

Bedford Local Plan Review: Draft Options and Draft Policies

Land east of Newton Lane,
Turvey

Prepared by Fisher German LLP on behalf of
Richborough Estates Ltd



Project Title:

Land east of Newton Lane, Turvey

Author:

[REDACTED]

Contact Details:

The Estates Office

Norman Court

Ashby de la Zouch

LE65 2UZ

[REDACTED]

01 Introduction

1.1 These representations have been prepared on behalf of Richborough Estates Ltd in respect of their land interests to the east of Newton Lane, Turvey, as illustrated on Figure 1 below.

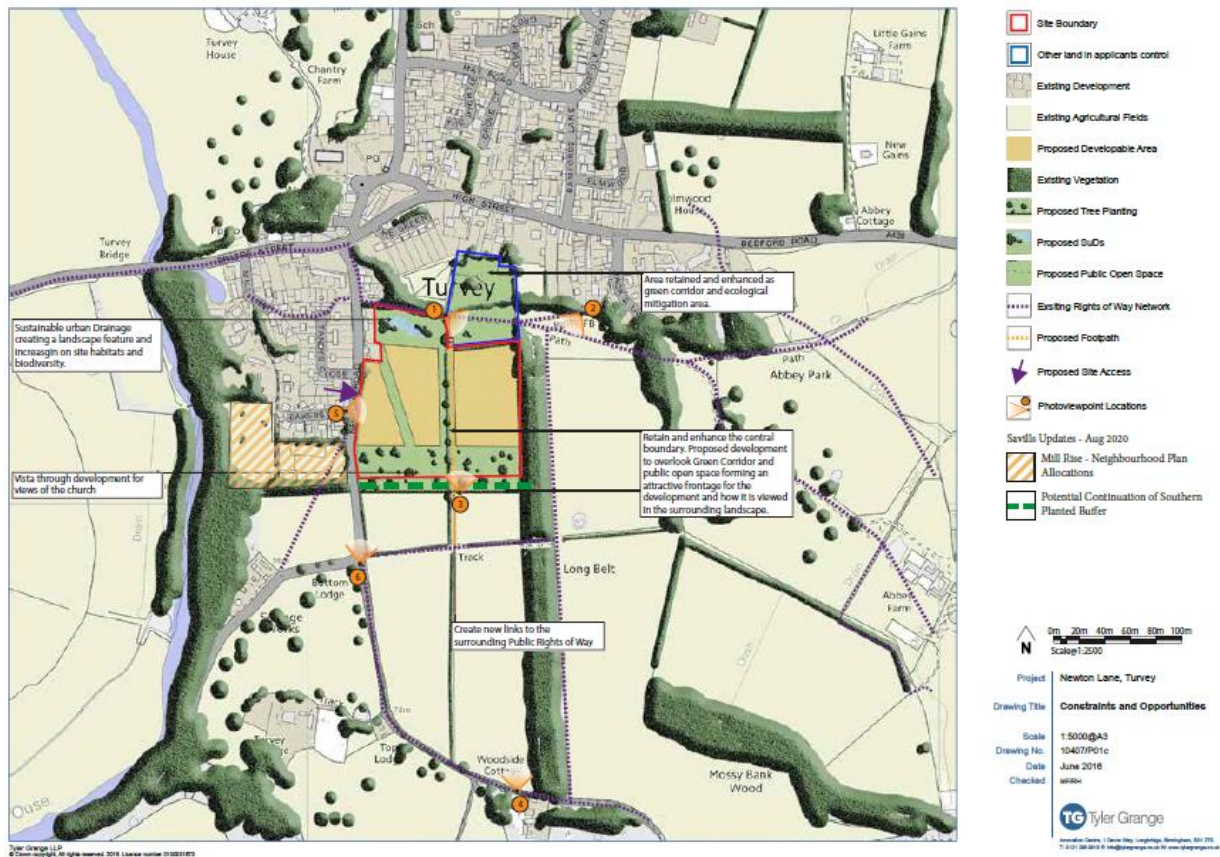


Figure 1: Site Location Plan with Opportunities and Constraints shown

1.2 The site has been previously promoted through the various stages of the development of the adopted Local Plan and was included as a preferred site as part of the Council's 2017 consultation paper. Technical documents to support the allocation of the site have previously been submitted including, amongst other documents, a detailed Highways Assessment and Landscape and Visual Impact Assessment, demonstrating the site's acceptability and deliverability. Despite this however, the adopted Local Plan sought to defer allocations to subsequent Neighbourhood Plans, which would deliver the housing targets set out in the Local Plan.

1.3 Turvey is a sustainable settlement designated in the adopted Local Plan as a Rural Service Centre. Turvey is one of the highest scoring Rural Service Centres in the Borough, scoring only a few points less than

settlements designated as Key Service Centres. The adopted Local Plan seeks to deliver 25 - 50 dwellings through the emerging Neighbourhood Plans (this is in contrast to the 500 dwellings in the Key Service Centres, which Turvey falls just outside of). In initial iterations of the Bedford Local Plan (2015 consultation paper) the Council produced evidence which demonstrated that the Rural Service Centres could deliver between 50 and 150 dwellings each. The Council recognised the benefits of delivering larger developments in the Rural Service Villages advising that:

“Some villages have experienced the loss of vital services such as shops and pubs in recent years. Changing the current strategy of restraint in the rural policy area could increase the population and change the age profile of rural villages. An increase in activity and spending power would support existing vulnerable village services and facilities, and possibly lead to new provision. Furthermore, larger developments would be likely to bring with them a range of types and sizes of housing, which would provide more choice for existing residents wanting to stay within a village but down-size.”
(Development Strategy and Site Selection Methodology Background Paper, September 2015)

- 1.4 The draft policies at that time supported such an allocation. Despite this latent capacity, the Council ultimately sought to reduce the quantum of housing to be delivered within the Rural Service Centres in favour of a new settlement, however, when the viability and deliverability of this was challenged the Plan period was reduced with an early review mechanism. Richborough Estates and a number of interested parties objected to this approach of the new settlement and the thereafter the reduced Plan period allowing the Plan to be found sound with the new settlement removed
- 1.5 Turvey Neighbourhood Plan has since progressed to referendum 15th July 2021. The result was marginal with 52% of votes in favour of the Neighbourhood Plan and 48% against.
- 1.6 The Plan identifies land to deliver 50 dwellings. Notwithstanding this, as has already been evidenced by the Council, settlements such as Turvey remain well positioned to provide additional sites to ensure the Council can meet its future housing needs. Whilst larger strategic sites may be required to deliver longer term development needs, sites in the Rural Service Centres can deliver quickly and ensure that the step change in delivery is met in the initial years of the Plan period whilst maintaining the vitality and viability of the services and facilities these settlements offer.
- 1.7 The land east of Newton Lane can deliver circa 80 dwellings, as demonstrated in the Vision Statement which was submitted alongside the representations to the Issues and Options Consultation in September 2020. It is considered this is commensurate with the size and sustainability of the settlement and combined with the 50 dwellings to be delivered through the Neighbourhood Plan would still be short

of the 150 dwellings the Council has previously evidenced the settlement can deliver within the current Local Plan period. Indeed, having regard to the sustainability of the settlement, and its place within the settlement hierarchy, just below those settlements which are expected to deliver 500 dwellings, it is considered that the capacity of Turvey to accommodate new homes could be far greater than 150 dwellings.

- 1.8 For ease of reference these representations follow the order of the policies in the Consultation Document.

02 Representations

Housing Requirement

- 2.1 The Council propose to utilise base Local Housing Need as established through the Standard Methodology as the adopted housing requirement. The Council conclude that this uplift (from the existing housing requirement) will assist in ensuring the wider aims of the Oxford-Cambridge Arc (which advocates significant growth in housing to ensure economic growth in the region, described as being of national importance by the Government) is delivered.
- 2.2 The Housing Requirement for Bedford is proposed to be 25,500 dwellings between 2020 and 2040, 1,275 dwellings per annum, as established through the standard method. The Council consider that 13,000 dwellings will be delivered through existing commitments, derived from planning permissions, current allocations and a windfall allowance. As such 12,500 dwellings need to be planned for in the emerging Plan to ensure Local Housing Need can be met.
- 2.3 The PPG is clear that when establishing a housing requirement "*the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*" [our emphasis] (Paragraph: 010 Reference ID: 2a-010-20201216). Examples of scenarios which may justify an increase of housing requirement include growth strategies, the delivery strategic infrastructure improvements or the requirement of an authority to take on unmet need from a neighbouring authority.
- 2.4 It is important to note that the PPG advises that the consideration of whether uplifts to the housing requirement, beyond local housing need are necessary, should be undertaken prior to and independently from any consideration of the ability of an area to meet that need. It is also important to note that Local Housing Need is, outside of the 20 largest towns and cities, a policy-off figure, as such delivering base Local Housing Need cannot be said to be delivering policy-on objectives relating to economic growth for example.
- 2.5 Within the emerging draft Plan and supporting documents, the Council do not substantively consider any merits for uplifting Local Housing Need, beyond a brief reference to the Oxford Cambridge Arc at 1.5 of the Development Strategy Topic Paper (June 2021), which acknowledges that the figure is a

minimum. The Council set out that it is not possible to positively plan for the increased requirements of the Arc due to the Arc Spatial Framework having been delayed 2 years, with a publication anticipated in the Summer 2021 and a target to be finalised by 2023. This is not considered to be a sufficient reason to not positively Plan for this in the short term.

- 2.6 Uplifting on the basis of the Oxford Cambridge Arc, is entirely sensible and is in accordance with the PPG and the Joint Declaration, signed by Bedford Borough Council. As a constituent member of the Arc, Bedford should be involved in active engagement with the emerging Spatial Framework and as such should be in a position to at the very least estimate the likely level of any uplift forthcoming on the basis of ongoing discussions. Even if there is some debate as to the level of update required, the Council could plan for a conservative uplift in the interim period. For example, if the level of uplift in the draft document is proposed to be 30%, the Council could seek to positively apply a 20% uplift as part of this emerging Plan. This is positive, in accordance with the Framework and entirely sensible. Taking a positive and flexible approach at this stage will enable the Council to better plan strategically for future uplifts, through for example through the delivery of strategic sites.
- 2.7 It will be an unacceptable position for this emerging Plan to be subject to an early review clause, as is the case for the current Local Plan. Such an approach would merely serve to frustrate and slow much needed development.
- 2.8 Planning only for the baseline requirement of Local Housing Need for all Arc Authorities would result in a significant shortfall against the agreed housing target of one million dwellings up to 2050 which are needed to support the economic goals of the Arc. The Standard Method, for all authorities, totals just over 20,000 dwellings per annum. To meet the one million dwelling target across the Arc, would take around 47 years if only 20,000 homes per annum are delivered; 18 years beyond the 2050 target. Using base Local Housing Need, the Arch Authorities will deliver only 63,500 dwellings up to 2050; 65% of the housing required. It is clear therefore that planning to meet the base Local Housing Need is inappropriate and an uplift is required likely in excess of 20%. The later Authorities start to uplift their housing requirement, the harder it will be to satisfy, as fewer years will remain to deliver the need. It is therefore considered that the housing requirement should be uplifted now in accordance with the emerging Spatial Framework, as is being explored by other authorities, including West Northamptonshire which has set out that a 40% increase in housing requirement may be necessary to fulfil its housing obligations as an Arc authority.

2.9 The proposal to utilise a stepped trajectory, referenced at 3.5 of the draft Plan, is not supported and not considered sound. Whilst the Council point to difficulties in achieving the uplift against the current housing requirement, this is primarily due to the approach to reduce the adopted Plan period, to a functional period up to 2030, despite the concerns of the development industry at the time. It is to us entirely inappropriate that these reported difficulties can be used as justification to delay current housing needs to later in the Plan period. This approach is particularly considered problematic in that, as detailed previously, housing needs will increase further; this, combined with stepping the trajectory to deliver increased numbers later in the Plan period will only further compound delivery. We have not seen any specific evidence which to us leads to the conclusion that a higher quantum of housing cannot be delivered in the short term and we are aware of a number of sites, including land east of Newton Lane, Turvey, which are available and can make an immediate contribution to the Council's housing land supply. On this basis, there is no justification for a stepped trajectory to be utilised.

Growth Strategy Options

2.10 Having regard to the concerns raised in respect of the housing requirement and the need to ensure that the Plan is sufficiently flexible to meet the Borough's own needs and those arising through the Arc, it is considered the distribution of housing should be displayed as a percentage. This would ensure that the Plan is able to respond quickly to changes in housing requirement, whilst maintaining the spatial distribution of housing.

2.11 In respect of the proposed options, it is considered that the spatially optimal solution is a hybrid of a number of the options presented. Our favoured approach would be an approach which seeks to continue delivery in the urban areas, delivers higher growth on key transport corridors, particularly the A421, but also retains an apportionment of growth across to the rural area.

2.12 The issue with the other options proposed is that they place significant emphasis on delivery in limited areas. Such an approach reduces the ability of the market to function most efficiently, as the variety and competition will be reduced. This reduces the ability for small and medium housebuilders to enter the market and reduces the options for home purchasers. This will become particularly apparent if a higher housing requirement is deemed to be appropriate, placing further pressure on a limited pool of settlements. As well as assisting delivery, dispersed growth, across the borough, will encourage a wider range of housebuilders into the market delivering concurrently; it also has the benefit of ensuring rural communities remain vibrant and maintain a healthy demographic composition, preventing issues such

as ageing village populations and falling rolls at village schools for example.

- 2.13 Dispersed growth (or Village related as it is referred in the consultation material) should form part of every spatial option proposed, albeit the level to be delivered could of course differ option to option. Any attempt to constrain dispersed growth is not supported.
- 2.14 Whilst it is recognised that the Adopted Plan makes some provision for dispersed growth, and growth in the sustainable rural settlements to the period 2030, if this pattern of development is not continued, it could result in 10-year + period where no growth occurs in such settlements. This could have a negative impact on the vitality and viability of these settlements.
- 2.15 A dispersed pattern of growth is better enabled through the availability of modern technology including recent modal shifts to online shopping, improvements to high-speed broadband provision, the increasing prevalence of home working and the greening of private vehicles through developments in electric vehicles (by the end of the proposed Plan Period petrol and diesel car sales will have ceased). In addition, following the recent periods of lockdown there is likely to be a continued demand for semi-rural opportunities, with the COVID-19 pandemic placing a greater emphasis on space and outdoor living.
- 2.16 Whilst we do not object to the principal of identification of a new settlement as a mechanism of future delivery, caution should be applied to overreliance on the delivery from new settlement/s to meet the overall quantum of housing growth necessary over the Plan period. Such sites are notoriously difficult to deliver and require significant amounts of planning and infrastructure delivery prior to the first dwellings being delivered. The preferred approach in this scenario is to positively allocate new settlement sites above and beyond the sites needed to meet the Borough's identified housing needs, with new settlements delivering towards the latter part of the Plan i.e. 2040 onwards. Smaller sites should be identified and allocated for delivery in the early years of the Plan to ensure that delivery of the Borough's housing needs is not constrained.

Site Allocations and Call for Sites

- 2.17 As previously set out, the Council have previously evidenced that settlements such as Turvey can deliver up to 150 dwellings in the period up to 2030. The emerging Local Plan looks beyond 2030 to 2040, and thus commensurate additional further growth in the sustainable rural settlements must be delivered during this extended time period. In Turvey, the 50 dwellings allocated in the emerging Neighbourhood Plan will not be sufficient for housing needs up to 2040. It is considered that sustainable growth in

settlements such as Turvey, up to 2040, should be in the region of 50-100 additional dwellings (ontop of the 50 dwellings allocated in emerging Neighbourhood Plan i.e. 150 dwellings in total). This is consistent with the Council's previous evidence base, current housing targets, and commensurate to their sustainability and spatial role. As previously set out, we would object to any attempt to stifle appropriate rural growth.

- 2.18 In that regard, we consider the emerging Local Plan must make allocations in the Rural Service Centres to ensure a suitable distribution of deliverable development sites up to 2040. Within Turvey it is clear through both the evidence supporting the Neighbourhood Plan and the previous assessments supporting the adopted Local Plan (whereby the Council's 2017 Local Plan consultation paper sought to identify preferred sites for allocation, which included land east of Newton Lane), that the most suitable and deliverable site beyond those allocated in the Neighbourhood Plan is land to the east of Newton Lane, Turvey. It was ranked by the Neighbourhood Plan as demonstrably the third best site and has previously been assessed by the Council as an appropriate site for allocation. A range of evidence documents have been produced by Richborough Estates which demonstrate the deliverability of the site.
- 2.19 The Land east of Newton Lane is well related to both the existing built form of Turvey and proposed development west of Newton Lane. It is a logical location for future growth. The development of the site for 80 dwellings can be delivered without undue impacts and would keep development levels within Turvey well below the 150 dwelling total which has already been considered appropriate up to 2030. The site can be safely accessed, as confirmed by the Highways Authority. The proposed scheme delivers the opportunity to provide dedicated off street parking for properties on Newton Lane (with ownership transferred to the properties) which currently have to park on street. The site would provide new areas of high quality public open space creating an attractive development and new amenity areas for existing and new residents. The site can deliver a policy compliant level of affordable housing.

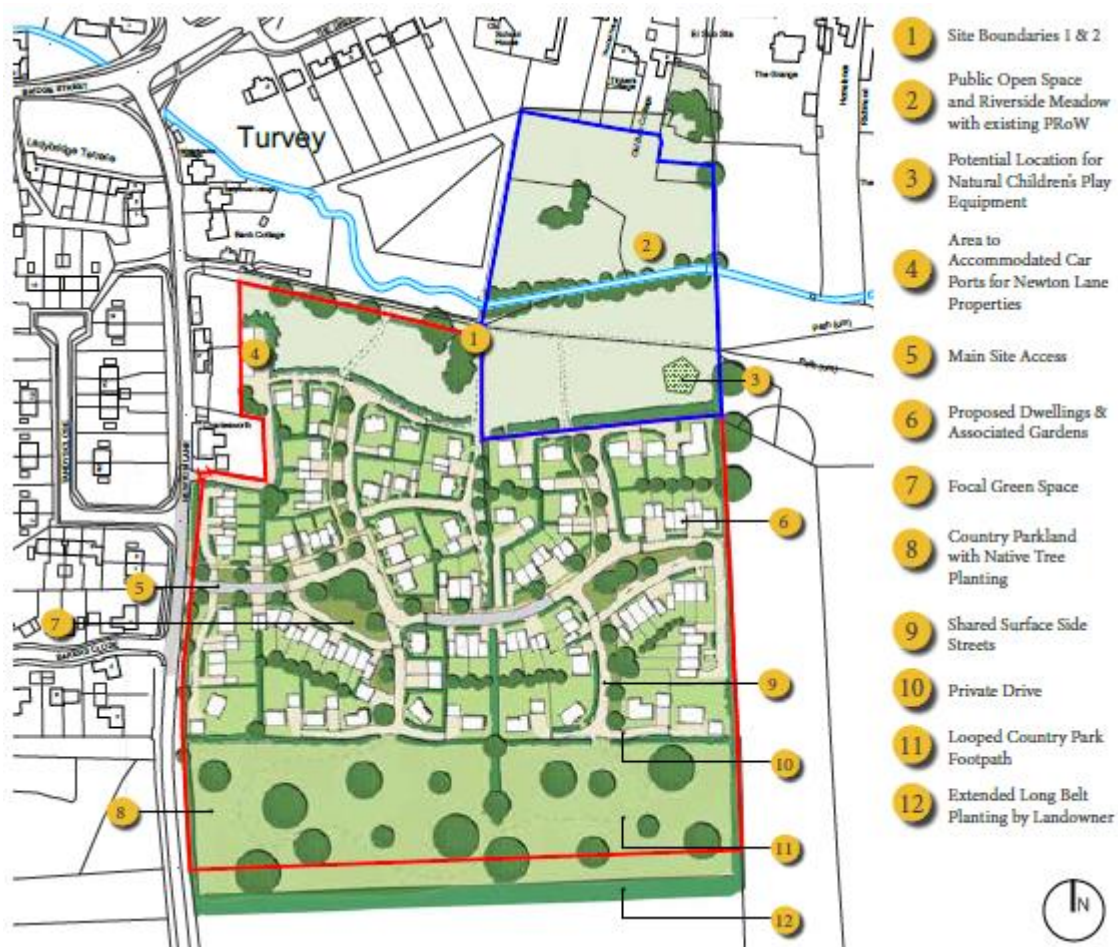


Figure 2: Indicative Masterplan, Land East of Newton Lane, Turvey

2.20 Land east of Newton Lane, Turvey should be positively allocated within the emerging Plan. This is considered to be entirely logical and will make a valuable contribution towards meeting the Council's housing needs and ensuring that Turvey delivers appropriate development up to 2040, not just 2030.

Self-build and custom housebuilding

2.21 The approach adopted by the Council in respect of *Policy SB1 - Self-build and custom housebuilding* is not supported, is not consistent with the Council's own evidence, and is not consistent with how evidence has informed other policies within the Plan. The Council has published evidence on the topic in the document the *Bedford Borough Local Housing Needs Assessment Self-build and Custom Housebuilding* (April 2021). This document concludes that the desires of self-builders is to build large, expensive properties and that currently sufficient single dwelling permissions adequately caters for this need. This accords with our understanding of self-build, wherein people are seeking bespoke and unique

opportunities, not simply adjacent to a modern housing development.

- 2.22 Despite this, and for no justified reason, the Council have opted to seek to promote a policy which requires serviced plots to be delivered on the majority of new housing sites. This approach is not effective, consistent with evidence and as such is not supported nor considered sound. It is not clear what the housing target is for self or custom build, and how this has informed the policy, particularly having regard to the conclusions of the evidence document which demonstrates that there are sufficient units being delivered.
- 2.23 It is well established that such criteria are difficult to deliver on modern housing developments and do not serve to provide additional units. In reality, such requirements may impede development unnecessarily, adding to developer burden with little merit. Such proposals can create enclaves within or adjacent to housing schemes, with designs which may be entirely at odds with the aesthetic of the rest of the scheme, which will have been specifically designed as a collective whole. In our experience, self-builders generally do not want to buy serviced plots within or adjacent to a modern housing estates. Our experience is that for the most part that they are instead looking for more bespoke rural opportunities.
- 2.24 We are yet to see evidence that this method of delivery has been successful. Furthermore, just because individuals are registered on the self-build register it does not mean that they will all build their own property, even if suitable land was available. The reality is the difficulty and skills required will mean only a small percentage of those on the register will ever develop a self-build property. It is also important to note that individuals can be on multiple self-build registers, even with a local connection test, which inflates the figures across a number of areas. Unless demand for plots is means tested, with expressions of interest supported by evidence of finances to build such a house, to simply just deliver self-build plots on strategic sites is an arbitrary approach which lacks nuance and will harm more justified housing delivery.
- 2.25 This policy requirement will serve to frustrate and slow housing delivery, given special consideration would need to be given to the location of the plots and how they can be accessed safely and independently from the typical development parcels. The delivery of plots following unsuccessful marketing is also more complex than suggested within the policy. The Policy assumes such plots could simply just be built out by the developer; the nature of the plots may not however lend themselves to being built by the developer and as such could leave undeveloped plots for significant period of time.

Such requirements will also deter developers, given the increased complexity and lack of certainty of outcomes. Custom build may not be in the business model of some housebuilders, which may preclude them from bidding for sites if such a requirement is retained. Self and Custom build is a market choice and should be led by the free-market, it is not and should not be treated as a need to be satisfied in the same manner as affordable housing. If there is sufficient demand for such units, and people are willing to pay a premium, then it will be adopted by more housebuilders.

- 2.26 The Council should instead seek to ensure the continuation of a positive policy environment where suitable self-build schemes, either of individual units or larger schemes or specific schemes providing serviced plots will be treated favourably. This encourages delivery in line with the Council's statutory duties, without compromising sites which make up a vital facet of the Council's overall proposed housing supply. It will also more likely better serve the self-build market by enabling development in line with the wishes of perspective self-builders. Having regard for the evidence, this policy is not sound, as it is not effective nor justified.
- 2.27 The Council should be guided by its evidence and remove this policy requirement. Without such alteration this policy is considered unsound as it is not justified, effective or consistent with national policy.