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For and on behalf of
Bedfordia Developments Ltd.

**BEDFORD LOCAL PLAN 2040 –
DRAFT PLAN STRATEGY OPTIONS AND DRAFT POLICIES CONSULTATION**

Land at Rushden Road/ Marsh Lane, Milton Ernest – LPA Ref: 910

**Prepared by
DLP Planning Ltd
Bedford**

September 2021





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1.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS

- 1.1 This representation has been prepared by **DLP Planning Ltd (DLP)** on behalf of **Bedfordia Developments Ltd. (Bedfordia)** in response to the Bedford Borough Council Local Plan 2040 consultation.
- 1.2 This representation relates to Land at Rushden Road/ Marsh Lane, Milton Ernest. The site is located to the north of the village of Milton Ernest and covers an area of approximately 4.99 hectares, currently in agricultural use. Part of the site (previously referred to as Site 510 in Bedford Borough Council's Call for Sites) has been proposed for allocation through Policy ME H1 of the Milton Ernest Neighbourhood Plan (MENP). The Neighbourhood Plan is currently at the Examination Stage with the Examiner's report recommending the Plan proceeds to referendum subject to modifications. A site plan identifying the site and an indicative/ illustrative layout are provided at Appendices 1 and 2.
- 1.3 DLP, on behalf of Bedfordia, welcomes the Council's decision to review and update the various elements of the extant development plan and provide for a new Local Plan document that will fully reflect the policies of the National Planning Policy Framework (the Framework) and provide for the up-to-date development needs of the borough and its residents in a sustainable manner.
- 1.4 DLP wishes to make several comments on the consultation document as part of the background context to the representations submitted on the site itself.
- 1.5 This representation specifically addresses those elements of the Council's policy and development strategy consultation proposals that our client feels fail to support appropriate opportunities for growth across the settlement hierarchy and fail to support choice and flexibility in supply through provision for small sites. This representation should be read alongside other submissions relating to our client's wider interests that provide more detailed comments on the approach to the emerging Plan.
- 1.6 **Section 2.0** addresses specific comments on the Council's Preferred Strategy Options and Preferred Option Policy Proposals together with their supporting evidence.
- 1.7 **Section 3.0** discusses the suitability of our client's land for development following a review of the Council's Site Assessment Proforma.

2.0 BACKGROUND TO THE LOCAL PLAN REVIEW AND ITS RELATIONSHIP WITH NATIONAL POLICY AND OTHER MATERIAL CONSIDERATIONS

2.1 This section addresses the Council's Published Consultation Document.

Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object

2.2 The Council's consultation document considers the role for development allocations to be identified in Neighbourhood Plans (as a result of the strategy in the Local Plan 2030) in the context of updates to the development strategy explored via the Preferred Options.

2.3 These representations identify that the consultation fundamentally fails to assess the role and ability of Neighbourhood Plans in meeting the requirements for sustainable development (including housing delivery) in the period to 2030 and beyond. The consultation proposals also provide no clarity on the impact of meeting additional requirements for growth in terms of whether the policies in 'made' Plans will remain in general conformity with the development strategy nor how further allocations might be provided for in an effective and positively prepared manner.

Reasoning

(i) Relationship with Delivery of the Area's Strategic Priorities

2.4 Paragraph 1.47 of the consultation proposals repeats the strategy outlined in Policy 4S of the adopted Local Plan. This does not confirm a realistic prospect that all 2,260 units will be delivered before 2030.

2.5 At paragraph 1.48 the Borough Council only provides vague indications of where further engagement might take place with Parish Councils to meet additional requirements for growth where a range of suitable sites are identified.

2.6 This paragraph is inconsistent with the intentions for a stepped trajectory and the NPPG for reviewing NDPs (which should encourage early review when strategic policies have changed). That is an inevitable consequence of the development plan in Bedford given its current failure to address levels of growth in accordance with the Standard Method. The Borough Council's own evidence indicates the strong likelihood of sites where early delivery can be prioritised, which includes our client's site proposed for allocation in Milton Ernest. This does not demand that meeting increased requirements for growth should extend beyond 2030.

2.7 Paragraph 28 of the Framework reaffirms the role for Neighbourhood Plans in providing for non-strategic allocations. Paragraph 29 confirms this must be within the context of Neighbourhood Plans that do not promote less development than set out in adopted strategy policies (which in this case will be replaced in the Local Plan 2040). Paragraph 66 of the NPPF2021 outlines that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. This is an important distinction from the 2012 version of the Framework. However, the Council's testing of options for the Local Plan 2040 rolls forward a 'one-size fits all' distribution of potential levels of growth in Key Service Centres and Rural Service Centres.

2.8 This fundamentally fails to accord with the current requirements of national policy and guidance and, importantly, has currently precluded the Council from considering 'hybrid' alternatives to the spatial strategy that would allow appropriate levels of sustainable development to be prioritised across the settlement hierarchy.

(ii) Identification of Housing Requirements for Designated Neighbourhood Areas

2.9 The Council's proposed approach is contrary to paragraphs 66 and 67 of the Framework. Paragraph 66 sets out that strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The Council's suggestion of rolling forward the contribution from the scale and distribution of growth identified in Policy 4S of the LP2030 is **not justified** and **not positively prepared**.

2.10 This is an important component of national policy and guidance in terms of seeking to avoid conflict between existing and emerging Neighbourhood Plans and the strategic policies of the development plan. This should form part of positive discussions between qualifying bodies and the local planning authority, recognising the ability of Neighbourhood Plans to sustain and increase housing delivery. Any indicative requirement figure would take into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the Neighbourhood Plan area and should minimise the risk of neighbourhood plan figures being superseded when new strategic policies are adopted (ID: 41-102-20190509).

2.11 The figures in Policy 4S of the LP2030 are a flawed basis for rolling forward potential

requirements against which Neighbourhood Plans are prepared for the following reasons:

- The figures were determined arbitrarily, without reference to the OAN in place at the time or strategies for individual settlements;
- In any event the Council's OAN knowingly represented a significant shortfall against the government's policy for calculating housing need, culminating in this immediate review;
- The figures are applicable only in the context of a foreshortened plan period to 2030; and
- Figures are provided only for certain settlements, with no requirement indicated for levels of the settlement hierarchy below Rural Service Centres (despite these having been considered in earlier rounds of plan-making for the LP2030).

2.12 It follows that the process for calculation of any indicative requirement would therefore materially and significantly exceed the evidence base for the LP2030 and the figures in Policy 4S. By extension this means that any evidence produced by groups preparing Neighbourhood Plans (for example assessments of local rural housing needs and whether relating to settlements listed in Policy 4S or not) would need to be considered in the context of the overall result of the standard method to 2040.

2.13 Any impacts upon the evidence base for emerging Neighbourhood Plans must be read alongside NPPG ID: 41-084-20190509, which answers the question 'when will it be necessary to review and update a Neighbourhood Plan' and states in relation to the above issues:

"There is no requirement to review or update a Neighbourhood Plan. However, policies in a Neighbourhood Plan may become out of date, for example if they conflict with policies in a Local Plan covering the neighbourhood area that is adopted after the making of the Neighbourhood Plan. In such cases, the more recent plan policy takes precedence."

Remedy

2.14 The solution to issues identified in these representations necessitates the Council complying with the requirements of paragraphs 66 and 67 of the Framework. In doing so, we consider that a 'hybrid' development strategy must remain supported throughout the Plan period, including recognition of the contribution that this would make towards the shortfall against local housing need for the period 2020 to 2030.

2.15 Without prejudice to any specific conclusions from this work this would support inclusion of 'village-related' development as a component of future growth. There may be scope to alter

the distribution of the housing requirement to Rural Service Centres upwards or downwards from the arbitrary figure of 25- 50 units adopted by the Council, depending on the capacity and other potential benefits for development in these settlements relative to their overall potential contribution to LHN.

- 2.16 For Rural Service Centres (with the exception of the reclassification of Oakley) it appears proportionate in the first instance to apply a pro-rata addition to levels of development envisaged in Policy 4S of the current LP2030 (i.e., a minimum 25-50 dwellings to 2030). Proportionate additional development in these settlements has the greatest potential to increase the pace of development and diversify supply and any increase could be achieved before 2030 in many cases.
- 2.17 The benefits of such an approach would significantly and demonstrably outweigh any harms given the potential to support the most appropriate locations for growth in each settlement from a range of site options. In the case of our client's interests at **Marsh Lane, Milton Ernest** this could be achieved through realising additional capacity within sites already selected as part of the process of Neighbourhood Plan preparation.

Paragraphs 3.26 – 3.28 (Small Sites) –Object

- 2.18 The Council's proposed approach to enabling the development of small sites as a source of flexibility in supply and to provide diversity within the construction sector is misconceived, inconsistent with national policy, ineffective and not justified. The Council is simply seeking to ignore the requirements at paragraph 69 of the Framework and undermine the government's objectives to support *inter alia* SME builders, prosperous rural communities, and measures to address affordability.

Reasoning

- 2.19 The Council seeks to rely on evidence of past and expected future trends in windfall development in place of the requirement in national policy to identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.
- 2.20 The reasoning for the approach in national policy is simple: the development plan is the most appropriate vehicle to set out positively prepared policies to support the delivery of small sites and enable small and medium developers (who often face the greatest barriers to entry

in the sector) to secure implementable planning permissions more easily.

2.21 The Council's own evidence in the Small Sites Topic Paper demonstrates a year-on-year fall in trends in the completion of small windfall sites against the Local Plan 2030 requirement of 970dpa. This is illustrative of issues affecting the sector. The Council must also be mindful of the fact that more recent policies in the development plan (particularly those within Neighbourhood Plans) provide a further barrier to bringing forward appropriate proposals on unidentified sites.

2.22 The evidence from past trends fails to support the Council's contention that windfall supply will provide for 10% of the higher requirement based on minimum annual local housing need for the period 2020 to 2040. The Council relies on expected future trends but the justification for its proposed approach fails for the following reasons:

- The Council's reference to extant commitments takes no account of any potential lapse rate or double-counting with assumptions of future supply
- Expected trends take no account of changes to Permitted Development Rights (including restrictions upon office-to-residential conversions and a reduction in the number of potentially suitable sites)
- Extant small-site commitments take no account of those that are effectively 'one-off' schemes that would not be accessible to the SME sector (e.g., backland plots or subdivision)
- The likely supply from Neighbourhood Plans, which is a tiny proportion of the 2,260 dwellings required from this source and illustrative of these Plans often focusing development on a limited number of challenging sites, is dwarfed by the resulting restrictions on additional growth.

Remedy

2.23 There are some positive aspects to the Council's evidence base to support growth on small sites, such as the 136 units' capacity identified in urban areas.

2.24 The Local Plan 2040 should also offer substantially greater support for the delivery of small sites in rural areas. This advances the case for the strategic policies of the Local Plan 2040:

- Setting out indicative requirements for all settlements within the borough's hierarchy (outside of Key Service Centres and Rural Service Centres) to encourage provision for appropriate levels of smaller-scale growth
- Proactively support the delivery of rural exception sites
- Proactively support suitable growth of those sites which are considered appropriate.
- Where Policy 4S of the Local Plan 2030 is superseded in terms of the scale and distribution of growth required at Key Service Centres and Rural Service Centres

ensure that any increased need for development to be provided through reviews of Neighbourhood Plan also has regard to Framework paragraph 69

- 2.25 The opportunity for the Local Plan 2040 and any Neighbourhood Plans to be prepared taking a more flexible approach towards the requirements of national policy is supported in principle.
- 2.26 For example, where any allocations proposed would offer the opportunity for early delivery and the potential to introduce multiple developers to relevant sites it would be appropriate to treat the 1 hectare threshold pragmatically, recognising that the revised strategy will itself provide substantial opportunities for diversification.
- 2.27 In the case of our client's land at **Marsh Lane, Milton Ernest** a further contribution towards the additional housing needs in the period to 2030 and beyond could be achieved through realising additional capacity within the site as already selected as part of the process of Neighbourhood Plan preparation. The additional developable area required to achieve this is unlikely to materially exceed the 1 hectare threshold in national policy and guidance, thus satisfying the requirements of national policy in relation to small sites.

Paragraphs 3.15 – 3.17 (Spatial Strategy Options) – Object

- 2.28 The emerging preferred options put forward by the Council continue to have an urban focus and the four variations all focus development on the urban area, A421 corridor, and existing and planned rail stations. This approach relies heavily on rail investment and also focuses growth to the south of the town, with very little growth planned to the north of the borough.
- 2.29 Representations addressing our client's interest elsewhere in the Borough endorse a 'hybrid' approach making provision for village-related development outside of the 'east' and 'south' corridor parishes. Reassessment of **Option 3c** provides an appropriate starting point for such an approach. Within this strategy option the Council has applied arbitrary 'one size fits all' totals to Key Service Centres and Rural Service Centres
- 2.30 A number of KSC's and RSC's have sites which have been identified as potentially suitable through the Councils Call for Sites (Summer 2020) and have been assessed as such by the Council through Local Plan Site Assessments. Milton Ernest is one of those RSCs which is in the process of producing a Neighbourhood Plan and was apportioned a housing target through the Local Plan 2030. The MENP is currently at examination stage with the Examiners

report recently being published which has recommended the Plan proceed to referendum subject to modifications.

- 2.31 Milton Ernest was identified in the Local Plan 2030 Policy 4S as a centre suitable for the delivery of between 25 to 50 dwellings. Local Plan 2030 Policy 4S also states that *“In rural service centres allocations may exceed 50 dwellings where specific local justification is set out in Neighbourhood Plans demonstrating that it would be appropriate in terms of the scale, structure, form and character of the settlement and the capacity of local infrastructure”*.
- 2.32 The Neighbourhood Plan currently includes one housing allocation Policy ME H1: Rushden Road comprising our client’s interests. The land has been promoted through various Local Plan and Neighbourhood Plan consultations.
- 2.33 Policy ME H1 was originally published stating the proposed delivery of a “maximum of 25 dwellings”. However, this point has been addressed through the Examiner’s suggested modifications in that it is advised that maximum be replaced by minimum to reflect policy and potential future housing need.
- 2.34 Our client intends to bring the scheme forward for residential development **within** the amended Settlement Policy Area (SPA) as set out in the MENP policy ME H1. This does not preclude the Borough Council, within its assessment of site options, considering the potential for additional growth within the wider site area outside of the Neighbourhood Plan’s proposed amendments to the SPA boundary, at this sustainable location. Similarly, the Neighbourhood Plan Examiner’s Report does not preclude a sensitive extension of the site area outside of the proposed SPA boundary amendment in order to provide for additional built or non-built uses (e.g., open space) associated with residential development upon the site.
- 2.35 Given the above, we would ask that Bedford Borough Council, reconsiders their proposed development strategy to test a **‘hybrid’** approach including ‘village-related’ development outside of the ‘east’ and ‘south’ corridor parishes. This could readily be achieved through allocating an additional amount of development to those northern parishes previously considered suitable for additional housing development, thus addressing the substantial risks to non-delivery associated with the Council’s Preferred Options and helping to sustain and enhance the role of the most sustainable settlements in the hierarchy.

3.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 910)

Introduction to Site and Proposals

- 3.1 Our client's interests at Land off Marsh Lane have previously been promoted at each consultation stage of the adopted Bedford Local Plan 2030 and throughout the preparation of the Milton Ernest Neighbourhood Plan.
- 3.2 As part of the Bedford Borough Councils previous 'Call for Sites' our client's land was assigned site reference 518 ('Land off Rushden Road'). This site forms the current proposed MENP housing allocation (Policy ME H1). The adjacent site, also in our client's ownership (ref: 162), adjoining the southern eastern boundary, was assigned to 'Land at Marsh Lane'. The site is now collectively referred to as Site Ref 910 in the Local Plan 2040 supporting Site Assessment Proforma June 2021.
- 3.3 The site forms an opportunity for comprehensive, sustainable development in the longer term. The larger part of the site previously referred to as Site 518 has been comprehensively analysed within the Borough Council's 'Site Assessments and Potential Options for Allocation' Report (April 2017) where it was identified as a potential allocation option for Milton Ernest considered to be able to make a "*significant contribution both alone and in conjunction with adjoining site 162 towards the strategy target of up to 50 dwellings for this village*". As illustrated at Table 2.1.1 of the AECOM Masterplanning Report (prepared as evidence to support the Neighbourhood Plan) sites 518 and 162 were both listed for consideration.
- 3.4 As part of the MENP evidence base a Site Assessment, was undertaken by Troy Planning and Design (TPD) which included Site 518 in the list of four site options flagged as having scope for further consideration. The TPD Assessment again also included Site 162 as a potentially suitable option. Within the TPD Assessment, Site 162 achieves a favourable Green/Amber assessment reflecting the potential opportunities associated with enhancements to Green Infrastructure and links to the countryside. The TPD Assessment also acknowledges that these benefits would likely be achieved through development in conjunction with the adjoining land under Site Ref 518, in terms of facilitating access and links to the A6.
- 3.5 In terms of TPD's view on site capacities, utilising their density calculation method, TPD

recorded a potential site capacity of 75 dwellings for site 518, if 50% of the site is developable at a density of 30dph. Adjacent site 162 is recorded in the TPD's Assessment as having a potential site capacity of 11 dwellings, at 30dph assuming a developable area of 70%.

- 3.6 Whilst several suggested amendments were taken forward by the Parish Council in the production of the submission version of the MENP, our client continued to highlight the potential benefits of incorporating a wider site boundary (including further green infrastructure / SUDS opportunities, improved links to the countryside and ecological / biodiversity enhancements), which could be further realised by joining site 162 to the allocation area.
- 3.7 The MENP Examiner's report published 28 July 2021, which recommended the Plan proceed to referendum subject to modifications, included removing the reference to a maximum of 25 dwellings (amending to minimum) reflecting policy and supporting acknowledgement that this site could support the delivery of further dwellings to address housing need.

Land off Marsh Lane

- 3.8 The site is located to the north of the village of Milton Ernest and covers an area of approximately 4.99 hectares, currently in agricultural use. The site is located outside of the current Settlement Policy Area (SPA). However, Policy ME C1, seeks to amend this boundary to include that part of the proposed housing allocation at Land off Marsh Lane (Policy ME H1) identified as the 'Development Area'.
- 3.9 For the avoidance of doubt our client intends to bring the scheme forward for residential development **within** the amended SPA as set out in the MENP policy ME H1. However, this should not preclude the potential to provide additional capacity for suitable residential development as part of preparation of the Local Plan 2040.
- 3.10 The site is positioned to the north of Bedford. The A6, one of the main routes into Bedford, runs through the settlement. As set out in the highways comments supporting TPD's Assessments, a safe and suitable access should be deliverable from Rushden Road (A6), at multiple points along the site frontage. This is also confirmed within the Borough Councils Site Assessment Proformas (June 2021) where it is stated "*A new access would have to be created onto the A6 however the proposed access location is fine. No significant traffic congestion in the area, and the development is unlikely to have more than a moderate impact*".

- 3.11 The site is bound by Rushden Road to the south-west, private residential properties to the north-west and south-east, and countryside to the north-east. A tall hedgerow screens the south-western edge from Rushden Road and the back of private properties south of the road, and the northern edge runs along an open field boundary. The gradient of the land rises north eastward through the site and as is shown on the supporting Constraints and Opportunities map at Appendix 2. There is little subdivision within the site.
- 3.12 The surrounding built environment consists of mainly lower density detached and semi-detached one and two-storey residential buildings, in various architectural styles. There are no flats, commercial or industrial buildings in the immediate vicinity of the site. The two Listed Buildings near the south-east are screened by walls and vegetation, but partly visible from the site. Mitigation for these assets in terms of any impact on their significance (including the contribution made by their setting) has been considered as part of the preparation and Examination of the MENP. The MENP Policy H1 criteria includes a requirement to maintain an appropriate buffer with between the development area and heritage assets, which our emerging proposals will accord with. Our client is also in the process of commissioning a detailed heritage assessment to inform future design proposals and requirements in terms of mitigation.
- 3.13 The site has good access to a range of local facilities. As confirmed through TPD's and Bedford's Local Plan Assessments, it is recorded as Green (less than 400m) in terms of access to village centre services including access to a primary school and access to public transport. The site is within close proximity to the village centre and a short walking distance (2 minutes) to nearest bus stop on Rushden Road with public transport connections to Bedford.
- 3.14 The site is defined by the Environment Agency as Flood Zone 1, which indicates that flooding from nearby rivers is unlikely. A small section of the south-eastern edge of the site can be prone to surface water flooding but this area of land would also form a suitable landscaped area that can incorporate flood attenuation and sustainable drainage features. A mature hedgerow runs along the western boundary of the site parallel to Rushden Road which largely defines the existing view from Rushden Road.
- 3.15 The site is not located within any statutory area, AONB, Local Nature Reserve, SSSI or Green Belt.

- 3.16 The land has no outstanding planning permissions and no planning history of note.

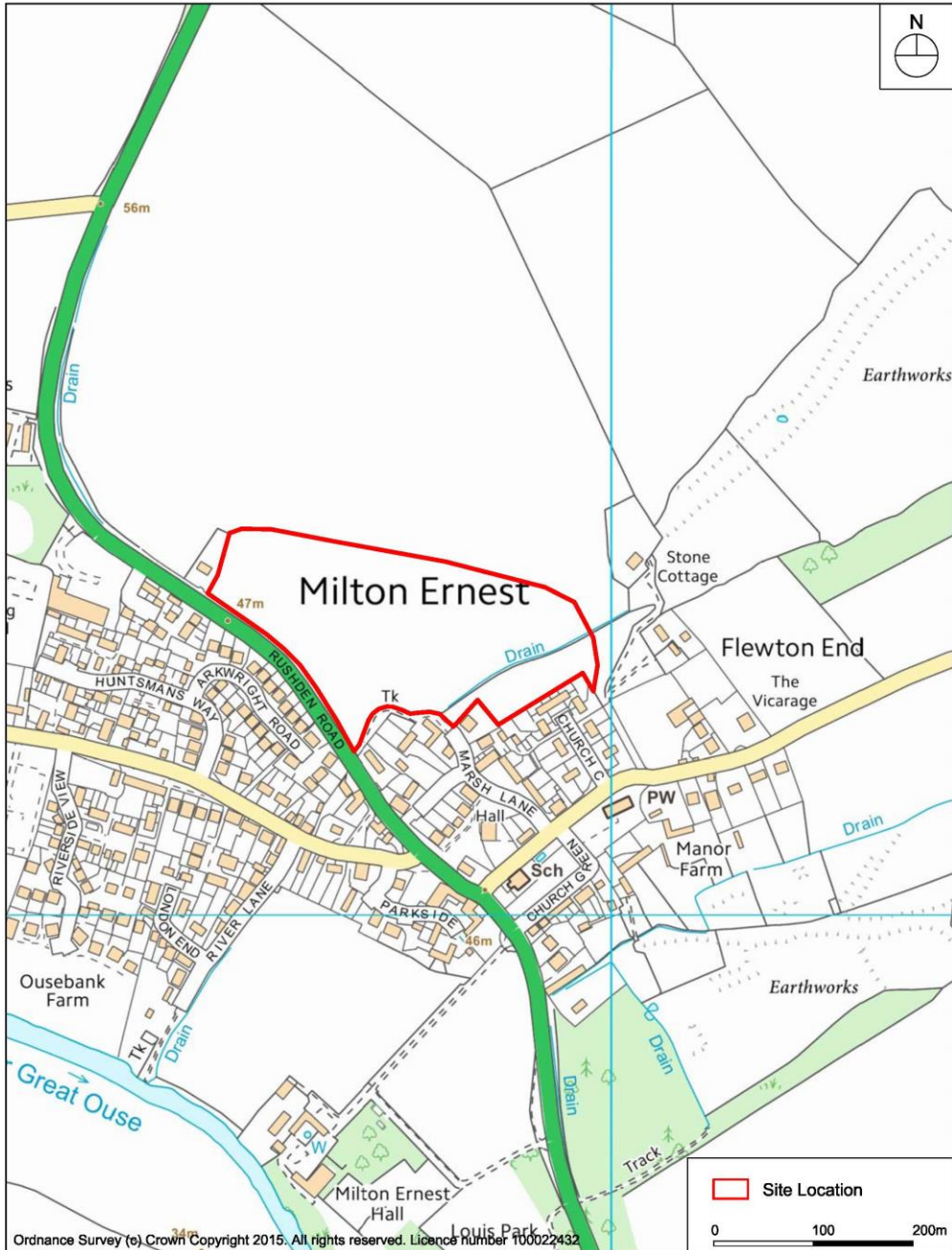
Potential Development Scheme

- 3.17 These representations have been prepared in the context of the submission version MENP and the proposed ‘development area’ indicated under Policies ME C1 and ME H1 of the MENP. While appropriate modifications were suggested (including those acknowledged by the Examiner in terms of capacity and links with the adjacent site), there were no overriding objections to the approach proposed in the MENP.
- 3.18 Equally, however, the evidence for the site itself reflects that there is no in-principle constraint to extending the area proposed for built development beyond the MENP’s suggested extension to the SPA boundary. Achieving further built and non-built uses beyond the proposed SPA boundary could be achieved together with potential benefits towards the requirements for sustainable development within the wider boundary of site refs 518 and 162.
- 3.19 As stated, the site as allocated is considered suitable, available, and achievable to meet the dwelling requirement set out in the MENP and policy 4S of the Local Plan. The site is capable of delivering a carefully considered residential development, which can help achieve the objectives of the proposed development strategy, in a sustainable location. The location of the site provides a natural extension to Milton Ernest and is well-related to and capable of enhancing the existing pattern of development along Rushden Road.
- 3.20 The site would allow for the development of a mix of dwelling types and sizes to complement and enhance the existing housing stock and to meet and address the specific local needs of the area. The site could be developed to respect and complement the established pattern, form, and character of the village, be sympathetic to the settings of the adjacent Listed Buildings and provide a congruous extension to the existing settlement form.
- 3.21 This site additionally provides opportunities to unify the western and eastern portions of the village along Rushden Road, together with providing a new active frontage facing the A6. The allocation of this site would reduce the linear spread of development to the south-west of Rushden Road, away from the existing village centre, instead facilitating the centralisation of development closer to the heart of Milton Ernest.

- 3.22 Whilst the allocation of this site has some potential to affect the local landscape character, this can be limited through comprehensive master planning and a careful consideration of green infrastructure. As highlighted in the AECOM Masterplanning document this can be achieved through the integration of landscaping buffering which delineates the new edge of the built-up area from the countryside to the north and “ensures a sympathetic village edge transition”.
- 3.23 To support these representations a Constraints and Opportunities Plan has been prepared (see Appendix 2).
- 3.24 The proposed approach in the MENP is broadly consistent with this Plan, in terms of initially focusing built residential development within the ‘development area’ proposed together with opportunities to deliver open space, recreation and ecological enhancement outside of the proposed amendment to the SPA boundary.
- 3.25 The Constraints and Opportunities Plan illustrates the ability to test further layout options considering the wider area, identifying scope for flexibility in terms of the extent of residential development and future opportunities for extension of the built area. This demonstrates scope for the delivery of increased dwelling numbers both within and beyond the proposed amendments to the SPA boundary as set out in the emerging MENP.
- 3.26 To support the progression of development in this location **in accordance with Policy ME H1** our client is in the process of commissioning a series of technical assessments covering highways, heritage and archeology and drainage options. Layout considerations and Masterplanning work has also been undertaken.
- 3.27 Emerging proposals for the site as proposed for allocation within the emerging MENP Policy ME H1 indicate that the site can sustainably facilitate options for site capacity that would sit comfortably across the range of 25-50 dwellings indicated in Policy 4S of the Bedford Local Plan 2030. These representations demonstrate the scope to assess the potential to support higher levels of growth based on the potential benefits to be provided such as the delivery of additional open space.
- 3.28 As part of preparation of the Local Plan 2040 it is important to safeguard acceptable parameters for future proposals in this location whilst avoiding the unnecessary prescription and limitations on opportunities to secure the achievement of sustainable development. This

would facilitate the Council identifying Milton Ernest to make a **modest** further contribution towards the additional needs for development in the period to 2030 and beyond, consistent with the Plan's overall requirements and objectives.

Appendix 1 Site Location Plan (Site Ref 910)



CLIENT Bedfordia	DATE 11.12.2015	OS REF	DRAWN BY PMG	DLP PLANNING LIMITED 4 Abbey Court, Fraser Road, Priory Business Park Bedford, MK44 3WH t 01234 832 740 f 01234 831 266 e bedford@dipconsultants.co.uk Offices also at: Bristol, Cardiff, Leeds, London, Milton Keynes, Nottingham, Rugby and Sheffield
	SCALE 1:5000 @ A4	DRAWING NO D01	CHECKED KLU	
PROJECT Land to the North of Milton Ernest	JOB NO BE1748	REV		
	DRAWING TITLE Location Plan			

Appendix 2 Constraints and Opportunities Plan (Site Ref 910)





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