

## **West Bletchley Neighbourhood Plan Review**

### **Regulation 15: Basic Conditions Statement**

# 1 Introduction

- 1.1 This statement has been prepared by West Bletchley Council in support of the formal submission of the revised West Bletchley Neighbourhood Plan to the Local Planning Authority, Milton Keynes City Council. The submission has been made under Regulation 15 of the Neighbourhood Planning (General) Regulations, 2012 (as amended) and explains how the basic conditions of neighbourhood planning and other considerations as prescribed by Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 have been met.
- 1.2 Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 requires that Neighbourhood Development Plans must meet the following basic conditions:
  - (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
  - (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
  - (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
  - (d) the making of the order contributes to the achievement of sustainable development,
  - (e) the making of the order 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),
  - (f) the making of the order does not breach, and is otherwise compatible with retained EU obligations, and
  - (g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.
- 1.3 This Basic Conditions Statement addresses these requirements in Section 3. The review of the West Bletchley Neighbourhood Plan is supported by a Consultation Statement and this Basic Conditions Statement.

## 2 Background

- 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 20<sup>th</sup> March, 2015.
- 2.2 The Neighbourhood Area for the West Bletchley Neighbourhood Plan is shown in Figure 1 below:

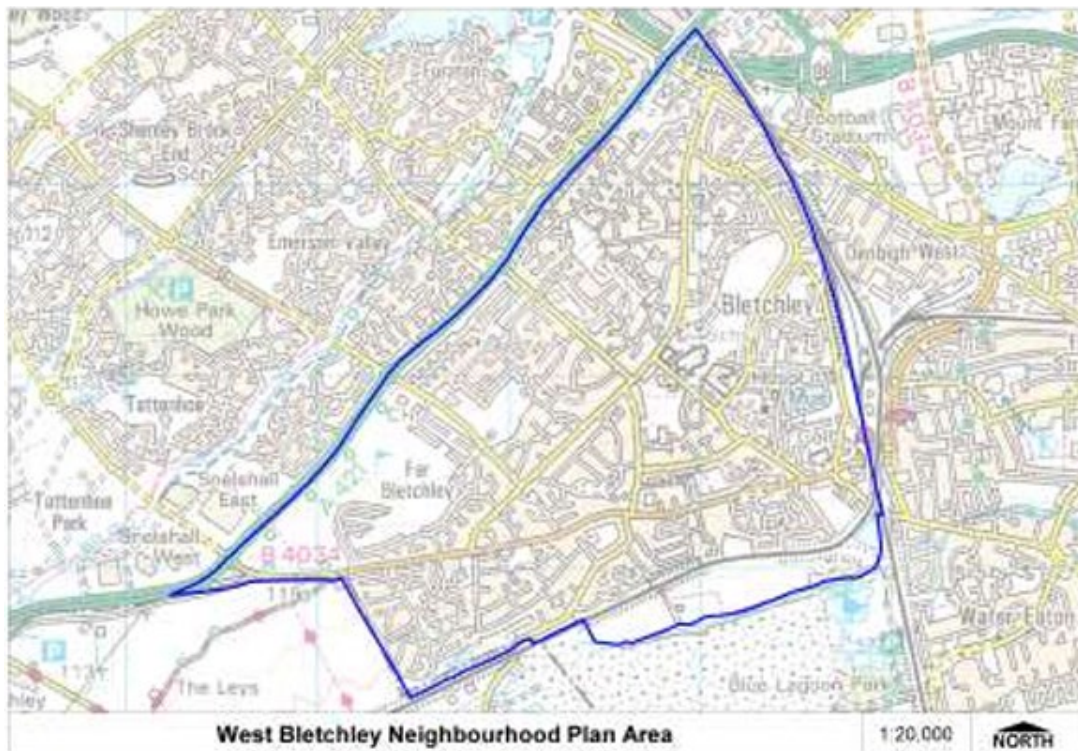


Figure 1: Neighbourhood Plan Area

- 2.3 The made Neighbourhood Plan covers the period from 2016-2026 and was prepared to be in general conformity with the strategic policies in the Core Strategy (adopted July 2013), which was subsequently replaced by Plan:MK in 2019. WBC wanted to undertake a review of the Neighbourhood Plan to ensure that an up to date plan is in place by 2026.
- 2.4 The current Development Plan for Milton Keynes comprises Plan:MK covering the period 2016-2031 (adopted in March 2019) and the Site Allocations Plan (adopted July 2018).
- 2.5 Preparation of the 'New City Plan' is currently underway which will take forward Milton Keynes' City Council's Strategy for 2050. The City Council consulted on a Regulation 18 version of the plan over the period July to October, 2024. The Local Development Scheme anticipates consultation on a Regulation 19 version of the New City Plan in February/March 2025 followed by submission by the end of May 2025.
- 2.6 Since the Neighbourhood Plan was made, there have been a number of changes to national and local planning policy as well as the publication of strategies and guidance of relevance to the WBC area, including the approval of a Town Deal for Bletchley and Fenny Stratford and the adoption of the Central Bletchley Urban Design Framework Supplementary Planning Document (SPD) in 2022. New socio/economic challenges have arisen associated with the impact of the Covid 19 pandemic, cost of living crisis and there is increasing awareness and the need for action to address the climate emergency. Some important elements of the context for the West Bletchley Neighbourhood Plan have, therefore changed or evolved since the plan was prepared.
- 2.7 In summer, 2024, the new Labour government consulted on changes to the NPPF. The revised NPPF was published in December 2024. This Basic Conditions Statement uses the latest version of the NPPF.
- 2.8 In view of the changes that have taken place since the original Neighbourhood Plan was made, the decision to proceed with a review of the made Neighbourhood Plan was made by West Bletchley Council on 26 June, 2023.
- 2.9 A Neighbourhood Plan Steering Group (NPSG) was formed by the Parish Council, comprising Parish Councillors and members of the local community.

- 2.10 West Bletchley Council approved the Regulation 15 Submission Version Neighbourhood Plan on the 24 February 2025. The Regulation 15 revised Neighbourhood Plan has been prepared having regard to the latest National Planning Policy Framework, December, 2024, and the strategic policies of the Milton Keynes Local Plan 'Plan:MK', adopted on the 20th March 2019 covering the period to 2031.
- 2.11 The Parish Council has worked with officers of Milton Keynes City Council during the preparation of the Neighbourhood Plan to ensure the relationship between the Neighbourhood Plan and the policies of 'Plan:MK' have been properly understood.

### 3 Assessment of the Basic Conditions

3.1 The following assesses the Neighbourhood Plan against the basic condition requirements contained within the Town Planning Act 1990, Schedule 4, Part 8:

***(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,***

NP Policy	National Planning Policy Framework Section & paragraph number	Comment
BNH1	2, Achieving sustainable Development – para 8; para 11.  3. Plan-making – para 18, 29, 30,31  5, Delivering a sufficient supply of homes – 61, 69, 71, 73, 74  12. Achieving well-designed places	The three policies in the NP chapter 7, Building New Homes support the achievement of NPPF paragraph 8, especially the social objective which seeks to support strong communities by ensuring a sufficient number and range of homes can be provided.  The policies of the neighbourhood plan are non-strategic, in line with the NPPF guidance on plan-making, and reflect the particular local circumstances of the West Bletchley Council area.  With regard to NPPF Section 5, the NP seeks a range of housing types and tenures and supports the delivery of affordable housing, the parish council has an aspiration to see 100% social housing delivered where existing homes owned by MKCC are redeveloped.
BNH2		
BNH3		
GC1	11. Making Effective Use of Land - 124, 125, 126, 130  12. Achieving well-designed places – 135	Section 8 of the NP – Regenerating the Garage Courts, supports the redevelopment of derelict and under-used garage courts to deliver new homes and community facilities. The NP policies support the guidance in the NPPF to develop brownfield land (especially in Section 11 of the NPPF). NP Policy GC2 seeks to achieve appropriate densities in any redevelopment by setting out a number of criteria including scale, density, layout, as well as directing developers to have regard to the West Bletchley Character Assessment; this approach aligns with that in NPPF para 130 and Section 1 ` 2, Achieving well-designed places. .
GC2		
PR1	8. Promoting healthy and safe communities – 96  14. Meeting the challenge of climate	The NP policies seek to protect and enhance the provision of open space areas within the parish area and support the regeneration of Rickley Park. This approach is consistent with NPPF para 96 c) - provision of safe and accessible green
PR2		
PR2a		
PR3		

	<p>change, flooding and coastal change – 164</p> <p>15. Conserving and enhancing the natural environment - 188</p>	<p>infrastructure, amongst others, to support healthy lives and address inequalities. NP Policy PR2 supports the delivery of new green infrastructure and the protection of existing, alongside new development. This aligns with NPPF para 164.</p> <p>NP Policy PR2a, seeks to protect existing green infrastructure and support the creation of new green corridors both within the parish and supporting links to the wider green infrastructure network. This approach is consistent with NPPF para 188.</p>
BP1	<p>16 . Conserving and enhancing the historic environment - 202</p> <p>9 . Promoting sustainable transport - 109</p>	<p>The NPPF sets out a framework for conserving and enhancing heritage assets. The Bletchley Park policies seek to protect the heritage assets associated with the wartime code breaking base at Bletchley Park. The policies also support the ongoing development of Bletchley Park as a museum and visitor facility. This approach is considered to be consistent with the NPPF policy and guidance.</p> <p>Policy BP2 aligns with para 109 in that it supports improvements to access to Bletchley Park and seeks to encourage sustainable transport modes.</p>
BP2		
BP3		
E1	<p>6. Building a strong, competitive economy – 85, 86</p>	<p>The NP policies support improvements to existing employment sites and buildings; NP Policy E2 sets out criteria to be used when considering proposals for new employment development in the parish. Policy E3 seeks to ensure that any proposals for the loss of an employment use is justified. Overall, the NP policies are consistent with the NPPF para 85, in particular, in that they help to create the conditions under which businesses in the parish can thrive.</p>
E2		
E3		
BS1	<p>6. Building a strong, competitive economy – 85, 86</p> <p>12. Achieving well-designed places – 131, 132</p> <p>9 . Promoting sustainable transport - 109</p>	<p>The Station Quarter policies set out the framework for achieving high quality regeneration of the Bletchley Station area. The policies are consistent with the NPPF approach to building a strong competitive economy, as well as supporting the creation of a well-designed place, by having regard to the approved Central Bletchley Urban Design Framework SPD and the approved design brief for the redevelopment of the police and fire stations.</p>
BS2		
BS3		
BS4		
LSC1	<p>7. Ensuring the vitality of town centres</p>	<p>The NP policies set out a framework for promoting new shops, improving existing shopping provision and supporting new retail</p>
LSC2		
LSC3		

LSC4	8. Promoting healthy and safe communities – 96, 98	provision in the Station Quarter area. This approach aligns with the NPPF section 7, as well as section 8, helping to maintain healthy communities by ensuring the availability of accessible local shops and services
C1	8. Promoting healthy and safe communities – 96, 98, 100	The NP seeks to protect existing community facilities and support the delivery of new facilities that meet the needs of existing and new residents. This approach is consistent with Para 96 of the NPPF seeks to achieve healthy, inclusive and safe places including by supporting places for people to meet and interact; the provision of high quality public space and a range of local shops and facilities.
C2		
SSA1	9 . Promoting sustainable transport - 109, 111  12. Achieving well-designed places  8. Promoting healthy and safe communities	The NP seeks to ensure that the streets in West Bletchley remain accessible for all groups of the community; supporting the modernisation of Bletchley train station. This approach is consistent with the NPPF, particularly with regard to promoting sustainable development but also achieving good design and healthy communities.
SSA2		
SSA3		
D1	12. Achieving well-designed places	The NP seeks to ensure that the parish’s special buildings and character are protected for future generations and that high quality development is achieved. This approach aligns with the NPPF’s policies for achieving well-designed places.
D2		



***(b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,***

3.2 The Neighbourhood Plan chapter 10 sets out policies to support the conservation and enhancement of the heritage assets at Bletchley Park, home of the Code Breakers. The NP policies have been reviewed by the Milton Keynes City Council Conservation Officer during the Regulation 14 consultation stage and some changes have been made to the policies as a result. On that basis, the NP is consistent with the aims of this clause.

***(c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,***

3.3 The Neighbourhood Plan chapter 10 sets out policies to support the conservation and enhancement of the heritage assets at Bletchley Park, home of the Code Breakers, which lie within the Bletchley Conservation Area. The Design Policies, D1 and D2 also seek to enhance the character of the parish. The NP policies have been reviewed by the Milton Keynes City Council Conservation Officer during the Regulation 14 consultation stage and some changes have been made to the policies as a result. On that basis, the NP is consistent with the aims of this clause.

***(d) the making of the order contributes to the achievement of sustainable development,***

- 3.4 The NPPF states in paragraph 7 that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (NPPF, Para. 8).
- 3.5 The strategic objectives of the Neighbourhood Plan comprise a balance of economic, social and environmental roles. The economic role has been met by supporting the creation of new employment opportunities and businesses and the protection of existing businesses through the Employment policies.
- 3.6 The social role includes the support for local shops and community facilities within the parish, through the shopping policies and the community facilities policies.
- 3.7 The environmental role has been delivered by the protection of the natural environment and historic environment, including the Conservation Area, and Listed Buildings at Bletchley Park. New development is required to demonstrate good design and the plan encourages the provision of accessible and sustainable transport.

**(e) the making of the order 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),**

3.8 The strategic policies in the Development Plan are set out in the adopted Plan:MK, dated March 2019.

NP Policy	Plan:MK Strategic Policy	Comment
BNH1	DS1 – Settlement Hierarchy SD1 – Place-making principles for development D1 – Designing a High Quality Place	<p><b>Policy DS1</b> directs the majority of new development to Milton Keynes city – Bletchley is not referred to specifically in Table 4.2, but most development is likely to come forward through brownfield regeneration and redevelopment. The policy BNH1 would support such regeneration and redevelopment.</p> <p>Policy SD1 sets out detailed placemaking principles. BNH1 aligns with the policy, especially criteria 2 and 4.</p> <p>Policy D1 – Policy BNH1 aligns with this policy, especially criterion 1</p>
BNH2	HN1 – Housing Mix and Density HN2 – Affordable Housing	<p>The NP Policy BNH2 aligns with Policy HN1 in seeking a range of types and tenures. It also conforms to Policy HN2 in that it requires affordable housing to be delivered at a level that conforms to the local plan policy requirements.</p> <p>Whilst not a strategic policy for Neighbourhood Planning, Plan:MK Policy HN3, sets out requirements for supported and specialist housing which aligns to BNH2.</p>
BNH3	DS1 – Settlement Hierarchy HN2 – Affordable Housing	<p>NP Policy BNH1 would support regeneration and redevelopment in line with Policy DS1.</p> <p>Neighbourhood Plan Policy BNH3 seeks the redevelopment of the REEMA sites and Mellish court site. The parish council wishes to see 100% social housing delivered on these sites.</p> <p>The aspiration for 100% social housing does not conform to the affordable housing mix required by Policy HN2.</p> <p>The comments from MKCC planning team and the housing strategy team on the Reg 14 consultation version explain why 100% social housing is unlikely to be delivered due to the lack of viability. Additional text has therefore been</p>

		added to the Neighbourhood Plan to acknowledge that the parish council might consider the addition of some market housing in order to enable the delivery of social housing. The revised NPPF of December 2024 also places a greater emphasis on the delivery of social housing than has been the case previously.
GC1	SD1 – Place-making principles for Development HN1 – Housing Mix and Density HN2 – Affordable Housing	The policies for the Garage court areas reflect the specific issues present within West Bletchley and the parish council’s attempt to address them. The requirements for redevelopment of these sites are in conformity with Plan:MK policies for the design and delivery of new development.
GC2		
PR1	NE4 – Green Infrastructure INF1 – Delivering Infrastructure	The Neighbourhood Plan policies are consistent with the relevant strategic policies in Plan:MK with regard to the provision and protection of green infrastructure, open space and the enhancement of the green infrastructure network across the city.
PR2		
PR2a		
PR3		
BP1	HE1 – Heritage and Development	The Neighbourhood Plan policies are consistent with the requirements of Plan:MK Policy HE1 to protect and enhance listed buildings and conservation areas.
BP2		
BP3		
E1	ER1 – Employment Sites within the borough of Milton Keynes ER2 – Protection of Existing Employment Land and Premises ER5 – Protection of Small Business Units	The Neighbourhood Plan policies seek to protect and enhance the existing employment sites within the parish. The policies also support the creation of new employment sites and provide criteria to manage proposals that would result in the loss of employment sites to other uses. The approach of the Neighbourhood Plan policies is consistent with the strategic employment policies of Plan:MK.
E2		
E3		
BS1	SD16 – Central Bletchley Prospectus Area SD1 – Place-making principles for Development ER2 – Protection of Existing Employment Land and Premises	The Neighbourhood Plan policies support the redevelopment of the Station Quarter area, consistent with the requirements of Plan:MK Policy SD16 and the subsequently produced Central Bletchley Urban Design Framework Supplementary Planning document.
BS2		
BS3		
BS4		
LSC1	ER9 – Character and Function of the Shopping Hierarchy	The Neighbourhood Plan seeks to promote, retain and enhance local
LSC2		

LSC3	ER11 – Protection of Local Shops, Post Offices, Banks and Public Houses ER13 – Non-retail uses in local centres within the City	shopping facilities to serve the local community of West Bletchley. As such, the plan’s approach is consistent with the strategic policies in Plan:MK, especially those that seek to protect the character and quality of local shopping areas. The Neighbourhood Plan also seeks to ensure that new local retail opportunities are of an appropriate scale to serve and enhance the railway station and the needs of travellers.
LSC4		
C1	CC2 – Location of Community Facilities (non-strategic) CC3 - Protection of Community Facilities (non-strategic) CC4 - New Community Facilities	The Neighbourhood Plan seeks to protect existing community facilities from redevelopment to non-community uses. It also supports the provision of new community facilities. This approach is consistent with the approach in Plan:MK, especially the need for full consideration of proposals before new alternative uses can be accepted.
C2		
SSA1	INF1 – Delivering Infrastructure CT1 – Sustainable Transport Network CT2 – Movement and Access CT3 – Walking and Cycling (non-strategic)	The Neighbourhood Plan seeks to ensure that the network of local roads and streets remains attractive and safe for a wide range of users, including cyclists and pedestrians. This approach is consistent with Plan:MK that promotes the use of travel modes other than the private car and applies a transport user hierarchy.
SSA2		
SSA3		
D1	D1 – Designing a High Quality Place D2 – Creating a Positive Character (non-strategic) D3 – Design of Buildings (non-strategic) D4 – Innovative Design and Construction (non-strategic)	The Neighbourhood Plan seeks to protect, conserve and enhance buildings and their surroundings/ The approach and the Design and Amenity requirements of NP Policy D2 are consistent with the Design policies in Plan:MK.
D2		

***(f) the making of the order does not breach, and is otherwise compatible with, retained EU obligations***

3.9 Milton Keynes City Council have considered the Neighbourhood Plan to determine the need for a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

3.10 They have also addressed the need for Appropriate Assessment, in accordance with European Directive 92/43/EEC, commonly known as the Habitats Directive.

3.11 The requirement for a Strategic Environment Assessment (SEA) is set out in the “Environmental Assessment of Plans and Programmes Regulations 2004”. There is also practical guidance on applying European Directive 2001/42/EC produced by the ODPM (now DCLG)<sup>1</sup>. These documents have been used as the basis for this screening report.

3.12 The assessment concluded that:

“Having screened the West Bletchley Neighbourhood Plan and consulted with Historic England, Natural England and the Environment Agency, it is the view of Milton Keynes City Council that the Plan’s effects are unlikely to have any significant impacts beyond the Neighbourhood Area and it is considered that overall the Plan will not have significant effects on the environment. It is, therefore, concluded that the West Bletchley Neighbourhood Plan does not need to be subject to Strategic Environmental Assessment.”

3.13 A copy of the Screening Statement for SEA and Appropriate Assessment from Milton Keynes City Council dated June 2024 is appended to this document at Annex 1. The Parish Council considers that the review of the West Bletchley Neighbourhood Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. The Plan has been subject to extensive engagement with those people local to the area who could be affected by its policies and their views have been taken into account in finalising the Plan.

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

3.14 The Neighbourhood Plan has been prepared in accordance with the requirements of the prescribed conditions set out in the Neighbourhood Planning (General) Regulations 2012 and the Localism Act 2011.



## 4 Conclusion

- 4.1 The Basic Conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the review of the West Bletchley Neighbourhood Plan and all the policies contained therein.
- 4.2 It is therefore respectfully suggested to the Examiner that the review of the West Bletchley Neighbourhood Plan complies with Paragraph 8(1)(a) of Schedule 4B of the Act.

# Annex 1:

## Screening Statement for Strategic Environmental Assessment and Appropriate Assessment, Milton Keynes City Council, June 2024

### West Bletchley Neighbourhood Plan Strategic Environmental Assessment Screening Statement Appropriate Assessment Screening June 2024

#### 1. Introduction

##### 1.4 What is the Screening Opinion?

2.4 This report has been produced to determine the need for a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

3.4 This document also addresses the need for Appropriate Assessment, in accordance with European Directive 92/43/EEC, commonly known as the Habitats Directive.

##### 1.4 Why has a revised screening opinion been prepared?

1.5 A screening opinion for the West Bletchley Neighbourhood Plan was previously undertaken in February 2017. Following adoption of the Neighbourhood Plan in March 2019, the Council wishes to update the Neighbourhood Plan. The update includes new policies on the redevelopment of Reema apartment blocks, and protecting open space, but there are no new allocations proposed.

#### 4.4 What is the Neighbourhood Plan trying to achieve?

The Neighbourhood Area covers the whole of the West Bletchley Parish Council Area (Appendix 1). The Neighbourhood Plan sets out eight broad objectives:

- Building New Homes
- Renewing Parks, Gardens and Open Space
- Conserving and developing heritage of Bletchley Park
- Creating New Employment
- Reviving Local Shopping Centres
- Protecting and Developing Community Infrastructure

- Ensuring Streets are Safe and Accessible
- Promoting High Quality and Sustainable Design

5.4 The made Plan does not allocate any new areas for development. Instead, it supports the redevelopment of old garage courts, local shopping centres and development of Bletchley Station and the surrounding area. The Plan also supports the continued conservation and heritage development of Bletchley Park and its setting.

**2. Policy context**

2.1 Plan:MK was formally adopted March 2019. Plan:MK provides the statutory land use planning framework for Milton Keynes.

2.2 Although the Neighbourhood Plan must be in general conformity with the strategic policies of the Local Plan and the Core Strategy, it can promote more development, but must not propose less. It will also provide a more local context to the non-strategic policies of the Local Plan.

2.3 The Neighbourhood Plan will be subject to public consultation in accordance with the relevant regulations prior to its adoption.

**3. SEA Screening**

3.1 The requirement for a Strategic Environment Assessment (SEA) is set out in the “Environmental Assessment of Plans and Programmes Regulations 2004”. There is also practical guidance on applying European Directive 2001/42/EC produced by the ODPM (now DCLG)<sup>11</sup>. These documents have been used as the basis for this screening report.

3.2 Neighbourhood Plans must be screened to establish whether or not they will require Strategic Environmental Assessment. The ODPM practical guidance provides a checklist approach based on the SEA regulations to help determine whether SEA is required. This guide has been used as the basis on which to assess the need for SEA as set out below.

Figure 1: Establishing the need for SEA

Figure 2: Establishing the need for SEA of the Neighbourhood Plan

Stage	Answer	Reason
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<p><b>1. Is the NP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament of Government? (Article 2(a))</b></p>	<p>Yes</p>	<p>It will be prepared by the Parish Council and adopted by Milton Keynes City Council under the 2012 Neighbourhood Planning Regulations.</p>
<p><b>2. Is the NP required by legislative, regulatory or administrative provisions? (Article 2(a))</b></p>	<p>Yes</p>	<p>Although there is no requirement to produce a Neighbourhood Plan, they are subject to formal procedures and regulations laid down by national government. In light of the European Court of Justice ruling in the Case C-567/10 it is considered that this means the NP is 'required'.</p>
<p><b>3. Is the NP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))</b></p>	<p>No</p>	<p>The NP is prepared for town and country planning purposes but does not explicitly set a framework for future development consent of projects in Annexes I or II of the EIA Directive.</p>
<p><b>4. Will the plan in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats directive?</b></p>	<p>No</p>	<p>An Appropriate Assessment has been undertaken for Plan:MK and that has concluded that the local plan will not require assessment under the Habitats Directive.</p> <p>The relatively small level of additional development likely to arise from the Neighbourhood Plan means that it is unlikely to require an assessment under Article 6 or 7 of the Habitats Directive.</p>
<p><b>6. Does the plan set the framework for future development consent of projects?</b></p>	<p>Yes</p>	<p>The Neighbourhood Plan will provide a framework for future development consent of projects in the area.</p>
<p><b>8. Is the NP likely to have a significant effect on the environment?</b></p>	<p>See results of Figure 3: Determining the likely significance of effects</p>	

Figure 3: Determining the likely significance of effects

<b>SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)</b>		
<b>Criteria</b>	<b>✓/x/?</b>	<b>MKC Comment</b>
<b><i>The characteristics of plans and programmes, having regard, in particular, to:</i></b>		
<b>1a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources</b>	✓	The NP will set a framework for future development projects, in terms of location, nature and scale/size. However, the plan will need to be in general conformity with higher level plans so the scope of the plan to fully influence projects and activities is somewhat limited.
<b>1b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy</b>	✓	The NP will form part of the statutory development plan for Milton Keynes with the same status in decision making as development plan documents.
<b>1c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development</b>	✓	Sustainable development will be at the heart of NPs and its policies could make a significant contribution to promoting sustainable development, particularly ensuring any appropriate brownfield sites are identified for possible development and by promoting sustainable transport modes and seeking improvements to existing green spaces.
<b>1d) Environmental problems relevant to the plan or programme</b>	x	It is not considered that there are any particular environmental problems relevant to the plan.
<b>1e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).</b>	x	The NP is unlikely to be directly relevant in regard to this criterion.

<b>Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b>		
<b>2a) The probability, duration, frequency and reversibility of the effects</b>	x	Overall, the effects of the plan on SEA topics are considered to be neutral. Where new development might have a negative effect this will be reasonably long term, although the effect is potentially reversible as redevelopment can occur.
<b>2b) The cumulative nature of the effects</b>	x	The cumulative impact of the effects of the plan on the environment is not expected to be any greater than the individual parts.
<b>2c) The trans-boundary nature of the effects</b>	x	Any impacts are only likely to be felt by the local area.
<b>2d) The risks to human health or the environment (e.g. due to accidents)</b>	x	The Plan's impact on human health is considered to be limited and it is not likely to have a significant impact on the environment due to accidents.
<b>2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)</b>	✓/?	The Plan supports the redevelopment of Bletchley Station and if that is realised then effects of the plan could be felt in a spatial area wider than the plan area. This indirectly could have an effect on population outside the plan area.
<b>2f) The value and vulnerability of the area likely to be affected due to:</b> I. special natural characteristics or cultural heritage, II. exceeded environmental quality standards or limit values III. intensive land-use	✓/?	The NP covers an area which includes a conservation area and Bletchley Park which is a World Heritage Site. However, the draft Plan does not propose any specific development within Bletchley Park and its policies support the continued conservation of this area and are in conformity with the site specific policies of the Plan:MK.
<b>2g) The effects on areas or landscapes which have a recognised national, community or international protection status</b>	x	There are no areas or landscapes with these designations in Milton Keynes.

#### 4. SEA Conclusion

- 4.1. West Bletchley Neighbourhood Plan supports new development in the plan area. However, the draft Plan does not allocate any new sites to support further growth. The Neighbourhood

Plan will provide a planning policy framework to be used when considering planning applications in the Neighbourhood Area.

- 4.2 The Plan's effects are unlikely to have any significant impacts beyond the Neighbourhood Area and it is considered that overall the Plan will not have significant effects on the environment. It is, therefore, the opinion of Milton Keynes City Council that the West Bletchley Neighbourhood Plan does not need to be subject to Strategic Environmental Assessment.

## 5. Consultation on SEA Screening Opinion

- 5.1 The three statutory bodies for the purposes of SEA Screening are Historic England, the Environment Agency and Natural England. These three bodies were consulted on the draft Screening Opinion and the following comments were received:

**Historic England:** The information supplied indicates that the plan will not have any significant effects on the historic environment. We note there are no site allocations. On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

**Environment Agency:** Based on a review of environmental constraints for which we are a statutory consultee, there are no areas of fluvial flood risk or watercourses within the neighbourhood plan area, or any water quality concerns. Therefore, we do not consider there to be potential significant environmental effects relating to these environmental constraints or other environmental sensitivities of interest to us.

**Natural England:** No response.

### SEA Screening Conclusion

**Having screened the West Bletchley Neighbourhood Plan and consulted with Historic England, Natural England and the Environment Agency, it is the view of Milton Keynes City Council that the Plan's effects are unlikely to have any significant impacts beyond the Neighbourhood Area and it is considered that overall the Plan will not have significant effects on the environment. It is, therefore, concluded that the West Bletchley Neighbourhood Plan does not need to be subject to Strategic Environmental Assessment.**

## 6. Appropriate Assessment (AA) Screening

- 6.1 Legal protection is afforded to habitats and species of European importance through Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna - known as the 'Habitats Directive'. Articles 6(3) and 6(4) of the Habitats Directive require AA of plans to be undertaken. This involves assessing the contents of plans to ensure that their policies and proposals maintain the integrity of Natura 2000 sites. The assessment must

determine whether the plan would adversely affect the nature conservation objectives of each site. Where negative effects can be identified, other options should be examined to avoid any potential damaging effects.

- 6.2 The application of the precautionary principle through the Habitats Directive means that plans can only be permitted once it is shown that there will be no adverse effect on the integrity of any Natura 2000 sites. In the rare case of there being no alternatives available or over-riding reasons of public interest why a plan needs to be implemented, plans that do have negative impacts may still be approved.

## **7. Screening for Appropriate Assessment**

- 7.1 The first stage in carrying out an Appropriate Assessment for the Habitats Directive is screening, by determining whether the plan is likely to have any significant effect on a European site, either alone or in combination with other plans and projects.
- 7.2 The Neighbourhood Plan will be in general conformity with Plan:MK which itself was screened for Appropriate Assessment. The screening process for Plan:MK demonstrated that Milton Keynes lies in an area void of any Natura 2000 sites. The nearest European site is the Chiltern Beechwoods to the south of the Borough although it was determined that the site would not be affected by Milton Keynes planning policy due to the distance of the site from Milton Keynes and there being no obvious impact pathways.
- 7.3 An Appropriate Assessment has been published for Plan:MK ([http://miltonkeynes.objective.co.uk/portal/planmk/plan\\_mk\\_submission/planmk\\_sa\\_hra?pointId=1510067377589](http://miltonkeynes.objective.co.uk/portal/planmk/plan_mk_submission/planmk_sa_hra?pointId=1510067377589)) which covers the period to 2031. This considers the impact of the Local Plan on the Upper Nene Valley Gravel Pits SPA and concludes that “development in the Milton Keynes Local Plan will not have a likely significant effect on any internationally important wildlife sites either alone or in combination with other plans and projects. These conclusions are based on the findings of the AA screening which concludes that no Natura 2000 sites are located within the district and no impact pathways have been identified linking Natura 2000 sites outside of the district e.g. Upper Nene Valley Gravel Pits SPA/Ramsar to development within Milton Keynes Borough. Therefore, an Appropriate Assessment is not required.”

## **8. Appropriate Assessment Conclusion**

- 8.1 Given the role of Neighbourhood Plans and the scale of development being proposed in the West Bletchley Neighbourhood Plan, it is considered that Appropriate Assessment of the plan is not required.

## **9. Contact**

Further information can be obtained from:  
Planning and Placemaking



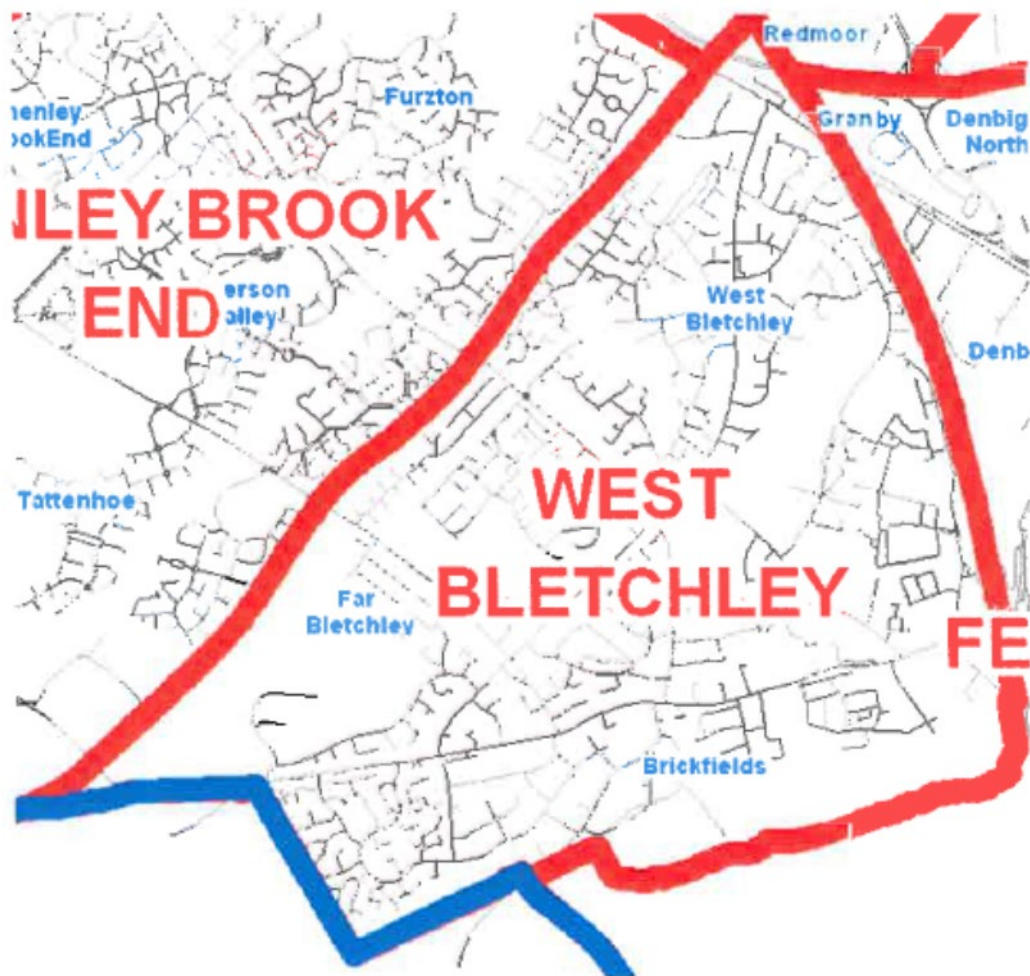
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**Appendix 1 – map of the West Bletchley Neighbourhood Plan designated area**



[A Practical Guide to the Strategic Environmental Assessment Directive \(2005\) \(ODPM\)](#)