West Bletchley Neighbourhood Plan Review

Consultation Statement

February 2025

1 Introduction

Legal Requirements

- 1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the review of the West Bletchley Neighbourhood Plan. As required by Part 5 of the Regulations, Section 15(2) a consultant statement should contain the following:
- Details of the persons and bodies who were consulted about the proposed Neighbourhood Plan;
- Explain how they were consulted;
- Summarises the main issues and concerns raised by the persons consulted;
- Describe how these issues and concerns have been considered, and where relevant, addressed in the proposed Neighbourhood Plan.

2 The Neighbourhood Plan Area

- 2.1 The review of the Neighbourhood Plan has been carried out by West Bletchley Council, which is the designated qualifying body for the Neighbourhood Area covering the whole of the parish of West Bletchley. The Neighbourhood Area was approved by the then Milton Keynes Council on 10 December, 2013. The first West Bletchley Neighbourhood Plan, was made part of the Development Plan on 20th March, 2015.
- 2.2 The Neighbourhood Area for the West Bletchley Neighbourhood Plan is shown in Figure 1 below:

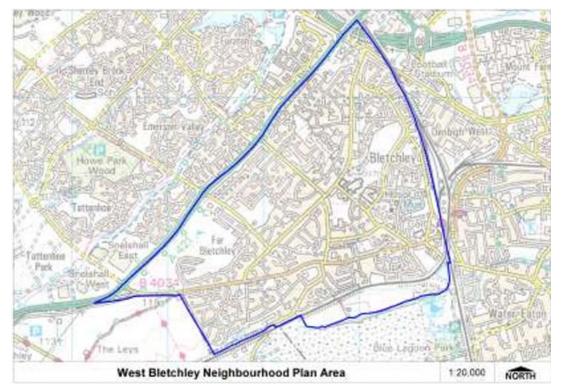


Figure 1: Neighbourhood Plan Area

3 Engagement and awareness raising

3.1 Engagement and awareness raising for the review of the Neighbourhood Plan has made extensive use of the parish council's Open Door parish newsletter. As set out in Section 4 below, during consultation on the Regulation 14 draft revised plan, the newsletter was supplemented by articles in the parish website, social media and the parish noticeboards across the parish area.

Steering Group

- 3.2 A Steering Group comprising parish councillors and representatives from local residents' and community organisations was formed at an early stage in the review of the neighbourhood plan to support the review process. The first meeting of the Steering Group took place on 4 April. The Steering Group received a paper setting out the reasons for the review of the Neighbourhood Plan and the process that was being undertaken. As at 4 April, a review of the plan's evidence base had been carried out, as well as an assessment of the existing neighbourhood policies against the strategic policies of Plan:MK and the NPPF. A table was considered by the Steering Group setting out some proposed changes to the existing policies and background text, together with a justification for the proposed change.
- 3.3 A second meeting of the Steering Group on 1 July 2024 considered an updated table of proposed changes, reflecting the discussion in April, as well as considering a paper on consultation arrangements for the revised neighbourhood plan. The parish council's Environment Committee on 8 July 2024 then considered and approved the proposed changes for final sign-off by Full Council in August.

Open Door parish newsletter

- 3.4 The newsletter is published 4 times a year and is delivered to some 9,500 homes across the parish. It is the main vehicle for communicating events and important information to the community. An example of the newsletter, which illustrates the wide range of information and advice that is typically published in Open Door can be seen on the following link: <u>October 2024 Open Door newsletter</u>
- 3.5 The first article about the review of the Neighbourhood Plan was published in the Open Door edition of October 2023. The review was mentioned in the Parish Clerk's Introduction and there was a one page article announcing the review and providing some background information.

3.6 Further articles about the review of the Neighbourhood Plan were published as follows:

March, 2024 – a one page article updated the progress on the review of the Neighbourhood Plan and announced the appointment of a Steering Group to oversee the work. The article invited anyone to make comments on issues affecting the parish that they would like to see considered as part of the review process. The article is attached at Appendix 1.

May, 2024 – a second article was published in the May 2024 edition of Open Door, again inviting residents to share any views or issues for consideration as part of the review of the plan.

August 2024 – a mention in the Chair's Welcome and a one page article announced the start of the public consultation period on the draft revised Neighbourhood Plan. The consultation period started on 2 September and closed on 31st October. A copy of the article is attached at Appendix 2.

4 Regulation 14 Consultation

- 4.1 The draft revised Neighbourhood Plan was consulted on for 8 weeks from 2 September 2024 to 31 October 2024.
- 4.2 Direct emails were sent to a number of consultees, these are listed at Appendix 3.
- 4.3 The Regulation 14 consultation on the draft revised Neighbourhood Plan was advertised on the parish website: see <u>Review of West Bletchley Neighbourhood</u> <u>Plan (Aug 30, 2024)</u>. This post was kept updated as the review programme progressed.
- 4.4 As set out in Section 3 above, extensive use has also been made of the Open Door newsletter throughout the review of the Neighbourhood Plan, including an article in the August 2024 edition setting out the details of the Regulation 14 consultation and how to make comments.
- 4.5 During the Regulation 14 consultation, in addition to the newsletter and the parish website, the parish council raised awareness and invited comments using their social media channels and posters on the parish notice boards across the parish area.

Social Media

- **4.6** The parish council operates a Facebook and Instagram account; it also runs the Facebook and Instagram sites for The Frank Moran Centre.
- 4.7 During the Regulation 14 consultation on the draft revised Neighbourhood Plan, a series of social media posts were made, to raise awareness of the consultation and invite comments. Posts were published on the following dates:

West Bletchley Council Facebook (<u>www.facebook.com/westbletchleycouncil</u>) and Instagram (<u>www.instagram.com/westbletchleyparishcouncil</u>):

- 2 September
- 14 September
- 5 October
- 14 October
- 20 October
- 28 October

Frank Moran Centre Facebook (<u>www.facebook.com/frankmoranMARC</u>) and Instagram (<u>www.instagram.com/frankmoranmarc</u>) :

- 2 September (Facebook and Instagram)
- 14 September (Facebook and Instagram)
- 14 October (Facebook)

Parish Noticeboards

The Parish council displayed an A4 poster containing the same information as that in the Open Door August 2024 issue at the following noticeboards:

- 221 Whaddon Way WBC offices
- Frank Moran Centre
- Saints estate- St Mary's Avenue adjacent to The Shops
- Racecourses estate Chepstow Community Centre Shops
- Poets estate Outside Holne Chase School
- Fairways estate Walton Heath
- Counties estate Sussex Road/Whaddon Way
- Scots estate Kincardine Drive
- Abbeys estate Melrose Avenue outside Chemist
- Church Green Green Open Space on Shenley Road (near Dover Gate and CGR)
- Castles estate Whaddon Way shopping area
- Rivers estate Trent Road (Open Space Area with Ascot Rail & Litter Bin adjacent to old school site)

External organisations

4.8 The Regulation 14 consultation period and details was publicised by Milton Keynes City Council on its Neighbourhood Planning pages of the Council website, see <u>Neighbourhood Plans in Milton Keynes | Milton Keynes City Council</u> 4.9 Community Action:MK, the infrastructure organisation for the Voluntary and Community section in Milton Keynes also included the details of the consultation in their weekly email newsletter, which is distributed widely across the local VCSE sector.

Responses received

- 4.10 By the close of the consultation period, responses had been received from 6 organisations. Of these, substantive comments were made by Milton Keynes City Council Housing team and by the City Council's Planning team. The parish council response to the consultation comments was considered by the Neighbourhood Plan Steering Group on 26th November, 2024. This resulted in a few further changes to the proposed response and the final parish council response was agreed by the Environment Committee 13th January, 2025. In addition to the changes considered by the Steering Group in November, a few additional updates have been made to the Neighbourhood Plan to reflect the implications of the revised NPPF that was published in December 2024.
- 4.11 The table setting out the comments received during the consultation, the parish council's response to those and how the plan has been amended as a result, is attached at Appendix 4.

5 Conclusion

5.1 The review of the West Bletchley Neighbourhood Plan has been drawn to the attention of the local parish community throughout the review process. The comments received during the Regulation 14 consultation period have been carefully considered by the parish council and a number of proposed changes are to be made to the revised neighbourhood plan as a result.

Open Door Article, March 2024

Review of the West Bletchley Neighbourhood Plan

In the last edition we advised that West Bletchley Council has agreed to review and re-adopt the West Bletchley Neighbourhood Plan.

The Council has accordingly now agreed to appoint a Steering Committee as the project board for this review with membership comprised of appointed Members of West Bletchley Council and representatives from the business, public and voluntary and community sectors.

The Council has also been successful in securing a government grant to enable it to appoint planning consultants, Hyas Associates, to provide independent consultancy support for the review.

The first stages of the review are now underway with a review of wider planning policy, census and other local data to provide updated evidence for the revised plan.

The review process will include a period of consultation with local residents but, in advance of that consultation taking place, anyone wishing to make comments, especially on any new issues affecting the parish that have arisen since the Neighbourhood Plan was adopted, may do so by e-mail to:

admin@westbletchleycouncil.gov.uk

The current West Bletchley Neighbourhood Plan can be viewed at:

https://www.milton-keynes.gov.uk/planning-and-building/planningpolicy/west-bletchley-neighbourhood-plan

Please continue to check the Council's website at <u>www.westbletchleycouncil.gov.uk</u> for further updates.

Open Door newsletter article, August 2024



Statutory consultees for Regulation 14 neighbourhood plan

Schedule 1 of the Neighbourhood Planning Regulations, 2012 (as amended),

Consultation Bodies

Adjoining authorities	County, district and parish councils, where appropriate Buckinghamshire Council: Newton Longville Parish Council Shenley Brook End & Tattenhoe Parish Council: Bletchley & Fenny Stratford Town Council: Milton Keynes City Council:
Homes England	
Natural England	
Environment Agency	
Historic England	
Network Rail	
Highways England	
Telecomms operators	
Health - MK Clinical	Bedford, Luton, MK CCG
Commissioning Group	Northamptonshire CCG
Electricity and Gas	National Grid
companies	Western Power
	Southern Gas Networks
	Cadent
Water and Sewerage	Anglian Water
Canal and Rivers Trust	
Bedford Group of	
Drainage Boards	
Voluntary Bodies	Those local to the parish
	Community Action:MK
	MK Community Foundation
Bodies which represent	Equality Council
the interests of different	

racial, ethnic or national groups in the neighbourhood area;	
Bodies which represent the interests of different religious groups in the neighbourhood area;	Council of Faiths – c/o Co-ordinator St Mary's Church All Saints Church Whaddon Way Church
	St Andrews Baptist Church
Bodies which represent the interests of persons carrying on business in	MK Chamber of Commerce –
the neighbourhood area; and	Bletchley Park Trust:
	MK College:
	SCIoT: Alex Warner, Principal:
Bodies which represent the interests of disabled persons in the neighbourhood area.	Milton Keynes Centre for Integrated Living

Other consultees with a local interest:

Bletchley Park Area Residents Association (BPRA)

Rectory Cottages

Windmill Hill Golf Course

Taylor Wimpey

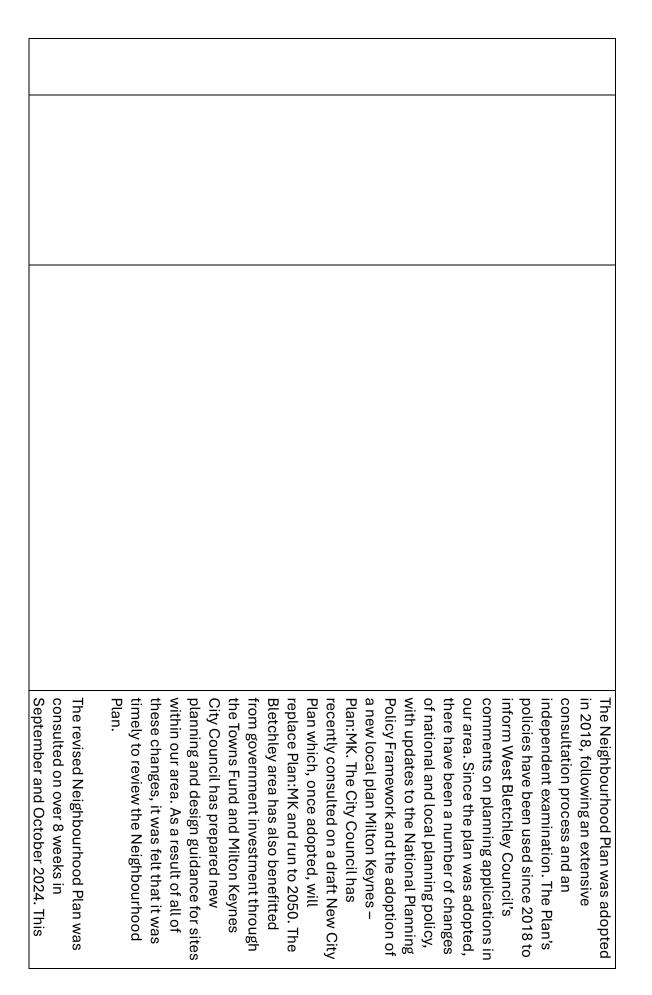
Regulation 14 consultation comments received and the parish council's response to those, setting out how the plan will be changed

Ref 1	Consultee details National Highways
2	Avison Young for National Gas
	Transmission
ω	Avison Young for
	National Grid
	Electricity
	Transmission
4	Anglian Water
ப	MK City Council Housing Strategy team

considerations to that end the Parish	
of this will depend on viability	Affordable housing eligible for grant is:
acknowledges that the achievement	Homes Programme 21-26 managed by Homes England.
social housing <u>, however, it</u>	claim grant for affordable housing through the Affordable
is for these to come forward as 100%	It is possible for registered housing providers to currently
Court, the parish council's aspiration	
Construction Blocks and Mellish	deliver.
"For the redevelopment of the REEMA	preference as well, in reality this would be very difficult to
to add the text underlined below:	rent homes would help meet need and would be our
Amend the last sentence of para 7.3	Policy BH2: Whilst 100% delivery of Reema sites as social
housing will be deliverable	
expectations that 100% social	
to avoid raising unrealistic	
viability considerations is necessary	
Reason: the addition of the caveat re	
3	
those unable to buy."	
ladder and freeing up rental homes for	
helping people onto the housing	
with eligible local connection criteria,	
homes should be reserved for people	
rent homes. These shared ownership	
homes, to cross subsidise the social	
small amount of shared ownership	
the Parish Council will consider a	
viability considerations. To that end,	
achievement of this will depend on	sites will be considered by the council for build or sale.
residents, it acknowledges that the	I point out no plans have been considered as yet on how the
housing to meet the needs of our local	viable.
construction blocks with 100% social	and private sale homes may be required to make the sites

 However, it would be very difficult for a site to be delivered as 100% social rent affordable housing, due to the low rent levels. The payback periods for any borrowing would be extremely long. We find that to make social rent housing delivery work on any site registered providers wish to have a mix of including affordable rent along and shared ownership properties to cross subsidise the social rent homes. Having said that, the new government may amend the grant funding levels on a new programme to be more generous. I think the deliverability of 100% social rent sites will depend entirely on the amendments to the grant funding be worth considering a small amount of shared ownership homes, which could help cross subsidise the social rent homes and could be reserved for people with eligible local connection criteria, helping people onto the unable to buy 	 Affordable housing additional to that in a s106 agreement Affordable housing delivered on a site that is 100% affordable The new government has stated it will support social rent homes above other tenures, and we can be fairly confident that a new grant programme will follow the end of the current one in 2026.
Recommendation : The revised NPPF, published in December 2024, provides greater clarity and support for the delivery of social rent housing. Paragraph 71 in the revised NPPF notes that 'mixed tenure sites can provide a range of benefits, including creating diverse communities and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly or entirely for Social Rent or other affordable housing tenures, from being supported' The proposed changes to the Neighbourhood Plan are in line with	Council will consider a small amount of shared ownership homes, to cross subsidise the social rent homes. These shared ownership homes should be reserved for people with eligible local connection criteria, helping people onto the housing ladder and freeing up rental homes for those unable to buy

	 when the new version of the NPPF appears General: it would be helpful to number separate bullet points in policies Foreword: The authors of the Neighbourhood Plan may wish to amend the Foreword to reflect the position on the NPPF and the MK City Plan 2050. 	2025. Changes to the NPPF and the adoption by MKCC of a new Local Plan are likely necessitate an early review of the West Bletchley Neighbourhood Plan. NPPF paragraph numbers quoted in the Neighbourhood Plan should be checked to see that they have not changed	Wednesday 9 October 2024. The MK City Plan is expected to be adopted in 2026. The Government is also revising the National Planning Policy Framework (NPPF). Following consideration of public consultation responses, a final version of the NPPF is expected to be published either later this year or early in
This is our Neighbourhood Plan for West Bletchley. It is a formal Development Plan, and will help us shape and guide development up to 2040. It will help us to ensure we have sustainable and well-planned development that enhances our community and it will also help us to resist poor developments that would diminish our quality of life.	Noted. Bullets in policies will be amended to use numbers instead. Replace existing Foreword with the following:		0 0



	supported and specialist housing	in the demands associated with the occupiers of the	care providers can sustainably accommodate the increase	supported and specialist housing. E.g. Local primary health	Plan:MK policy HN3 has caveats about the development of		from housing Strategy.	New policy BNH2 – new para is 7.3. See also comments	Strategy Team).	viability considerations (see comments from Housing	percentage of affordable housing on site will depend on	social housing. While this is a Parish Council aspiration, the	replacement of the REEMA construction blocks with 100%	Para 3.10: The Parish Council wishes to see the	Paragraph numbering is out - see pages 19, 20, 21, 22		Figure 5: the numbering is difficult to read		Figure 2: quite difficult to read									
care and care homes, supported and	"The development of sheltered, extra-	part of the policy reads:	Add additional criteria so that this	remove the (iii) numbering.	paragraph within the policy (i.e.	Make point (iii) a standalone		Amend Policy BNH2 as follows:					as already set out above.	Change to final sentence of para 3.9	Noted – this will be addressed.	improve the legibility	Noted – as above, we will try to	legibility for the next version	Noted – we will try to improve the	examination to take place.	arrange for and independent	revised Neighbourhood Plan and	consult on this latest version of the	Milton Keynes City Council will now	from the consultation responses.	further changes to the plan arising	Neighbourhood Plan includes some	submission version of the revised

	specialist housing to meet local need,
	will be supported where:
	a) It is in an area close to and with
	easy accessibility to facilities
	and services for pedestrians
	and those with impaired
	mobility;
	b) It would not result in an over-
	concentration of that type of
	accommodation in that area;
	c) Local primary health care
	providers can meet the
	increased demand on their
	services associated with
	occupiers of such
	accommodation
	Reason: the additional caveats for
	specialist and supported housing
	bring the NP into line with the
	strategic policies of Plan:MK
	(specifically Policy HN3).
Amend para 7.5: This is new paragraph 7.6.	Noted – the locations of the REEMA
	blocks and Mellish Court will be
The REEMA blocks and Mellish Court should be shown on	added to Figure 5.
 the Policies Map.	
 Re: 100% social housing aspiration: Similar comment to	See comments and proposed
one made earlier. While this is a Parish Council aspiration,	additional Background Text above for this issue.

	Policy BP3:	New Policy PR2a: Noted	Policy PR1: Noted										provide some variety.	surrounding area. They actually provide an opportunity to	form of development as the general character of the	garage courts by their nature are appropriate for the same	Policy GC2 redevelopment of garage courts – not sure that		changes or replacement of the current SPD.	date adopted version. That would then cover any future	referred to should be the 2023 standards or the most up to	it is suggested that a note is added somewhere that the SPD	adopted until next year. Where it refers to parking standards,	Standards SPD but a new version is not expected to be	Policy GC2 Background text: MKCC is reviewing its Parking	See also comments of Housing Strategy Team.	viability considerations.	the percentage of affordable housing on site will depend on
Number the putters	Amend Policy BP3 as follows:	No change	No change	Standards should be used.	Reason: to clarify which Parking	Standards SPD 2023,	Keynes City Council's Parking	requirements of the <u>current</u> Milton	change emergency and the	commitments under the climate	In line with the parish council's	delete the struck-through text) :	to read (add in underlined text and	Amend second sentence of para 8.4		the time."	Council Parking Standards in force at	line with the Milton Keynes City	and existing properties is available in	sufficient parking to serve the new	redevelopment for housing that	courts are proposed for	"It is important that where parking	Background Text to read:	Amend first sentence of para 8.4 of			

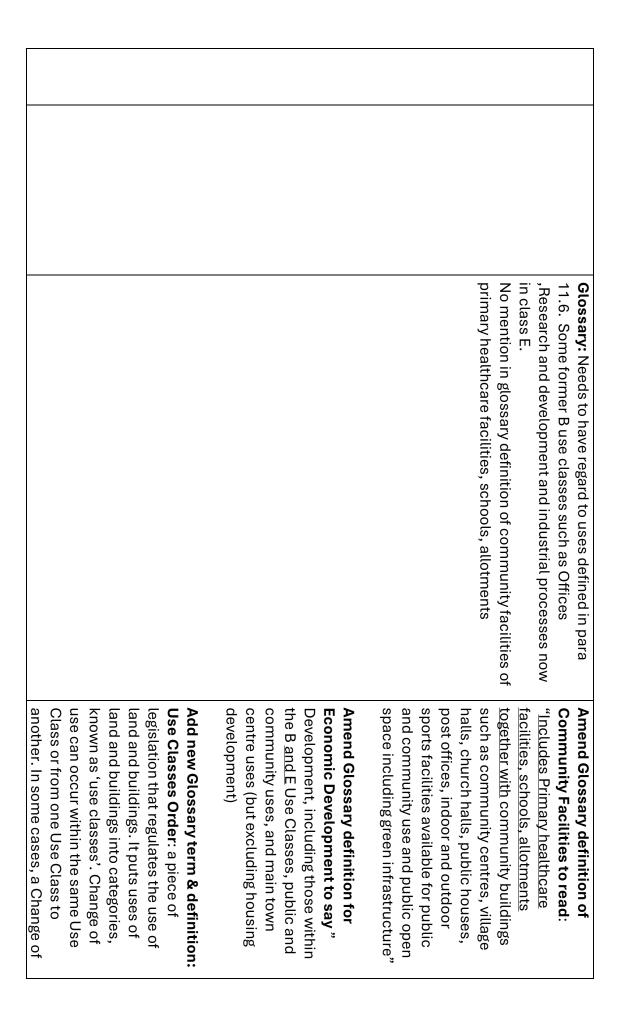
 a) Appendix J on page 278 of Plan:MK identifies policy ER2	Delete the last 2 bullets in the first
 as a strategic policy to be considered when preparing a Neighbourhood Plan. The text to Plan: MK policy FR2	part of the policy to say:
 (Protection of Existing Employment Land and Premises)	<u>"No viable economic use can be</u>
says "in general marketing of a property should be for a	found for the site or building with
The New City Plan proposes to increase the marketing	over at least a period of 2 years at a
period to 12 months. That changed policy will not replace policy ER2 in Plan:MK until the City Plan is adopted.	price that reflects the market value of the asset and its condition and
Lowover in the case of Blotchley Dark the markating of	טוופווווא נוופ וופפווטימ טן נוופ מאפני
buildings on this historic heritage site may take longer than	Replace the entire second part of the nolicy (including the three bullets)
existing Neighbourhood Plan policy. In the circumstances	with the following:
retain the two year marketing period in policy BP3.	"Development Proposals, where all
	the above criteria have been fulfilled,
 b) The last two bullet points should be amalgamated and	should respond to the specific war
should cover: length of marketing, offer at reasonable	une character and appearance of the conservation area having
market value; offering the freehold of the site.	particular regard to factors such as
paragraphs 49 and 50 of HE's Good Practice Advice	layout, plan form, scale, form,
(GPA) Note 2 Managing Significance in Decision Taking	massing, design, appearance, fenestration materials"
and paras 32/33 of GPA4 Enabling Development and	
Heritage Assets Historic England provides useful	Reason : to align the policy criteria
guidance and possible wording for this policy. If you	with Historic England guidance.
require help with the wording of this policy, the	c
Coulicit s meritage and Design Manager witt be able to	
assist.	

	nolicy is how the proposals to enhance the jobs and training	
the policy (where it can be	An additional question raised by the current wording of this	
end of the first paragraph of		
 Add the word 'they' to the 	policy E4 does not appear within the plan.	
Policy E2,	Policy E2: There is a reference to policy E4 in policy E2 but	
	stock of accommodation for smaller local businesses is supported and noted.	
Noted - no change	Chapter 11: The Parish Council's support for preserving the	
Reasons: omitting the date allows for subsequent versions of the Parking Standards to be used.		
Milton Keynes Parking Standards SPD (2016)		
the reference to parking standards as follows (delete 'SPD' and the date) :	latest version, and the Standards are currently being reviewed. It would be better to leave out the date.	
Under the delivery section amend	Page 67 – refers to Parking Standards 2016. This is not the	
	c) Replace this text with: "Development Proposals, where all the above criteria have been fulfilled, should respond to the specific war time character and appearance of this part of the conservation area, having particular regard to factors such as layout, plan form, scale, form, massing, design, appearance, fenestration, materials etc."	

prospects of local people will be monitored and by whom? The Parish Council may wish to reconsider this aspect of the policy and consider deleting this wording.	 delete the first bullet point entirely.
	Reason: Policy E4 no longer exists so reference to it need to be removed from the plan.
Page 71, Community Action: Although the Parish Council	Replace the Community Action
are not proposing any amendment or changes to this text in the WBNP, to avoid any potential misunderstandings	Note after Policy E3 with the following text:
MKCC would comment as follows.	
MKCC is not currently imposing obligations for skills &	developments provide opportunities
training, except for S106 contributions for skills training to	for local people to train and develop
support Further Education through MK College or	their skills. The Parish Council will
provide skills and training opportunities, along the lines	authority to require developers and
identified, as part of their corporate social responsibility	occupiers of new employment
activities.	proposals to provide Section 106
	contributions for skills training to
	Support Further Education through MK
	developers to provide skills and
	training opportunities such as those
	listed below, as part of their corporate
	social responsibility activities:
	 School and college work
	experience placements;

million of funding from the	includes part of West Bletchley) was awarded £22.7 million	
West Bletchley) was awarded £22.7	"In 2021, the Bletchley and Fenny Stratford area (which	
Stratford area (which includes part of		
"In 2021, the Bletchley and Fenny	Bletchley.	
	reflect current projects located within or close to West	
Update para 11.17 to read:	Para 11.17: Suggest para 11.17 be updated as follows to	
	minimum period of 12 months rather than two years.	
	suggest the wording in policy E3 refers to marketing for a	
	be vacant and prone to vandalism. As a compromise we	
	Two years is a long time to market a property, which could	
	replace policy ER2 in Plan:MK until the City Plan is adopted.	
	marketing period to 12 months. That changed policy will not	
	However, the New City Plan proposes to increase the	
years	should be for a minimum period of 6 months.	
period of 12 months instead of 2	strategic policy, suggests that marketing of a property	
refer to a continuous marketing	Existing Employment Land and Premises) which is a	
Amend the first bullet of Policy E3 to	Policy E3: The text to Plan:MK policy ER2 (Protection of	
occupation.		
and skills development during		
 Opportunities for employment 		
employees; and		
 NVQ skills achievements for 		
construction activity;		
employment through		
apprenticeships and		
 Opportunities for 		
schools and colleges;		
support activities through local		
- Construction curriculum		

Page 73, para 11.21 : London Midland is no longer the train operator. Best to just day the trin operator.	Page 72: might be helpful to include a plan showing extent of Station Quarter Opportunity Area, together with the SPD opportunity areas and the development brief site.		of funding from the Government's Town Fund. The funding will be used to deliver a number of projects that will address the challenges that the area faces in terms of skills, economic opportunities, investment, transport and physical connectivity. West Bletchley Council is represented on the Town Deal Board which develops and oversees the delivery of the programme of interventions in the area. Several Town Deal projects are located in West Bletchley including the Tech Park project at the SCIoT, transformation at Bletchley Park and the Transport Hub." NB The transport hub is on the boundary with Bletchley & Fenny Stratford Town Council.
In para 11.21, delete 'London Midland' and remove the brackets around the train operator: revised para to be as follows: 11.21 The Parish Council will work with MKCC, our neighbours Bletchley	Noted – a plan will be prepared to show these areas.	Reason: to provide the most up to date context for the Bletchley towns Fund projects.	Government's Town Fund. The funding will be used to deliver a number of projects that will address the challenges that the area faces in terms of skills, economic opportunities, investment, transport and physical connectivity. West Bletchley Council is represented on the Town Deal Board which develops and oversees the delivery of the programme of interventions in the area. <u>Several Town Deal projects are</u> <u>located in West Bletchley including</u> <u>the Tech Park project at the SCIoT,</u> <u>transformation at Bletchley Park and</u> <u>the Transport Hub."</u>



refe	Sug				
referenced ideally with a link so one can view them.	Suggest documents referred to or listed in the WBNP are				
appropriate	Noted, links will be added where	comprehensive as possible.	Reason: to make the Glossary as	planning permission or prior approval.	Use may require an application for