

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

By e-mail to: planningforthefuture@bedford.gov.uk

Dear Sir/Madam,

Re: Review of the Bedford Local Plan 2030 – Call for Sites Submission for the former W&H Peacock Auction House (26 Newnham Street), 24 Newnham Street and land to the rear of 22 Newnham Street, Bedford

On behalf of our clients [REDACTED] we are pleased to submit details of the above site for consideration as part of the Review of the Bedford Local Plan 2030 – Call for Sites submission.

In commencing an immediate Review in accordance with Policy 1 of the adopted Plan the Council is, as required, seeking to ensure that future needs for growth are provided for in-line with government policy i.e. local housing need calculated using the standard method. This will entail meeting a significant (up to c.35%) increase in the minimum annual requirement for development for at least the period 2020-2040 upon adoption of the Review, expected in 2023.

The Review of the Local Plan is an important opportunity to address issues regarding flexibility and choice in a variety of locations for growth, as well as ensuring a balanced allocation of land for development sufficient to meet future needs.

The scope for the Review has been enhanced as a consequence of the foreshortened plan period of the current Plan, and its strategy of apportioning specific (albeit minimum) values for the distribution of housing across the settlement hierarchy and the deferral of site allocations to Neighbourhood Plans. Equally, the challenges of housing delivery must also reflect realistic timescales to 'unlock' developable sites in the Urban Area, as well as ensuring necessary supporting infrastructure in other locations.

The Borough Council has acknowledged this through consideration of a diverse range of spatial options to inform the Local Plan Review. As stipulated by national policy this is an opportunity to ensure that Plans are positively prepared in terms of seeking opportunities for sustainable development.

Our client's site at the former W&H Peacock Auction House (26 Newnham Street), 24 Newnham Street and land to the rear of 22 Newnham Street should be considered in this context. The details submitted illustrate the opportunity for a sustainable contribution towards an appropriate spatial strategy that would satisfy key elements of the proposed Sustainability objectives and requirements for development.

As part of the details submitted for our client's site, we confirm that this location is free from overriding constraints to availability or suitability and that access can be provided.

Development of our client's site is suitable to provide up to 50 residential dwellings (Use Class C3) comprising a mixture of market and affordable unit types. The site would see the redevelopment of a largely redundant parcel of previously developed land within the urban area of Bedford which is surrounded by existing residential development, increasing both public surveillance and activity within the area.

Its location near to the town centre provides for convenient and easy access to a range of local services and facilities by both foot and cycle and will minimise the use of the private car. This reflects the density of the scheme which seeks to make optimal and most efficient use of the site and is reflective of paragraph's 123a) and c) of the NPPF which identify that density standards should seek a significant uplift in the average density of residential development within city and town centre locations that are well served by public transport and that applications should make efficient use of land.

The scheme has recently been prepared for pre app purposes based around the concept of a 'mews/townhouse' typology that supports and enables the key development parameters of affordability, community, density, deliverability, diversity, flexibility, identify, longevity and place making. Buildings could be accommodated onsite to take account of existing topography, use of natural light source, ventilation, cooling and solar gain as well as providing natural surveillance to areas of public open space. It is also proposed that roof space will comprise green roofs where possible.

The redevelopment of the site would create immediate and short term direct and indirect employment opportunities and can be brought forward with no access or highway constraints.

In light of the extensive scope for the Review of the Local Plan 2030 we consider that an appropriate strategy will require a combination of multiple spatial options over the plan period. In the case of our client's land at the former W&H Peacock Auction House (26 Newnham Street), 24 Newnham Street and land to the rear of 22 Newnham Street, this would achieve the Council's strategy to direct growth in the first instance to available sites within the Bedford/Kempston urban area. As per the details submitted, in this case our client's site is free from constraints associated with some locations in the Town Centre/urban area that restrict viable development options or significantly impact upon development timeframes. We would encourage the Council weigh these benefits positively when assessing the site in this context. However, this should only be a part of the Council's strategy and this Plan should consider a variety of locations for growth beyond the urban area.

We look forward to future updates regarding preparation of the evidence base for the Local Plan Review. We would be happy to answer any questions or requirements for clarification as part of the Council's assessment of the site within the next version of the Housing and Economic Land Availability Assessment and ahead of future stages of consultation regarding the Local Plan Review.

Yours sincerely,


Associate Planner

Encl – Call for Sites Form and Site Location Plan