Wendy Burden
Intelligent Plans and Examinations
(IPE) Ltd
29 Monmouth Street
Bath
BA1 2DL

| | |
|---|---|
| Please ask for: | Sonia Gallaher |
| Direct Line: | 01234 718570 |
| E-mail | Sonia.gallaher@bedford.gov.uk |
| Date: | 9 September 2019 |

Dear Ms Burden,

**Independent Examination of Oakley Neighbourhood Development Plan**

I refer to your letter dated 27 August 2019. Set out below are the answers to your questions to Bedford Borough Council on the Oakley Neighbourhood Development Plan.

8. *Policy 3S states that neighbourhood plans will allocate sites for new housing. ONP Policy HG1, which deals with housing growth in Oakley, deals only with new housing which is not on allocated sites. Whilst there is clear reference in the ONP to the two new housing sites, these need to be formally allocated in an ONP policy. It would seem appropriate to incorporate the allocation of the sites proposed for housing in the ONP within Policy HG1. I suggest changes to the Policy to incorporate the allocation of the two sites; to provide more clarity in the wording of the Policy; and to avoid an approach which would be over prescriptive and in conflict with national policy. I would welcome the views of the QB and of BBC on the following amended Policy.*

Bedford Borough Council has considered the proposed policy wording. We suggest that the word 'help' is inserted before the word 'meet' in the first sentence. In the dot points in the third paragraph, we think it is necessary to add in the word 'and' to the end of the sentences so that it is clear to developers that they have to comply with all of the requirements and not just one of the points. Our suggested wording is as follows:

"ONP HG1: Housing Growth in Oakley

To **help** meet the requirement for new housing within Oakley the following sites are allocated for residential development:

• Land at Station Road to accommodate about 30 dwellings (Site 170)
• Land to the rear of High Street to accommodate about 10 dwellings (Site 171)

The development of these allocated sites should be carried out in accordance with the Housing Site Design Brief set out in Annex 4.

In addition to the allocated sites, housing development will be supported on sites located within the Settlement Policy Area and where it would not cause harmful impact on the adjoining rural area.

Housing development outside of the settlement policy area will be supported where it meets the following requirements:
- It would comprise infill development within an existing housing row or cluster; **and**
- It would complement the existing housing and not lead to any harmful change to the established character of the locality; **and**
- It would result in existing housing or the proposed housing having adequate garden space to support outdoor seating, drying of clothes, play and other typical garden uses; **and**
- It would avoid the creation of further linear or ribbon development along roads in and around the settlement."


10. *Policy BE1 restricts the ONP to supporting B1 development only on existing business or industrial sites. The reasons given for such a restriction relate to the potential for the generation of heavy traffic. There is no such restriction to B1 development provided in national policy or in the emerging BBSLP Policy 73, which deals with key employment sites. In these circumstances, therefore, the ONP is seeking to impose more onerous requirements in the assessment of employment development than that set out in national and emerging policies. To secure the compliance of Policy BE1 whilst recognising the importance of the highways issues in the consideration of B class proposals I suggest the following form of words on which I would welcome comments from BBC and the QB.*

*"ONP BE1: Business*

*Employment development (as defined by Use Class B1, B2 and B8 of the General Development Order) will be supported in the following locations:*

*• Within the Highfield Park, Willow Vale and Station Road business parks.*
*• Within existing business or industrial sites.*

*Providing there is no significant harm to the amenities of nearby residents or to local landscape and rural character; and*
*Subject to an assessment of the impact of any new employment development on the highway network to demonstrate that the proposals would not result in*

*any unacceptable increase in traffic congestion, noise or vibration and would not cause harm to road safety or the air quality of residents."*

Bedford Borough Council agrees with the proposed changes to the policy wording for Policy BE1.

11. *National and emerging Local Plan policies encourage the identification of locally important green spaces and valued local landscapes by rural communities. Policy ONP LE1 is headed "Significant Landscape Areas". It needs to be clear that these landscape areas are of local rather than strategic value, and unless the QB wishes to suggest any other form of words this could be achieved through the insertion of the word "locally" before "significant" in the heading and throughout the text of the policy and subsequent supporting text.*

*In addition, through the requirement of "must preserve or", the third paragraph seeks a higher standard of protection than that provided through national policy. This should be changed to "should contribute to and" to have regard to national policy, unless BBC and the QB have any other suggestions to make.*

Bedford Borough Council broadly agrees with the proposed changes to Policy ONP LE1 though an alternative form of wording could be to replace 'must preserve or enhance that setting' with 'should mitigate the effect of development on that setting', because it may be that mitigation could be achieved by removing something currently harmful. The words 'should contribute to' suggest that something should be added (such as landscaping) when in some circumstances this may not be the most appropriate approach. Please note that there is a typo in the second paragraph of this policy; 'approaval' should read 'approval'.

Please contact Sonia Gallaher (details above) if you require any further clarification.

Yours sincerely

Gill Cowie

Gill Cowie
Manager for Planning and Housing Strategy