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For and on behalf of



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

Land at Carlton Road, Turvey

**Prepared by
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1.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS

- 1.1 These representations are submitted on behalf of [REDACTED] in respect of land in their control to the east of Carton Road Turvey.
- 1.2 The representations comprise two parts. In the first part are comments on the general strategy of the emerging Local Plan reflecting our client's concern about timescale, strategy and deliverability of housing, especially in regard to the role of the Borough in the Ox-Cam Arc and moreover to the apparent failure of the consultation policies to address the needs of rural settlements and reflect their critical role both in terms of rural sustainability and also the contribution they can make towards housing provision, especially in the earlier years of the Plan.
- 1.3 The second part identifies the allocation of land at Carlton Road, presently allocated for 25 dwellings in the Turvey Neighbourhood Plan (TNP), the scope to increase the capacity of the site in relation to the boundaries that have been established in the TNP, and arising from previous assessments of the land, the capacity to extend the site to accommodate at least 100 dwellings (including the current allocation).

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

Summary of Local Plan 2030 and Requirement for Immediate Review

2.1 The Bedford Local Plan 2030 (BLP2030) was adopted subject to the provisions of Policy 1 – ‘Reviewing the Local Plan 2030’. The Inspectors’ Report provides further clarification of the requirement for Modifications introducing the approach to this Policy and that it was considered essential for soundness.

2.2 Paragraph 1.1 of the Council’s Strategy Options and Draft Policies Consultation (LP2040) affirms the significance of the ‘guillotine’ mechanism inserted within the review policy, which engages paragraph 11(d) of the NPPF2021 in the event that a new Local Plan is not submitted for Examination before January 2023. While the Borough Council is clearly aware it cannot avoid the consequences for the statutory development plan of failing to adhere to these timescales, the LP2040 doesn’t show that it sufficiently addresses the reasons for first introducing Policy 1 of the BLP2030.

2.3 Drawing from the Inspectors’ Report:

- Paragraph 17 emphasises the importance of considering longer-term requirements and thus together with other issues with the Plan a **need** for the review to be undertaken **as quickly as possible** with the three-year timeframe providing balance to allow work to be completed effectively
- Paragraphs 33-34 anticipate that the review will consider the balance between jobs and workers including any changes in the balance of net out-commuting and the implications of the Oxford-Cambridge Arc
- Paragraph 40 confirms that the Local Plan 2030’s housing requirement was determined as 970 dwellings per annum as a result of transitional arrangements for the Examination of Plans under the 2012 version of the Framework.
- Paragraph 113 confirms an expectation of two reviews before 2030 to address potential issues of non-delivery, maintain a buffer in supply and to ensure that the allocation/supply of housing is sufficient to meet the identified need, which is, itself, likely to change over time (as calculated by the government’s standard method).
- Paragraph 123 recognises that the continued existence of a five year supply of deliverable sites (within the provisions of the Local Plan 2030) is dependent on the progress with constrained capacity in the urban area and bringing forward allocations within Neighbourhood Plans quickly. The scope for early review is to allow for potential issues of non-delivery to be addressed and to consider the requirement for any additional housing site allocations in the light of evidence on housing need and realistic supply at that time.

2.4 Paragraph 18 of the Inspectors’ Report confirms that Policy 1 cannot set the parameters of

the updated Local Plan. While there is a desire for alignment with the delivery of cross-boundary strategic priorities (including those related to the delivery of the Oxford-Cambridge Arc) the requirement for review is a result of the deficiencies with the approach put forward by the Council in the BLP2030.

- 2.5 The appointed Inspectors determined (in the context of the 2012 Framework) it would not be effective for the policies of the BLP2030 to look beyond that date. The findings of soundness are predicated on the context of a very narrow remit of addressing the area's strategic priorities (and even then, only with the application of the three-year 'guillotine' following adoption).
- 2.6 It is not open to future Inspectors to reach the same conclusion. This emphasises the importance of the of the first paragraph of Policy 1 and the overriding objective of the review to secure levels of growth that accord with government policy – that a Plan must be fundamentally deliverable over the plan period; it cannot further defer relevant decisions relating to options to meet the area's development priorities.
- 2.7 In not fully responding to the reasons and scope of requirements for the review and subsequent update of the Local Plan the Council risks rolling forward several of the same fundamental shortcomings found in the BLP2030. This is not only contrary to the objectives of sustainable development but, in the context of the most recent policy and guidance, simply fails to provide the basis for a sound Local Plan.

National Policy and Guidance

- 2.8 The most recent version of the National Planning Policy Framework, published in July 2021, follows commencement of the Council's LP2040 consultation. The changes were published in draft format in January 2021 (including those relevant to the plan-making framework) and thus available for the Council to consider.
- 2.9 These representations highlight four important components of the 2021 Framework and the changes they necessitate for the scope of the review, relative to the 2012 version of the Framework against which the current BLP2030 was assessed. Other specific provisions of the Framework and NPPG are referred to in comments relating to detailed elements of the consultation proposal.
- 2.10 Firstly, paragraph 22 of the NPPF2021 confirms that strategic policies should look ahead

over a minimum 15-year period from adoption and anticipate long-term requirements. This is a significant change from paragraph 157 of the 2012 Framework that specified that policies should be drawn up over an appropriate timeframe and only preferably a 15-year horizon.

- 2.11 Secondly, the second sentence of NPPF2021 paragraph 22 is a significant alteration. It requires that policies should address a vision that looks further ahead (at least 30 years) where larger scale developments such as new settlements or, more importantly, significant extensions to existing villages and towns form part of the strategy. Significance is not defined but in our client's consideration that must be taken to be a measure in relation to the scale of the host settlement and not just in absolute scale terms. The transitional arrangements for these provisions at Annex 1 confirm their application to the preparation of all Plans except those that have already at an advanced stage.
- 2.12 The Council's Preferred Options clearly anticipate reliance on these approaches to growth and the associated implications in terms of extended timescales for development. None of the Council's Preferred Options set out the proposed approach beyond a 20-year horizon. As a result, detailed policies for the scale and distribution of growth cannot be considered consistent with national policy without significantly extending their scope alongside provision for the other requirements of sustainable development.
- 2.13 Thirdly, the requirements of Policy 1 of the BLP2030 accord with the circumstances outlined at paragraph 33 of the NPPF2021 where a significant change in circumstances is identified as a result of the calculation of local housing need. Paragraph 61 of the NPPF2021 outlines that minimum annual local housing need should be calculated using the government's standard method. This is translated into the requirements against which plans must be assessed for soundness in terms of ensuring they are positively prepared and seek to meet needs in full (see NPPF2021 paragraph 35 and footnote 21) alongside the consideration of unmet needs from neighbouring areas. NPPF2021 paragraph 31 also emphasises the importance of considering relevant market signals.
- 2.14 The NPPG provides further clarification that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Circumstances where it may be appropriate to plan for a higher housing need figure than the standard method indicates include any growth strategies for the area and strategic infrastructure improvements that are planned (ID:

2a-010-20201216).

- 2.15 The Council accepts that there are no exceptional local circumstances that justify deviating from the standard method, but the LP2040 consultation does not indicate assessment of any alternative approach identifying a higher need than calculated by the standard method (that will typically be considered sound) (ID: ID: 2a-015-20190220). The assessment of market signals should include expected changes in the labour market, engagement with stakeholders for economic development and changes that may affect the anticipated population and local housing stock (ID: 2a-027-20190220).
- 2.16 Finally, paragraph 35 of the NPPF2021 confirms that the criteria for assessing soundness have changed since the 2012 Framework. In order to provide for a justified approach, policies of a Plan must provide ‘**an appropriate strategy**’ rather than the ‘most appropriate’ strategy when assessed against reasonable alternatives. Paragraph 32 of the NPPF2021 provides further detail on the basis for assessing the proposed strategy in terms of seeking net gains for sustainable development and ensuring that the Plan has addressed relevant economic, social and environmental objectives.
- 2.17 In summary, there is no longer any support in national policy for the outcomes of the BLP2030 Examination in terms of further constraining the plan period, or the overall level of growth, or deferring decisions on key components of approaches to meet strategic priorities for the area (particularly in terms of overall housing need, including affordable housing, and the delivery of social and community infrastructure).

Other Material Considerations (Notably Ox-Cam Arc Spatial Framework)

Emerging Oxford Cambridge Arc Spatial Framework

- 2.18 The proposed Oxford-Cambridge Spatial Framework will have the status of national policy and is intended to form a material consideration for plan-making alongside the NPPF.
- 2.19 The government is currently seeking view on priorities for the Framework as part of consultation on the document ‘Creating a Vision for the Oxford-Cambridge Arc’ (until October 2021). The latest consultation proposals set out an aim to guide sustainable planning and investment decisions under four policy pillars:
- the environment;
 - the economy;

- connectivity and infrastructure; and
- place-making.

2.20 Whilst paragraphs 2.10 and 2.11 of the consultation indicate that the role of the Framework will not be to make site allocations or to include detailed policies better left to local plans (including for example, setting out the housing requirement), it does emphasise the importance of meeting housing needs in full (including affordable housing). It relies on the calculation of minimum annual local housing need but opportunities to increase levels of development above this minimum starting point are clearly anticipated as part of its aspirations to support economic development and ensure a balance between the delivery of new jobs and homes (see paragraph 2.6).

2.21 As it is the government's intention to commence implementation of the Spatial Framework throughout 2023, its policies can be expected to be in place as a material consideration at the time the LP2040 is undergoing Examination and therefore must be addressed.

3.0 REPRESENTATIONS – DRAFT PLAN VISION, OBJECTIVES AND STRATEGY OPTIONS

3.1 This section is to address Chapters 1 to 4 of the published consultation on the draft LP2040.

Comments on Strategy Options / Proposed Approach and Supporting Evidence *Paragraph 1.5 (proposed plan period)– Object*

3.2 Definition of the proposed plan period underpinning the LP2040 has been rendered inconsistent with national policy following publication of the NPPF2021.

Reasoning

3.3 Significant extensions to existing villages and towns that form part of the strategy for an area should be set within a vision that looks further ahead (at least 30 years) than the minimum 15 year time horizon from the date of adoption of a local plan.

3.4 Given Bedford's location in the Ox-Cam Arc a 30 year horizon is essential where paragraph 1.2 of the 'Creating a Vision for the Ox-Cam Arc' consultation document confirms that the Spatial Framework will extend to 2050 and beyond. Preparation of the Bedford Local Plan 2040 should be undertaken consistently with this aim.

3.5 The proposed plan period of 2020 to 2040, particularly when read in the context of the Council's draft strategy could result in a further delay in meeting development needs in full (until at least 2030); will generate a requirement for further, successive, reviews; and is setting the plan up to fail both in terms of overall supply and also the spatial distribution which will not allow a clear vision for planned growth in the villages that will be necessary to deliver the scale of growth needed.

Remedy

3.6 Bedford Borough Council should not wait for transitional arrangements upon introduction of the Ox-Cam Arc Spatial Framework and then undertake yet another review as this will generate continued uncertainty and delay. Realistically, as a result of the scale and pattern of the proposed in the LP2040 consultation, delays to timescales for development will likely result in failure to meet needs in full between 2030 and 2040.

3.7 Those parts of the Council's draft strategy relying on larger-scale development including growth that is significant in relation to existing settlements should be profiled to look further

ahead, to 2050.

- 3.8 This reemphasises that in terms of the soundness requirements, the Council must fully embrace those sustainable opportunities to meet the increased requirements for growth in the immediate term and enable this through the prioritisation of suitable and deliverable sites as part of a 'hybrid' strategy.

Paragraph 1.10 (alignment with the Ox-Cam Spatial Framework)– Comment

- 3.9 The draft strategy contends that the Council draws heavily on the 'pillars' of economic development and the natural environment drawn from the Spatial Framework. However, they fail to embrace the comprehensive approach to supporting sustainable development as anticipated by the Spatial Framework. Paragraph 1.10 ignores altogether the place-making 'pillar' of the Framework while the LP2040 draft strategy as a whole is overly reliant on assumptions regarding improvements in strategic-level connectivity. This fails to embrace local opportunities for sustainable development.

Reasoning

- 3.10 It is surprising, and inconsistent with national policy and the emerging objectives of the Ox-Cam Arc Spatial Framework, that the LP2040 draft strategy Options make no mention of the connectivity or place-making pillars of the Spatial Framework. Each should be considered of equal importance.
- 3.11 Specifically, paragraph 4.1 of the Ox-Cam Arc consultation places significant emphasis on connectivity, defined as:

“improving communities’ access to the services they need – like a good quality, sustainable water supply and broadband, schools, cycle lanes and healthcare, as part of a great approach to place-making.”

- 3.12 Paragraph 4.4 affirms the importance of recognising the needs of an ageing population in terms of service delivery and moreover, at paragraph 4.5 the document goes on to explain:

“the policies of the Framework will be used to create a clear infrastructure plan giving communities access to the public services they need – including education and health”

- 3.13 The settlement hierarchy in Bedford Borough means that Rural Service Centres and Key Service Centres across the authority have a key role in delivering the requirement for sustainable communities, serving a wider rural hinterland – both immediate needs and throughout the plan period. The strategy in the BLP2030 has deferred important decisions

relating to these priorities both in terms of avoiding the reclassification of centres and by placing the requirement to allocate sites upon Neighbourhood Plans. Priorities have therefore not been addressed and in any event the current strategy has only sought to address a foreshortened period to 2030.

Remedy

- 3.14 The Council's draft strategy consultation proposals offer no scope to address these local requirements for place-making and connectivity as part of a comprehensive strategy.
- 3.15 The Local Plan must acknowledge the continuing need for additional village-related growth outside of the 'east' or 'south' transport corridor parishes. Opportunities for sustainable development in accordance with these requirements (and the objectives of the emerging Spatial Framework) must be embraced both in the period to 2030 (to address the immediate uplift in the need for growth) and across the entire plan period to sustain the role and function of the Borough's most sustainable settlements within the context of a longer term vision.

Paragraph 1.11 (Local Housing Need and Levels of Growth)– Comment

- 3.16 Meeting LHN in full should be considered to be the starting point given the pivotal point in which the Borough finds itself within the Ox-Cam Arc. The Council has demonstrably not fully tested options to meet higher potential levels of growth and there appear to be significant issues with the assumptions of labour demand and labour supply techniques to forecast future changes in jobs and the requirement for additional workers. As such the LP20-40 draft strategy clearly in fact fails to address the economic pillar of the NPPF2021.

Paragraph 1.14 (Scope of the Plan) – Object

- 3.17 The Council's draft strategy consultation proposals indicate that the purpose of updates to the Local Plan following the requirements of the review policy (BLP2030 Policy 1) are to outline a development strategy to 2040 and meet national policy requirements for the delivery of growth. This fails fully to reflect the reasons for first introducing the requirement for immediate review and, in particular, the pattern and scale of housing growth necessary to achieve sound outcomes for plan-making (particularly with regards paragraphs 20 and 74 of the NPPF2021).

Reasoning

- 3.18 As set out in the Spatial Framework consultation document (paragraph 5.5) the Ox-Cam Arc

demonstrates poor affordability where development has not kept pace with need. That is exactly the position in Bedford Borough resulting from the approach adopted in the BLP2030.

- 3.19 Thus (at paragraph 5.7) it is an aim of the Ox-Cam Spatial Framework to ensure that it establishes policies to enable **housing needs to be met in full, including much-needed affordable housing** where direction will be provided by the Framework e.g. implementation of East-West Rail, identification of Opportunity Areas and support for the delivery of previously developed land.
- 3.20 What this means in practice is that prioritizing opportunities to meet full development needs is an important component of the place-making pillar as part of a joined-up approach providing for sustainable communities.
- 3.21 The LP2040 draft strategy proposals would sustain a very substantial shortfall against minimum annual local housing need until at least 2030. Due only to considering a horizon to 2040, and as a result of likely timescales for the characteristics of larger-scale development (including new settlements), it is furthermore highly likely a significant shortfall against full development needs will persist until 2040 and beyond unless the strategy is supported by a wider range of deliverable sites.

Remedy

- 3.22 The Council's proposed draft strategy needs to offer flexibility and, moreover, choice to address the current and persistent failure to meet needs in full if the Local Plan is not to become significantly constrained for a substantial period before any of the longer-term solutions proposed as part of the emerging LP2040 achieve significant delivery – see supporting report on Housing Delivery which generally accompanies the representations submitted on behalf of the clients of DLP Planning Ltd.

Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object

- 3.23 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 BLP2030) in the context of updates to the development strategy explored through the LP2040 consultation.
- 3.24 The consultation fundamentally fails to assess the role and performance 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

- 3.25 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. Even where a Neighbourhood Plan has been made at Turvey there is demonstrably little appetite in a community that only narrowly voted to support the NDP, to now embark on a further similar exercise which is likely to be as divisive as the current NDP proved to be. Other communities have failed even to reach that stage other than as a means to try and prevent development taking place altogether.
- 3.26 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.
- 3.27 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.
- 3.28 Paragraph 28 of the NPPF2021 reaffirms the role for NDPs in providing for non-strategic allocations. Paragraph 29 confirms this must be within the context of NDPs not promoting 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 NPPF2012. However, the Council’s testing of options for the LP2040 rolls forward a ‘one-size fits all’ distribution of potential levels of growth in Key Service Centres and Rural Service Centres.

3.29 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. It risks leading to planning by appeal in Neighbourhood Plan areas where the NDP has fallen out of date.

Remedy

3.30 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’.

3.31 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.

Section 2 (Draft Vision) – Object

3.32 Firstly, there is a shortcoming in the Vision in terms of it reflecting comprehensive opportunities for sustainable development across the Borough. Secondly, while there are positive aspects for outcomes sought under the Vision these will not be addressed as part of the strategy due to the Council’s selected Preferred Options.

Reasoning

3.33 The draft Vision sets out that:

“Rural communities will embrace appropriate development, in many instances through the preparation of their own neighbourhood plans.”

3.34 This would imply a requirement for additional growth. However, the draft strategy apparently exclude such growth from a significant number of centres. The draft Vision fails to address that it is part of the role of the local plan review (and resulting updates) to address strategic priorities deferred as a consequence of the BLP2030 (for example expansion of primary healthcare and secondary education). The Vision also fails to reflect that the proposed

development strategy is not looking to provide for any additional growth in rural areas as part of an uplift to meet housing needs in full before 2030. This is a significant shortcoming and overlooks suitable and deliverable sites that could be prioritised now to meet these increased needs alongside the delivery of other substantial benefits.

3.35 Theme 4 (Better Places) of the Council's proposed Objectives states:

“Provide appropriate amounts and types of housing to meet the needs of the borough's urban and rural communities over the lifetime of the Plan making the housing stock more adaptable and resilient

3.36 The principle is supported but is reliant on delivering diverse opportunities for development across the settlement hierarchy. The draft strategy as it stands renders this highly unlikely.

Remedy

3.37 There should be demonstrable scope to alter the distribution of the housing requirement to sustain continued appropriate levels of growth in the rural hierarchy and recognise the sustainable capacity of the higher order rural settlements to continue to accommodate further development.

Paragraphs 3.15 – 3.18 (Spatial Strategy Options) –

3.38 Whilst paragraph 1.47 refers to acknowledging the role of NDPs in meeting a small element of current housing needs it is unclear at that point the future role of such settlements where planning by NDP appears to be default approach. Turning to the Spatial Strategy Options, none appears to allow for further rural development whether secured by reviews of NDPs or otherwise. As such the LP2040 strategy appears to focus all of the development around the urban area of Bedford, the A421 and the A1 transport corridors, leaving the northern and western areas of the Borough relatively untouched.

Reasoning

3.39 Where the intention is that the LP2040 rolls forward the Local Plan (and for the reasons set out above, needs to be significantly more ambition if it is not intended that it should fail) then it is essential that positive planning should occur in the rural parts of the Borough. That is both for their own sustainability and also as a means of ensuring deliverability of new homes particularly in the earlier years of the Plan – see 3.6 above.

3.40 Accordingly, none of the options proposed are adequate to address either the delivery needs

of the Borough or indeed its actual spatial housing requirement. Despite the lack of northern development in the Borough through the preferred options, the Rural Service Centres (RSC) such as Turvey, are capable of delivering development within the plan period up to 2040, with emerging Neighbourhood Plans and suitable sites being identified in the Call for Sites event that Bedford Borough Council undertook in the Summer of 2020

- 3.41 For the reasons set out in the following part of these representations, land opportunities exist at Turvey which can make a material contribution to supply, without being exceptional and which can help deliver a sustainable mix of development not reliant on deferring growth on large strategic sites.
- 3.42 In all cases however it is noted that the Council's work remains at this time at a relatively early stage with significant 'gaps' in the evidence presented – particularly in terms of development timescales, infrastructure delivery and viability. Notably:
- Infrastructure Delivery Plan – to be prepared alongside site allocations
 - Settlement Hierarchy (September 2018) – review underway
 - Plan-wide Viability Assessment – yet to be commissioned.

Remedy

- 3.43 It is therefore our expectation that any future draft of the LP2040 will properly address the role of the designated rural settlements reflective of the role which they can and should play in delivering the spatial objectives as well as supporting the overall delivery of growth for the extended plan period.

Policy SB1 (Self-Build and Custom Housebuilding) – Support

- 3.44 The policy sets out the requirement for new developments to include a proportion of self/custom build housing as part of the proposals. Our clients support Policy SB1, but would advise on additional parameters and wording to be included within the policy.

Reasoning

- 3.45 The wording of the prospective policy does not indicate whether the required plot provision is a maximum or a minimum figure, which could result in different interpretations.
- 3.46 Also, the current structure of the policy does not envisage the provision of development sites

that are entirely self-build or custom houses, which would enable the creation of distinctive developments, that can meet a greater demand on a single site.

- 3.47 By reliance on a variety of sites providing self build opportunities, the policy risks failing to meet demand because those wishing to self build are not usually looking to do so on larger standard estate type developments and in such circumstances the ringfencing of self build plots may lead to some developments not being completed and, overall a shortfall in meeting housing targets.

Remedy

- 3.48 The wording of the policy should be amended to allow for whole sites to be self-build or custom developments as well as encouraging self build opportunities as a complementary element of allocated sites. The wording should also seek to establish provision as a minimum whilst encouraging scope to deliver sites which are approved solely for such housing – and therefore more likely by definition to appeal to those who want to participate in self build.

4.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA

Introduction to Site and Proposals

- 4.1 The site subject to this representation is land off Carlton Road, Turvey.
- 4.2 An area of approximately 2ha has been allocated in the Turvey Neighbourhood Plan (TNP), which passed referendum on the 15th July 2021. The TNP allocates two sites, and at paragraph 5.20 notes that each site is suitable for 25 dwellings. However, Policy T1 which is the development policy for Carlton Road, does not specify a number of dwellings to be provided, just that the site is allocated for housing development along with a set of development principles.

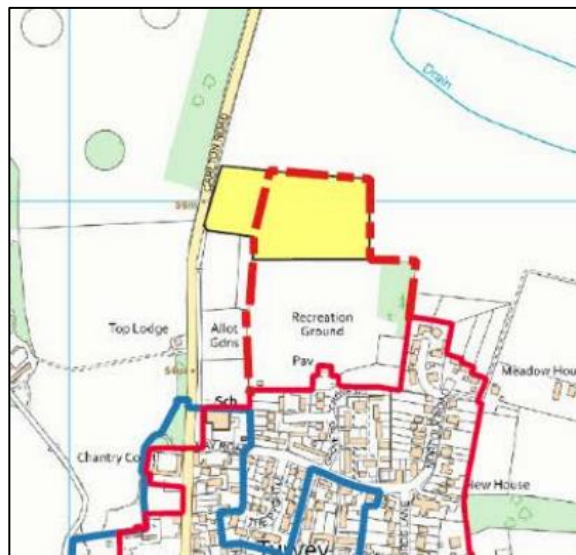


Figure 1: Turvey Settlement Boundary, with Carlton Road allocation marked yellow.

- 4.3 Our view is that the net developable area of the site (excluding open space to be retained on the Carlton Road frontage and significant boundary landscaping) could provide a capacity of at least 40 dwellings having regard to Framework paragraph 124.
- 4.4 The site has however no physical constraint which would prevent the increase in capacity beyond the boundaries of the present allocation. Having regard to our submissions above in respect to the timescale of the plan, the need to plan strategically even in relation to growth in villages and moreover to the scale of development that will be required, we consider that the current allocation should be extended.

- 4.5 In the first instance the site is demonstrably deliverable, and our client expects to bring forward development within the boundaries prescribed in the TNP once the TNP is 'made'. It is our case that more, deliverable, sites are needed in the early years of the new Local Plan in order to sustain the supply of housing until such time as the major new development allocations can be relied upon to support the five-year supply. For the reasons set out we do not consider that they will be able to do so until at least 2035 and possibly 2040. Consequently, a further allocation should be made to Turvey and that, having regard to the assessment carried out for the TNP which concluded that land at Carlton Road was suitable for development, the only logical conclusion would be that the site is also suitable for an extension of the present site. That is supported by consideration that there are no physical boundaries on the land save for those that will be created by the current allocation and infrastructure will be provided to support the current allocated development.
- 4.6 Notwithstanding that Policy T2 of the TNP states '*Housing development must include a mix of sizes of accommodation, based on the most recent evidence of local need that is available. This must include smaller units (1-2 bedrooms) to cater for first time buyers and those seeking to downsize*' there is no physical constraint on the delivery of a full range of house types including the provision of affordable homes including First Homes.
- 4.7 Furthermore, the site could also deliver self-build or custom dwellings, with there not being a policy that would inhibit a scheme that was largely consisting of these elements rather than market or affordable housing.

Response to Borough Council's Site Assessment Pro-Forma and Neighbourhood Plan Assessment

- 4.8 The site was not submitted to the Summer 2020 Call for Sites event due to progression with the Neighbourhood Plan, as such it was not assessed as part of the production of the Local Plan. Therefore, a comparative assessment has been undertaken below on the Neighbourhood Plan assessment.

Site Assessment Criteria – Support

- 4.9 As part of the Neighbourhood Plan a much larger site than the allocation (2ha) was initially considered, comprising up to 19.5ha which had an indicative capacity of 380 dwellings. Smaller options of between 90 and 120 dwellings were also submitted and this formed the basis of the original site assessment.

Reasoning

- 4.10 The assessment rejected the delivery of 90-120 dwellings only insofar as it was considered in the context of the then emerging housing requirement to be a scale of development greater than proportionately required for Turvey. The assessment however acknowledged the ability of the site potentially to deliver around 50 dwellings. Subsequently 25 units have been indicatively allocated through the TNP. It follows however that a larger allocation could be delivered that was well related to the settlement in the circumstances where a greater scale of growth is required in the Borough to meet its future planned needs.
- 4.11 Issues in the assessment were raised in relation to landscaping, flood zones, mineral safeguarding areas, listed buildings and highways, but all were capable of being overcome through mitigation as set out in the assessment and affirmed through the current allocation.
- 4.12 The assessment concluded that the site was capable of delivering up to 50 dwellings and that this was an appropriate scale of development. The site was therefore deemed as suitable, available, deliverable, and recommended as an allocation.

Suggested Alternative Site Assessment Finding

- 4.13 Given the findings of the previous assessment, 50 dwellings, it is our view that the site has capacity to deliver development in the order of 90-100 dwellings. This would still be less than that originally appraised and could be accommodated without adverse impact on the site or breaching any existing natural barriers – of which the current TNP allocation would be a part.
- 4.14 As such, for the purposes of the emerging Local Plan 2040, a further allocation north of Carlton Road should be made of at least 75 dwellings.



[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
Planning
[Redacted]

SHEFFIELD
Planning/ SDD / SPRU
[Redacted]



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