

WEST BLETCHLEY NEIGHBOURHOOD PLAN 2025-2040

Submission Draft (January 2025)

REPORT TO MILTON KEYNES CITY COUNCIL

By

Christopher Lockhart-Mummery KC

Independent Examiner

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SUMMARY

I am the Independent Examiner appointed to carry out the examination of the draft West Bletchley Neighbourhood Plan 2025-2040, dated January 2025.

The Plan is a review of the 1st Neighbourhood Plan for the West Bletchley area 2016-2026, made in March 2019.

I was appointed by Milton Keynes City Council with the support of the qualifying body, West Bletchley Council.

I have determined that the proposed modifications to the 1st Neighbourhood Plan do not change the nature of that Plan. Accordingly, this examination is required, but a referendum will not be required.

I conclude that, subject to the very few recommended modifications specified in this Report, the Neighbourhood Plan complies with the statutory basic conditions and meets the other legal requirements.

I therefore conclude that, subject to those modifications being made, Milton Keynes City Council should make this Neighbourhood Plan.

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Introduction

1. I am appointed by Milton Keynes City Council (MKCC) with the support of West Bletchley Council (WBC), the qualifying body, to undertake the independent examination of the draft West Bletchley Neighbourhood Plan 2025-2040, as submitted for examination (the NP).
2. I am an independent King's Counsel with over 50 years' experience of practising in the field of Town and Country Planning. I am a member of NPIERS Panel of Independent Examiners. I am independent of any local connection and have no conflicts of interest.

Background and Scope of the Examination

3. WBC is the Parish Council for the area of West Bletchley. The then Milton Keynes Council, as local planning authority, designated the neighbourhood area, which comprises the whole of the Parish of West Bletchley, on 10 December 2013. The Parish is described in the following terms at paragraph 2.3 of the NP:

The parish is located in the south west edge of Milton Keynes and our neighbours are the separate parish of Bletchley and Fenny Stratford to the east and beyond the Mainline railway, Tattenhoe to the north of the H8 Standing Way, the new estate at Newton Leys built on the former brickfields to the south, and the rural parishes Great Horwood and Great Brickhill, with Newton Longville to the west that are outside Milton Keynes in the Aylesbury Vale area of Buckinghamshire Council. Most of the parish is housing but there are important employment areas in the eastern part near to the Mainline railway station, and we are the home of Bletchley Park, the centre of the Code Breakers in World War II and now a museum and visitor attraction.

As noted above, most of the parish is housing, much of it post-war. A significant feature of the layouts of some of these later estates are garage courts, which are often under-used and in poor condition. The garage courts are the subject of proposed policies in the NP (below).

4. Paragraphs 2.17-2.18 of the NP state as follows:

In 2021, the Bletchley and Fenny Stratford area (which includes part of West Bletchley) was awarded £22.7 million of funding from the then 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 digital 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.

2.18 A number of the Town Deal projects are located within West Bletchley, including the plans for the redevelopment of the former police and fire Stations; transformation at Bletchley Park; the Transport Hub, linked to the delivery of East West Rail and improved fibre connectivity.

5. The 1st neighbourhood plan for West Bletchley (which remains the current NP) is the West Bletchley Neighbourhood Plan 2016-2026 (the 1st NP) which was made in March 2019. It was made following the examination carried out by John Parmiter FRICS FRSA MRTPI, leading to his report to the then Milton Keynes Council dated 21 September 2018. Subject to certain modifications, he recommended that the 1st NP should proceed to referendum.
6. Since the 1st NP was made there have been a number of changes of national and local planning policy, with updates to the NPPF and the adoption of a new local plan Milton Keynes – Plan: MK. The City Council has recently consulted on a draft New City Plan which, once adopted, will replace Plan: MK and run to 2050. The Bletchley area has also benefited from Government investment through the Towns Fund and Milton Keynes City Council has prepared new planning and design guidance for sites within the area.
7. Accordingly, the NP incorporates the revisions to the 1st NP that WBC wish to take forward.

Statutory requirements in relation to a Modifications NP

8. Section 38A(11A) of the Planning and Compulsory Purchase Act 2004 provides that Schedule A2 applies provisions for the modification of a neighbourhood development plan.

9. The relevant provisions of Schedule A2 are as follows. Paragraph 1 provides that a qualifying body can submit a proposal to the local planning authority for the modification of a neighbourhood development plan. Paragraph 7 provides that it applies if “(c) *the authority consider that the modifications contained in the draft plan to which it relates are so significant or substantial as to change the nature of the neighbourhood development plan which the draft plan would replace*”. If that is the position, the authority must consider the plan under the provisions of Schedule 4B that apply to an original neighbourhood plan (including referendum). Paragraph 10 provides that the matter referred to above is the first matter for the examination to determine. Paragraph 11 provides that if the determination is made that the modifications are not such as to change the nature of the plan, “...*the examiner must consider the following –*
 - (a) *whether the draft plan meets the basic conditions (see subparagraph (2));*
 - (b) *whether the draft plan complies with the provision made by or under sections 38A and 38B;*
 - (c) *such other matters as may be prescribed*”.

Paragraph 11(2) provides that the draft plan meets the basic conditions if –

- (a) *having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan,*
- (b) *the making of the plan contributes to the achievement of sustainable development,*
- (c) *the making of the 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),*
- (d) *the making of the plan does not breach, and is otherwise compatible with retained EU obligations, and*

- (e) *prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the plan.*

Paragraph 11(3) provides:

“The Examiner is not to consider any matter that does not fall within sub-paragraph (1) (apart from considering whether the draft plan is compatible with the Convention rights).”

10. Paragraph 12 provides that a hearing is only required *“in any case where the examiner considers that there are exceptional reasons for doing so”*.
11. Paragraph 14 provides that if the examiner recommends that the local planning authority should make the draft plan – with or without modifications – the authority must make the plan. In other words, there is no provision for a referendum.
12. Are the modifications so significant or substantial as to change the nature of the NP? PPG advises that in making this decision the Examiner will consider the nature of the existing plan, alongside representations and the statements of the matter made by the qualifying body and the local planning authority. It is also suggested that allocating significant new sites for development might require both examination and a referendum.
13. A revision NP must be accompanied by a statement setting out the nature of the revisions. The Modification Proposal Statement and Schedule dated February 2025 describes how the revisions have been assessed against the three types of modifications set out in PPG:
 - *Minor (non-material) – do not materially affect the policies of the plan.*
 - *Material which do not change the nature of the plan and would require an examination but not a referendum.*
 - *Material which do change the nature of the plan, requiring both examination and referendum. These could include allocating significant new sites for development.*

14. I reached clear conclusions that (1) the assessments made in the Schedule were justified and (2) that therefore the revisions, where material, were not so significant or substantial as to change the nature of the NP. Both MKCC and WBC concluded in the same terms. I notified my decision on this matter to MKCC on 18 May 2025.

Consideration of the Statutory Requirements

15. I have set out the relevant terms of Schedule A2 above. The statutory tests relate to “*whether the draft plan*” meets the statutory requirements. Paragraph 11(3) provides that the “*draft plan*” means “*a draft of the neighbourhood development plan as proposed to be modified*”. In other words, the Examiner is to consider whether the proposed modifications meet the statutory tests. Accordingly, this examination and my report will consider the modifications only. This approach is consistent with the examination of other revision NPs.

The Examination Process

16. I was appointed on 29 April 2025. I was supplied with electronic links to all relevant documents by email of the same date, showing the documents on the MKCC NP website. Also provided were the regulation 16 representations.
17. Following consideration of all the relevant documents, and having regard to paragraph 12(2) of Schedule A2 (above) I did not consider that there were any exceptional reasons to justify a hearing. I communicated that decision to MKCC on 18 May 2025.
18. Accordingly, the examination proceeded on the basis of the documents only, together with my visit to the area. I carried out an unaccompanied visit on Wednesday 28 May 2025.

Other Statutory Requirements

19. These are set out in the Town and Country Planning Act 1990 (as amended) and sections 38A-38C of the Planning and Compulsory Purchaser Act 2004.
20. The NP was prepared and submitted for examination by a qualifying body: section 38A.
21. It has been prepared for an area designated under section 61G of the 1990 Act.
22. The NP meets section 38A(2) in that it sets out policies in relation to the development and use of land in the neighbourhood area.
23. The NP meets the requirements of section 38B – it specifies the period for which it is to have effect, it does not include provisions about development which is excluded development, and does not relate to more than one neighbourhood area.

Consultation

24. The Consultation Statement February 2025 sets out the consultation undertaken in compliance with the Neighbourhood Plan Regulations 2012. It describes the setting up of a Steering Group and the publicity undertaken in 2024. Regulation 14 consultation was carried out for 8 weeks, 2 September – 31 October 2024. The responses to that consultation, and the resulting amendments, are set out in Appendix 4.
25. In my view the consultation undertaken was adequate and met the statutory requirements.
26. Regulation 16 consultation was carried out between 14 March – 25 April 2025. Twelve representations were made, including a short representation from MKCC. I have carefully considered all these representations.

The Development Plan

27. The 1st NP was prepared to be in general conformity with the Milton Keynes Core Strategy (adopted July 2013). The current applicable development plan for the area (excluding the 1st NP) comprises Plan: MK 2016-2031 (adopted March 2019) and the Site Allocations Plan (adopted July 2018).
28. MKCC undertook regulation 18 consultation in July-October 2024 on a proposed replacement of Plan: MK, the new City Plan to 2050. A revised local development scheme was approved in February 2025. This indicates the intention to undertake regulation 19 consultation in the period September – October 2025. An examination is anticipated in the period April – December 2026. No date for adoption is presently indicated.

National Policy and Guidance

29. The current NPPF was issued in December 2024. National policy advice is provided in relevant sections of PPG.

Basic Conditions Statement

30. The BCS (to which further reference is made below) rightly assessed the NP against the latest (and current) national policy (NPPF December 2024) and local plan (Plan: MK).

Strategic Environmental Assessment and Habitats Regulations Assessment

31. Annex 1 to the BCS exhibits the Screening Statement carried out by MKCC dated June 2024. Having particular regard to the fact that the NP proposes no development allocations, the Screening Statement concluded that neither SEA nor Appropriate Assessment was required. I have no reason to doubt these conclusions.

Human Rights and Surviving EU Obligations

32. I have no reason to believe that making the NP would breach or be incompatible with the European Convention on Human Rights or surviving EU obligations.

Assessment of NP

33. As stated at paragraph 15 above, this examination is concerned to test the draft revisions against the basic conditions and other statutory requirements. It does not revisit the 1st NP in that context, so that where the policies of the 1st NP are unchanged in this NP (or are merely the subject of minor or updating revisions), no comment is made in this report.
34. The first examiner concluded (paragraph 15.1 of his report) that the 1st NP was well-presented and clear. He recommended a number of changes to improve the 1st NP yet further. The resulting high standard has been carried forward into this NP. I congratulate all those involved in the production of a very well-presented and clear NP. It is also concise, according with specific advice in PPG. The very high standard of this NP has resulted in my ability to produce this concise report.
35. I highlight the few modifications I recommend in the style **Recommend**.
36. The Foreword contains a concise description of why this NP has been produced. It twice uses the term “adopted” in relation to the 1st NP, whereas the correct term is “made”. This minor error also occurs in other sections of the NP. I **Recommend** that, to conform with the statutory background, these errors should be corrected. Likewise, there are references to the 1st NP being made/adopted in October 2018, whereas the correct date is March 2019. These should be corrected.

Part One

37. The Introduction, Section 1, is clear and sets the local plan context for the NP. In paragraph 1.11, to comply with the Habitats Regulations, after the last word there should be inserted “or Appropriate Assessment”. I so **Recommend**.
38. Section 2, West Bletchley Today, clearly sets out the context for the NP. It contains appropriate updating of the equivalent section in the 1st NP, and I have no comment (save to applaud the high quality mapping and other visual material, seen throughout the NP).
39. Section 3, Key Issues and Opportunities, introduces the concept of MKCC’s proposal, announced in November 2023, to relocate tenants out of the REEMA blocks by the end of 2028 (REEMA construction is a system of building using prefabricated reinforced concrete panels. They are susceptible to damage from the weather over time). Paragraph 3.9 refers to the wish of WBC to see the replacement of the REEMA blocks with 100% social housing. Recognising that this will depend on viability considerations, WBC would consider a small amount of shared ownership homes for cross-subsidy purposes. The reflection of this topic in policy is dealt with in paragraphs 45-47 below.
40. The REEMA sites and Mellish Court are listed on page 41 and shown on Figure 5 “Our Strategy”.

Part Two

41. Section 4, Key Vision and Strategy, is largely unchanged from the 1st NP. In the Vision section, paragraphs 4.1-4.6, a new statement is introduced (paragraph 4.6) addressing climate change and biodiversity.
42. Section 5 sets out Our Ten Key Objectives. Objective 10 is new, addressing the topics in paragraph 4.6 of the text.

Part Three – Policies

43. Section 6, Introduction, updates the previous text.
44. Section 7, addresses Building New Homes. The revisions proposed in this section raise the following topics. First, the new policy in Plan: MK dealing with affordable housing – Policy HN2 – is referred to. Developments of 11 or more homes are required to provide 31% as affordable housing, 5% of which are to be provided at a level broadly equivalent to social rent. WBC's aspiration is for the redevelopment of the REEMA blocks and Mellish Court to come forward at 100% social housing. Second, it is acknowledged that the achievement of this will depend on viability; to that end a cross-subsidising element of shared ownership homes will be considered. The residential development of the REEMA blocks is addressed in paragraph 7.6 as an element of future housing provision.
45. Three policies – BNH1 – BNH3 – are linked to this text. BNH1 is largely unchanged from the first part of Policy BNH1 in the 1st NP. Policy BNH2 is an expansion of the latter part of Policy BNH1 in the 1st NP, relates to specialist housing, and is entirely appropriate. It is consistent with Policy HN3 of Plan: MK.
46. Policy BNH3 is a new policy and relates to the Redevelopment of the REEMA blocks and Mellish Court. It re-states the wish of WBC to see 100% social housing. But it does not reflect viability considerations flagged in the text (paragraph 7.3).
47. The absence of any reference to viability considerations is not consistent with Policy HN2D of Plan: MK (and its supporting text). It is not consistent with the deliverability objectives of national policy and guidance. It is inconsistent with the supporting text in paragraph 7.3. It therefore would not comply with the basic conditions. I therefore **Recommend** that the following should be added to the end of the second sentence of BNH3:

Acknowledging viability considerations, a small amount of shared ownership homes may be permissible to cross-subsidise the social rent homes.

48. Section 8 is concerned with Regenerating the Garage Courts. The text is unchanged from the 1st NP, save that paragraph 8.5 updates the situation with respect to the courts in Berwick Drive. Policy GC1 is unchanged. Policy GC2 contains a slight elaboration by reference to the West Bletchley Character Assessment December 2017. No issues arise in relation to these minor changes.
49. Section 9 is titled Protecting and Renewing Our Parks, Gardens and Public Spaces. Paragraph 9.4 reflects the findings of the West Bletchley Habitat Survey Biodiversity Study (2020), and paragraph 9.5 the Green Infrastructure Strategy February 2024. A new policy is introduced, PR2a, directed to the protection of existing green infrastructure. It is an entirely appropriate policy, consistent with national policy and the local plan.
50. Policy PR3 addresses Local Green Space. Nine LGS's are identified, with no changes from the 1st NP. The former policy was defective in not having a linked development management policy. This is now corrected in appropriate terms.
51. Section 10 addresses Bletchley Park. The text is updated, including a reference to the award to the Bletchley Park Trust of £2.24m from the Town Deal. Minor changes are proposed to Policy BP3, which raise no issues for this examination.
52. Section 11 is titled Retaining and Creating New Employment. A paragraph, paragraph 11.6, is added to the text dealing with recent changes to the Use Classes Order. This is also reflected in changes to Policy E2 and E3.
53. Policy E1 is unchanged from the 1st NP. There are minor changes to Policies E2 and E3 (including a desirable clarification ["or"] in Policy E3, and further

detail as to the nature of marketing required. In my view the changes proposed accord with the basic conditions.

54. The second part of Section 11 addresses the Bletchley Station Quarter Opportunity Area. The text is updated to refer to Policy SD16 of Plan: MK, the Central Bletchley Prospectus Area, the implications of the funding from the Town Fund as they relate to West Bletchley, and the Milton Keynes City Council Central Bletchley Urban Design Framework Supplementary Planning Document, and the development brief for the former police and fire station site (November 2022). The related policies BS1-BS4 are unchanged from the 1st NP.
55. Section 12 is concerned with Reviving Our Local Shopping Centres. The only change to the text (paragraph 12.7) reflects changes to the Use Classes Order. Policy LSC3 now reflects the wish to protect local shops as well as support them.
56. Section 13 is concerned with Protecting and Developing Community Facilities. The text is changed to refer to changes to the Use Classes Order, to add post offices as community facilities, and to indicate that not all community facilities are shown on Figure 5 (page 40). The list on Figure 5 is extended to refer to an additional 7 facilities. Criterion 2 of Policy C1 (marketing) is amended to incorporate reference to price (the requirement for a 12 month marketing period is unchanged).
57. Section 14 relates to safe and accessible streets. The title to Policy SSA1 is changed, and the policy incorporates reference to the environmental impacts of additional traffic (consistent with national policy). Policy SSA3 now incorporates reference to the access needs of all potential users.
58. In Section 15, there are no changes to the Design Policies, D1 and D2.
59. There are minor changes to Part 4 (Implementation and Monitoring) for the purposes of updating and to reflect the changes to the policies.

Conclusions and Recommendations

60. As I stated earlier (paragraph 34) the very high quality of the 1st NP and the changes proposed in this NP have enabled this report to be relatively brief.
61. I have already concluded that the proposed modifications to the 1st NP are not so significant or substantial as to change the nature of the NP.
62. I agree with the assessments and reasons set out in the Modifications Schedule. There will be no need for a future referendum.
63. I also agree with the assessments and conclusions in the Basic Conditions Statement, subject to the minimal number of modifications recommended in this report.
64. Subject to those modifications, I **Recommend** that MKCC should make the draft plan with the modifications specified in this report.
65. I am grateful for the assistance I have received from MKCC, and for the preceding work of WBC.

Christopher Lockhart-Mummery KC

Examiner

June 2025