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For and on behalf of



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

**Manor Farm, Knotting – LPA Ref: 633**

**Prepared by  
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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 [REDACTED] in response to the 'Bedford Local Plan 2040 – Draft Plan Strategy Options and Draft Policies (Regulation 18) Consultation'.
- 1.2 This representation relates to Manor Farm, Knotting. The site forms part of a larger farm holding and for these purposes extends to approximately 1ha and fronts onto Melchbourne Road, comprising a number of former farm buildings and hardstandings. There are no constraints or site specific designations that would prevent the use of the buildings / site for development purposes. A location plan identifying the site is provided at Appendix 1.
- 1.3 DLP, on behalf of [REDACTED], 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 a number of comments on the consultation document as part of the background context to the representations we are submitting on the site itself.
- 1.5 [REDACTED] have concerns over the past failings of the Borough to capitalise on its locational context and the previous long-standing planning strategy that saw a concentration of development on the urban areas of Bedford and Kempston and the parallel restraint of development in rural areas. This as we have detailed elsewhere has failed to recognise the potential and capacity of rural settlements and their need for growth, and a corresponding reduction in rural service provision and the consequences of that.
- 1.6 This representation specifically addresses those elements of the Council's policy and development strategy consultation proposals that 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.
- 1.7 **Section 2.0** addresses specific comments on the Council's Preferred Strategy Options and

Preferred Option Policy Proposals together with their supporting evidence.

- 1.8 **Section 3.0** discusses the suitability of our client's land for development including a response to the Council's Site Assessment Proforma.

## **2.0 OBSERVATIONS AND REPRESENTATIONS – PREFERRED STRATEGY OPTIONS AND PREFERRED OPTION POLICY PROPOSALS AND EMERGING EVIDENCE**

2.1 This section addresses the Council's the 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. 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. There are outstanding objections to several of the emerging Neighbourhood Plans at Key Service Centres (in particular at Great Barford and recently at Sharnbrook).

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. This does not demand that meeting increased requirements for growth should extend beyond 2030.

2.7 Paragraph 28 of the NPPF2021 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 NPPF2021. 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, recognises 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 Plans (for example assessments of local rural housing needs) 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 based for emerging Neighbourhood Plans must be read alongside PPG 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 NPPF2021. 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 i.e., through 'top up allocations'.

- 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 Key Service Centres upwards or downwards from the arbitrary figure of 500 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 Outside of the approach to identification of a housing requirement for Key Service Centres and Rural Service Centres the Council should adopt a flexible approach to supporting development opportunities outside of defined settlements on suitable, previously developed, sites that could contribute towards housing needs in the wider rural area.

***Paragraphs 3.26 – 3.28 (Small Sites) –Object***

- 2.17 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 and inconsistent with national policy, ineffective and not justified. The Council is simply seeking to ignore the requirements at paragraph 69 of the NPPF2021 and undermine the government’s objectives to support *inter alia* SME builders, prosperous rural communities, and measures to address affordability.

***Reasoning***

- 2.18 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.
- 2.19 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.
- 2.20 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.

2.21 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

2.22 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. In reality we consider that this total should be increased and that in order to achieve the Council's Preferred Options to include allocation of a further 1,500 units within the urban area it will be necessary to maximise the potential contribution from small sites. The Council's total of 1,500 is over-and-above extant development plan allocations within the Town Centre that are and will remain significantly constrained. Failure to diversify urban supply without support through the development plan will result in this component of the spatial strategy being unsound.

2.23 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 the re-use and redevelopment of sites in the wider rural area, such as our client's land at **Manor Farm, Knotting**
- 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 NPPF2021 paragraph 69

- 2.24 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.
- 2.25 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.

***Paragraphs 3.15 – 3.17 (Spatial Strategy Options) – Object***

- 2.26 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.
- 2.27 Representations addressing our client's interests 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.
- 2.28 Within this strategy option the Council has applied arbitrary 'one size fits all' totals to Key Service Centres and Rural Service Centres but made no provision for a contribution towards the strategy totals from locations outside these settlements e.g., on previously developed rural sites.
- 2.29 This is inconsistent with the approach to other strategy components where a more flexible approach is applied e.g., non-specific estimates of urban capacity. Utilisation of other appropriate sites would add flexibility to the strategy and reduce any of the harmful effects that the Council associates with testing non-specific levels of village-related growth.

### 3.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 663)

#### Introduction to Site and Proposals

3.1 The site was previously submitted to the Council for consideration as part of the Council's 'call for sites' exercise in August 2020, this following on from discussions about the future of the buildings some years previously. The land area being promoted is shown below.

**Figure 1: Manor Farm, Knotting**



3.2 The site forms part of a larger farm holding and for these purposes extends to approximately 1ha and fronts onto Melchbourne Road and comprises a number of former farm buildings and extensive hardstandings.

3.3 The site is located on the east side of Melchbourne Road in the village of Knotting approximately 10 miles north of Bedford town centre. The access point is feasible via Melchbourne Road, which is a 40mph road. There is no traffic congestion in the area.

3.4 The site currently falls outside of a defined Settlement Policy Area, however, permitted development rights would enable the change of use of the buildings. An allocation of the land for development of the site would enable a more imaginative and beneficial scheme to be

realised, having regard to the site's setting and opportunities for outstanding design that it represents.

- 3.5 The site, due to its size and location, is capable of delivering a carefully considered residential development in accord with the existing character of the area, and at a level that may be achieved through the change of use and conversion of the buildings. Given the permitted development rights that apply, the site's allocation would enhance the scope for a fully contextual development in keeping with the structure, form and character of the area, and its surrounds.
- 3.6 The site offers small scale, considered growth that will benefit the existing amenities, facilities and services of the settlement and its neighbouring villages. This will ensure the village and the surrounding wider rural area continue to thrive.
- 3.7 The site has no known environmental, ecological, or archaeological constraints that would inhibit development.

### **Response to Borough Council's Site Assessment Pro-Forma (Site ID: 663)**

#### ***Site Assessment Criteria***

- 3.8 We have reviewed the Council's assessment of the site and wish to make a number of comments below.

#### **Within or adjoining the urban area or a defined settlement policy area boundary**

- 3.9 The site falls outside of a defined settlement policy area (SPA); however, it should be considered for development. The site forms part of a larger farm holding extends to approximately 1ha. The site offers the opportunity for delivering a carefully considered residential development in accordance with the existing character of the area, and at a level that may be achieved through the change of use of the buildings.

#### **Impact on designated or non-designated heritage assets or their setting**

- 3.10 The Council's site assessment proforma finds that the proposal has the potential to cause harm to heritage assets, which may range from low to high. The existing buildings are substantial and utilitarian in appearance, and as such there will be options to avoid, reduce

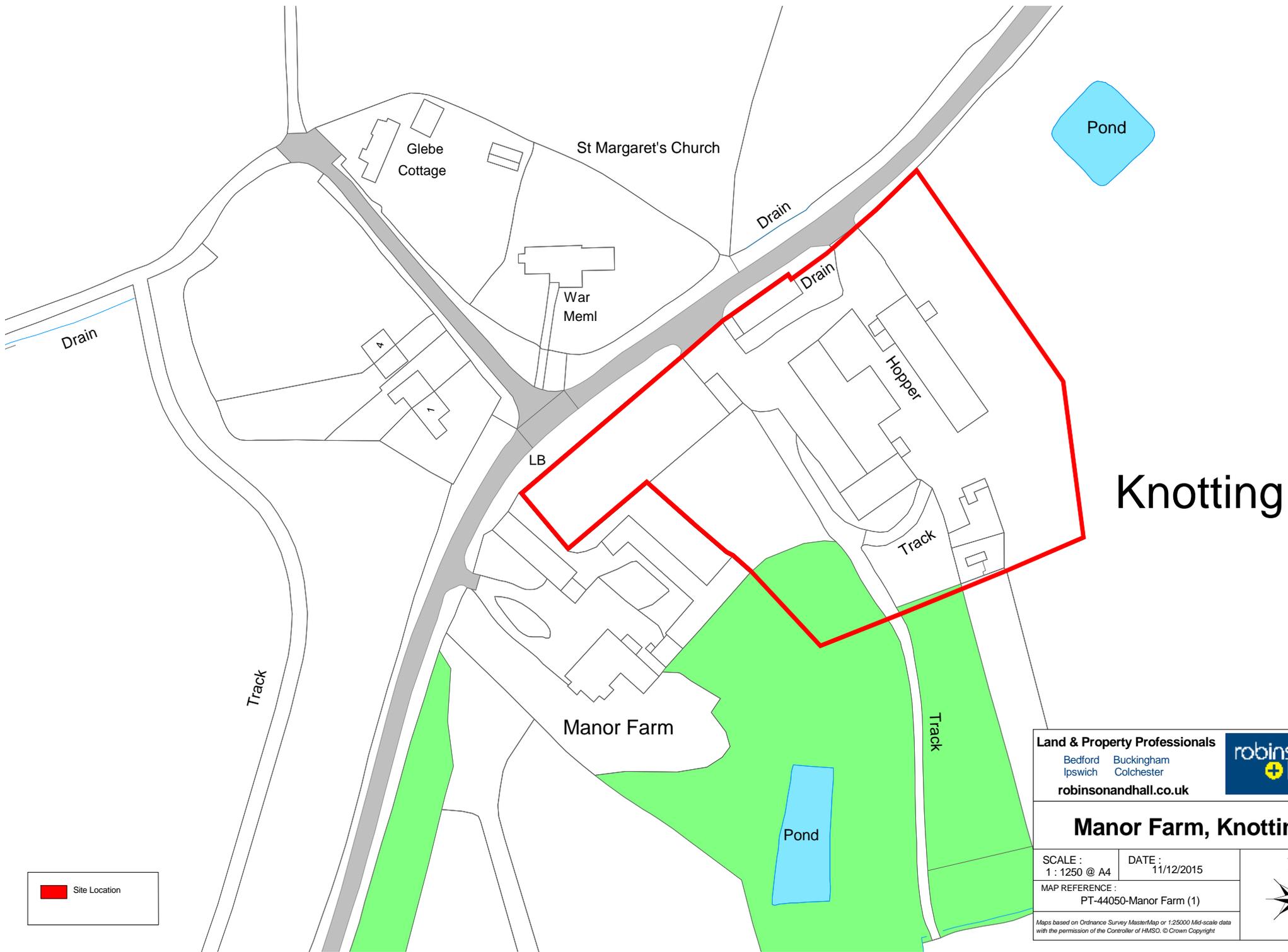
or mitigate this harm, and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation.

- 3.11 There are no designated heritage assets within the site itself. A sensitively designed scheme for conversion and redevelopment, subject to suitably worded policy criteria, would form the basis to secure acceptable outcomes and would offer the Council greater control than any change of use under rights for permitted development.

### **Protected Species**

- 3.12 The Council's assessment states that protected species have been recorded on the site. This could be addressed through an ecology survey and protected species surveys, if appropriate, and the recommendations and mitigation strategy could be incorporated into any development scheme.

**Appendix 1 Site Plan (Manor Farm, Knotting – LPA Ref: 633)**



<b>Land &amp; Property Professionals</b> Bedford    Buckingham Ipswich    Colchester <a href="http://robinsonandhall.co.uk">robinsonandhall.co.uk</a>		
<h2>Manor Farm, Knotting</h2>		
SCALE : 1 : 1250 @ A4	DATE : 11/12/2015	
MAP REFERENCE : PT-44050-Manor Farm (1)		
<small>Maps based on Ordnance Survey MasterMap or 1:25000 Mid-scale data with the permission of the Controller of HMSO. © Crown Copyright</small>		



[Redacted]

**BEDFORD**  
Planning / SDD / SPRU

[Redacted]

**BRISTOL**  
Planning / SDD / SPRU

[Redacted]

**EAST MIDLANDS**  
Planning/ SDD

[Redacted]

**LEEDS**  
Planning

[Redacted]

**LONDON**  
Planning

[Redacted]

**MILTON KEYNES**  
Planning

[Redacted]

**RUGBY**  
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