

Part B – Please use a separate sheet for each representation

Name or organisation: CODE Development Planners Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	TC1(S)	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to representations below

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to representations below

(Continue on a separate sheet /expand box if necessary)

Please note. In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I have been involved in the promotion of this site throughout the preparation of the BBLP 2040 and I would be able to assist the inspector with background and contextual information.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

BEDFORD BOROUGH LOCAL PLAN 2040

(REGULATION 19)

JULY 2022 REPRESENTATIONS



Client: The Executors of the late [REDACTED]
Project: Alington Estate, Little Barford
LP policy ref: TC1(S) and
LP para ref: 5.7
Nature of comment: Support
Date: 29 July 2022

1 Introduction

1.1 These representations have been prepared by CODE Development Planners on behalf of the Executors of the late [REDACTED] in relation to the policies and evidence base of the regulation 19 Bedford Borough Local Plan 2040 (BBLP 2040).

2 Proposals being promoted

2.1 The Alington Estate, Little Barford is proposed for allocation under Policy HOU19 of the BBLP 2040 for a new settlement to delivery at least 4,000 new homes and in the region of 4ha of employment land. The policy also identifies, inter alia, “*walkable neighbourhoods which will enable residents to meet the majority of their day to day needs locally*” and “*the new settlement will provide a range of community services and facilities including health, education, retail, culture, community meeting spaces, multifunctional open space and sports and leisure facilities.*” However, there is no corresponding recognition within Policy TC1(S) and paragraph 5.7 that the new settlement will create a local centre and neighbourhood centres.

2.2 The Town Centres and Shopping Policies Topic Paper, April 2022 refers to the types of centres (para 2.3). It states, “*Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre.*” We recognise that until a masterplan has been progressed for the new settlement at Little Barford the location and extend of the local centre within it will not be spatially defined. However, the effective delivery of the ‘placemaking’, ‘accessible’ and ‘prosperous’ elements of Policy HOU19 would be enhanced by the inclusion of Little Barford as a “Local Centre: Key Service Centre” within policy TC1(S) and an additional bullet point within Policy HOU19.



- 2.3 Although Wixams is not a direct comparable, wording in paragraph 5.7 of the BBLP 2040 states, “*Wixams new settlement is identified as a potential Key Service Centre as, over the course of the plan period, the planned town centre will be constructed and, once completed, will serve the settlement . . .*” It would seem reasonable that similar wording should be inserted into the policy in recognition of Little Barford’s allocation as a new settlement.
- 2.4 The urban area of St Neots, Huntingdonshire is within 0.5 miles of the northern boundary of the Little Barford New Settlement boundary. St Neots has been identified within the Huntingdonshire Local Plan to 2036 as one of four spatial planning areas. This designation is the highest order settlement and reflects St Neots’ status as a traditional market town and as one of the most sustainable centres for development¹.
- 2.5 The relative positions of St Neots and Little Barford within the settlement hierarchy, with St Neots categorised as the equivalent of a strategic or district centre and Little Barford as a local centre: key service centre (policy TC1(S)) recognises that whilst the day to day needs of the residents of the new settlement of Little Barford will be provided on site, residents would travel beyond the new settlement for access to higher order facilities. The proximity of the two settlements to one another enables such journeys to be made by sustainable and active modes of travel.
- 2.6 Identifying Little Barford within the settlement hierarchy, with St Neots designated in a higher tier of settlement, protects St Neots from competition from Little Barford whilst recognising that there will be a relationship between the two.
- 3 Modifications required to Policy HOU19**
- 3.1 The landowner broadly support Policy HOU19 and confirm that a new settlement at Little Barford will deliver at least 4,000 new homes, circa 4ha of employment land and associated infrastructure to support a new community. However, modifications are required to ensure robustness against the tests of soundness and improve the legibility of the policy. To achieve both aspects the following modifications are required to Policy HOU19.

Hierarchy of Town Centres

- 5.7 Kempston (the Saxon Centre together with parades on Bedford Road and Bunyan Road) continues to perform the role of a district centre. In addition, the Council has identified a number of local centres which serve smaller catchment areas. Five local centres are designated within the Bedford urban area, whilst in the rural parts of the borough a number of Key Service Centres are designated which serve their surrounding rural areas. Remaining groupings of shops which are of purely neighbourhood significance are identified as neighbourhood centres. Wixams and Little Barford new settlements are identified as a potential Key Service Centres as, over the course of the plan period, the planned town

¹ One of four ‘spatial planning areas’ - reflecting its status as one of the districts traditional market towns and most sustainable centres (Policy LP2: Strategy for development of the Huntingdonshire Local Plan 2036, May 2019).



centre ([Wixams](#)) and large village centre ([Little Barford](#)) will be constructed and, once completed, will serve their settlement [and in the case of Wixams](#) wider rural area.

Policy TC1(S) Hierarchy of town centres

The hierarchy of centres is as follows –

<u>Type of centre</u>	<u>Designated centres</u>
1) Strategic centre	Bedford town centre
2) District centre	Kempston (including the Saxon Centre, Bedford Road and Bunyan Road)
3) Local centres	<u>Urban centres</u> Castle Road, Bedford Church Lane, Bedford Ford End Road, Bedford Midland Road (west), Bedford Tavistock Street, Bedford <u>Key Service Centres</u> Bromham Clapham Great Barford Little Barford (proposed new centre) Sharnbrook Shortstown Wilstead Wixams (proposed new town centre) Wootton
4) Neighbourhood centres	Remaining centres (small parades of shops of purely neighbourhood significance which are not town centres in retail policy terms)