

WOUGHTON COMMUNITY NEIGHBOURHOOD PLAN

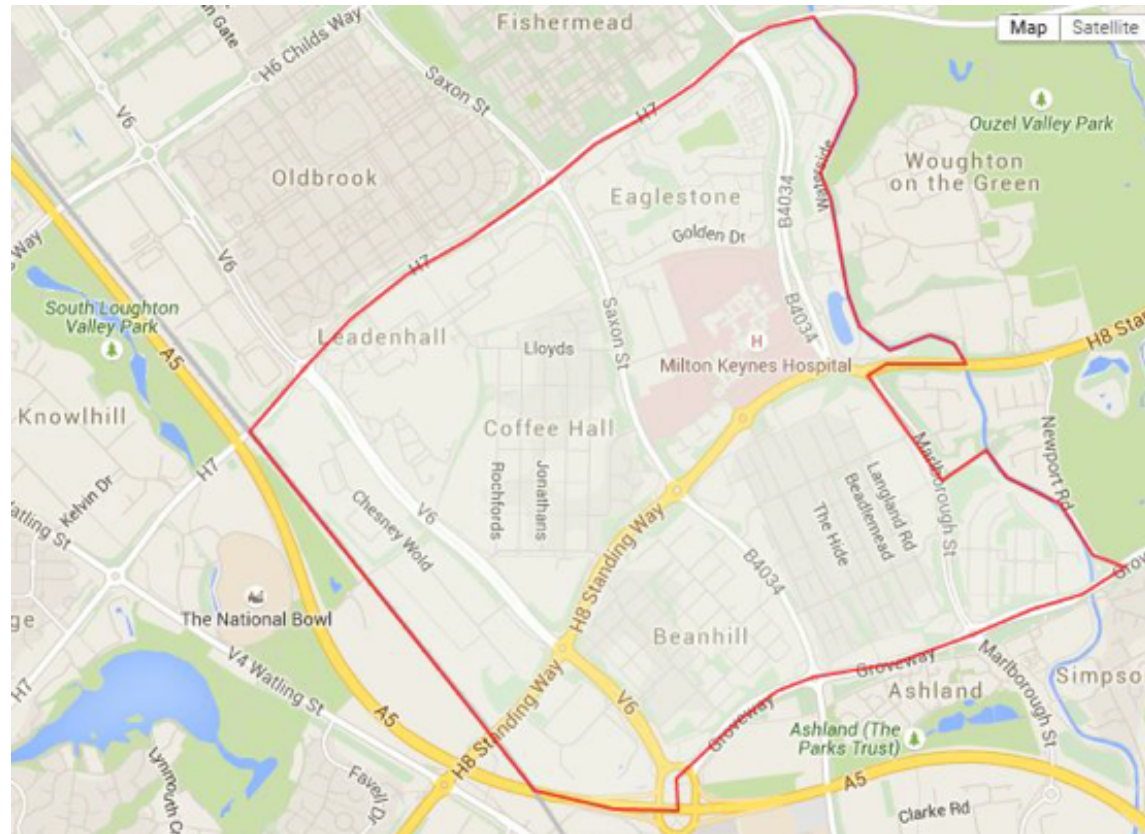
2016 -2031

BASIC CONDITIONS STATEMENT

Published by Woughton Community Council under the Neighbourhood Planning (General) Regulations
2012

1. INTRODUCTION & BACKGROUND

1.1 Woughton Community Council (WCC) has prepared a Neighbourhood Plan for the area designated by Milton Keynes Council (MKC) on 13 January 2015 under the provisions of the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The designated area is shown in Plan A below.



Plan A: Woughton Designated Neighbourhood Plan Area

1.2 The policies described in the Neighbourhood Plan relate to the development and use of land in the designated Neighbourhood Area. The plan period of the Neighbourhood Plan is from 1 April 2016 to 31 March 2031 and it does not contain policies relating to 'excluded development' as defined and required by the Regulations.

1.3 The Statement addresses each of the 'basic conditions' required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Town & Country Planning Act. The Regulations state that a Neighbourhood Plan will be considered to have met the basic conditions if:

- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan,
- the making of the neighbourhood development plan contributes to the achievement of sustainable development,
- the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations.

1.4 The plan preparation process has been led by the Community Council, as the 'qualifying body' under the 2012 Regulations, with development of the Plan delegated to a Project Steering Group comprising councillors and representatives from each of the residential Grid Squares in the area and from other organisations, e.g. Milton Keynes Council and the Hospital. All the Steering Group activities were regularly reported to the Community Council for information. However, as the qualifying body, the Community Council itself has approved the publication of:

- The Issues and Futures Consultation document of March 2016
- Pre Submission Neighbourhood Plan of September 2016
- The Submission Neighbourhood Plan of December 2016

1.5 The Community Council has worked closely with Milton Keynes Council (MKC) since the start of the project to collate and examine the evidence base, to design and iterate policy proposals and to define the proper relationships between the Neighbourhood Plan and the Milton Keynes Local Plan (saved policies) 2005 and emerging Plan: MK (2017 to 2032). For the most part, strategic planning policy says very little about this kind of regeneration area and says nothing specific about Woughton.

1.6 In addition, it has also been crucial to find a way for the Neighbourhood Plan to bridge the gap between the announcement by MKC (as land and property owner and housing authority) in 2014 of its regeneration programme (which has recently commenced its 15 year life) and the delivery of that programme in Woughton. This has not been straightforward and has not yet

been achieved as successfully as the Community Council would have liked. In its representations on the Plan at various stages, MKC has been keen to stress that any planning policy framework must acknowledge that the regeneration programme must be financially viable. The Community Council considers that it has met this challenge if the Plan is considered as a whole, but, in representing the local community, it must establish some key principles to guide how viability should be determined. This is dealt with in several places throughout this statement.

1.7 MKC has also raised its concern that insufficient feedback has been obtained from the local community for the Plan to carry great weight, given the population of the Parish. This is addressed in §2.4 below; suffice to say that the communities of the area are more transient than the average population of the city and the more well-established residents are either happy to allow their respective resident association representatives to make their case or to wait for further details of the regeneration programme to emerge before engaging. These are all valid reasons why engagement in such areas is more challenging than other areas.

1.8 However, the Community Council is a community leader, with strong connections across the area. As a proxy for the scale of engagement that would have been ideal for this project, it has used the insights of its own councillors and the other association representatives to supplement the consistent insights obtained from the engagement activities. Importantly, as the separate Consultation Statement will show, there have not been any significant differences of community opinion; when policy preferences have been sought, the responses have been consistent enough to give the Community Council the confidence to know that, when the Plan goes to referendum in due course, it will secure majority support. This will be a considerable achievement, given the worries and concerns of many in the community of what 'regeneration' might mean for their homes, families and jobs. The Community Council will continue to use its best endeavours to encourage and enable local people to engage in the project and it will work hard to publicise the examination and referendum to ensure a strong turnout.

1.9 The Neighbourhood Plan contains a number of land use policies (in Section 3) that are defined on the Policies Map as being geographically specific and also some non-statutory proposals (in Section 5) that are included for the completeness of the Neighbourhood Plan. For the most part, the plan has been deliberately avoided containing policies that may duplicate saved development plan policies that are material considerations in determining future planning applications.

1.10 In making a clear distinction between land use planning policies and non-statutory proposals relevant to land use planning, the Neighbourhood Plan allows for the examination to focus on the requirement of the policies to meet the Basic Conditions but also allows the local community to see the Neighbourhood Plan in the round. In any event, the non-statutory proposals will each have a land use effect at some later point but cannot do as part of the Neighbourhood Plan as they fall outside its scope.

2. CONFORMITY WITH NATIONAL PLANNING POLICY

2.1 The Neighbourhood Plan has been prepared having regard to national policies as set out in the National Planning Policy Framework 2012 (NPPF) and is mindful of the Planning Practice Guidance (PPG) of October 2014 in respect of formulating neighbourhood plans.

2.2 In overall terms, there are four NPPF paragraphs that provide general guidance on neighbourhood planning, to which the Neighbourhood Plan has directly responded:

Para 16

2.3 The Community Council believes it has led the Neighbourhood Plan in planning positively to support the strategic development needs set out in the adopted Milton Keynes Core Strategy for regeneration and economic development and in anticipating future regeneration and growth strategies for the city. Within this framework, the Plan supports future change by shaping and directing how development should happen in principal terms to bring the local community along with it. With few precedents for neighbourhood planning in this context, the Plan represents a major development planning achievement for the Community Council.

Para 183

2.4 The Neighbourhood Plan establishes a clear vision and objectives for the Area that reflect the views of the majority of the local community that have engaged with the project so far. As the separate Consultation Statement makes clear, the volume of comments made on the Plan during its preparation has been low, despite the Community Council's considerable efforts through a range of media. However, the feedback from local people across the area has been consistent, whether directed to the Community Council for this project or directly to MKC in respect of its emerging regeneration programme. This feedback has framed the key policy proposals of the Plan.

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2.5 The Community Council believes the Neighbourhood Plan, as highlighted below, is in general conformity with all the relevant policies of the Milton Keynes Core Strategy and of the earlier Local Plan, as set out in Section 4 below. The Neighbourhood Plan avoids duplicating other development plan policies by focussing on policies that translate the general requirements of the

development plan into a Woughton community context. Once made, the Neighbourhood Plan should be easily considered alongside the development plan and any other material considerations in determining planning applications.

2.6 In terms of shaping and in shaping the details of the regeneration programme, the Plan makes proposals for the preparation of a Community Regeneration Plan, as a practical but formal means of bringing the planning authority, the regeneration partners and the local community together to translate its principles into detailed proposals. This approach follows the best practice in estate regeneration over recent years.

TABLE A: NEIGHBOURHOOD PLAN & NPPF CONFORMITY SUMMARY

No.	Policy Title	NPPF Ref.	Commentary
WN1	Distinctive Grid Squares	21, 58	This policy is intended to ensure the Grid Squares retain a strong sense of place as distinctive communities from each other and from other parts of the city (§58). It also reinforces the value of Redmoor and Bleak Hall as employment areas (§21).
WN2	Medical Facilities	21	This policy promotes the clustering of medical facilities and related businesses on the back of the city hospital at Eaglestone, if new land in the area (at nearby Coffee Hall) becomes available through redevelopment plans. This aligns with §21 in respect of promoting modern economic development.
WN3	Self-contained Grid Squares	21, 30, 38	This policy encourages greater economic activity in each residential Grid Square to enable them to become more self-contained as communities (§21). If successful, the policy will reduce the need to travel to other parts of the city for convenience retail and job needs (§30). Any redevelopment proposals are likely to be of a scale that will allow for developing a stronger mix of residential and non-residential uses than was the case when these areas of the city were first planned (§38).
WN4	Green Grid Squares	111, 114	This policy establishes the type of green infrastructure policy framework envisaged by §114 to protect, improve and connect a variety of natural and recreational assets through the area.

WN5	Play & Activity Areas	74	This policy seeks to distinguish between those play and activity areas that are well used and liked by the local community and those that are not for various reasons. It follows an assessment of their popularity and quality and requires those shown on the Policies Map to be protected or re-provided.
WN6	Local Green Spaces	76, 77	This policy proposes a number of important green spaces in the community to be protected from development by their designation as Local Green Spaces.
WN7	Trees in the Public Realm	58, 114	This policy requires future development proposals to avoid the loss of mature trees so they remain a key characteristic of the Grid Squares (§58), as well as important biodiversity assets in an urban landscape (§114).
WN8	Community Gardens, Allotments & Orchards	70, 114	This policy promotes new shared spaces for the community to enjoy (§70) that may also form part of the Green Infrastructure Network of Policy WN4 in the longer term (§114).
WN9	Housing Design	57, 58, 61	This policy establishes a series of key design principles on which any plans for refurbishment and redevelopment of the housing stock of the four regeneration Grid Squares (and plans for new homes in other parts of Woughton) should adhere to. The goal is to achieve high quality and inclusive designs for all development, including individual buildings, public and private spaces and wider area development schemes (§57) and to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit (§58). Most importantly, the policy recognises that although visual appearance and the architecture of individual buildings are important factors, securing high quality and inclusive design goes beyond aesthetic considerations and it addresses the connections between people and places and the integration of new development into the natural, built and historic environment (§61).
WN10	Housing Mix in Regeneration Grid Squares	50	This policy establishes the emphasis of housing types and tenures to broaden the existing housing stock across the area, not just to reflect local demand but also to appeal to new households moving to this part of the city in future.
WN11	Houses in Multiple Occupation	50	This policy refines existing city HMO supplementary guidance to reflect the specific circumstances of this area with the aim of avoiding an over-concentration of HMOs but acknowledging that they will continue to meet some local housing needs.

WN12	Redways & other Footpaths	35	This policy establishes the Redways and other footpaths as important means of encouraging walking trips through and between the Grid Squares and other parts of the city.
WN13	Bus Routes and Facilities	35	This policy promotes the use of public transport by requiring any redevelopment plans to make provision for access to new bus services through the residential areas.
WN14	Competitive Grid Squares	21	This policy supports the retention and growth of the existing employment-based Grid Squares to deliver more jobs at these strategically important locations in the city.
WN15	Grid Square Local Centres	23	This policy allows for the expansion (and potential relocation) of the existing local centres in each residential Grid Square to support the local population. It acknowledges the position of the local centres in the retail hierarchy of the city – they will continue to meet local needs only.
WN16	Netherfield Local Centre	23	This policy, as with WN15, respects the retail hierarchy, with Netherfield as the largest of the established Local Centres continuing to perform a higher order role.
WN17	Educational Facilities	72	This policy supports the continued role of land at Leadenhall to deliver education services not just for the Parish but for the wider city.
WN18	Community Facilities	70	This policy encourages and enables the continued use of existing community facilities in the Parish by supporting development proposals that further this objective, including the extension or partial redevelopment of existing buildings.
WN19	Primary Schools	72	This policy focuses any future growth in the demand for new primary school places on the existing schools, which are capable of improvement and extension, rather than requiring a new school is provided.
WN20	Regenerate: Refurbished Housing	173, 190,191	These policies set out the principles by which the regeneration and/or refurbishment of the area will come about through the implementation of the land use policies contained in the Neighbourhood Plan and other parts of the development plan. As such, they are consistent with the provisions of §190-§191 in respect of engaging the local community in shaping change. They also acknowledge that pursuing sustainable development requires careful attention to viability and costs in plan-making. The
WN21	Regeneration: Redevelopment		
WN22	Regeneration: Masterplanning		

			policies of the Plan are aimed at being deliverable and to avoid policy burdens that would be too prescriptive or too onerous (§173).
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3. CONTRIBUTION TO ACHIEVING SUSTAINABLE DEVELOPMENT

3.1 As a Strategic Environmental Assessment (SEA) of the Neighbourhood Plan has not been required – see Section 5 below - an assessment of the contribution that each policy makes to achieving sustainable development is provided in Table B below. In overall terms, the assessment shows that every policy makes at least one positive contribution and none will deliver a negative sustainability impact. This is perhaps unsurprising, given that the Neighbourhood Area is highly constrained and there has been no appetite from the local community to wish to change the character or role of the community.

TABLE B: NEIGHBOURHOOD PLAN & SUSTAINABLE DEVELOPMENT SUMMARY

No.	Policy Title	Soc.	Eco.	Env.	Commentary
WN1	Distinctive Grid Squares	+	+	+	The policy will have positive effects in maintaining the distinctive character of each Grid Square for a mix of residential, employment and social infrastructure purposes. In doing so, the goal is to ensure that each Grid Square contributes to meeting the city's needs for these uses but seeks to build on their established uses.
WN2	Medical Facilities	0	+	0	The policy will have a positive economic effect in encouraging the clustering of new medical businesses and other facilities around the hospital, if the land becomes available through the redevelopment of Coffee Hall. As such, it will utilise brownfield land rather than existing green space, and so will avoid having a negative environmental effect.
WN3	Self-contained Grid Squares	+	+	+	The policy will have a range of positive effects in encouraging proposals for additional commercial and community uses in each residential Grid Square so they become more self-contained than at present. Redevelopment may create land for new facilities to support larger local populations that in turn will increase the local demand for services. If so, then one outcome will be less reliance of travelling (usually by car) out of the Grid Square to obtain those services.

WN4	Green Grid Squares	+	0	+	The policy will have a positive environmental affect in maintaining the core features of the established network of woodland, open spaces and wildlife corridors through the area. As many of these features also have local recreational value, the policy will also have a positive social effect.
WN5	Play & Activity Areas	+	0	0	The policy will have a positive social effect in retaining those existing facilities that are well used and enjoyed by the local community, or at least requiring their re-provision through any redevelopment scheme if necessary.
WN6	Local Green Spaces	+	0	+	The policy will have positive social and environmental effects in protecting key open spaces for the continued enjoyment of the local community and which also contribute to the green infrastructure network. In keeping the number of such spaces to a minimum the policy will avoid a negative social effect that would result from too many protected spaces making unviable regeneration schemes.
WN7	Trees in the Public Realm	+	0	+	The policy will have positive environmental and social effects as the presence of many mature trees in the Parish is a defining characteristic of the older Grid Squares and they contribute to maintaining the biodiversity of this urban area. In allowing for some replacement of lost trees where unavoidable, the policy will avoid a negative social effect that would result from too many protected trees making unviable regeneration schemes.
WN8	Community Gardens	+	0	+	The policy will have positive social and environmental benefits by promoting the establishment of new community gardens to provide food growing and social activity opportunities and to contribute to the biodiversity of this urban area.
WN9	Housing Design	+	0	0	This policy will have a positive social effect in maintaining the essential character of the Grid Squares that are good examples of the New Town style and are different to much of the city that has been developed since. The local community has placed great importance on this design objective.
WN10	Housing Mix in Regeneration	+	0	0	This policy will have a positive social effect in diversifying the housing stock in terms of its types and tenures to appeal to a broader demographic of households in the future. Importantly, it will enable the existing community to stay in the Parish if they so choose.

WN11	Houses in Multiple Occupation	+	0	0	The policy will have a positive social effect in continuing to meet the needs of some households for whom an HMO provides access to affordable housing, but also does so by seeking to avoid the social problems that can result from an over-supply of HMOs in respect of the transient nature of those households.
WN12	Redways & other Footpaths	+	0	0	The policy will have a positive social effect in protecting the core features of the existing network of Redways and main footpaths from unnecessary loss, so they will continue to provide convenient means of accessing local facilities by foot.
WN13	Bus Routes and Facilities	+	0	+	The policy will have a positive social effect by increasing access to local bus services, which presently are primarily routed along the grid roads and not through the Squares. If successful, the policy will have a positive environmental effect in enabling a modal shift from the use of cars to public transport in a city where this is notoriously difficult.
WN14	Competitive Grid Squares	0	+	0	The policy will have a positive economic effect in encouraging proposals to increase the employment density and land use at the established Redmoor and Bleak Hall business areas to create new jobs. It avoids negative environmental effects as these areas are well established for these purposes and there is land available within each area for development without the need to lose any significant area of green space.
WN15	Grid Square Local Centres	+	+	+	The policy will have a range of positive effects by protecting and encouraging the expansion of the existing Local Centres for commercial and community purposes. The Centres should be hubs of greater community and economic activity in the future, especially if increases in the local populations raises demand for these services within the Grid Square, to avoid car trips to other areas.
WN16	Netherfield Local Centre	+	+	+	As with WN15, the policy will have the same range of positive effects. The Netherfield Centre plays a higher order role in the retail hierarchy and it is able to continue to serve an increased local population from within its own Grid Square as well as its neighbours. There is therefore the potential for greater job creation here and for an environmental gain in encouraging a switch from car use, especially if future bus services better connect it to the other Grid Squares and by protecting the core footpath network between the Squares.

WN17	Educational Facilities	+	0	0	The policy will have a positive social effect by encouraging additional education facilities at Leadenhall, which already serves the local population and the wider city in this way.
WN18	Community Facilities	+	0	0	The policy will have a positive social effect in protecting and improving the range of community facilities in the area, and plugging gaps where facilities are absent.
WN19	Primary Schools	+	0	0	The policy will have a positive social effect by encouraging future investment in improving and extending the current group of primary schools in the Parish, as the demand for places increases with a larger local population.
WN20	Refurbished Housing	+	0	0	These policies will have a positive social effect in ensuring the local community plays a key role in shaping the details of the future regeneration plans. It is especially important that the fabric of community relations is retained through any widespread redevelopment programme through the ways in which local people are able to stay in the Parish or their specific Grid Square if they choose with the minimum of disruption to their lives. The refurbishment of existing homes will improve their quality and small infill schemes to make such a programme viable should avoid any negative environmental effects through careful planning and community engagement.
WN21	Redevelopment				
WN22	Masterplanning				

4. GENERAL CONFORMITY WITH THE DEVELOPMENT PLAN

4.1 The Neighbourhood Plan has been prepared to ensure its general conformity with the strategic policies of the development plan for Milton Keynes.

4.2 The Plan needs to reflect existing land use planning policies for Milton Keynes as they affect Woughton. It also needs to anticipate the possibility of major policy changes in the coming years for the city and Woughton through other non-development plan routes, e.g. the regeneration programme.

Milton Keynes Core Strategy (2013) & Local Plan (2005)

4.3 These documents have been adopted by MKC as formal planning policy documents (together known as 'the development plan' for MK) and they are used on a day-to-day basis to help determine planning applications. They include policies to guide where and how new development should happen in and around the city and to set the design standards of new development schemes.

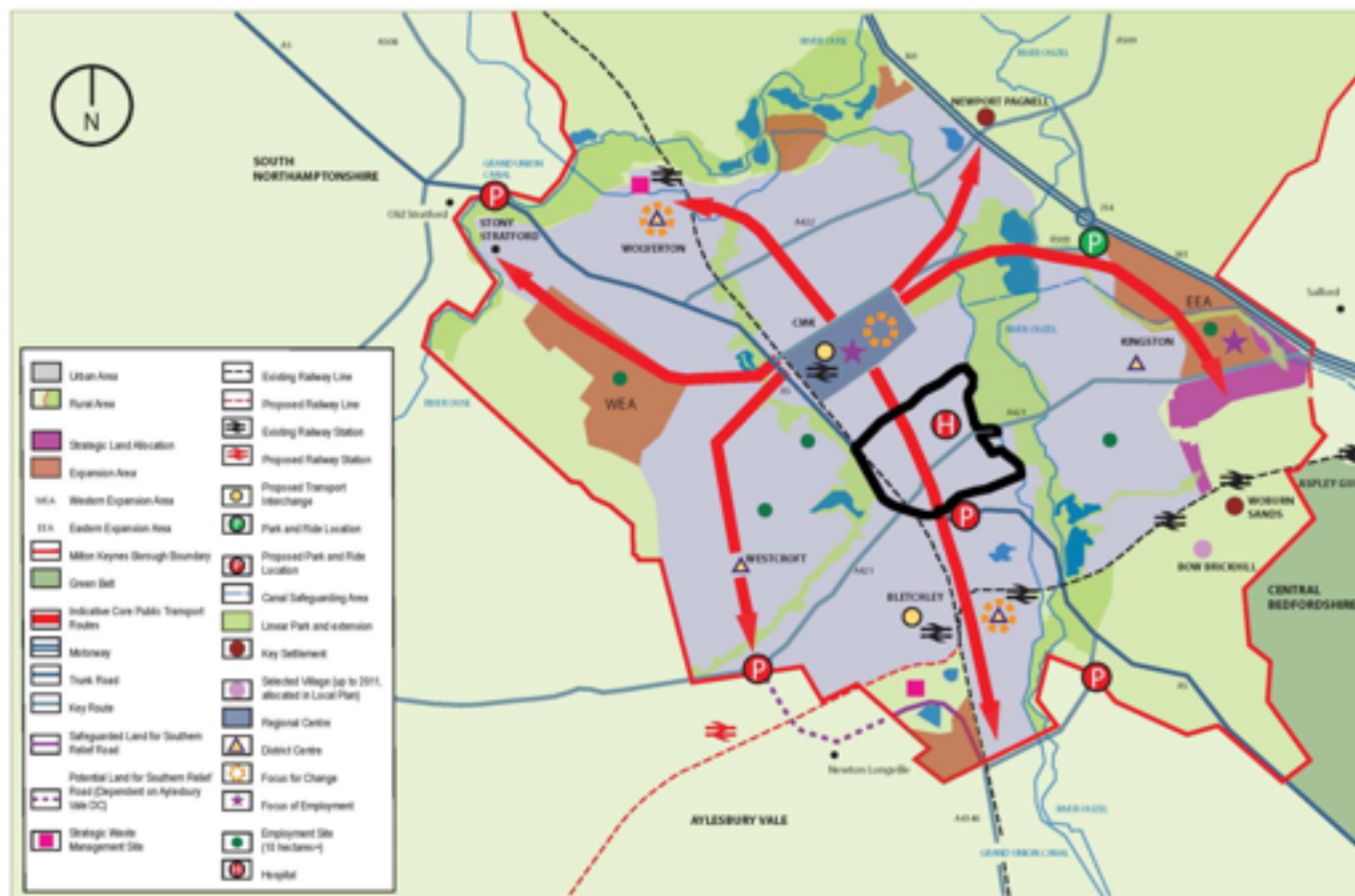
4.4 The most relevant Core Strategy policies are:

- CS1 Milton Keynes Development Strategy - setting out the settlement hierarchy and determining the key locations for new housing and jobs
- CS8 Other Areas of Change – shaping change in regeneration areas of the city to manage physical change, economic improvement and improved human and social capital
- CS10 Housing – managing the mix of new housing types and tenures and enabling suitable infill development schemes
- CS12 Developing Successful Neighbourhoods – ensuring that major development schemes support sustainable lifestyles
- CS13 Ensuring High Quality, Well Designed Places – requiring high standards of design that respond to the character of place
- CS17 Improving Access to Local Services & Facilities – protecting open spaces and other community facilities
- CS19 The Historic & Natural Environment – protecting the city's heritage and green infrastructure assets

4.5 There are also some 2005 Local Plan policies that remain relevant:

- S12 Linear Parks (which identifies the Ouzel Valley, which runs alongside Tinker's Bridge and Peartree Bridge, and ensuring development schemes protect their landscape, nature conservation and recreational value)

- D1 Impact of Development Proposals on Locality
- D2 Design of Buildings
- D2A Urban Design
- D3 Canalside Development
- H1 Archaeological Sites (which identifies the Scheduled Ancient Monument at Woughton on the Green)
- HE6 Conservation Areas (which identifies the Conservation Area at Woughton on the Green)
- NE1 Nature Conservation Sites
- T1 Transport User Hierarchy
- T5 Public Transport
- T15 Parking Provision
- H7 Housing on Unidentified Sites
- H8 Housing Density
- H9 Housing Mix
- H10 HMOs
- E1 Protection of Employment Land (which identifies the industrial areas at Bleak Hall and Redmoor)
- LC2 Non Retail Uses in Local Centres
- LC3 New Development in Local Centres
- TC19 Housing in Local Centres
- L2 Protection of Public Open Spaces (which identifies a number of such spaces in the Parish)
- C1 Location of Community Facilities
- C2 Protection of Community Facilities (which identifies a number of such uses in the Parish)
- C5 Health Facilities (which identifies a number of such uses in the Parish)
- C9 Reserve Sites (which identifies sites at Coffee Hall and Netherfield for future development needs)



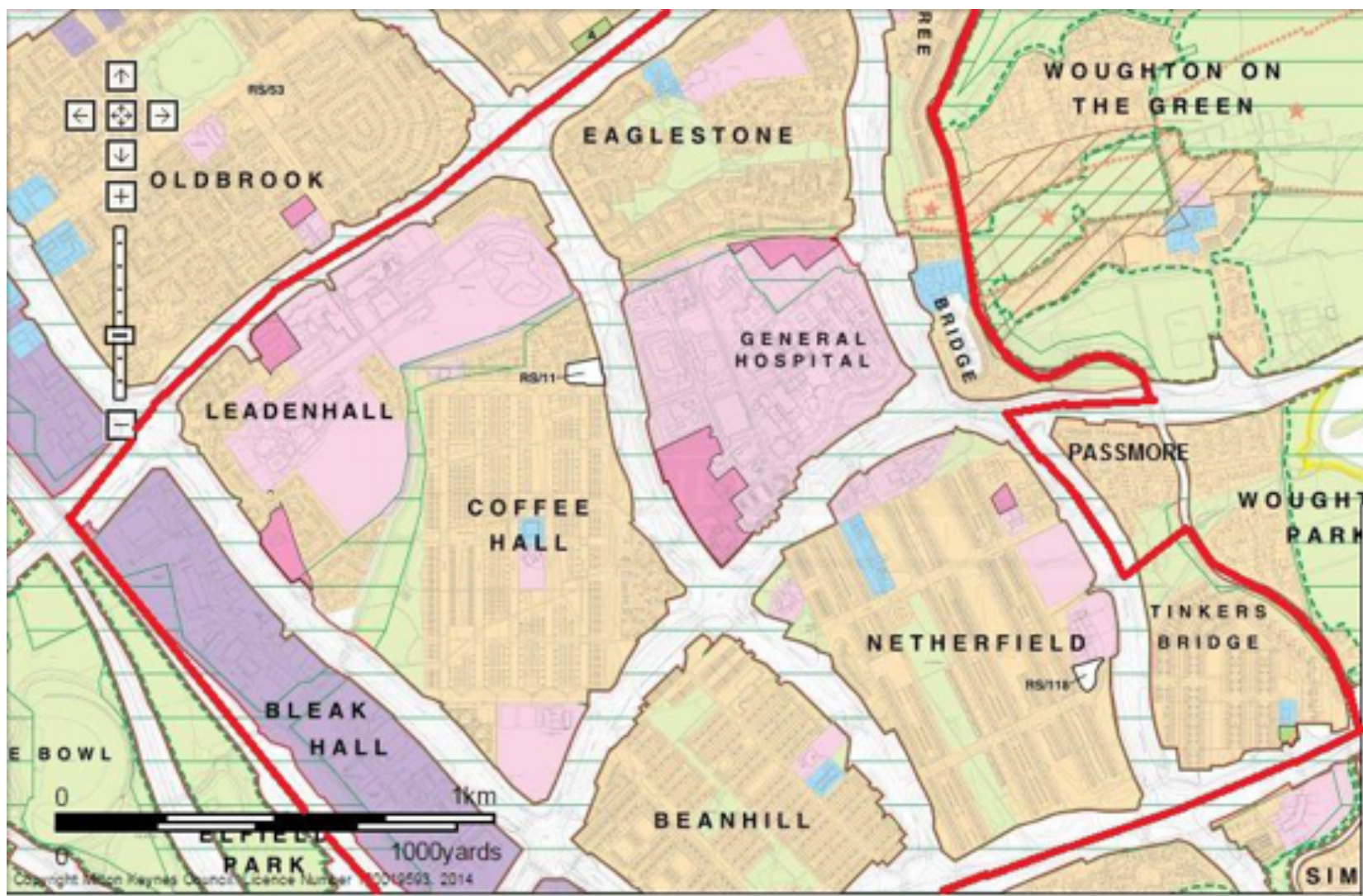
Plan B: Milton Keynes Core Strategy: Key Diagram with Woughton Neighbourhood Area Boundary

4.6 As Woughton is a well-established, built up area of city, the two plans do not have much to say about the parish. But, they have guided how some of the more recent development schemes like the Academy have taken place. Importantly, they have not anticipated and therefore planned for any significant change in Woughton. But, Policy CS8 of the Core Strategy ('Other Areas of Change') states that, "Through close work with communities ... Neighbourhood Plans will identify the specific changes required ... addressing the potential need for physical change, economic improvement, improved human capital and social capital ...". This provides an indication for what goals the WNP should consider.

4.7 MKC continues to use saved policies of the Local Plan of 2005 when determining planning applications. Although it contains no policies that are specific to Woughton, its Policies Map (see Plan C below) does contain a number of general policies for MK that apply to Woughton as well as other parts of the city. It does identify the different land uses in the parish and the local biodiversity interest of some of the green spaces and road verges (and the old Peartree Lane). And it identifies the special heritage importance of the Scheduled Ancient Monument and the Grade II listed Moated Site and Fishpond at the Old Rectory in Peartree Bridge, and Conservation Area at neighbouring Woughton-on-the-Green, which is on the edge of Peartree Bridge, as well as the public footpath and bridleway of Peartree Lane.

4.8 In addition, there are plans and proposals for the city in a number of other documents, though none identify specific proposals in Woughton:

- The Local Transport Plan 3 (2011-2031)
- MK Economic Development Strategy 2011-2026
- MK Community Strategy 2004 – 2034
- MK Green Infrastructure Plan 2008



Plan J: Milton Keynes Local Plan 2005 Policies Map: Woughton Extract (showing land use types, green corridors and heritage assets)

‘Plan:MK’ (new Milton Keynes Local Plan) & ‘MK Futures 2050’

4.9 MKC is now preparing a new Local Plan for the city (known as ‘Plan:MK’) for the period from 2017 through to at least 2032. That document will plan for future the housing, economic and infrastructure needs of the city by deciding where and how the city should grow.

4.10 In January 2016, MKC published an important document as its next step to completing Plan:MK. The ‘Strategic Development Directions Consultation’ document set out four possible different ways (or a combination of) that the city can continue to grow by delivering at least 1,750 new homes per year through to 2031. It recognises that the pattern of growth that has characterised the past 30-40 years may not be possible to continue, given physical and environmental constraints.

4.11 One of the development options is focused on making more efficient use of land within the existing city boundaries through redevelopment and infill schemes. It identifies the potential of land in Central MK, redundant employment land and the Regeneration:MK programme to significantly increase the number of homes for the city and reduce the need for greenfield sites outside the city. But it also acknowledges that there will be traffic and infrastructure impacts and the essential ‘New Town’ character may change as a result. The likelihood is that this option will be part of the final plan alongside elements of the other options that are looking at opportunities beyond the city.

4.12 In addition, MKC is thinking about the longer term future of the city through to 2050 (in an initiative called ‘MK Futures 2050’). This recognises that the origins and pace and nature of growth of the city have been unique in the UK. Its place as an increasingly important national city will present challenges for the next thirty or forty years that need to be considered now.

Regeneration

4.13 MKC adopted its Regeneration:MK Strategy 2030 in 2015 that has three goals: to empower people of take ownership of their future; to deliver transformational change in priority neighbourhoods; and to tackle the root causes of poverty by improving access to employment.

4.14 The focus of the strategy is a major 15 year regeneration programme for the city commencing in April 2016 with the launch of a new partnership between MKC and Mears Group plc. The programme is aimed at addressing an aging housing stock, and its social consequences, in particular parts of the city including Woughton. It will include a repairs and maintenance programme for homes that are economic to retain and estate redevelopment schemes for areas where it is uneconomic to retain the existing building stock. The programme also aims to bring significant economic benefits to these areas.

4.15 MKC proposes that the programme will focus on seven areas of the city where the need for regeneration is most acute, four of which are in Woughton, namely Netherfield, Coffee Hall, Beanhill and Tinkers Bridge. In setting up the programme and partnership, MKC has acknowledged lessons from recent similar actions at the Lakes Estate in Bletchley. Notably, it believes a focus on improving only Council-owned property using its own finances will not be sufficient to tackle the root causes of poor health and unemployment in these areas.

4.16 At this stage, it is too early to know what the programme will be for these communities but the Strategy makes clear the potential value in Neighbourhood Plans enabling local communities to play an important part in shaping these decisions in the coming months and years. It is expected that an initial development programme will be published before the end of the first year of the programme in 2017, once an audit of the housing stock in each area has been completed.

4.17 Certainly, the combined scale of these four communities – some 9,000 people – and their close proximity to each other mean that the programme will create potential opportunities for change in Woughton.

The Role of the Neighbourhood Plan

4.18 The Neighbourhood Plan provides the opportunity for the local communities of the parish to shape the future of their area. Whilst the Plan itself cannot decide if the regeneration areas are refurbished or redeveloped, it can set out the principles by which those decisions are implemented. The focus of the Plan is therefore on those four Grid Squares where change is most likely and significant. But that does not mean that it has paid no attention to the rest of the Parish, with a number of policies covering the employment areas at Redmoor and Bleak Hall and the other Squares of Eaglestone, Leadenhall and Peartree Bridge.

4.19 The intention is for this Plan to contain policies that reflect the community's opinions on how Woughton as a whole should change over the next 15-20 years. At the same time, Plan:MK and Regeneration:MK are working on how Woughton might fit into their plans. The goal will be to ensure the MKC documents respond positively to the agenda established by the Neighbourhood Plan, which will set out the expressed preferences of the local community.

4.20 There is no precedent yet for a neighbourhood plan playing this role in this type of situation. The Community Council is therefore working closely with officers of MKC and of the Regeneration:MK partnership to ensure the Plan is as well informed as it can be about their future decisions and vice versa.

TABLE C: NEIGHBOURHOOD PLAN & DEVELOPMENT CONFORMITY SUMMARY

(Note: Core Strategy policies are referenced as 'CS'; Local Plan policies are referenced by other letters, e.g. 'S')

No.	Policy Title & Refs	Commentary
WN1	Distinctive Grid Squares	In seeking to reaffirm the primary roles of each Grid Square in the established functional hierarchy of uses in the city, the policy is consistent with all the Core Strategy policies, and especially the development strategy of CS1. It is also consistent with E1 in protecting employment land at Redmoor and Bleak Hall.
WN2	Medical Facilities	The policy is consistent with CS15 in promoting the high value economic development as part of a cluster focused on the hospital, should land become available at Coffee Hall to do so in the longer term.
WN3	Self-contained Grid Squares	The policy is consistent with CS4, CS12 and CS17 in encouraging each residential Grid Square to become more self-contained. Redevelopment and an increase in the local population may enable more commercial and community facilities to be viable in future, but not at a scale that would be inconsistent with the hierarchy of uses in the city.
WN4	Green Grid Squares	The policy is consistent with CS13 and CS19, and with S12 and L2, in respect of defining a network of green infrastructure assets comprising in part access to the Linear Parks (S12) and protecting some public open spaces (L2). The network will provide the setting for high quality designed places (CS13) by protecting the most important assets (CS19). The definition of the network on the Policies Map focuses on the core land areas and network features – given there are considerable areas of open space that are not covered by this policy in the regeneration Grid Squares, this policy is not inconsistent with CS8 in enabling the viable regeneration of those Squares in the future.
WN5	Play & Activity Areas	The policy is consistent with CS17 and C2 in seeking to prevent the unnecessary loss of valued play facilities and their replacement in safe and convenient locations if they do need to be redeveloped. Not every Area is identified on the Policies Map – there are some that are not considered to be worthy of protection and so the policy is not inconsistent with CS8 in enabling the viable regeneration of those Squares in the future.

WN6	Local Green Spaces	The policy is consistent with CS19 and L2 in seeking to protect those parts of the network of WN4 that are considered to be sufficiently special to the local community to warrant protection from development, no matter are the future regeneration plans. Again, only those spaces that meet the test of the NPPF and are essential for protection are shown on the Policies Map – given there are considerable areas of open space that are not covered by this policy in the regeneration Grid Squares, this policy is not inconsistent with CS8 in enabling the viable regeneration of those Squares in the future.
WN7	Trees in the Public Realm	The policy is consistent with CS19 in respect of protecting the natural environment of the city but also in the ways in which mature trees play such an important role in defining the Grid Squares.
WN8	Community Gardens, Allotments & Orchards	The policy is consistent with CS12 in encouraging future development schemes to make provision for healthier lifestyles in an area lacking this kind of community facility at present.
WN9	Housing Design	The policy is consistent with CS13 and CS19, and with D2, H8 and TC19, in establishing the key design principles on which any future regeneration scheme should be based. The principles are drawn from the distinctive New Town style that characterises the four regeneration Grid Squares (CS13), which are part of the heritage of the city (CS19). They allow for increases in housing density (H8), primarily through the use of current non-developed land but also, to a small extent, through an increase in building heights at specific Local Centre locations (TC19). The principles are not prescriptive in their design guidance (D2) but provide a coherent framework for the key components of the future architecture to ensure any new townscape is special to each Grid Square and not common to any other part of the city. Again, this approach need not hinder the development of innovative and viable regeneration plans (CS8).
WN10	Housing Mix in Regeneration Grid Squares	The policy is consistent with CS10 and H9 in providing for a wide range of housing types and tenures that will broaden the current housing stock of the Parish and of each regeneration Grid Square. The goal is for each Grid Square to be able to meet the needs of its local community through the lifetime of households forming and staying in the area throughout their lives. And, where redevelopment is the focus of regeneration, an increase in the density of new housing will provide opportunities for a wider cross section of the city's demographic profile to live in the area.
WN11	Houses in Multiple Occupation	The policy is broadly consistent with H10 in that it brings into development plan policy the provisions of the HMO Supplementary Planning Document of 2012. However, some parts of the Parish have concentrations of HMOs to an extent that the standard 35% threshold is not relevant. In those cases, the policy proposes a lower threshold of 20% to ensure that the social problems common to concentrations of HMOs in small areas are properly managed.

WN12	Redways & other Footpaths	The policy is consistent with CS11 in protecting a core network of footpaths through the Parish to encourage walking and cycling trips within each Grid Square and beyond to other parts of the city.
WN13	Bus Routes and Facilities	The policy is consistent with CS11 in encouraging the re-routing of bus services into the Grid Squares from around their edges to enable more use to be made of these services. Redevelopment may enable new roads to make this easier for bus operators.
WN14	Competitive Grid Squares	The policy is consistent with CS3, CS15 and CS16 as it encourages greater economic activity at Redmoor and Bleak Hall, which play a strategic role in the city's employment offer.
WN15	Grid Square Local Centres	The policy is consistent with CS12 in bolstering the ability of the existing Local Centres in the Grid Squares to better meet the day to day needs of their local communities. Although one or more may grow in size to meet the demand from larger local populations in the future, none will be inconsistent with the retail hierarchy of CS4.
WN16	Netherfield Local Centre	The policy is also consistent with C12 but acknowledges that Netherfield is a higher order Local Centre than the others. Again, any growth in the scale or variety of commercial uses there will not undermine the retail hierarchy of CS4.
WN17	Educational Facilities	The policy is consistent with CS15 in encouraging further clustering of education facilities at Leadenhall to serve the needs of the local area and of the wider city.
WN18	Community Facilities	The policy is consistent with CS17 in seeking to ensure that any increase in demand for new community facilities can be met within the area and that existing gaps in provision are plugged.
WN19	Primary Schools	The policy is consistent with CS15 in seeking to ensure that any increase in demand for primary school places from the regeneration or other plans can be met by the existing schools in the Parish, which are capable of accommodating that demand between them.
WN20	Regenerate: Refurbished Housing	These policies are intended to shape the principles within which the regeneration programme is planned and delivered in Woughton. As such, they do not have a direct relationship with the Core Strategy or Local Plan policies. However, they are broadly in line with the provisions and ambitions of CS8, which could not have anticipated the potential role that a Neighbourhood Plan could play in helping shape change in places as Woughton.
WN21	Regeneration: Redevelopment	
WN22	Regeneration: Masterplanning	

5. COMPATABILITY WITH EU LEGISLATION

5.1 MKC undertook a screening of the Neighbourhood Plan to determine whether or not a Strategic Environmental Assessment (SEA) would be required in accordance with Regulation 9 of the Environmental Assessment of Plans & Programmes Regulations 2004. It concluded that as the policies are unlikely to have any significant environmental effects then an SEA would not be necessary.

5.2 It consulted the statutory bodies on its draft opinion and they validated this opinion. A copy of the opinion is attached to this statement as Appendix A as the statement of reasons for this determination, in line with PPG paragraph 11-031 and as required by Regulation 9(1). The Neighbourhood Plan has also had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act.