

NEIGHBOURHOOD PLANNING OFFICER DECISION			
DECISION REQUIRED <i>(please tick one box)</i>			
Designate a Neighbourhood Forum		Agree comments on a pre-submission plan	
Designate a Neighbourhood Area	X	Agree comments on a submitted plan	
Whether to accept and publicise a Submitted Plan		Agree the appointment of an Examiner	
Whether to decline or accept a repeat proposal		Agree actions to take following an Examiner's report	
Whether to modify a Plan or Order			
LOCATION/ PARISH			
		Bletchley & Fenny Stratford	
DATE RECEIVED			
		12 February 2020	
DEADLINE FOR DECISION <i>(where Regs require this)</i>			
		22 May 2020	
LEAD OFFICER			
		David Blandamer	
ISSUES/COMMENTS <i>(including details of any consultations undertaken and any comments received)</i>			
<p>Bletchley and Fenny Stratford Town Council has submitted an application to Milton Keynes Council to designate their parish area as a Neighbourhood Area. The application has been made in accordance with Regulation 5 of the Neighbourhood Planning (General) Regulations 2012.</p> <p>In accordance with Regulation 6 of those Regulations (as amended by Regulation 2 of the <i>Neighbourhood Planning (General) (Amendment) Regulations 2015</i>), Milton Keynes Council published the area application, and held a six week public consultation between February and March 2020. The application was advertised on the Council's website and consultation finder, in the Council's internal Councillors News communication, and through direct emails to all Ward Councillors, all Parish and Town Councils, and affected neighbouring Local Planning Authorities.</p> <p>Three responses to the consultation were received (see attached table).</p> <p>In reaching its decision on a neighbourhood area application, a local planning authority should consider:</p> <ul style="list-style-type: none"> • the statement accompanying the application, • the desirability of designating the whole of the area of a parish as a neighbourhood area, • any representations received during the consultation period and, • whether it is appropriate to define the area as a business area under Section 61H of the Act. <p>In parished areas, the legislation recognises that the parish council's administrative boundaries will form logical boundaries for neighbourhood planning unless circumstances dictate otherwise. In this case, part of the parish area, the Lakes Estate,</p>			

already has a made neighbourhood plan. The Town Council has therefore proposed to designate the whole of the parish area, apart from the Lakes Estate.

Officers are satisfied that the Bletchley & Fenny Stratford Parish area represents a coherent, consistent and appropriate area for the purpose of neighbourhood planning. Whilst there are employment areas and Bletchley and Fenny Stratford town centres within the neighbourhood area, the overriding character of the area as a whole is residential. Consequently, it is not considered appropriate to designate the area as a business area under Section 61H of the Act.

It is therefore recommended that the neighbourhood area for Bletchley & Fenny Stratford, as proposed by the Town Council, is designated.

BACKGROUND DOCUMENTS: *(insert hyperlink to files on L drive)*

<\\Mkc\dfs01\Shared\Planning\Development Plans\Localism Act\Neighbourhood Plans from non frontrunners\Bletchley & Fenny Stratford\Neighbourhood Area Designation>

DECISION TAKEN: To approve the Neighbourhood Area for Bletchley & Fenny Stratford, as proposed by Bletchley & Fenny Stratford Town Council, in accordance with Section 61G of the Town and Country Planning Act, 1990 (as amended).

SIGNED:



Tracy Darke - Director Growth, Economy and Culture

DATE: 1 May 2020

Representations on Bletchley and Fenny Stratford Neighbourhood Area

Name	Representation	Response
Aylesbury Vale District Council	As this is a Neighbourhood Area with no details of the plan that will come forward, we just acknowledge receipt for now and have no comments on the area being designated other than it is relatively close to communities in parishes in the Aylesbury Vale area. Therefore, we look forward to being consulted at the Pre-Submission stage so we can influence the plan that comes forward. Depending on what is in the plan that comes forward Buckinghamshire Council (which replaces AVDC on 1 April 2020) may have representations to make at the next stage.	Noted.
Dawn Brady	Having looked at all your documents which are not very clear to the normal citizen, I wonder if you have any concerns for the extra flats and houses you are planning on building in Fenny Stratford. We already have a major problem with parking and you are planning on another possible 68 dwellings that I know of and others I have heard rumours of, which in turn could be a possible 136 cars needing parking spaces in what used to be a quiet little nice place to live. Already they park on pavements and despite repeated requests nobody does anything about it so what chance having all the extra cars also we do not have enough infrastructure for more housing, we can wait three weeks for a doctor's appointment now, with hundreds more people it is going to turn into chaos.	The current consultation is to agree the boundary for the Neighbourhood Plan. It is not a consultation on the Neighbourhood Plan itself.
Savills, on behalf of Adil Catering Ltd	<p>Administrative Boundaries</p> <p>The proposed catchment area does not cover a neighbourhood, rather it encompasses a significant amount of land with many varying characteristics and predominant land uses. Within the PPG for Neighbourhood Plans, administrative boundaries are referred to as a guideline to follow when deciding the appropriate boundaries of a Neighbourhood Area (Paragraph 033, Reference ID: 41-033-20140306). The proposed Area does not follow this guidance, instead extending beyond the administrative boundary of the Bletchley East and Bletchley Park Ward. This demonstrates that the proposed B&FSNP Area is too broad, covering two administrative boundaries wards and areas of different characteristics and communities. Accordingly, the Area cannot reasonably be considered to constitute one neighbourhood, rather multiple neighbourhoods combined.</p> <p>Settlement Boundaries</p>	<p>For town or parish councils, there is a presumption that the neighbourhood area will be the same as the parish boundary. Where a parish council applies for the whole of the area of the parish to be designated as a neighbourhood area, the local planning authority must designate the whole of the area applied for.</p> <p>Consequently, it is already accepted that the parish</p>

Representations on Bletchley and Fenny Stratford Neighbourhood Area

	<p>As well as administrative boundaries, paragraph 033 of the PPG references how settlement boundaries should also be considered when developing the proposed neighbourhood plan catchment Area. The B&FSNP proposes a catchment Area covering at least four settlements including, but not exclusively, Lakes Estate, Water Eaton, Fenny Stratford and Bletchley Town Centre. Each of these areas have differing characteristics from one and other and should be regarded as different neighbourhoods in their own right.</p> <p>The inclusion of this many of neighbourhoods within a single proposed plan Area is considered to be both contrary to the Act but also unfeasible in terms of appropriately defining the needs of residents (as the Area contains too many residents to define such needs) and therefore impossible to shape and respond to such needs through the neighbourhood planning process. Thus, the proposed B&FSNP Area does not accord with the Act nor PPG guidance set out within paragraph 33.</p> <p>Population Size</p> <p>The size of the population (living and working) in the area is also referenced as a guideline for the boundaries of a Neighbourhood Plan. Electoral Boundaries, or wards, are cited as being an appropriate size of a neighbourhood area. The average population of an electoral boundary is specified as being 5,500 residents. Using the 2011 census as a basis, the population of Bletchley East alone is predicted to now be 15,366. As Bletchley East only makes up a proportion of the proposed B&FSNP catchment area it is reasonable to assume that the population of the whole catchment Area is in fact over triple the recommended population guidance of a Neighbourhood Plan Area, as listed within paragraph 33 of the PPG. We therefore consider that as well as being too broad in spatial terms, the B&FSNP catchment Area also spans across too many residents to reasonably suggest that the area comprises one whole neighbourhood.</p> <p>Local Land Uses and Walking Distances</p> <p>Lastly, the catchment area for walking to local facilities (shops, schools and amenities) and whether the area is wholly or predominantly a business area are outlined as guidance to where the Neighbourhood Plan Boundary should be located. As the below extract from the local plan policy map shows, the proposed B&FSNP Area encompasses:</p> <ul style="list-style-type: none">• Town centres comprising a mix of town centre uses;	<p>area (and not wards) is the most appropriate boundary for a Neighbourhood Plan. Part of the parish, the Lakes Estate, already has a made Neighbourhood Plan, and so it makes sense to exclude that area from the proposed Bletchley & Fenny Stratford Neighbourhood Area.</p>
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Representations on Bletchley and Fenny Stratford Neighbourhood Area

	<ul style="list-style-type: none">• Primary Shopping Areas and frontages;• Allocated employment areas;• A football stadium; and• Multiple shopping and Leisure areas; <p>In terms of walking distances to facilities, it would take approximately an hour to walk from Newton Leys to the Asda Milton Keynes Supercentre. Similarly, it would take approximately half an hour to walk from Bletchley Train Station to Fenny Stratford Train Station. These distances and walk times illustrate that the facilities contained within the proposed Area are not located within proximity to one and other such that they can be considered to comprise a neighbourhood and again indicate that the proposed Area is much too broad.</p> <p>Furthermore, as well as some of the land uses being a substantial distance from each other, the land use characteristics vary too much within the proposed Area to constitute one whole neighbourhood. As well as encompassing the primary shopping areas, allocated employment areas and leisure areas as allocated within the proposals map, the proposed B&FSNP Area also covers areas of industrial parks of employment use.</p> <p>The option of seeking to designate the area as a Business Neighbourhood Plan was considered by the Bletchley and Fenny Stratford Town Council, but it was concluded <i>that the character of the [whole] parish is that of a mixed residential and commercial area</i> as outlined within the B&FSNP Area adoption statement.</p> <p>The Town Council has conceded that the proposed Area contains a wide variety of mixed residential and commercial uses and we consider this to further demonstrate that the size of the proposed Area is too great and should instead be refined, focussing on smaller-scale, neighbourhood specific catchments and themes.</p> <p>In grouping together large areas characterised by both employment and residential uses, the proposed plan Area becomes counter-productive to its original intent, which is to facilitate sustainable development at a neighbourhood level and respond positively to the Government's agenda for growth, according with the tests of 'soundness' as established in the National Planning Policy Framework (NPPF) (2019).</p>	
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Representations on Bletchley and Fenny Stratford Neighbourhood Area

	<p>Conclusion</p> <p>For the reasons set out within this representation, we consider that the proposed B&FSNP Area would be at odds with the Localism Act (2011), supporting planning guidance in relation to the production of Neighbourhood Plan Areas and ultimately, does not pass the tests of 'soundness' as established in the National Planning Policy Framework</p> <p>We therefore consider that the application for the Neighbourhood Plan Area in its current form should be withdrawn and revised to respond to the comments set out within this letter.</p>	
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