&H Properties Ltd
PR2	Bidwells
PR3	English Heritage
PR4	Savills on behalf of The Trustees of Bedford Estate
PR5	Milton Keynes Council
PR6	Network Rail
PR7	Natural England
PR8	Aspley Guise Parish Council
PR9	James Farmer

Woburn Sands Neighbourhood Plan

Publicity responses, October 2013

PR1

Terence O'Rourke
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24 October 2013

Our ref: 100375E

Dear Sir/Madam

Woburn Sands Neighbourhood Plan

We write on behalf of our client, O&H Properties Ltd in response to the submitted Woburn Sands Neighbourhood Plan (WSNP). Our client has land interests within the defined WSNP area.

Our client welcomes the production of the WSNP, which offers the local community a genuine opportunity to influence the location, type and form of future development in their area. Unfortunately having considered the draft WSNP and the supporting documentation, we consider that the plan fails to meet the basic conditions of compliance set out within paragraph 8 of Schedule 4B to the Town and Country Planning Act (TCPA).

In order to be truly effective, a neighbourhood plan must reflect the views of local residents, businesses and stakeholders alike. To achieve this sub-section (a) within paragraph 14 of Part 5 of The Neighbourhood Planning (General) Regulations 2012 requires neighbourhood planning bodies to '*publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area*'. Despite owning significant areas of land to the west of the town our client has not been invited to participate in the preparation of the plan or provide their views. Furthermore it is notable from the list of organisations that were present at the Issues Meeting held in March last year (appendix 1 of WSNP) that there was very limited representation from the private sector in general. We believe that this is a fundamental failing in the preparation process and has influenced the anti-development bias of the plan.

Paragraph 184 of the National Planning Policy Framework (NPPF) requires Neighbourhood Plans to be in '*general conformity*' with the strategic policies of the Local Plan. It also states that Neighbourhood Plans '*should not promote less development than set out in the Local Plan*'. These requirements are also set out in paragraph 8 of Schedule 4B to the TCPA.

Woburn Sands Neighbourhood Plan Publicity responses, October 2013

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Terence O'Rourke

Planning | Design | Environment

Policy CS1 'Milton Keynes Development Strategy' within the Milton Keynes Core Strategy (MKCS) identifies Woburn Sands as one of three 'key settlements' where the main development outside of Milton Keynes urban area and the strategic allocations should occur. The town has been identified as a sustainable location based on its population size, broad range of local services and good public transport links. In contrast to this aspiration draft policies WS6 (Housing development) and WS8 (Employment development) within the WSNP seek to resist future residential and employment development beyond that, which has been consented within the Parklands scheme (former Nampak site). These policies are believed to go beyond the remit of the neighbourhood plan, lack any substantive justification and are clearly in conflict with the MKCS. Similarly, draft policy WS5 (Development beyond the built-up area) seeks to prohibit any development in the rural areas, which again goes beyond the protective rural policies in MKCS and national guidance. These draft policies are therefore overly restrictive, contrary to national guidance and in conflict with the development plan.

We note that the WSNP is dated April 2013 and makes a number of references to MKCS. Since this date the MKCS has been updated and was subsequently adopted in July 2013. The final document includes more recent urban and rural housing numbers and a requirement for an early review in 2015. The consequence of these changes is that the WSNP is inconsistent with the adopted Core Strategy and seeks to cover a longer timeframe. The WSNP must reflect the latest housing position as set out in the plan and cover either the same or a shorter timeframe (up to 2015). After this period either a review of the neighbourhood plan will be necessary or the production of a new plan, which is consistent with the revised Core Strategy. In its current form the WSNP is clearly out of kilter and in conflict with the Local Plan and therefore fails one of the fundamental conditions set out in the regulations.

In summary, whilst our client welcomes the production of the neighbourhood plan, the current draft fails to meet the basic conditions as set out in the 2012 regulations and the TCPA. In this circumstance we believe that the plan should be withdrawn, re-written and subject to further consultation amongst a broader local group. Our client would welcome the opportunity to contribute to this process with the aim of producing a more positive and representative plan. Failing this, we believe that the independent Inspector will have no choice but to recommend that the plan does not proceed based on the failings set out above.

We thank you for the opportunity to comment on the plan and hope to be able to participate in the production of a revised draft in due course.

Finally, we would respectfully ask to be kept informed of the progress of the plan through the examination and any possible further revision and referendum.

Yours sincerely



Will Cobley
Associate Director

Cc. Pippa Cheetham, O&H Properties Ltd
File

Woburn Sands Neighbourhood Plan

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PR2

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Dear Sirs

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Representations on behalf of Various Clients

Woburn Sands Neighbourhood Plan Draft for Examination (April 2013)

We object to the detailed provisions of the draft neighbourhood plan on behalf of various clients. The draft Plan is not in conformity with the NPPF, the adopted MK Core Strategy 2013 and it does not achieve sustainable development.

The Neighbourhood Plan should reflect existing commitments and extant planning permissions and be in general conformity with the Development Plan, in this case the 2013 Core Strategy. Currently, it has no regard to the impact of these, predominantly as it has not been positively prepared. The final Examination draft plan does not meet the Basic Conditions Tests.

Policy CS9 of the adopted Milton Keynes Core Strategy 2013 confirms that in the period 2010-2016 the Council will prepare a Site Allocations Plan to identify land that can assist the delivery of an average of 110 homes per year in the rural area (1,760). The focus for this development will be the Key Settlements of Woburn Sands, Newport Pagnell and Olney. The Policy also provides support for development of extant allocations in the selected villages of Bow Brickhill and Hanslope, along with some limited growth in Sherrington and some limited infilling within villages.

In the period April 2010 to March 2013 there were 313 completions in the rural area (MK Assessment of Five Year Land Supply 2013 – 2018). The residual target for the period 2013-2026 therefore equates to 1,447 (111 per annum). The Council has identified capacity within the rural area to deliver 579 homes in the period 2013-2018. This level of provision is sufficient to satisfy the 5 year housing land requirements for the rural area (equivalent to 5.2 years) but it would exhaust all remaining planning permissions, allocations, unallocated previously development sites and relies on a generous windfall allowance of 35 dwellings per year in the rural area.

The MK Site Allocations Plan will therefore need to identify new sites to accommodate a further 868 dwellings in the period 2018-2026 ($1,447 - 579 = 868$) and potentially more based on the overall shortfall of supply identified by the Core Strategy Inspector. This figure could potentially increase if one or more of the sites which comprises the Council's 5 year supply estimate does not deliver as anticipated or if windfall completions fall short of the projected levels.

Policy CS9 of the Core Strategy does not seek to establish how much growth should be directed to each Key Settlement. It simply confirms that Woburn Sands, Newport Pagnell and Olney will be the focus for

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residential development in the rural area. In identifying appropriate sites to accommodate the residual target of at least 868 dwellings, this should be led by factors such as land availability, infrastructure capacity and viability. Accordingly, where there are no demonstrable constraints which would prevent the delivery of further growth within a particular settlement, there are no planning policy grounds to impose an artificial cap on development.

We do not therefore agree with the approach of the Neighbourhood Plan, whereby the parts of Woburn Sands within MK administrative area would not accommodate any further growth beyond the existing planning permissions and historic allocations. The suggestion being that the settlement has already 'taken its share' is not well founded and conflicts with the Development Plan. This proportional approach to housing distribution is not consistent with Policy CS9 and moreover would not secure to the most sustainable pattern of growth, as require by the Government's National Planning Policy Framework. Woburn Sands has a main line railway station, shops, community facilities and education facilities. The fact that the school provision is sited within the parts of the settlement that are not within the Parish boundary albeit they are clearly within Woburn Sands is misleading at section 3.4.1. The settlement will also benefit from the new schools to be provided on the nearby Wavendon Strategic Lane Allocation.

It is also our view that even if a proportional approach to housing distribution in the rural area was adopted, Woburn Sands parish would still need to accommodate growth in addition to that already committed through planning permissions and allocations. This is illustrated by the brief calculations below:

- Rural Area Target 2010 – 2026 = 1,760
- Dwellings to Selected Villages = 80 (Bow Brickhill = 25, Hanslope = 15 and Sherrington = 40)
- Windfalls = 175 (@ 35 per annum in years 1-5)
- Rural Area Residual Target = 1,505
- Key Settlement Target = 502 (1,505 / 3)

The above calculation demonstrates that limited development in the selected villages (delivery of allocations in Bow Brickhill and Hanslope and identification of a small site in Sherrington), along with a windfall allowance in the first 5 years of the plan period (as allowed for by Paragraph 48 of the NPPF) would deliver 255 dwellings. The proportional approach would therefore direct the remaining 1,505 dwellings to the Key Settlements of Woburn Sands (within MKC boundary), Newport Pagnell and Olney, equating to 502 dwellings per settlement. In these circumstances, sites would need to be identified in Woburn Sands to accommodate approximate 200 dwellings in addition to those already completed since 2010, under construction or committed.

In accordance with Paragraph 48 of the NPPF, we have not included a windfall allowance beyond the first 5 years of the plan period. Paragraph 48 is quite clear that a windfall allowance may be included within the 5 year supply (if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply) but it does not suggest that the allowance may extend beyond year 1-5. The Government's recently released National Planning Practice Guidance (NPPG) provides best practice guidance to sit alongside the policies of the NPPF. In the section titled 'Testing Land Availability' the NPPG advises that *"plan makers should not need to rely on windfall allowance in years 6-15. This is because local planning authorities have the ability to identify broad locations in years 6-15, allowing a degree of flexibility to meet development needs where specific sites cannot be identified"*.

On the basis of the above, it is considered that it would be inconsistent with the Policy CS9 to seek to artificially constrain housing development in Woburn Sands through this neighbourhood plan. This approach would not secure the most sustainable pattern of growth in the rural area and it fails to deliver the Government's principle objective to *'boost significantly the supply of housing'* (Paragraph 47, NPPF). Even if the rural area housing target is distributed proportionately across, there is still a need to find land for approximately 200 additional dwellings in Woburn Sands in the period to 2026. The moratorium proposed by

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the Neighbourhood Plan would therefore be inconsistent with both the Core Strategy and the NPPF and would fail to effectively assist in the delivery of adopted housing targets.

It is also to note that Woburn Sands has only delivered 10 homes through windfall development over the past 10 year period from 2002-2012 (source: MK Housing land supply paper Dec 2012). It is therefore reasonable to conclude that it is unlikely to yield natural growth through windfall provision to 2026.

The Neighbourhood Plan seeks to alter the key principles that underpinned the rural part of the core strategy. We appreciate an alternative spatial distribution could be considered through the Site Allocations DPD however as currently drafted the neighbourhood Plan does not include sufficient information (or any relevant background documents) to explain any discussions with landowners and housing developers to show that there are no suitable and available site options that would help deliver the Core Strategy rather than undermine it. A reasonable review of a sites availability, constraints and delivery assumptions should be included in order to clearly demonstrate that the Core Strategy will not be prejudiced. The basic summary of sites set out in section 6.2 is poor. The limited background work that is available does not relate to the assessment of the settlement capacity and potential growth options and why they should be discounted. There is no clear assessment of the quality and environmental capacity of the rural area and the green spaces that surround the town within the Neighbourhood Plan area to conclude under Policy WS5 that any extension of the built-up area would be damaging to the current network of public footpaths and in turn damaging to the health and wellbeing of the residents.

Furthermore, we object to the reference to Greens Hotel at paragraph 6.1.2 which concludes that the Town Council '*and the wider community*' remains opposed to the development of the Greens Hotel Site. There is no evidence base submitted to justify this claim.

The plan does not provide a practical framework for Woburn Sands. It should recognise the fact that the Core Strategy clearly assumes that the settlement will assist with the delivery of homes in the rural area through Policy CS9. We strongly object to the Sustainable Objectives and specifically Policy WS5 and Policy WS6. Test 3 is not met.

Summary

The complete block on future development conflicts is likely to conflict with the delivery of the Core Strategy and the assumptions made regarding the edge sites and future impacts is not justified or supported by a clear evidence base. The Neighbourhood Plan has not been positively prepared and 1,2 and 3 of the Basic Conditions Tests have not been met.

Whilst we welcome the opportunity to comment upon the Examination Draft of the plan, we consider there are key adjustments required to enable it to be considered robust, sustainable and deliverable, as well as being in accordance with both the existing planning policy for Milton Keynes and the National Planning Policy Framework to meet the Basic Conditions.

We raise specific concerns about the evidence base on which the plan is based; particularly further information is required to demonstrate why the sites listed at section 6.2 are undevelopable with more robust and transparent work undertaken. At present there can be no certainty that the Core Strategy housing targets can be accommodated through this plan's proposals, particularly in respect of Housing delivery in the rural area.

I would be grateful to receive confirmation of receipt of this submission as well as any further information in relation to the progress of the Neighbourhood Plan. We may also like to participate in the examination process and as such would be grateful if you could provide details in due course.

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Changes required

It is not possible to amend the text to make the plan compliant. Significant work is required to bring the draft policies in line with the NPPF and 2013 Core Strategy including an objective assessment of all potential future sites to meet the rural housing targets to 2026 and a commitment within the draft plan of sites that are capable of delivering future growth.

This is an observation that goes to the heart of the draft plan and its credibility as a Development Plan or a material consideration at a future date, without significant updates and changes.

Basic Conditions Statement (April 2013)

The assessment of the plan (and its sustainability appraisal) against NPPF is unclear as the document is not available for inspection. However the lack of positive preparation and future provision of development sites to achieve sustainable development is not satisfactory and we consider this test is not met.

There is no clear assessment of the draft plan against the Development strategy and rural area policies of the 2013 Core Strategy. Had this occurred, it would clearly have shown that the draft plan conflicts with the Objectives of the CS. The block on development at Woburn Sands within the administrative area of MK may prejudice the delivery of the Core Strategy by 2026. We consider test 3 is not met.

We recommend changes are made to ensure that it meets the Basic Conditions Tests. Strategic Policy CS9 of the Core Strategy commits the provision of circa 1,760 homes in the rural area and Woburn Sands is identified as a Key Settlement which will be a focus for growth.

We express concern that the draft Plan does not provide certainty of delivery of the 1,760 units committed in the Core Strategy and will not assist to ensure that an adequate supply of rural sites is maintained to deliver the growth targets to 2026. The reasons stated for not planning for any additional growth in the town beyond that already planned/committed does not appear robust.

Neighbourhood Plan Sustainability Appraisal

The Examiner should note that the website for the Neighbourhood Plan set out by the Town Council did not include the copy of the Sustainability Appraisal. The link was incorrect and only included a repeat of Appendix B. It has not therefore been made available for comment.

We were unable to obtain the relevant document from MKC as the web site was not available (<http://www.milton-keynes.gov.uk/planning-policy/displayarticle.asp?ID=86167>) due to an upgrade in the Council's computer system. As at today's date, the MK Website has not been updated and only displayed the current position as the Cabinet on 25 July 2012. We reserve the right to comment as and when this becomes available.

Yours faithfully



Stacey Rawlings MRTPI
Partner, Planning

PR3



ENGLISH HERITAGE

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21st October 2013

Dear Sir or Madam,

Woburn Sands Neighbourhood Plan – Publication and Consultation

Thank you for your e-mail of 3rd September 2013 inviting English Heritage to comment on the Woburn Sands Neighbourhood Plan publication version.

When commenting on the previous version in February this year we thought it would be helpful to say a little more about the historical character of the Conservation Area under "Background Information and Data". We are disappointed that this has not been done.

However, we are pleased to see the inclusion of a reference to the protection of the historic nature of the Conservation Area under "Sustainability Objectives" in response to another of our previous comments. We still believe that the first Objective also relates to Policy WS1, and welcome the amendment to the wording of that Policy to avoid it being considered too inflexible.

We note that in the Town Council's Consultation Statement the Town Council's response to our previous request for a specific policy for the conservation and enhancement of the historic environment and heritage assets of Woburn Sands is that a reference has been added in paragraph 6.1. Without the previous version of the Plan to compare with, we are not clear what reference has been added. However, it is clear that no new WS Policy has been added as we requested, which is also a disappointment.

Our previous comment regarding assessing the proposed policies against the sustainability objectives related to the Sustainability Appraisal but such an assessment has not been included. We note the Town Council's response to our comment - "Cross references provided in schedule of objectives" – but we believe this is a reference to Section 5 of the Plan, where the Plan's Sustainable Objectives and Policies are indeed cross-referenced, but their compatibility is not assessed, which was our point.

Cont'd

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However, notwithstanding our disappointment that not all of our previous comments were taken on board by the Town Council and the lack of assessment of the Plan's Policies against the Sustainability Objectives, we do not maintain that the Plan fails to satisfy the Basic Conditions.

Thank you again for consulting English Heritage on the Woburn Sands Final Plan. I hope these comments are helpful, and please contact me if you have any queries.

Yours faithfully,



Martin Small
Historic Environment Planning Adviser
(Bucks, Oxon, Berks, Hants, IoW, South Downs and Chichester)

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Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly
available



Woburn Sands Neighbourhood Plan

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PR4

30 October 2013
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Dear Sir/Madam

Woburn Sands Neighbourhood Plan 2013 - Consultation Response

We are instructed to submit representations on the above plan on behalf of our client, The Trustees of Bedford Estate ("the Estate"). The Estate made representations at the Final Consultation Draft Stage of the Neighbourhood Plan preparation in February 2013. Further representations are being made at the Final Neighbourhood Plan stage to reiterate the Estate's position, as previous concerns raised have not been afforded any significant weight.

The Estate welcomes the production of this plan in developing a localised planning framework and vision for the future management of growth in the parish of Woburn Sands. Once adopted, the Plan will provide a mechanism to influence more centralised planning decisions which reflect the aspirations of the local community and its main issues of concern.

The 2011 Localism Act introduced the concept of Neighbourhood Plans allowing Parish or Town Councils to develop planning policies on the development and use of land within their community. Once ratified via a local referendum, the plan assumes the status as part of the Development Plan for the area and hence forms a material consideration in the determination of planning applications. However, Neighbourhood Plans need to be prepared in accordance with a number of criteria, including that they must not conflict with national and local planning policies and they should also not be used as a tool to prevent new development which has been identified by the Local Planning Authority.

Milton Keynes Council adopted their Core Strategy in July 2013. The Core Strategy will provide the growth framework for the 15 year period to 2026 and proposes the highest rate of growth for any city in the south east outside of London. This includes the provision of an additional 28,000 residential units and 42,000 new jobs.

Woburn Sands is identified as a key settlement within the adopted Core Strategy where development beyond Milton Keynes' defined boundaries will be concentrated (Policy CS1) due to the range of facilities and services that it offers. The identified rural housing target is 1,760 new residential units and whilst some of this new provision is already provided for through existing commitments, the remaining requirement is to be allocated in the Site Allocations Plan. Policy CS9 (Strategy for the Rural Area) confirms that the Council intends to prepare a Site Allocations Plan to identify land to deliver an average of 110 homes per year in the rural area, with development to be focused upon Newport Pagnell, Olney and Woburn Sands. Furthermore, it states that any changes to the boundaries of these settlements will be considered through the Site Allocations Plan. As this plan is likely to soon become part of the Development Plan for the area, the Woburn Sands Neighbourhood Plan should therefore be prepared in conformity with this emerging document.

The Woburn Sands Neighbourhood Plan sets out a vision for the town stating that:

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'Woburn Sands will remain an attractive and sustainable location which meets the aspirations of residents, the wider Woburn Sands community and all those who use the town's facilities'.

In particular, this vision of protecting the existing quality of the environment and ensuring that it continues to function as a sustainable settlement is fully supported.

Policy WS2 concerns open space in the existing built up area and the approach to protect these existing open spaces is entirely supported by the Estate. In light of previous representations made by Savills and other parties, the wording of the policy has been changed to remove 'The Town Council will continue to resist the development of the Greens Hotel site where possible'. However, the policy's supporting commentary still clearly states its opposition to the redevelopment of the Greens Hotel site. Such a position is not considered sustainable as the site already has planning permission (ref: 11/01032/FUL) that allows for its redevelopment and this would also be contrary to the provisions of Neighbourhood Plans as they are not intended to specifically oppose new development.

As Savills and other parties have previously raised, Policy WS5 concerns the existing development envelope of the settlement and seeks to preserve the surrounding countryside through opposing any extension to the current built-up area. This policy is considered to be at odds with the Milton Keynes Core Strategy which identifies Woburn Sands as a key settlement to provide rural growth in the period to 2026, potentially involving a settlement boundary review through the Site Allocations Plan. Thus, whilst it is acknowledged that Woburn Sands has recently accommodated a significant level of housing growth through the redevelopment of the Former Plysu and Nampak site, Milton Keynes Council may still need the town to accommodate further growth in this plan period. This policy is therefore potentially in conflict with the Core Strategy.

Policy WS6 (Housing Balance) seeks to limit any new housing development (with the exception of the Parklands development) to small scale infilling or replacement dwellings. The Core Strategy does not advocate such a restrictive approach identifying Woburn Sands as a key settlement to accommodate growth in the rural area, potentially involving a future settlement boundary review to release additional land for development. This policy should therefore be reviewed to ensure it does not conflict with these strategic policies. Equally, Policy WS8 (Employment) adopts a restrictive approach towards the future allocation of land for employment purposes (specifying that only land at Parklands will be welcomed) at the town which given that the employment land requirement for the rural area has yet to be identified, could again create a conflict with these strategic policies.

In summary, whilst our client supports the principle of this plan it is considered that modifications are required to a number of policies to ensure conformity with the strategic policies of the Milton Keynes Core Strategy.

Yours sincerely

A handwritten signature in dark ink, appearing to read "Savills", written in a cursive, stylized script.

Savills

PR5

Milton Keynes Council's comments on the submitted Woburn Sands Neighbourhood Plan
As agreed by Delegated Decision, 29 October 2013

Milton Keynes Council would wish to congratulate Woburn Sands Town Council on the successful preparation of their Neighbourhood Plan. The submitted plan is succinct and clear, and the supporting documentation demonstrates the work that has gone into its preparation to this stage.

Arguably, some of the policies in the Woburn Sands Neighbourhood Plan do not wholly fit within the remit of planning and it may be difficult to apply them in a development management environment. Such policies are aspirational, rather than being deliverable through the planning system; for example, policies WS10, WS13, WS14 and WS16. However, we understand the Town Council's desire to have such policies included in the Plan. It will be for the independent examiner to determine if they can form part of the Development Plan.

The Basic Conditions that Neighbourhood Plans must meet are set out in the Localism Act, and the Council's comments relating to the Woburn Sands Neighbourhood Plan are framed around those Basic Conditions, as below.

Must be appropriate having regard to national policy

The submitted Basic Conditions statement refers to the table at paragraph 73 of the Sustainability Appraisal of the Plan. While we are not suggesting that the Plan is in discordance with the NPPF, it is considered that the source of the 'National Policies' is unclear. These are simply headings, without giving any indication of what the 'National Policy' is. The table also doesn't indicate how the 'x', 'xx' or 'xxx' has been justified, or what the link is between the NPPF policies and the plan objectives. It implies relevance, and not necessarily that there is conformity, or that national policy has been taken into account in the preparation of the Plan.

Must contribute to the achievement of sustainable development

The submitted Sustainability Appraisal seems to demonstrate the sustainability of the town of Woburn Sands, not the policies in the Plan. We would want it to show how the Plan and the policies it contains contribute towards achieving sustainable development. What will the Plan do to improve the situation?

Must be in general conformity with the strategic policies in the development plan for the local area

PR5 Cont

It is considered that the Plan is currently in general conformity with the Core Strategy, and development coming forward is aiding the delivery of that strategy. However, it is worth noting that as work on a new Local Plan progresses, it may be that housing requirements for Woburn Sands are reconsidered and the Neighbourhood Plan may no longer be in conformity.

There appears to be a difference in view over the role of the town as a Key Settlement. As a Key Settlement in the Milton Keynes Core Strategy, it is possible that Woburn Sands will be expected to take further development, either as part of delivering the Core Strategy targets or as part of the new Plan:MK. We note that the Town Council asserts that the increase in the number of dwellings already being delivered through the Taylor Wimpey Parklands development “fulfils the town’s obligation as a Key Settlement”. However, Milton Keynes Council is concerned that insufficient evidence has been provided to justify that position and consider that the Examiner may wish to explore this issue further. Conversations with the Town Council have revealed that attempts were made to survey housing needs in the town, but no response from the community was received. We consider that this information should have been made clearer in the Plan to justify the Town Council’s position in this regard.

Provision in the Neighbourhood Plan to allow infilling development may be sufficient to meet any housing targets or requirements in the town which is the aim of Neighbourhood Plan Policy WS6. Nonetheless, we can’t preclude the possibility that the new local Plan may allocate additional development in this area. However, the Town Council and residents would be involved in that plan-making process and any new allocations would be made in the context of full consultation with stakeholders.

Must be compatible with human rights requirements and must be compatible with EU obligations

Both these basic conditions appear to have been adequately addressed.

Referendum area

In relation to the area which would be appropriate for the Referendum process, it is Milton Keynes Council’s view that the Neighbourhood Area, i.e. the parish of Woburn Sands, would form the most suitable area.

Woburn Sands Neighbourhood Plan

Publicity responses, October 2013

PR6

Milton Keynes – Woburn Sands Neighbourhood Plan

Thank you for the opportunity to provide feedback to the proposed policy.

Network Rail is the “not for dividend” owner and operator of Britain’s railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations – the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network.

Network Rail has the following comments to make.

(1) Woburn Sands Level Crossing

Network Rail has commented in the past on planning applications which would result in a material increase in the type and volume of traffic over the crossing. The policy document comments:

“There has recently been considerable progress in the planning of the proposed upgrading of the East-West rail line. The western extension of the Bedford – Bletchley line will provide a link from Bedford to Aylesbury, Bicester, Oxford and Reading; as part of the scheme the line, including the section running through Woburn Sands, will eventually be electrified. It is envisaged that the line will carry a significant amount of freight as well as passengers. Detailed planning will be undertaken by Network Rail during 2013 but it is envisaged that major work on the Woburn Sands section will take place in 2017.

*There will be major implications for Woburn Sands. The most challenging issue will be how to deal with the level crossing and the pedestrian crossings. There are already times of the day when significant delays occur at the level crossing; the advent of more and longer trains will exacerbate this considerably and discussions have already started on how to mitigate this. It will be essential for the health of the town that the free flow of vehicular traffic between Woburn Sands and other parts of Milton Keynes is maintained. It is also important that the enhanced railway service supports the economy of the town both by providing a commuter link for residents and also by servicing the proposed employment units in Parklands. **Policy WS15 While appreciating the importance of improving the rail services to Woburn Sands the priority will be to seek measures to minimise delays at the level crossing and to ensure the safety of both cars and pedestrians crossing the railway.**”*

In light of the comments above, we would recommend that the council contact the Network Rail Route Level Crossings Manager to discuss this issue.

(2) Asset Protection Issues

In light of the neighbourhood plan we would request that the **Woburn Sands Neighbourhood Plan** authority / group should contact Network Rail for any proposals within the area to ensure that:

- (a) Access points are not impacted
- (b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g.
 - Drainage works / water features
 - Encroachment of land or air-space
 - Excavation and earthworks
 - Wind turbines
 - Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues
 - Lighting impacting upon train drivers ability to perceive signals
 - Landscaping that could impact upon overhead lines or Network Rail boundary treatments
 - Any piling works
 - Works that result in impact to train drivers and their perception of signals as a result of lighting
 - Any scaffolding works
 - Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under **s55 British Transport Commission Act 1949**)

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PR6 Cont

- Any use of crane or plant
- Any fencing works / acoustic fencing works and boundary treatments
- Any demolition works
- Any hard standing areas
- Works adjoining / adjacent or near to railway stations

We would very strongly recommend that the **Woburn Sands Neighbourhood Plan** authority / group are made aware that any proposal within 10m of the operational railway boundary will also require review and approval by the Network Rail Asset Protection Team, and such schemes should be accompanied by a risk assessment and a method statement. No works should commence on site without the approval of the Network Rail Asset Protection Engineer. Network Rail is required to recover any expenses incurred in facilitating third party proposals, a BAPA may be required for works on site.

We would request that the **Woburn Sands Neighbourhood Plan** authority / group when submitting proposals for a development contact Network Rail's Town Planning Team and include a location plan and a description of the works taking place for review and comment.

All initial proposals and plans should be flagged up to the Network Rail Town Planning Team London North Western Route at the following address:

Town Planning Team LNW
Network Rail
1st Floor
Square One
4 Travis Street
Manchester
M1 2NY

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PR7

From: Routh, Charles (NE) [<mailto:charles.routh@naturalengland.org.uk>]

Sent: 06 September 2013 14:01

To: Development Plans

Subject: Woburn Sands Town Council submitted their draft Neighbourhood Plan to Milton Keynes Council NE ref: 96571

Dear Sir/Madam, I can confirm that, having read the plan, Natural England does not consider that this plan poses any likely significant risk to internationally or nationally designated nature conservation sites, nor impact on any protected landscape and so does not wish to make specific comments on the neighbourhood plan.

I attach a feedback form which we would appreciate if you would complete and return.

Charles Routh

Lead Adviser, Winchester Land Use Operations Team, Natural England. 07990 773630

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PR8

ASPLEY GUISE PARISH COUNCIL

Clerk: Molly Fitzgerald 10 Bedford Road Aspley Guise Milton Keynes MK17 8DJ
Tel No: 01908 583795
Email: Molly.fitz@hotmail.co.uk

Development Plans Team
Planning and Transport Group
Milton Keynes Council
Civic Offices
1 Saxon Gate East
Central Milton Keynes
MK9 3EJ

24th September 2013

Dear Sirs

Consultation on the Woburn Sands Neighbourhood Plan.

Aspley Guise Parish Council has received details of the Woburn Sands Neighbourhood Plan.

The Parish Council is very happy to support the Woburn Sands Neighbourhood Plan.

Yours sincerely

Molly Fitzgerald (Mrs)
Clerk to the Parish Council

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PR9

From: James.Farmer@blum.com [<mailto:James.Farmer@blum.com>]

Sent: 03 September 2013 14:54

To: Development Plans

Subject: Woburn Sands Neighbourhood Plan Consultation

Mr J Farmer
Willow Barn
Salph End
Ravensden Road
Renhold
MK41 0LA

Dear Sir / Madam,

I am writing on behalf of a number of Landowners, Land off Bow Brickhill Road.

In respect to policy WS6 and the development envelope. Consideration should be given to proposals currently under discussion with Milton Keynes Council regarding land of Bow Brickhill Road Woburn Sands. In advance of the forthcoming changes to permitted development rights for agricultural buildings, which will allow the conversion of redundant stables/barns to residential dwellings. Attention therefore should be paid to the importance of rural smallholdings, and the sustainability of agricultural holdings with dwellings.

In the short term there could be at least ten to twelve homes built on land of Bow Brickhill Road (through the higher authority of permitted development rights), and therefore consideration should be given to how the Neighbourhood plan conforms with current/future permitted rights for development i.e Residential, Industrial, Retail etc. Landowners in Woburn Sands have not been consulted formally on the Neighbourhood plan, and the content varies significantly with the intention of landowners, and the information coming from our land agents.

Please let me know if you have any queries.

Best Regards

James Farmer