

West Bletchley Neighbourhood Plan, Reg 16 consultation responses

Bidwells on behalf of Bletchley Developments Ltd and Corte Sports

c/o Suzi Green

Associate, Planning

On behalf of Bidwells' clients, Bletchley Developments Limited & Corte Sports, I submit this response in relation to the proposed modifications to the West Bletchley Neighbourhood Plan Regulation 16 Consultation.

My client is generally supportive of the ability of the local community to shape the vision for their local area and appreciate the thought that has gone into the preparation of the draft plan and its policies.

My client is a landowner within the designated Neighbourhood Plan Area and their site, Land at Water Eaton Road, is directly affected by the proposals set out in the plan (site location plan enclosed).

Below I set out a couple of comments in relation to the draft plan which should be given consideration prior to the draft Neighbourhood Plan being submitted for examination by an Independent Inspector.

Compliance with the Strategic Plan

Under both the made West Bletchley Neighbourhood Plan (March 2019) and emerging review (live Regulation 16 consultation), my client's site, Land at Water Eaton Road, is identified as an existing employment site. Policies E1, E2 and E3 make provision for either the improvement of existing employment sites, new employment development on these sites or for their redevelopment to nonemployment uses.

My client considers that these policies when taken as a collective are inconsistent with the provisions set out in the strategic plan, specifically Policy SD16 'Central Bletchley Prospectus Area' of Plan:MK (adopted March 2019), and the supporting Central Bletchley Urban Design Framework Supplementary Planning Document (March 2022).

My client's site falls within the Central Bletchley Prospectus Area on the adopted Policies Map for Plan:MK. Within this area Policy SD16 applies. This policy does not restrict my client's site to employment uses, but rather allows for its redevelopment to a residential use. This is further reinforced by the Central Bletchley Urban Design Framework Supplementary Planning Document which identifies my client's site for a residential use.

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Policies E1 and E2 are in direct conflict with the strategic plan in attempting to restrict the site to employment use only, despite the provisions of the strategic plan which support its redevelopment to a residential use.

Policy E3 is inappropriate in that it attempts to put more stringent requirements in place than the strategic plan in terms of pursuing a non-employment use on the site.

On this basis, the Neighbourhood Plan does not meet basic condition e for which

Neighbourhood Plans are required to meet (Neighbourhood Planning Practice Guidance, Paragraph: 065 Reference ID: 41-065-20140306); the draft plan should not proceed to independent examination without revision to the identified policies.

Meanwhile Uses

The emerging West Bletchley Neighbourhood Plan should be amended to include a policy which allows for the introduction of meanwhile uses until more permanent development can be delivered.

To clarify, a meanwhile use refers to the short-term use of temporarily empty buildings or land. These can be introduced prior to and during redevelopment activity. In recent years, a range of temporary “meanwhile” uses of vacant sites and buildings have emerged across UK, particularly in London (where there is notably a specific policy encouraging meanwhile uses in the London Plan).

The benefits of meanwhile uses can include:

- Helping to keep an area vibrant and active before permanent development.
- Changes to the perception of a site/unit and its future role, giving it a more favourable image to the market and improving its viability.
- Short and medium-term local job opportunities.
- Supporting small businesses, start-ups and provide space for community uses through the provision of more affordable and flexible business space.
- Increased footfall to neighbouring shops and services.

It is noted that the concept of a meanwhile use is not discussed in Plan:MK or the made/emerging West Bletchley Neighbourhood Plan. As such, this represents a grey area in local/neighbourhood level policy terms. The Neighbourhood Plan review presents an opportunity to provide a clear policy on this matter, particularly given the known viability issues that are associated with the redevelopment of Bletchley and the benefits that meanwhile uses can unlock for the area.

Whilst there is a void in planning policy terms at the local level, National policy and guidance supports the use of meanwhile uses.

Paragraph 03 of ‘Making Effective Use of Land’ Planning Practice Guidance specifically addresses the prospect of meanwhile uses. It states that: *“Temporary uses can help improve the physical appearance of vacant or partially-utilised land or buildings, and provide space for local services and community spaces, businesses and residential accommodation, until more permanent development is delivered.”*

The National Planning Policy Framework (NPPF) (December 2024) is clear that planning policies and decisions should promote an effective use of land.

Paragraph 127 of the NPPF is clear that: *“Planning policies and decisions need to reflect changes in the demand for land...Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:...b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.”*

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Whilst it is recognised that the above paragraph is not directly applicable in the context of the Neighbourhood Plan, the general principle of supporting alternative uses on sites due to a consideration of market circumstances is established through this policy.

There is therefore a strong policy and guidance basis for creating additional flexibility in the

emerging Neighbourhood Plan to allow for meanwhile uses.

My client's site is an example of where a meanwhile use policy would be beneficial. My client is actively seeking to establish a padel centre as a meanwhile use on their land as it is not financially viable to pursue its redevelopment at present. They have undertaken appropriate viability assessment work to demonstrate this.

The proposed use has a social/community function and will promote physical activity, supporting health outcomes. It will also have positive economic impacts e.g. through job creation. The meanwhile use will also provide financial returns in the interim.

Without pursuing a meanwhile use on this site, the land will sit vacant and will continue to have a detrimental impact on its surrounding physical environment. The proposed meanwhile use will activate this site.

My client is in the process of securing pre-application advice from the Council for the meanwhile use and will be seeking to submit a planning application imminently following its receipt. It remains my client's expressed intent to redevelop this site in the future. This represents just one example of where a policy in relation to meanwhile uses would be beneficial in planning terms.

My client would kindly request that the emerging West Bletchley Neighbourhood Plan makes provision in policy to allow for the introduction of meanwhile uses.