



# Local Plan 2040

Have Your Say on the Future of Your Borough

## Bedford Borough Council – Local Plan 2040 Draft Plan Consultation Response Form

We would prefer to receive your comments via our online system

[www.bedford.gov.uk/localplan2040](http://www.bedford.gov.uk/localplan2040)

**In particular, if you are a planning consultant or agent please help us to speed up the production of local plans by using the online system. If you require assistance, please contact us on 01234 718070.**

Please only use this form if you cannot respond online and to make your comments on the Local Plan 2040 Draft Plan and its supporting documents. You will need to have the document you want to comment on to hand so that you can enter the appropriate references. Copies of the document are available to view on the Council's website [www.bedford.gov.uk/LocalPlan2040](http://www.bedford.gov.uk/LocalPlan2040) and in paper copy (**by 45 minute appointment**) at Bedford Central Library, Harpur Street, Bedford MK40 1PG (01234 718174). Subject to Covid restrictions being lifted on 19<sup>th</sup> July, paper copies will also be made available at all libraries in the borough, plus the key documents will be available at Rushden, St Neots, Biggleswade and Flitwick libraries during normal opening hours.

Please email this response form to us: [planningforthefuture@bedford.gov.uk](mailto:planningforthefuture@bedford.gov.uk)

Alternatively, responses can be sent by post. Please attach a stamp and send to:

Planning Policy Team  
Bedford Borough Council  
Borough Hall, Cauldwell Street  
Bedford, MK42 9AP

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them. **All responses (electronic and paper) must be received by 5pm on 3 September 2021.**

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. Personal data will be collected and processed in accordance with the Data Protection Act and the General Data Protection Regulations. Further information can be found on the council's Data Protection webpage and in the Privacy Notices for planning policy.

All responses will be made public.

### CONTACT DETAILS

#### Personal details

Title

Name

Job title (if applicable)

Organisation (if applicable)

Address  c/o Agent

Postcode

Telephone Number

Email

**AGENT DETAILS (if applicable)**

If you are a planning consultant or agent, you can do this on-line. You will be able to save a draft to complete later, save the final version for your records, save paper and speed up plan making. If you require assistance, please call 01234 718070

Title

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If you are using an agent, who would you prefer any correspondence to go to?  
(Please mark X one box only)

Contact agent	Contact client	Contact both
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Your interest (Please mark X one box only)

Land owner	Resident	Consultant	Agent	Other
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please specify 'Other' (please write in)

**Please use a separate form (this page) for each consultation document paragraph, policy or evidence base document you are commenting on.**

**Which paragraph number, policy number or evidence base document are you commenting on?**

2.0 - Vision And Objectives

**Please add your comments in the box below, and continue on an additional sheet if necessary.**

The Vision sets out general planning aims, and we have no particular comments to make on the Borough becoming more sustainable, the delivery of good design, or improved transport options etc. However, it is surprising that the Vision does not make any stronger statements on growth, where it will be located, or make a commitment to delivering the required number of new dwellings, and employment land as identified in the remainder of the Draft Plan.

Given the emerging focus on the delivery of the Oxford - Cambridge Arc as identified in the document, and the current consultation on priorities for the Spatial Framework, it seems a missed opportunity for the plan not to take a lead in setting out a how it could play an important role in delivering the vision. The statement at paragraph 1.11 appears to read as “*we will do what have to*”, rather than seeking to embrace the ambitions that Government has for development within the Arc.

In particular it would seem sensible for the plan to make some provision for the possibility of an uplift in housing and employment growth that may emerge through the preparation of the Arc’s Spatial Framework. The current consultation on “Creating a Vision for the Oxford-Cambridge Arc”, states that the Government is:

*“concerned about the affordability and availability of housing in the Arc, and what this will mean for the Arc’s communities, economy and environment. Development of new homes is already happening in the Arc, but in the main centres this has not kept up with need. We also know people are being priced out of the area, increasing the need to make more polluting journeys for work and leisure, and making home ownership less likely for many.”*

**Our emphasis**

At paragraph 5.8 of the consultation, it adds:

*“In parallel to the development of the Spatial Framework, the government is also exploring options to speed up new housing and infrastructure development in the Arc to help meet its ambitions, where evidence supports it. This includes examining (and where appropriate, developing) the case for new and/or expanded settlements in the Arc, including options informed by possible East West Rail stations between Bedford and Cambridge and growth options at Cambridge itself.*

**Our emphasis**

While it is acknowledged that the Local Plan review and the Spatial Framework will be prepared in parallel, it is clear that the emerging vision is targeting a more advanced and robust form of growth. Therefore, for the Plan to be “positively prepared”, we would contend that the Local Plan Review should allow for some uplift whether that be 10 or even 20%. If the Spatial Framework is adopted at the same time as the plan, there is likely to be the added pressure to consider another urgent review to keep pace with the changing policy context, therefore allowing for some uplift would pre-empt this and help towards reducing the burden going forward.

This important point is supported by updated guidance in the revised National Planning Policy Framework (2021); and, while it is accepted that this Consultation was developed in advance of the publication of the revised Framework, we must highlight that under paragraph 22 it states that where Local Plans are to include new settlements or significant extensions to towns and villages, then it should be set within a vision which looks at least 30 years ahead. As the transitional arrangements at paragraph 221 of Annex 1 confirm this applies to plans that have not reached Regulation 19 stage; then, no matter which strategy is chosen, the Bedford Local Plan 2040, must expand its “vision” to set out how it will accommodate growth beyond 2040 and deliver on the ambitions of the Arc.

**Which paragraph number, policy number or evidence base document are you commenting on?**

Neighbourhood Planning – Paragraphs 1.46 to 1.51

**Please add your comments in the box below, and continue on an additional sheet if necessary.**

It is noted that Neighbourhood Planning has been largely successful in Bedford Borough, and that discussions with the parishes are ongoing as to whether this remains a tool that communities wish to use to allocate new development in the next plan period. Our client raises no objection to this approach, and would welcome the opportunity to engage with the Parish Council on the benefits the site can offer. However, if this method of allocation is chosen going forward, it is important that a clear policy structure is created to define the level of growth to be allocated by each community. We would also argue that should those plans not come forward in a timely manner, such as within 3 years of the adoption of the Local Plan 2040, the policy should allow for sites to come forward adjoining the Settlement Policy Areas, therefore the allocation policy will be deemed out of date for that Parish/Settlement for the purposes of Development Control

We are aware that the Parish Council is in the early stages of preparing a Neighbourhood Plan, and may do so in order to set out its preferences for development in the response to any strategy prepared by the Borough Council. Our client wishes to highlight that they would welcome the opportunity to meet and engage with the Parish Council on the opportunities their site can offer in respect of housing, informal open space provision and equipped play.

**Which paragraph number, policy number or evidence base document are you commenting on?**

3.0 Growth And Spatial Options – Paragraphs 3.4 and 3.5

**Please add your comments in the box below, and continue on an additional sheet if necessary.**

The current housing need requirements of 970 dwellings per annum were based on a previous housing needs methodology which was allowed to proceed on the basis that the Local Plan 2030 was submitted and examined under the procedures of a former version of the NPPF. The late adoption of the Plan, and the reduction of the plan period from 2035 to 2030, resulted in the Inspector imposing a requirement for the Council to undertake and submit a review of the Plan for examination within three years of its adoption, (Policy 1 – Reviewing The Local Plan 2030).

It is therefore explicit that the Council needs to consider the review in the context of an elevated housing requirement as set out in the Standard Methodology, as well as consider the need for an uplift to be planned for as the Arc's Spatial framework is prepared. The Council must therefore address this in this Review. If this is not adequately addressed throughout the earliest stages of the plan period, then there is danger that there will be a shortfall to meet demand, along with the commensurate need for affordable housing. If the Arc Spatial Framework requires a further uplift, this will again require another immediate review, we would therefore urge the Council to consider planning for longer term growth and avoid working to only the minimum requirements.

It has long been stated that there is need to deliver a step change in housing delivery, but this has never been more apparent than the comparison of the previous objectively assessed housing need, versus the need identified in the standard methodology. This uplift in housing numbers, as well as employment land provision, needs to be targeted from the point of adoption, and not, as has been implied in the text, pushed back five years via a stepped trajectory. This approach will undoubtedly compound the problem and will create a far greater burden on delivery between 2030 and 2040, it is also inconsistent with the objectives of the vision for the Arc.

Paragraph 3.5 infers that additional growth will not be delivered until infrastructure relating to the Black Cat junction and the East West section are complete. However, this is unrealistic and fails to meet the required need of the step change in delivery at the point of adoption. Growth needs to be planned for in a manner which starts to deliver at the point of adoption, and the strategy needs to deliver a range of sites in a range of locations to meet the need. Strategic Infrastructure development will progress at its own pace and will emerge in parallel with the delivery of new housing and employment opportunities.

**Which paragraph number, policy number or evidence base document are you commenting on?**

3.0 Emerging Preferred Options – 2a, 2b, 2c and 2d

**Please add your comments in the box below, and continue on an additional sheet if necessary.**

It is not clear whether the Parish of Staploe falls within eastern parishes and is therefore within preferred strategy 2d, or the northern parishes which are not part of any of the preferred strategy options. As it not specifically mentioned our client assumes it is not part of this strategy.

We would therefore highlight that some development is advisable in this location in order to prevent the existing villages stagnating and to maintain the vitality and viability of existing services. Local needs housing could be considered in villages such as Duloe which is situated adjacent to the A1 and is due north of Wyboston which has been identified as a potential location for growth.

While this is small village it has the potential to offer sustainable rural growth, either connected with the neighbouring town of St Neots or with the possible new settlement west of Wyboston.

**Which paragraph number, policy number or evidence base document are you commenting on?**

Paragraph 4.4 – Site Allocations And Call For Sites - Draft Plan Strategy Options And Draft Policies Consultation

**Please add your comments in the box below, and continue on an additional sheet if necessary.**

Our client controls the Land at South West Duloe, which is being promoted through the Call For Sites Process, Site ID 3420. This site is available for up to 84 dwellings; however, the site is being promoted with the notion of delivering up to 25 dwellings on the northern part of the field adjacent to the settlement, with the remainder possibly available to meet other objectives such as open space provision. The concept would be to deliver a proportionate development in scale with the existing size of the village and to meet identified housing need.

Duloe is a small, rural hamlet with limited housing stock. Although there are limited services in the village St Neots hosts a range of services, including restaurants, supermarkets, pubs, schools, and doctors' surgeries, all of which are accessible at a longer walk/short cycle.

Our client understands the need for both affordable and market housing in the borough, and as such is willing to deliver between 10 and 25 houses in order to meet the Parish's housing need. Developing between 10 and 25 houses on minimum of 0.5 ha up to 1 ha, means that the site is deliverable in the short term, and therefore can make an early contribution to housing delivery in the borough.

It is well recognised that villages and rural settlements such as this make for attractive locations for self-build plots. Table 12 of the Housing Strategy 2021-2026 shows that there are currently 45 registrants who have registered a preference for Self-Build housing in Staploe (which includes Duloe) and the surrounding areas. This site is also being promoted for self-build through the Call for Sites process and provides an opportunity to provide self-build plots in a location where they are required.

**Which paragraph number, policy number or evidence base document are you commenting on?**

Policy SB1 – Self-Build And Custom Housebuilding

**Please add your comments in the box below, and continue on an additional sheet if necessary.**

Policy SB1 (Self-Build and Custom Housebuilding) is not consistent with the objectives of Self-Build and what it can achieve. The policy is far too narrow as it is only focussed on delivering Self-Build plots as part of wider development schemes, not on delivering them where they are wanted.

The Self-Build community tend to want unique plots in low density rural areas which have a particular character, outlook, landscape value etc, so that they can build a bespoke dwelling which is suitable for that type of location. People building their own home do not want uniform plots which are situated next to standard houses on large estates. Conversely, people wanting to purchase a standard house type on an estate may be put off buying next to a Self-Build plot as they won't know what exactly their property will be adjoining, and this could cause issues for the housebuilders.

Furthermore, the policy does not make clear where abouts in the estate the Self-Build plots will be located. Will they be dispersed throughout the development, or located in an area of their own? Are the Self-Builders supposed to follow the design and material selection of the major housebuilders, or are they able to utilise the more innovative designs which Self-Build is supposed to offer? There are likely be conflicts in the design and character of the houses built on the Self-Build plots and the standard house types on the rest of the estate.

There is therefore a fundamental difference between the objectives of policy SB1 and what Self-Builders actually want. The policy does nothing to address locational needs with regards to providing plots where they are wanted. As such, if there is a village with a degree of interest for Self-Build but which is not earmarked for growth, then the policy would fail to deliver this. The policy should therefore facilitate for Self-build plots be provided where they are wanted or it will not drive Self-Build provision. As the Self-Build Register shows a broad range of desirable locations, then a commensurate range of sites should be provided if the objectives of SB1 are to be realised.

Self-Build is an area of housing which is very economically viable and supports small and medium scale contractors. One of the advantages of Self-Build, is that Self-Builders are more likely to take risks and push for unique technology, and implement bespoke design etc. The purpose of the Government's Self-Build policy is to encourage housing delivery through a part of the market which is not currently well catered for. Only a very small provision of Self-Build housing is delivered in England when compared to other western countries. This is an untapped part of the market which has very limited opportunities due to the constraints of the planning system.

The Self-Build Register creates an avenue for people to identify their interest in Self Build and their locational requirements in order to connect people to plots that may secure planning permission for this purpose.

There are very few "true" Self-Build plots that are delivered through the planning process. Some provision is needed for Self-Build opportunities to be considered as exceptions to the normal rural restraint policies. Some neighbouring authorities including Central Bedfordshire have facilitated this.

We would advocate the use of exception site policies for Self-Build as set out in Point 3 of the National Custom & Self-Build Association's manifesto which sets out ten areas where Government Support can help the custom and self-build sector fix the broken housing market. Suitable safeguards such as a local connection test and standardised legal structures are available to ensure that such sites are restricted to the delivery of Self-Build.

There are lots of small sites across the district which in or adjacent to existing Settlement policy Areas, or close to the built up areas of small settlements which could come forward to meet this type of provision.

To conclude, the objectives of policy SB1 can only be delivered if there is a reasonable and proportionate distribution of growth in desirable places where a need is identified on the Self-Build Register. If development is too narrowly focused around the urban area, such as indicated in option 2a, then policy SB1 will result in an over provision of Self-Build plots in and around the urban area, and a lack of sites where they are needed.

### **Which paragraph number, policy number or evidence base document are you commenting on?**

Small Sites Topic Paper

**Please add your comments in the box below, and continue on an additional sheet if necessary.**

NPPF Paragraph 69 states that Development Plans and Brownfield Registers should identify land to accommodate 10% of a Local Authorities housing requirement on small and medium sites no larger than one hectare (1ha).

However, the Small Sites Topic Paper states that this requirement can be achieved without making site allocations beyond the urban area due to completions on windfall sites. We do not agree with this assertion.

We would argue that the Council are not addressing this requirement in the way envisaged by the NPPF, i.e. through **Development Plans and Brownfield Registers**. The Council should not be relying upon windfall development to deliver on a national policy requirement. In order to be positively prepared the Plan needs to take a proactive approach by allocating land through the Local Plan process.

As recognised by the NPPF, *"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly."* (Paragraph 69)

The Council should therefore be actively encouraging small and medium sites to come forward, whether that be by allocating sites in the Local Plan, or delegating such allocations to local communities, to be delivered

by Neighbourhood Plans. They should not simply attempt to reach the minimum requirement. Housing on small and medium size sites that are delivered through windfall development should be seen as a bonus.

We appreciate that the strategy consultation is not detailed and does not identify specific sites or proposals, but it is inferred that development is likely to be allocated on larger sites. Therefore, we would contend that there is an opportunity to achieve the objective of housing delivery on small and medium sized sites by directing some growth to the villages where a greater proportion of small sites are being promoted. This will facilitate some proportionate growth in these settlements which will contribute towards their vitality, and the viability of existing services and facilities.

There is also an opportunity to achieve the requirements of housing delivery on small and medium sites in conjunction with the Council's obligation to deliver Custom and Self-Build opportunities by making some of these allocations for self-build plots. Small sites in sustainable villages are ideal for delivering Custom and Self-Build housing plots. Many people interested in Custom and Self-Build want bespoke plots in villages rather than plots which are delivered as part of wider developments.

The Plan going forward needs to plan for a significant increase in housing numbers up to 2040, and small and medium sites can make a meaningful contribution towards this. The Council should therefore make provision for this in the Local Plan.