

Section 13 (1) of Schedule 4B of the Town and Country Planning Act 1990.

Summary of Representations received to Consultation on changes to the Stony Stratford Neighbourhood Plan following receipt of the Examiner’s report and Milton Keynes Council’s response.

Respondent	Summary of comments	Milton Keynes Council response
Historic England	We note the Council’s intention to accept all the examiners recommendations and we welcome and support the additional text and changes proposed by the Council.	Noted and welcomed.
Andrew Ray Local resident	<p>High Street – whilst the plan commendably aims to retain the commercial activities in the High Street, but if this is unsuccessful then conversion of empty premises to residential would be the way forward. Plan B would be to allow the change of use to residential of the period properties to create high quality residential accommodation and shape the quality of the remaining commercial offering.</p> <p>There should be a presumption against the conversion to residential of upper floors of properties that have the potential to be converted to dwellings (rather than just upper floor flats). The development of gardens at the rear of High St properties should also not be allowed.</p> <p>Plough Corner – the proposed shared surface between Horsefair Green and Russell Street would exacerbate the existing ‘hanging around’ space around “takeaway corner”, which is already subject to low grade anti-social behaviour late in to the night at weekends. The shared surface could create conflicts between pedestrians and motorists and there would be a risk to young children travelling through the area.</p>	<p>The current consultation on the neighbourhood plan for Stony Stratford seeks comments on some additional changes to the plan over and above those recommended by the independent planning examiner. No additional changes to Policy 1 are proposed at this stage.</p> <p>With regard to the need for flexibility to allow conversion of redundant commercial unit to residential properties the neighbourhood plan, which has been through two previous consultations and an independent examination, seeks a different approach, namely support for the commercial activities. It is not recommended that the plan’s policies be changed at this stage, as this would require further work and consultation which would delay the adoption of the plan. It is recommended that Neighbourhood Plans are reviewed every 5 years or so and if, at the point of review, the economic situation has changed, then the Town Council would be able to consider a different approach.</p> <p>With regard to Plough Corner, the proposed amended policy seeks to improve the attractiveness of this area. The</p>

		<p>redesign on the London Road/ Wolverton road junction is no longer part of the policy but is now identified as a future aspiration and would only come forward in conjunction and with the support of Milton Keynes Council as the local highway authority.</p>
<p>Michael Moutrie</p>	<p>There are a number of errors in the maps which need to be corrected:</p> <ul style="list-style-type: none"> • Map 2 omits the Primary Shopping Area and part of the Town Centre Area including the northern part and south of Market Square and conflicts with the town centre map in the Milton Keynes Policies Map October 2017 which is part of Plan:MK; • Map 3B is different to the map of Land off the High Street in the Milton Keynes Policies Map October 2017; • Map 4 omits several buildings that were part of the original Cofferridge Close scheme and are apparently now to be included in policy 2; • the southern boundary on map 5 copies the incorrect Town Centre Area boundary on map 2 and runs through buildings; • Map 9 is not consistent with policy 9 although it appears that the policy is to be significantly changed requiring a new map 9 anyway. • Map 12 omits part of the Sports Ground (and most of the Open Space in the Parish as shown in the Milton Keynes Council Open Space Assessment November 2017) • The lack of a comprehensive Proposals Map is a significant defect and one should be produced for the Referendum 	<p>Although the majority of the map based recommendations from the Examiner have been addressed in Version 20 of the neighbourhood plan, there are a number of further changes that will be made to the maps prior to the final referendum version of the plan being published. These comments are useful to highlight areas that need to be addressed.</p> <p>Whilst well advanced, Plan:MK has not yet been submitted nor adopted and so the Neighbourhood Plan has to demonstrate its conformity with the current adopted Development Plan for the area which comprises the Core Strategy (2013) and the Milton Keynes Local Plan (2005). Whilst there are some differences between some plans and some of the policies in the neighbourhood plan and Plan:MK it would be counter- productive at this stage to change the neighbourhood plan as further modifications to Plan:MK might still arise through the examination process.</p> <p>A proposals map would be helpful, although this was not required by the Examiner. Whilst he updated maps within the plan will ensure that the spatial elements of policies are</p>

		clearly shown a Proposals Map will be prepared to accompany the Neighbourhood Plan.
	<ul style="list-style-type: none"> I support the changes proposed by Milton Keynes Council to policies 2, 3, 4 and 9 published November 29, 2017. They appear to improve Version 20 but for a variety of reasons the Plan would now benefit from even further changes. 	<p>Noted.</p> <p>The consultation on the proposed additional changes was not intended to open up the opportunity for wider revisions to the neighbourhood plan which is substantially advanced in its preparation process. Further changes of the type suggested below would require the plan to go back to a draft consultation stage and a second submission. A number of the comments made could be considered as revisions and amendments to the neighbourhood plan once it has been made. It is recommended that neighbourhood plans are reviewed regularly so that they can remain up to date as national and other local planning policy changes.</p>
	<ul style="list-style-type: none"> When Plan:MK is approved it will take precedence despite the statement in para 3.6. It would be useful to identify any conflicts or significant variations, and either update the Neighbourhood Plan accordingly or recognise those policies which will not apply once Plan:MK is approved. 	<p>Plan:Mk will take precedence over the neighbourhood plan where there is a conflict between policies.</p> <p>As noted above, as some elements of Plan:MK could yet change as a result of modifications arising from its examination, it would be worth waiting for Plan:MK to be adopted before considering which, if any policies in the neighbourhood plan, are superseded by the new local plan. This could be done as an update to the Neighbourhood Plan and published on the Town Council and MKC website or as part of an early review of the neighbourhood plan.</p>

	<ul style="list-style-type: none"> The Urban Capacity Study February 2017 and the more recent Strategic Housing Land Availability Assessment, part of the Plan:MK process, consider several sites in Stony Stratford for residential development including U94 at Queen Eleanor Primary School. This is similar to the undefined Southern Gateway proposed in policy 9. The SHLAA concludes that the Southern Gateway is undeliverable and undevelopable. The site should be removed from policy 9. 	<p>As above, it is not recommended that the neighbourhood plan is changes to accommodate Plan:MK at this stage.</p> <p>The SHLAA identifies available sites for housing across the borough and does not preclude development coming forward. Encouragement for development at the Southern Gateway in the neighbourhood plan could encourage development to come forward there.</p>
	<ul style="list-style-type: none"> Policy 9 supports the conversion of the Doctors Surgery (i.e. Health or Medical Centre) into a hotel or similar. This assumes relocation to Cofferridge Close which may have been possible in 2011 but I am not currently aware of any such proposal. However a new health facility is to be established in the near future in nearby Whitehouse and this policy therefore not only approves relocation from Stony Stratford in principle but also creates “hope value” on the existing site. It is doubtful that the qualification of relocating the Health Centre to Cofferridge Close would carry much weight in considering any planning application for conversion of the site. It would therefore be prudent to remove the site from policy 9 and rely on policy 3 to protect it. 	<p>Agree with the issue raised, suggest replacing the caveat in Policy 9 “(if the practice is relocated to part of the main Cofferridge Close buildings)” with revised wording “(if the practice is relocated <i>elsewhere within the town centre</i>)” to be consistent with Policy 3.</p>
	<ul style="list-style-type: none"> The Plan does not address a number of planning consents eg: - the St. Giles site (ref 15/00670/FUL) and the subsequent construction which renders redundant the statement in policy 9. The St. Giles site should be removed from policy 9. - the consent (ref 15/00268/OUT) for residential development at the Fullers Slade Local Centre which 	<p>With regard to the St Giles site it is recommended that this site be removed from Policy 9.</p> <p>The reference to the other two sites in Policy 9 could remain unchanged as the consents are yet to be implemented.</p>

	<p>requires policy 6 to be updated including recognition of the other existing uses. - the consent for application 14/00955/FUL may require policy 4 (The Plough site) to be updated.</p>	
	<ul style="list-style-type: none"> • The requirement in policy 2 for signage consistent with the rest of the town is well intentioned but maybe this is the opportunity to restore the original signage, or similar, which was rather more distinctive than the existing. 	<p>This matter goes beyond the remit of the current consultation and would require a more comprehensive review of the neighbourhood plan. The wording in question was added by the Examiner.</p>
	<ul style="list-style-type: none"> • The single most important development proposal in Stony Stratford over the next few years is the “regeneration” of Fullers Slade. The Plan might have discussed key issues such as the decision making process and the provision of actual affordable housing, although such items are more likely Community Aspirations than Neighbourhood Plan policy. • Nevertheless the Plan could provide planning policy for consideration of any redevelopment such as: density; retention and provision of Open Space; retention and provision of amenities; building style, height, layout. However it has little to say and it is apparent from paras 9.6 & 9.7 that it has even less to say now: these evidently refer to former policy, now removed. 	<p>It is unfortunate that the neighbourhood plan does not address the regeneration proposals at Fullers Slade, however these proposals have emerged since the neighbourhood plan was submitted and examined.</p> <p>As explained above, to introduce new policies at this stage would require a fundamental review of the plan, taking it back to a pre-submission consultation stage. On balance, as the neighbourhood plan is well advanced, it is better for the neighbourhood plan to be progressed to referendum as it is, with the Town Council considering how it may provide support to the community of Fuller Slade with regard to the regeneration programme there.</p>

	<ul style="list-style-type: none"> • Previous versions of the Plan confused Community Aspirations with the requirements of a Neighbourhood Plan. Version 20 appears to distinguish the two elements throughout the document. However a Referendum or approval by Milton Keynes Council will, in practice, be only of the Neighbourhood Plan and not of the Community Aspirations. • It would therefore be sensible to transfer all of the Community Aspirations into a separate Annex or Appendix that can be removed or set aside for the Referendum but retained by the town council as a programme of work for the near future. 	<p>This is an issue relevant to many neighbourhood plans, however, in this case, it is considered that the policies in the neighbourhood plan are clearly identified and that information at the referendum stage can make it clear that it is the adopted Plan's policies that will be used when making decisions on planning applications.</p>
	<ul style="list-style-type: none"> • The anomalies in paras 9.6 and 9.7 suggest that the final document would benefit from a thorough proof read. 	<p>Noted.</p>
<p>CBRE Ltd, on behalf of Yorkshire & Clydesale Bank Pension Trustees Ltd</p>	<p>Our comments relate to the following policies: Policy 2 – Cofferridge Close; and Policy 9 – Development Proposals.</p> <p>The most relevant planning history of Cofferridge Close is the appeal decision issued in 2013. The Inspector dismissed the appeal. The Inspector was not opposed to the principle of redevelopment. Rather the grounds to dismiss the appeal largely focussed on the nature and design of the scheme, which was considered inappropriate in a conservation area.</p> <p>Our Client considers that Cofferridge Close, in its present mixed-use form, has reached the end of its economic life, and</p>	<p>Noted</p>

	<p>as such the emerging Neighbourhood Plan must not unduly limit the site’s commercially viable redevelopment potential in the future. Furthermore, our Client recognises that any replacement building/development should be appropriate to its location within the conservation area and in the context of any nearby listed buildings.</p>	
	<p>Policy 2 – Cofferridge Close Policy 2 of the Stony Stratford Neighbourhood Plan directly concerns our clients site, Cofferridge Close. It is wholly included within the Stony Stratford Conservation Area. The periphery of the site also includes a Grade II listed residential terraces and entrance archway at 7 – 23 Silver Street.</p> <p>We disagree with the proposed new wording for the introductory paragraph to this policy, in particular the final sentence which includes reference to the unlisted remainder of Cofferridge Close being considered as a ‘non-designated heritage asset’. We would recommend that this final sentence be deleted.</p> <p>This part of the site (which is the main part of Cofferridge Close) is not locally listed, not included in any local Historic Environment Record (HER) and not identified in any conservation area appraisal / character assessment. In the 2013 appeal decision referenced previously, and which was issued post publication of the NPPF, the Inspector did not refer to the site as being a non-designated heritage asset. The additional text has also not been proposed as a modification in the Examiner’s Report. Additionally, it would appear</p>	<p>The proposed new wording to the introduction to the policy has been included to enhance the way in which the neighbourhood plan addresses heritage matters.</p> <p>Neither the NPPF nor the NPPG require LPAs to identify non designated heritage assets in local lists or otherwise, albeit it is acknowledged that inclusion on a local list is helpful in the interests of transparency and sound strategic planning.</p> <p>Milton Keynes Council is preparing a local list and it is expected that Cofferridge Close will be included given its historical significance and relationship to the listed buildings.</p> <p>The purpose of this consultation was to consult on proposed additional changes to the Neighbourhood Plan over and above those modifications already recommended by the Examiner.</p>

	<p>contradictory to define the site as a non-designated heritage asset and then go on to provide for its redevelopment in the policy.</p>	
	<p>CBRE supports the proposed modification to remove the prescriptive 3-storey height limit criterion from the Cofferridge Close Policy. This change could allow for more imaginative design responses without being unduly constrained by a rigid height limit.</p> <p>The additional (replacement) criterion requiring scale and height to be consistent with existing buildings is considered unnecessary and should be deleted (and again has not been proposed as a modification in the Examiner’s Report).</p> <p>As with the deleted criterion, if rigidly applied the proposed new criterion could also curtail otherwise appropriate high-quality designs for the site. The key design test is implicit in the expanded first bullet point of the policy which requires new development to preserve and enhance the conservation area and setting of any adjoining listed buildings.</p>	<p>Noted.</p> <p>The proposed replacement of the 3 storey limit with the policy requirement for redevelopment to be of a scale and height that respects and is consistent with the existing surrounding buildings is considered to be more flexible than an absolute height limit.</p>
	<p>With regards to the expanded first bullet point in the policy, we consider that it would be more appropriate for it to read ‘preserve <i>or</i> enhance ...’ rather than ‘preserve <i>and</i> enhance’ as this would better accord with case law and other legal requirements concerning heritage assets.</p>	<p>The wording of the first bullet point in Policy 2 was added by the Examiner (ie it is not a change that has been proposed in the consultation) and is considered to be the most appropriate wording.</p>

	<p>Cofferidge Close is a central element in relation to commercial and employment activities within the town and as such a balanced approach must be considered when weighing up the benefits of development proposals alongside the preservation of a built form, which has been the subject of significant alteration since it was built. This will include the consideration of the wider economic policies of the Core Strategy (2013) of the Local Planning Authority, Milton Keynes Council, such as Policy CS15 which outlines the aspirations of Milton Keynes to develop as a major city with a highly skilled workforce and deliver economic prosperity.</p>	<p>Noted.</p>
	<p>The policy criterion dealing with retention of current green space in the site cross-refers to Policy 13. Notwithstanding our comments made previously objecting to such a requirement, the correct policy reference (based on the submission version of the Plan) should be Policy 15.</p>	<p>The Examiner's report recommends the deletion of Policies 11 and 14 in the original submission neighbourhood plan. The subsequent re-numbering of the policies has resulted in Policy 15 becoming Policy 13 in the final version of the plan.</p>
	<p>Policy 9 identifies the site of the existing doctor's surgery between Market Square and our Client's site as having the potential for B1 (Business) Use or C2 (Hotel) use. However, the planning use class for Hotel under the Town and Country Planning (Use Classes) Order 1987 is identified as C1.</p>	<p>Noted, this will be corrected.</p>
	<p>Consideration could be given to rewording that the additional text proposed for the adjacent Doctor's Surgery site so that it is more succinct. It is already noted that development should respect the conservation area and reference to matters of specific design detail could limit more imaginative design responses which could still contribute to the conservation</p>	<p>The proposed additional wording is intended to provide clarity for prospective developers by highlighting key elements that any new development should address.</p> <p>Given the unsympathetic appearance of the current doctors' surgery building within the conservation area, the policy</p>

	<p>area. Additionally, in line with our comments to Policy 2, we would recommend that reference is also made to preserving or enhancing the conservation area in the criterion.</p>	<p>seeks to ensure that any new development has a beneficial effect on the character of the conservation area.</p>
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