

**From:** [planning for the future](#)  
**To:** Thurleigh NP  
**Subject:** 04 May 2020 11:51:01  
**Date:**  
**Attachments:**

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Dear Sirs

Thank you for consulting the Canal & River Trust. As the Trust have no canals within this area we have no comment to make. Please remove us from the mailing list for this particular Neighbourhood plan.

Kind regards




**Canal & River Trust**



[canalrivertrust.org.uk](http://canalrivertrust.org.uk)

Sign up for the Canal & River Trust Newsletter

[canalrivertrust.org.uk/newsletter](http://canalrivertrust.org.uk/newsletter)

 [@canalrivertrust](#)  
 [/canalrivertrust](#)  
 [/canalrivertrust](#)

Date: 06 May 2020  
Our ref: 316058  
Your ref: Thurleigh Neighbourhood Development Plan



Bedford Borough Council  
[planningforthefuture@bedford.gov.uk](mailto:planningforthefuture@bedford.gov.uk)

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Sir/Madam

**Thurleigh Neighbourhood Development Plan Regulation 16**

Thank you for your consultation on the above dated 01 May 2020

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Consultations Team

**From:**  
**To:** [planning for the future](#)  
**Cc:** [Planning Policy](#)  
**Subject:** Thurleigh Neighbourhood Development Plan  
**Date:** 09 May 2020 15:40:00

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Thank you for consulting Milton Keynes Council on the Thurleigh Neighbourhood Plan. The Council does not have any comments to make on the draft Plan.

Regards

Milton Keynes Council | UDLA | Placemaking | Growth, Economy and Culture | Civic Offices | 1  
Saxon Gate East | Milton Keynes | MK9 3EJ

**Please Note:** My working days are Monday, Tuesday, Wednesday, and Thursday

*Creating great places to live, work and visit.*

**PART A**

	<b>Your Details</b>
<b>Full Name</b>	<div></div> <div></div>
<b>Address</b>	C/O DLA Town Planning 5 The Gavel Centre, St Albans
<b>Postcode</b>	AL3 6PQ
<b>Telephone</b>	<div></div>
<b>Email</b>	<div></div>
<b>Organisation (if applicable)</b>	DLA Town Planning
<b>Position (if applicable)</b>	Strategic Planning Manager



**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	HS3
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☒ Support
- ☐ Support with modifications
- ☐ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

DLA Town Planning represents the owners of Hayle Field and together we have been working with the Parish Council since 2015 in relation to this site. We exhibited initial plans for the site at the Neighbourhood Plan Call for Sites exhibition on 25 May 2016. We then held a specific local exhibition for the Hayle Field site on 6 June 2017. The feedback from these events was largely positive.

The site is proposed as a housing allocation for 20 dwellings and we support this allocation.

An outline planning application is currently with Bedford Borough Council for determination. The application is being held in abeyance pending progress on the Neighbourhood Plan. However, there are no technical issues that would prevent the grant of planning permission and this illustrates the suitability and deliverability of the site for housing.

On a practical note, the Hayle Field site can be viewed from the road and it would be possible for the Examiner to undertake a site visit while maintaining appropriate social distancing requirements.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

None

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☐

*Yes, I wish to participate at an oral examination* ..... ☒ X

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

If the Examiner feels an oral examination is necessary and if it relates to the Hayle Field site, then we would like the opportunity to be present and represent the landowner. We can advise on the technical work that has been done to support delivery of the site and advise on the current status of the planning application.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* .....yes please..... ☒ X

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**From:**

**Sent:** 21 May 2020 17:31

**To:** Planning Policy <Planning.Policy@bedford.gov.uk>

**Subject:** RE: Thurleigh Neighbourhood Development Plan

Good Afternoon,

Rushden Town Council has made the following observations at their Planning Consultative Committee Meeting.

**RESOLVED**

Rushden Town Council has no objection

***Kind Regards***

**From:**  
**To:**  
**Subject:** Thurleigh Neighbourhood Plan  
**Date:** 26 May 2020 10:25:22

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Good Morning

Thank you for the opportunity to comment on the Thurleigh Neighbourhood Plan. Oakley PC fully supports the Plan.

Regard

**From:** Carr Richard  
**To:** [planning for the future](#)  
**Cc:** [Carr Richard](#)  
**Subject:** FW: Thurleigh Neighbourhood Development Plan  
**Date:** 26 May 2020 11:17:33

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Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the Thurleigh Neighbourhood Development Plan

Best wishes

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-

29 May 2020

[avisonyoung.co.uk](http://avisonyoung.co.uk)

Bedford Borough Council  
[planning.policy@bedford.gov.uk](mailto:planning.policy@bedford.gov.uk)  
via email only

Dear Sir / Madam  
**Thurleigh Neighbourhood Plan Regulation 16 Consultation  
May – June 2020  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

#### **About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

#### **Proposed development sites crossed or in close proximity to National Grid assets:**

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to National Grid infrastructure.

**Distribution Networks**

Information regarding the electricity distribution network is available at the website below:

[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Information regarding the gas distribution network is available by contacting:

[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

**Further Advice**

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



## Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

Cadent Plant Protection Team  
Block 1  
Brick Kiln Street  
Hinckley  
LE10 0NA  
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

**From:** [planning for the](#)  
**To:** [future](#)  
**Subject:** Thurleigh Neighbourhood Development Plan  
**Date:** 05 June 2020 10:19:09

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Dear Sir

We write with regard to the Thurleigh Neighbourhood Development Plan. The form on the Borough Council website is beyond our IT skills on an Apple Mac laptop so an email will have to suffice. We have tried to be concise.

Paragraphs 4.2 and 8.10 The reference to 30 more houses is not, so far as we are aware, the policy of Thurleigh Parish Council and there have been a number of public consultation meetings in the village over the last eight months which have been well attended and close to unanimous in condemning the suggestion that the village either needs or will benefit from an additional 30 houses.

Paragraphs 6.5.1 and 6.5.2 The village is too often treated as a through route linking the A1 and the A6. Traffic speed is a significant issue for the local population (and a local Speed Watch group has been created). There is no 20mph speed limit around the primary school despite the fact that parents regularly park on the High Street outside the School and close to a double bend. The School is within a conservation area.

Paragraph 6.5.7 Our address is [REDACTED] and the property is situated [REDACTED]. We have no desire to see the church illuminated! More light pollution and totally unnecessary.

Paragraph 8.18 The key objection we have to the Plan is the proposed increase in housing at "The Beeches" (10 houses) and Hayle Field (20 houses). The infrastructure in the village is unable to support the population now. There is no village shop, post office or chemist. Every time a villager requires anything they need to access a vehicle. The condition of the roads leading to the village is, frankly, dangerous. Why has Thurleigh not been allocated speed bumps (such as Milton Ernest)? Every additional house will mean additional vehicles and greater risk.

The application with regard to Hayle Field has caused a great deal of reaction almost all of it negative. The field is not wholly within the boundary of the village at present. If 20 houses are agreed this will, no doubt, open the door to the original application which was for 90 houses. We believe that hedgerows have been removed illegally from the field surrounds (particularly the edge which is adjacent to the High Street). As a community the villagers have been puzzled and irritated by the apparent inability or unwillingness of the relevant authorities to take action.

Paragraph 8.51 We are mystified by the reference to The Jackal Public House which has been closed for four years and shows absolutely no sign of reopening any time soon.

Thank you for your consideration.

Yours sincerely

[REDACTED]

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	4.12	Policy Reference:	
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**Do you support, oppose, or wish to comment on this paragraph?  
(Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☒ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

As set out in the 2020 Bedford Plan, there is no requirement for housing in Thurleigh.

The Questionair which we were asked to comment on began by telling us that we had been told by Bedford that we must have a minimum of 20 houses, we were asked where this housing should be, not if we agreed with the requirement, I think this was in about 2015. The responses are now out of date. The village should be re-consulted in the light of the adopted plan with no requirement for housing.

Additionally, it has now become apparent that Bedford are looking to develop Twinwoods and the Wind Tunnel site ( part of which is in Thurleigh) or Thurleigh Air Field. The scale of these proposals will be a new town in the next plan along with 500 houses at Clapham and more at Sharnbrook. These were not on the table when the villagers were consulted. Now the housing need would be covered in all these surrounding developments.

So the present form of the proposal is dependent on past consultations which were in different circumstances and the process should be re-started as this was 5 years ago and is no longer relevant.

Additionally, the number of sites now being proposed, along with exception sites which we know are under discussion but are omitted from this document as no consultation or policy refers to exception sites, could result in a massive amount of construction traffic. The shortest rout to Bedford for material deliveries for Hales Field, the site favored by the 3 remaining members of the NDP group, would be down Robins Folly. For 20 houses, with associated road materials and equipment for earth moving and construction, drains , concrete, bricks, roof trusses etc, the number of HGV's would be way in excess of the capability of this road, which is single carriage way in places and as it is on a bus rout, lorries often get stuck at present trying to pass the bus.

The road network is just not adequate to handle the quantity of construction traffic for these sites and the Exception sites.

The additional subsequent traffic, of say 2 cars per household has also not been considered and no analysis of the road network has not been assessed.

There is no employment in Thurleigh for any new residents, so they would all be travelling to work in Bedford or other places. This has not been addressed.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

A new survey of the Residents should be sent out as it is more than 5 years since the consultation took place and as above, circumstances have now changed.

Additionally, since that questionnaire in 2015, there have been at least 12 new dwellings created in Thurleigh, as a result of the Chapel conversion to 4 flats, and the building of 2 new dwellings on the High St, 1 in the garden of a Listed cottage, 1 in the garden of a house in Vicarage Green, 2 barn conversions at Rutters Farm and the extension of the caravan park at a farm. These were during a time which the Bedford Structure Plan had a policy of No New Houses in Thurleigh. So the results of the Questionair should have these dwellings deducted from the number of new houses which the village thought they were obliged to have in 2015 when they were consulted.

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... x  
☐

*Yes, I wish to participate at an oral examination* ..... ☐

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... x ☐

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	HS1
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☒ Support
- ☐ Support with modifications
- ☐ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Anglian Water has no objection to the principle of residential development on this allocation site.

As the Development Plan will be read as a whole we don't consider there is a need to set out the requirements in respect of foul drainage and surface water management which appear in the adopted Bedford Local Plan in this policy.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination .....*

X

*Yes, I wish to participate at an oral examination ..... ☐*

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me ..... X*



**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	HS2
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☒ Support
- ☐ Support with modifications
- ☐ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Anglian Water has no objection to the principle of residential development on this allocation site.

As the Development Plan will be read as a whole we don't consider there is a need to set out the requirements in respect of foul drainage and surface water management which appear in the adopted Bedford Local Plan in this policy.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination .....*

X

*Yes, I wish to participate at an oral examination ..... ☐*

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me ..... X*

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	IF1
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☒ Support
- ☐ Support with modifications
- ☐ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Policy IF1 requires development proposals to make provision for both water supply and sewerage which is supported.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination .....*

X

*Yes, I wish to participate at an oral examination ..... ☐*

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me ..... X*

**PART A**

	<b>Your Details</b>
<b>Full Name</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	
<b>Organisation (if applicable)</b>	Barton Willmore on behalf of St Modwen Developments Ltd
<b>Position (if applicable)</b>	Associate Planner

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.43 & 9.4	Policy Reference:	NLUA2
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☐ Oppose
- ☒ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

St Modwen Developments Ltd (SMD) have land interests within the Thurleigh Neighbourhood Area, including Thurleigh Airfield to the north of Thurleigh village.

**Representations to the Thurleigh Neighbourhood Development Plan Submission Version (the NDP), made on behalf of SMD, are set out in a letter dated 12<sup>th</sup> June 2020. Please read this letter alongside this form.**

The aspiration for the Twin Reservoirs at Thurleigh Airfield to be protected and enhanced, as set out in Non-Land Use Action 2 of the NDP, with supporting text at paragraphs 8.43 and 9.4, is noted. As stated at paragraph 1.5 of the NDP, development of Thurleigh Airfield is subject to policies under the direct control of Bedford Borough Council and, as such, is not covered in the NDP, which is an approach supported by SMD. Nevertheless, SMD wish to assure the Parish Council and local community that they will continue to liaise with them in respect of development of Thurleigh Airfield, including any proposals that include the Twin Reservoirs.



**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

N/A

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☐

*Yes, I wish to participate at an oral examination* ..... ☒

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

If the Twin Reservoirs are to be discussed at an oral examination, SMD respectfully request to participate. Moreover, SMD respectfully request to participate in any oral examination in order to fully present their case in respect of housing and employment policies and their request for the Former Officers' Mess Site to be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	1.7	Policy Reference:	
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☐ Oppose
- ☒ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

St Modwen Developments Ltd (SMD) have land interests within the Thurleigh Neighbourhood Area.

**Representations to the Thurleigh Neighbourhood Development Plan Submission Version (the NDP), made on behalf of SMD, are set out in a letter dated 12<sup>th</sup> June 2020. Please read this letter alongside this form.**

In respect of the Village History and Background, paragraph 1.7 of the NDP states: *“The Old ‘Officers’ Club on Keysoe Road is a further reminder of the former airfield. This brownfield site is now owned by St Modwens PLC.”*

The reference to ‘St Modwens PLC’ should be ‘St Modwen Developments Ltd’.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

SMD respectfully request that paragraph 1.7 is amended as follows:

*The Old 'Officers' Club on Keysoe Road is a further reminder of the former airfield. This brownfield site is now owned by St Modwen Developments Ltd ~~St Modwens PLC~~.*

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☐

*Yes, I wish to participate at an oral examination* ..... ☒

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

SMD respectfully request to participate in any oral examination in order to fully present their case in respect of housing and employment policies and their request for the Former Officers' Mess Site to be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART A**

	<b>Your Details</b>
<b>Full Name</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	
<b>Organisation (if applicable)</b>	Barton Willmore on behalf of St Modwen Developments Ltd
<b>Position (if applicable)</b>	Associate Planner

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.21	Policy Reference:	HS2
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☒ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

St Modwen Developments Ltd (SMD) have land interests within the Thurleigh Neighbourhood Area, including the Former Officers' Mess Site on Keysoe Road, which comprises 1.82 hectares of previously developed land that is well related to the main built up part of Thurleigh village.

**Representations to the Thurleigh Neighbourhood Development Plan Submission Version (the NDP), made on behalf of SMD, are set out in a letter dated 12<sup>th</sup> June 2020. Please read this letter alongside this form.**

SMD support Thurleigh Parish Council in their preparation of a neighbourhood plan but have concerns that should be addressed to ensure that the Plan meets the basic conditions. In respect of the housing allocations, including Land at The Beeches (Policy HS2), our concerns, in summary, are that:

- a. There is insufficient evidence to support the housing allocations contrary to national policy and advice and, as such, it is not demonstrated that the allocations are deliverable, which provides uncertainty as to how much of the allocated housing will come forward over the plan period.
- b. The housing allocations do not maximise the use of previously developed land contrary to national policy and advice and a strategic policy of the development plan, and which runs counter to achieving sustainable development.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

SMD respectfully request that the Former Officers' Mess Site, which comprises previously developed land, be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

Our representations, as set out in the letter dated 12<sup>th</sup> June 2020, together with the Illustrative Masterplan, demonstrate that:

- The Former Officers' Mess Site is suitable for housing development.
- The proposals for the Site have evolved in consultation with the local community.
- A scheme could come forward in compliance with policies within the NDP.



## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☐

*Yes, I wish to participate at an oral examination* ..... ☒

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

SMD respectfully request to participate in any oral examination in order to fully present their case in respect of housing and employment policies and their request for the Former Officers' Mess Site to be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART A**

	<b>Your Details</b>
<b>Full Name</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	
<b>Organisation (if applicable)</b>	Barton Willmore on behalf of St Modwen Developments Ltd
<b>Position (if applicable)</b>	Associate Planner

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.22	Policy Reference:	HS3
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☒ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

St Modwen Developments Ltd (SMD) have land interests within the Thurleigh Neighbourhood Area, including the Former Officers' Mess Site on Keysoe Road, which comprises 1.82 hectares of previously developed land that is well related to the main built up part of Thurleigh village.

**Representations to the Thurleigh Neighbourhood Development Plan Submission Version (the NDP), made on behalf of SMD, are set out in a letter dated 12<sup>th</sup> June 2020. Please read this letter alongside this form.**

SMD support Thurleigh Parish Council in their preparation of a neighbourhood plan but have concerns that should be addressed to ensure that the Plan meets the basic conditions. In respect of the housing allocations, including Land at Hayle Field (Policy HS3), our concerns, in summary, are that:

- a. There is insufficient evidence to support the housing allocations contrary to national policy and advice and, as such, it is not demonstrated that the allocations are deliverable, which provides uncertainty as to how much of the allocated housing will come forward over the plan period.
- b. The housing allocations do not maximise the use of previously developed land contrary to national policy and advice and a strategic policy of the development plan, and which runs counter to achieving sustainable development.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

SMD respectfully request that the Former Officers' Mess Site, which comprises previously developed land, be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

Our representations, as set out in the letter dated 12<sup>th</sup> June 2020, together with the Illustrative Masterplan, demonstrate that:

- The Former Officers' Mess Site is suitable for housing development.
- The proposals for the Site have evolved in consultation with the local community.
- A scheme could come forward in compliance with policies within the NDP.

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☐

*Yes, I wish to participate at an oral examination* ..... ☒

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

SMD respectfully request to participate in any oral examination in order to fully present their case in respect of housing and employment policies and their request for the Former Officers' Mess Site to be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

## PART A

	<b>Your Details</b>
<b>Full Name</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	
<b>Organisation (if applicable)</b>	Barton Willmore on behalf of St Modwen Developments Ltd
<b>Position (if applicable)</b>	Associate Planner

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.57	Policy Reference:	
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☒ Support with modifications
- ☐ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

St Modwen Developments Ltd (SMD) have land interests within the Thurleigh Neighbourhood Area, including the Former Officers' Mess Site on Keysoe Road, which comprises 1.82 hectares of previously developed land that is well related to the main built up part of Thurleigh village.

**Representations to the Thurleigh Neighbourhood Development Plan Submission Version (the NDP), made on behalf of SMD, are set out in a letter dated 12<sup>th</sup> June 2020. Please read this letter alongside this form.**

In respect of employment policies, SMD support that the Former Officers' Mess Site is not allocated for employment development in the NDP.

However, SMD have concerns with paragraph 8.57 of the NDP which states (our emphasis): "*Whilst the NDP working party wished to allocate the site of the former "Officers Mess" site, on Keysoe Road, for additional employment growth in the village ... they have been made aware by the landowner that this site is **not available** for this purpose.*"

In summary, the Former Officers' Mess Site is available for development, but employment is not considered to be an achievable or suitable use for the Site. Housing development would be a more appropriate and viable, and therefore deliverable, use of the Former Officers' Mess Site.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

SMD respectfully request that paragraph 8.57 be amended as follows:

*Whilst the NDP working party wished to allocate the site of the former "Officers Mess" site, on Keysoe Road, for additional employment growth in the village, (with employment uses restricted to those classes that do not rely on the regular use of commercial traffic movements) they have been made aware by the landowner that whilst the Site is available for development, employment is not an achievable or suitable use ~~this site is not available for this purpose.~~*

In addition, as the Former Officers' Mess Site is available, and comprises previously developed land, SMD respectfully request that it is allocated for housing development, either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches (Policy HS2) and Land at Hayle Field (Policy HS3).

Our representations, as set out in the letter dated 12<sup>th</sup> June 2020, together with the Illustrative Masterplan, demonstrate that:

- The Former Officers' Mess Site is suitable for housing development.
- The proposals for the Site have evolved in consultation with the local community.
- A scheme could come forward in compliance with policies within the NDP.



## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☐

*Yes, I wish to participate at an oral examination* ..... ☒

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

SMD respectfully request to participate in any oral examination to fully present their case in respect of housing and employment policies and their request for the Former Officers' Mess Site to be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART A**

	<b>Your Details</b>
<b>Full Name</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	
<b>Organisation (if applicable)</b>	Barton Willmore on behalf of St Modwen Developments Ltd
<b>Position (if applicable)</b>	Associate Planner

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.43 & 9.4 Plan Review	Policy Reference:	
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☐ Oppose
- ☒ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

St Modwen Developments Ltd (SMD) have land interests within the Thurleigh Neighbourhood Area.

**Representations to the Thurleigh Neighbourhood Development Plan Submission Version (the NDP), made on behalf of SMD, are set out in a letter dated 12<sup>th</sup> June 2020. Please read this letter alongside this form.**

In respect of the review of the NDP, paragraph 10.1 states that the NDP will be “... *reviewed periodically to ensure that it addresses any changes in both national and local planning policies.*” However, the timetable for the review of the NDP does not align with the timetable for the review of the Bedford Borough Local Plan 2030.

In summary, whilst Policy 1 of the Local Plan 2030 commits Bedford Borough Council to an early review of the Local Plan 2030, which the Local Development Scheme April 2020 shows is underway with a new Local Plan to be adopted December 2023, the first possible review of the NDP, as set out at paragraph 10.3 of the NDP, is 2025, with paragraph 10.4 giving the first commitment to a review as 2028. As such, policies in the NDP may become out of date.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

SMD consider it would be prudent for the NDP to set out a clear commitment, in policy, to a formal review of the NDP in line with the timetable for the review of the Local Plan 2030 to ensure it remains up-to-date.

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☐

*Yes, I wish to participate at an oral examination* ..... ☒

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

If the review of the NDP is to be discussed at an oral examination, SMD respectfully request to participate. Moreover, SMD respectfully request to participate in any oral examination in order to fully present their case in respect of housing and employment policies and their request for the Former Officers' Mess Site to be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART A**

	<b>Your Details</b>
<b>Full Name</b>	
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<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	
<b>Organisation (if applicable)</b>	Barton Willmore on behalf of St Modwen Developments Ltd
<b>Position (if applicable)</b>	Associate Planner

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.14-8.20: Site Assessment & Selection	Policy Reference:	
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☒ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

St Modwen Developments Ltd (SMD) have land interests within the Thurleigh Neighbourhood Area, including the Former Officers' Mess Site on Keysoe Road, which comprises 1.82 hectares of previously developed land that is well related to the main built up part of Thurleigh village.

**Representations to the Thurleigh Neighbourhood Development Plan Submission Version (the NDP), made on behalf of SMD, are set out in a letter dated 12<sup>th</sup> June 2020. Please read this letter alongside this form.**

SMD support Thurleigh Parish Council in their preparation of a neighbourhood plan but have concerns that should be addressed to ensure that the Plan meets the basic conditions. In respect of housing policies, SMD welcome that the NDP allocates land for housing growth but consider that the site assessment and selection process is inadequate. In summary:

- (i) The process fails to clearly set out the methodology for site assessment, contrary to national policy and advice and, as such, does not robustly justify those sites selected and discounted as housing allocations.
- (ii) Linked to (i) above, the assessment of the Former Officers' Mess Site is incorrect and inconsistent with the assessment of the allocated sites – that is, Land at The Beeches and Land at Hayle Field – which has resulted in it being unreasonably dismissed as a suitable option for housing development.
- (iii) There is insufficient evidence to support the housing allocations contrary to national policy and advice and, as such, it is not demonstrated that the allocations are deliverable, which provides uncertainty as to how much of the allocated housing will come forward over the plan period.
- (iv) The housing allocations do not maximise the use of previously developed land contrary to national policy and advice and a strategic policy of the development plan, and which runs counter to achieving sustainable development.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

SMD respectfully request that the Former Officers' Mess Site, which comprises previously developed land, be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

Our representations, as set out in the letter dated 12<sup>th</sup> June 2020, together with the Illustrative Masterplan, demonstrate that:

- The Former Officers' Mess Site is suitable for housing development.
- The proposals for the Site have evolved in consultation with the local community.
- A scheme could come forward in compliance with policies within the NDP.



## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☐

*Yes, I wish to participate at an oral examination* ..... ☒

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

SMD respectfully request to participate in any oral examination in order to fully present their case in respect of housing and employment policies and their request for the Former Officers' Mess Site to be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches and Land at Hayle Field.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒





The scaling of this drawing cannot be assured			
Revision	Date	Drn	Ckd
-	-	-	-

Site Boundary  
1.82Ha (4.50Ac)

Project  
**Officers Mess  
Thurleigh**  
Drawing Title  
**Aerial View**

Date  
25.05.18

Project No  
28544

Scale  
1:1,000@A2

Drawing No  
RG-M-02

Drawn by  
S.G.

Check by  
D.S.

Revision  
-

01020304050m

N

DRAFT

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Planning & Design • Environmental Planning • Graphic  
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2001  
SOUTH  
AMPTON

Offices at Birmingham Bristol Cambridge Cardiff Ebbwfleet Edinburgh  
Leeds London Manchester Newcastle Reading Southampton





The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd

Site Boundary  
1.82Ha (4.50Ac)

Indicative site capacity @8dph:  
15 dwellings

Project  
**Officers Mess  
Thurleigh**

Drawing Title  
**Illustrative Masterplan**

Date  
25.05.18

Scale  
1:1,000@A2

Project No  
28544

Drawn by  
S.G.

Check by  
D.S.

Revision  
A

0 10 20 30 40 50m

**DRAFT**

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Leeds London Manchester Newcastle Reading Southampton



# LOCAL DEVELOPMENT SCHEME

April 2020

## **CONTENTS**

<b>1.0</b>	<b>INTRODUCTION</b>	<b>1</b>
<b>2.0</b>	<b>THE DEVELOPMENT PLAN</b>	<b>3</b>
<b>3.0</b>	<b>STATEMENT OF COMMUNITY INVOLVEMENT</b>	<b>4</b>
<b>4.0</b>	<b>COMMUNITY INFRASTRUCTURE LEVY</b>	<b>4</b>
<b>5.0</b>	<b>SUPPLEMENTARY PLANNING DOCUMENTS</b>	<b>4</b>
<b>6.0</b>	<b>POLICIES MAP</b>	<b>4</b>
<b>7.0</b>	<b>DOCUMENTS UNDER PREPARATION</b>	<b>5</b>
	Diagram 1 Documents which will provide the framework for development in the Borough beyond 2021	<b>6</b>
<b>8.0</b>	<b>PROJECT MANAGEMENT RESOURCES</b>	<b>7</b>
<b>9.0</b>	<b>SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT</b>	<b>7</b>
<b>10.0</b>	<b>MONITORING AND REVIEW</b>	<b>7</b>
<b>11.0</b>	<b>EVIDENCE BASE</b>	<b>8</b>
	Appendix 1 Saved and continuing policies	<b>9</b>
	Appendix 2 Material Supplementary Planning Guidance	<b>11</b>
	Appendix 3 Schedule of Adopted Local Development Documents	<b>12</b>
	Appendix 4 Schedule of Documents under Preparation or to be Commenced	<b>16</b>
	Appendix 5 Local plan timetable	<b>19</b>
	Appendix 6 Glossary of Terms	<b>22</b>
	Appendix 7 Changes made to the Local Development Scheme	<b>25</b>

## 1. INTRODUCTION

- 1.1 Local planning authorities are required to prepare a Local Development Scheme (LDS). The scheme is a public statement which sets out the programme for the production of Local Development Documents (LDDs).
- 1.2 This 2020 review of the LDS is required primarily to reflect the adoption of Local Plan 2030 and provide the timetable for the preparation of the new local plan. It replaces the LDS adopted in May 2018 and will be reviewed as frequently as is necessary to ensure that it is kept up to date.
- 1.3 The LDS is available for inspection at the Customer Service Centre, 2 Horne Lane, Bedford, MK40 1RA during normal office hours and via the Council's website at [Local Development Scheme](#)

### NATIONAL POLICY

#### THE LOCALISM ACT 2011

- 1.4 The Localism Act introduced new rights and powers to allow local communities to shape new development by working together to prepare neighbourhood development plans . These may be taken forward either by town and parish Councils or by neighbourhood forums.
- 1.5 Neighbourhood Plans are a powerful tool for shaping the development and growth of a local area. They should not just re- state the Council's plan but set out the community's views on the development and use of land in their neighbourhood. The Localism Act includes a "basic condition" that requires neighbourhood plans to be in general conformity with the strategic policies of the local plan.
- 1.6 Unlike many of the parish, village or town plans produced in the past, a neighbourhood plan becomes a formal part of the planning system. Neighbourhood plans form part of the development plan and sit alongside documents adopted by the local authority. Planning applications will need to be decided against the Council's plans, adopted neighbourhood plans and any other material considerations.
- 1.7 In another important change to the planning system, communities can use neighbourhood planning to permit the development they want to see-in full or in outline, without the need for planning applications. This can be achieved through the preparation of 'neighbourhood development orders'.

- 1.8 The borough council will continue to produce local plan(s) that set the strategic context within which neighbourhood development plans sit and will provide information about neighbourhood planning to help local groups decide whether they want to take advantage of their new planning powers.
- 1.9 A number of neighbourhood plans are being progressed in the borough. Further information is available on the Council's website following this link: [Neighbourhood Planning](#)

#### TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

- 1.10 Part 2 of the Planning and Compulsory Purchase Act 2004 ([“the Act”](#)) establishes a system of local development planning in England and the [2012 Regulations](#) update provision for the operation of that system.

#### THE NATIONAL PLANNING POLICY FRAMEWORK 2019

- 1.11 In addition to these two pieces of legislation, the National Planning Policy Framework ([NPPF](#)) was first published in March 2012 and updated in 2018 and 2019. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making. The NPPF is however a material consideration and must be taken into account in the decision making process.
- 1.12 It is the Council's view that the overall strategy of these adopted plans is consistent with the NPPF. The Allocations and Designations Local Plan was examined and adopted in 2013 so its policies post-date the introduction of and have been found to be consistent with the NPPF. The Local Plan 2030 was adopted in January 2020.

#### THE NATIONAL PLANNING PRACTICE GUIDANCE

- 1.13 On 6 March 2014 the Department for Communities and Local Government (DCLG) launched the [planning practice guidance web-based resource \(PPG\)](#). This was accompanied by a [Written Ministerial Statement](#) which includes a list of the previous planning practice guidance documents cancelled when this site was launched. The PPG is continually updated.

## 2. THE DEVELOPMENT PLAN

- 2.1 When determining planning applications the decision shall be in accordance with the development plan unless material considerations indicate otherwise. The statutory development plan for the borough is currently made up of the following documents
- [Local Plan 2030 \(adopted 2020\) policies](#)
  - [Saved Local Plan 2002 policies.](#)
  - [Saved Minerals and Waste Local Plan 2005 policies.](#)
  - Continuing policies in [the Allocations & Designations Local Plan \(adopted 2013\)](#)
  - [The Minerals and Waste Local Plan: Strategic Sites and Policies \(adopted 2014\)](#)
- 2.2 [The Planning and Compulsory Purchase Act \(2004\)](#) provided for transitional arrangements to allow for a smooth handover between the old Local Plan system and the Local Development Framework that replaced it. The Act allowed for the policies in the existing adopted local plans to be ‘saved’ for a period of three years from commencement. The Secretary of State agreed to extend the period for which Local Plan 2002 policies are saved until such time as they are replaced. This means that relevant policies in the Local Plan 2002 are still “live” and can be afforded weight in making planning decisions.
- 2.3 Appendix 1 of this LDS lists all the saved policies in the adopted Local Plan 2002 in addition to the continuing policies in the Allocations and Designations Local Plan 2013.
- 2.4 The transitional arrangements did not allow for the formal ‘saving’ of approved supplementary planning guidance. However the Council’s adopted supplementary planning guidance will continue to be a material consideration in the determination of planning applications where it elaborates upon saved Local Plan 2002 policies. Appendix 2 sets out a schedule of current supplementary planning guidance (SPG) and includes a list of the documents that have been withdrawn and archived. Archived documents are available on the council’s webpages for reference.
- 2.5 Minerals and waste planning is dealt with on behalf of the unitary councils (Bedford Borough Council, Central Bedfordshire Council and Luton Borough Council) by a shared Minerals and Waste Service that is hosted by Central Bedfordshire Council. Following the adoption of the Minerals and Waste Local Plan: Strategic Sites and Policies (2014), the remaining saved Minerals and Waste Local Plan 2005 general and environmental policies have been reviewed as part of the Local Plan 2030 and two policies remain saved. These are included in Appendix 1.



### **3. STATEMENT OF COMMUNITY INVOLVEMENT**

- 3.1 A revised [Statement of Community Involvement](#) was adopted on 30 October 2019. The document sets out consultation standards and the Council's approach to involving the community and stakeholders in the production of planning documents. It replaces the Statement of Community Involvement that was adopted in 2013.

### **4. COMMUNITY INFRASTRUCTURE LEVY**

- 4.1 The introduction of a [Community Infrastructure Levy](#) was agreed and a charging schedule adopted by the Council on 5 February 2014 to be brought into effect from 1 April 2014. Related to this, a [Planning Obligations SPD](#) was adopted by the Council on 17 July 2013. The supplementary planning document sets out the approach and standards for securing and using developer contributions alongside the operation of CIL.

### **5. SUPPLEMENTARY PLANNING DOCUMENTS**

- 5.1 Details of adopted local development documents are listed in Appendix 3. Documents under preparation and planned but not yet commenced are listed in Appendix 4.

### **6. POLICIES MAP**

- 6.1 The Town & Country Planning (Local Planning) (England) Regulations 2012 Regulation 9 requires the local planning authority to provide a [policies map](#) illustrating geographically the application of the policies in the adopted development plan. As a result of the adoption of the Allocations & Designations Local Plan the policies map was updated in January 2014. The policies map has been updated to reflect the adoption of Local Plan 2030 and the consequential policy changes.

## 7. DOCUMENTS UNDER PREPARATION

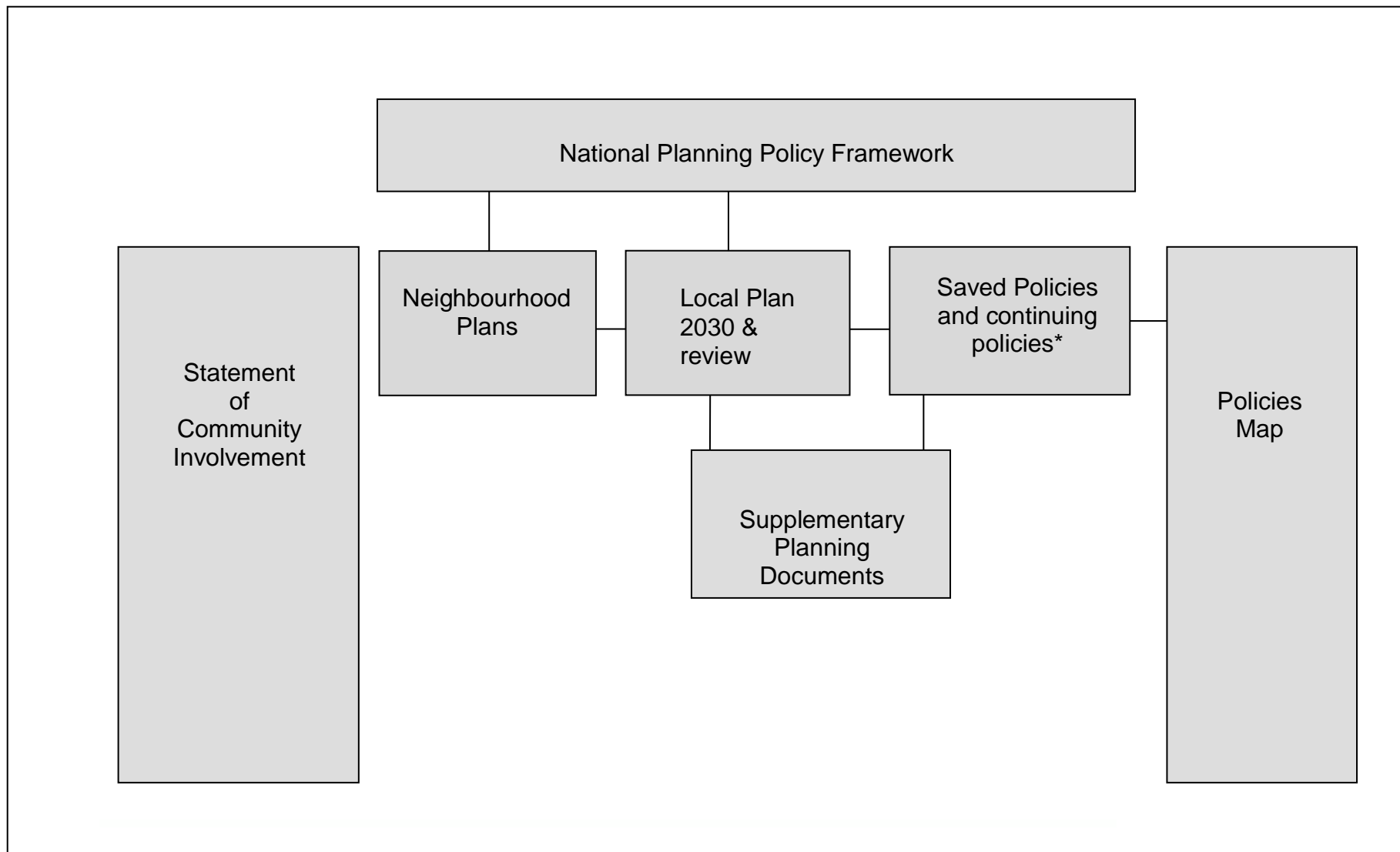
### BEDFORD BOROUGH LOCAL PLAN

- 7.1 Local Plan 2030 (adopted January 2020) includes a requirement for the plan to be reviewed quickly. Policy 1 states “*The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan...*” Preparatory work is already underway. The new local plan will apply to the whole of the local authority area. It will review the development strategy, include site allocations and review development management policies where required. Given that Local Plan 2030 has been so recently adopted it is likely that many of the policies will remain unchanged.
- 7.2 A first Issues and Options consultation is programmed to be carried out in the summer 2020 and alongside it a ‘call for sites’ exercise.
- 7.3 A timetable for the production of the new local plan is set out at Appendix 5

### SUPPLEMENTARY PLANNING DOCUMENTS

- 7.4 Diagram 1 shows the documents which will provide the framework for development in the borough following the adoption of the new local plan.

DIAGRAM 1 DOCUMENTS WHICH WILL PROVIDE THE FRAMEWORK FOR DEVELOPMENT IN THE BOROUGH FOLLOWING THE ADOPTION OF THE NEW LOCAL PLAN



\*Saved Local Plan 2002 and ADLP 2013 policies not replaced by policies in the Local Plan 2030 or local plan review.

## **8. PROJECT MANAGEMENT RESOURCES**

- 8.1 The main resource for the preparation of the Local Development Documents will be the Planning Policy team along with specialist officers within the Environment Directorate, consultancy and legal advice as required. The team's top priority is the preparation of the local plan review.
- 8.2 The Council has commissioned consultants to progress development briefs and design codes for two sites: Ford End Road and Land south of the river.
- 8.3 The production of any further SPDs relating to the major sites will depend on the resources of external parties as the initial drafts are expected to be produced by consultants acting for the developers concerned with the individual sites. Council resources will also be required. It is intended that the documents would be produced on a collaborative basis.
- 8.4 The timetable provided in this document is dependent on resource being available as and when required, including those of external bodies such as the Planning Inspectorate.

## **9. SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT**

- 9.1 One of the requirements of the plan-making system is to undertake a [sustainability appraisal](#) and [strategic environmental assessment](#) of Local Development Documents. This appraisal process is one which should shape the content of the documents by being undertaken at key stages in the documents' preparation. Therefore, in the preparation of Local Development Documents the Council will:
  - At the pre-production stage: carry out a scoping exercise and collect baseline information.
  - At the submission stage; make available a sustainability appraisal report, amended and updated as necessary.
  - At the examination stage; where necessary, appraise any significant changes proposed.
  - At adoption; integrate into ongoing monitoring activity.

## **10. MONITORING AND REVIEW**

- 10.1 The Council is required to prepare a Bedford Borough Planning Monitoring Report ([BBPMR](#)) to monitor how effectively its policies and proposals are being implemented, and what action might need to be taken to address emerging issues or problems.

This includes an assessment of the level of housing completions against housing requirements. It also reports on progress being made in implementing the work programme set out in the Local Development Scheme.

- 10.2 Arising from the Bedford Borough Planning Monitoring Report, the Council will consider what changes, if any, need to be made to the Local Development Scheme. The Council will bring forward changes to the Local Development Scheme at other times in response to significant new issues or changes in circumstance.

## **11. EVIDENCE BASE**

- 11.1 It is important that the preparation of Local Development Documents is underpinned by a strong base of evidence to inform their proposals. Each document under preparation will set out its evidence base and relevant documents will be made available on the Council's web site.

## APPENDIX 1 Saved and continuing policies

<b>Saved Policies from the 2002 Local Plan</b>
H2 – Britannia Iron Works
H6 – Biddenham Loop
H7 – Land west of Kempston
H8 – Land north of Bromham Road, Biddenham
H9 – Land at Shortstown
H11 – Land south of Fields Road, Wootton
H12 – Land north of Fields Road, Wootton
H13 – Land off Rousebury Road, Stewartby
H14 – Elstow Storage Depot
H23 – Housing in second order villages
E2 – Land south of Cambridge Road
E10 – Elstow Brickworks
LR4 – Rowing course

<b>Continuing Allocations and Designations Local Plan Policies (2013)</b>
AD1 Sustainable Development Policy
AD3 Land at Hall End Road, Wootton
AD4 Land at Old Ford End Road, Queens Park, Bedford
AD7 Land East of Eastcotts Road, Bedford
AD10 Lansdowne Road, Warwick Avenue and Dynevor Road, Bedford
AD11 Land at Medbury Farm, Elstow
AD12 Land at Bell Farm, Kempston
AD13 Marston Vale Innovation Park Phase 2, Wootton
AD15 Manton Lane Reservoir Site, Bedford
AD16 Land West of Manton Lane, Bedford

<b>Continuing Allocations and Designations Local Plan Policies (2013)</b>
AD17 Land West of the B530, Kempston
AD18 Land North of the A6-A428 Link Road, Bedford
AD19 Land at Manton Lane, Bedford
AD20 Land at Bedford Road, Great Barford
AD21 Land at Chawston Lake, Roxton Road, Wyboston
AD22 Land North of Ravensden Road, Salph End, Renhold
AD23 Bedford River Valley Park Enabling Development
AD24 Green Infrastructure Opportunity Zones
AD26 Bedford River Valley Park
AD27 Bedford to Milton Keynes Waterway Park
AD28 Provision of Open Space and Built Facilities in Association with New Development
AD36 Pedestrian Routes
AD38 Commercial Vehicle Parking and Motorists Facilities
AD39 Cycling
AD40 Village Open Spaces and Views
AD41 Urban Area Boundary
AD42 Local Gaps
AD43 Urban Open Spaces and Gaps
AD44 Former Land Settlement Association Area

<b>Saved Bedfordshire and Luton Minerals and Waste Local Plan Policies (2005)</b>
W17 – Land raising
W22 – Safeguarding existing sites

## APPENDIX 2

### MATERIAL SUPPLEMENTARY PLANNING GUIDANCE

The following supplementary planning guidance (SPG) which relates to policies in adopted Local Plans, was prepared in accordance with Government guidance and is considered to be a material consideration in the determination of planning applications.

Name of SPG and Date	Policy to which it relates
<b>Development Briefs</b>	
Great Denham (formerly Biddenham Loop) Revised Brief (2003) supplemented by Great Denham Design Guide and Code SPD January 2010	H6
Land West of Kempston (2003) supplemented by West of Kempston Design Guide and Code SPD January 2010	H7
Land North of Bromham Road Biddenham (2003)	H8
Land at Shortstown (2003)	H9
Wootton Development Brief (1999)	H11 & H12
Elstow New Settlement (1999) (Wixams)	H14
<b>Design Guides</b>	
Achieving Quality in Residential Layouts (1997)	Policy 29 LP2030 (previously BE29 LP2002)
Residential Extensions, New Dwellings and Small Infill Developments (2000)	Policy 28S and Policy 29 LP2030 (previously BE29)



## APPENDIX 3

### SCHEDULE OF ADOPTED LOCAL DEVELOPMENT DOCUMENTS

DPD = Development Plan Document SPD = Supplementary Planning Document LDD = Local Development Document

Document Title	Status	Role and Content	Geographical Coverage	Chain of Conformity	Date for pre-submission consultation (Issues & Options)	Date for public participation on draft (DPD) draft SPD and sustainability appraisal report	Date for submission to Secretary of State	Date of adoption
Shopfronts & Adverts in Conservation Areas	SPD	Provides detailed guidance on the design of shopfronts and adverts in conservation areas	The town centre and conservation areas in authority area	To conform with Local Plan 2030 policies 15 and 34.	N/A	Sept – Oct 2005	N/A	Adopted Nov 2005
Great Denham (formerly Biddenham Loop): Design Guide and Code	SPD	Sets out the design code for the land allocated under Local Plan Policy H6	The land at Great Denham, formerly known as Biddenham Loop	To conform with Local Plan 2002 saved policy H6 and national policy	N/A	N/A	N/A	Adopted Jan 2010
West of Kempston: Design Guide and Code	SPD	Sets out the design code for the land allocated under Local Plan Policy H7	The land west of Kempston	To conform with Local Plan 2002 saved policy H7 and national policy	N/A	N/A	N/A	Adopted Jan 2010
Allocations & Designations Local Plan	LDD	Allocates land required for future development, designates areas where particular controls will apply and establishes the policy boundary of settlements	Whole authority area	To conform with the Core Strategy and Rural Issues Plan	Dec 2007 - July 2010	Sept -Nov 2011	May 2012 - June 2013	Adopted July 2013

Document Title	Status	Role and Content	Geographical Coverage	Chain of Conformity	Date for pre-submission consultation (Issues & Options)	Date for public participation on draft (DPD) draft SPD and sustainability appraisal report	Date for submission to Secretary of State	Date of adoption
Planning Obligations	SPD	Sets out the approach and standards for securing and using developer contributions	Whole authority area	To conform with adopted policies in the Core Strategy and Rural Issues Plan, Town Centre AAP and Allocations and Designations Local Plan	N/A	Dec 2012 -Feb 2013	N/A	July 2013
Open Space	SPD	Sets out guidelines for the operation of new local open space standards	Whole authority area	Allocations and Designations Local Plan Policy AD28	N/A	June-July 2013	N/A	September 2013
Community Infrastructure Levy Charging Schedule	LDD	Sets out the charges to be applied to different types of new development in the Borough	Whole authority area		Dec 2012	May 2013	July 2013	February 2014

Document Title	Status	Role and Content	Geographical Coverage	Chain of Conformity	Date for pre-submission consultation (Issues & Options)	Date for public participation on draft (DPD) draft SPD and sustainability appraisal report	Date for submission to Secretary of State	Date of adoption
Parking Standards for Sustainable Communities	SPD	Sets out standards and guidelines for the design and amount of vehicle parking in new developments	Whole authority area	The Core Strategy & Rural Issues Plan and Local Transport Plan 3, the Allocations and Designations Local Plan and Local Plan 2030 Policy 31.	N/A	May-June 2014	N/A	September 2014
Land North of Bromham Road design guide – Revision/ Addendum 2015	SPD	Provides detailed guidance on all aspects of design for the land north of Bromham Road, Biddenham through a design guide with revisions arising from changes to the masterplan and policy changes at local and national level	The land north of Bromham Road development area	To conform with saved Local Plan 2002 policy H8 and national policy	N/A	Jan-Feb 2015	N/A	March 2015

Document Title	Status	Role and Content	Geographical Coverage	Chain of Conformity	Date for pre-submission consultation (Issues & Options)	Date for public participation on draft (DPD) draft SPD and sustainability appraisal report	Date for submission to Secretary of State	Date of adoption
Sustainable Drainage System (SuDS) SPD 2018	SPD	Provides a framework to promote sustainable development within Bedford Borough through planning standards and objectives set out in the document. Sets out the requirements for the implementation of Sustainable Drainage Systems (SuDS) in future development. It will identify the information required to validate and support planning applications.	Whole authority area.	NPPF and Local Plan 2030 Policy 93.	N/A	Nov-Dec 2017	N/A	February 2018
Statement of Community Involvement	LDD	Document setting out standards and approach to involving the community and stakeholders in the production of the development plan.	Whole authority area	To conform with corporate consultation policies and guidance.	N/A	N/A	N/A	Adopted October 2019
Bedford Borough Local Plan 2030	LDD	Sets out the spatial strategy for the borough from the date of adoption (2020)	Whole authority area	Duty to co-operate requirements and NPPF.	January 2014	September 2018 (second Regulation 19 publication)	December 2018	January 2020

## APPENDIX 4

### SCHEDULE OF DOCUMENTS UNDER PREPARATION OR TO BE COMMENCED

Document Title	Status	Role and Content	Geographical Coverage	Chain of Conformity	Date for public participation on issues and options (LDD) draft SPD and sustainability appraisal	Date for pre-submission publication	Date for submission to Secretary of State	Proposed date for adoption
Bedford Borough Local Plan Review	LDD	Sets out the spatial strategy for the borough from the date of adoption	Whole authority area	Duty to co-operate requirements and NPPF.	Summer 2020	Summer 2022	January 2023	December 2023
Health Impact Assessments	SPD	The potential need for an Assessment in relation to a planning application will be raised with applicants through the pre-application process. This document will be provided which will include further advice in relation to where an HIA is required, what it should contain and the health outcomes the development should seek to achieve.	Whole authority area	National Policy and LP2030 Policy 2S	Summer 2020	N/A	N/A	Winter 2020
Ford End Road planning brief and design code	SPD	Comprehensive development brief and design code to set out distribution of uses and guide development.	Ford End Road area in Bedford	Local Plan 2030 Policy 12	Autumn 2020	N/A	N/A	January 2021

Document Title	Status	Role and Content	Geographical Coverage	Chain of Conformity	Date for public participation on issues and options (LDD) draft SPD and sustainability appraisal	Date for pre-submission publication	Date for submission to Secretary of State	Proposed date for adoption
Land south of the river planning brief and design code	SPD	Comprehensive planning brief and design code to set out distribution of uses, phase and guide development.	South of the river area in Bedford	Local Plan 2030 Policy 14	Winter 2020	N/A	N/A	March 2021
Forest of Marston Vale design guidance	SPD	To provide guidance on how to achieve the policy requirements.	Forest of Marston Vale area	Local Plan 2030 Policy 36S	Summer 2020	N/A	N/A	December 2020
Trees and Development	SPD	To provide guidance on the types of trees for inclusion as part of landscaping, installation and future maintenance that is suitable for particular types of development	Whole authority area	Local Plan 2030 Policy 39	Summer 2020	N/A	N/A	December 2020
Design guidance to guide the development of small residential sites, infill development and extensions	SPD	To update and replace the Council's existing guidance "Residential Extensions, New Dwellings & Small Infill Developments" (RENSID) (and sections of "Achieving Quality in Residential Layouts")	Whole authority area	Local Plan 2030 Policy 29	As resources allow			

Document Title	Status	Role and Content	Geographical Coverage	Chain of Conformity	Date for public participation on issues and options (LDD) draft SPD and sustainability appraisal	Date for pre-submission publication	Date for submission to Secretary of State	Proposed date for adoption
Guidance for the design of shopfronts	SPD	To update and replace the Council's existing guidance "Shopfronts and Advertisements in Conservation Areas"	Whole authority area	Local Plan 2030 Policy 29	As resources allow.			
Guidance on advertisements	SPD	To provide design guidance on advertisements	Whole authority area	Local Plan 2030 Policy 34	As resources allow			

# APPENDIX 5

## LOCAL PLAN TIMETABLE

	Jan	Feb	March	April	May	June	July	August	Sept	Oct	Nov	Dec
2020						E						
2021			E									
2022			E									E & FC
2023	Submit plan											

	Issues and options work
	Issues and Options consultation
	Draft plan consultation
	Pre-submission consultation
	Examination
	Adoption
E	Executive meeting
FC	Full Council meeting



## LOCAL PLAN TIMETABLE

<b>Document Details</b>	
Title	Bedford Borough Local Plan Review
Role and Content	Identifies levels of growth and the spatial strategy to be adopted by the Council. It allocates land for development, designates specific areas subject to planning policies controlling development and will update development management policies where appropriate.
Status	Local Development Document/Local Plan
Chain of Conformity	To conform with the NPPF/Corporate priorities and policies.
Geographic coverage	Whole Authority Area

<b>Timetable</b>	
Pre-production	Spring 2020
Preparation of issues and alternative options and consideration of Representations. Call for sites.	Summer 2020
Draft plan consultation.	Summer 2021
Submission Publication (Regulation 19)	Summer 2022
Submission to the Secretary of State	January 2023
Examination period	2023

Receipt of Inspector's binding report	Autumn 2023
Adoption	Winter 2023

<b>Arrangements for production</b>	
Lead organisation/department	Chief Officer – Planning & Infrastructure Development
Management arrangements	Key stages agreed by Executive and Full Council in accordance with the Council's constitution. Adoption by Full Council.
Resources required	Planning Policy team and input from across the Council. Consultancy input to background studies and reports. Input from duty to cooperate partners.
Approach to involving the community	In accordance with the SCI.

<b>Post production</b>	
Monitoring and review mechanisms	Bedford Borough Planning Monitoring Report

## APPENDIX 6

### GLOSSARY OF TERMS

**Allocations** Sites specifically identified on the Policies Map for development.

**Core Strategy & Rural Issues Plan** The long-term spatial vision and strategy for the local planning authority area, including the key strategic policies and proposals to deliver that vision. The Plan is a part of Bedford's Development Plan.

**Design Codes** A set of specific rules or requirements to guide the physical development of a site or place. The aim of design coding is to provide clarity as to what constitutes acceptable design quality and thereby provides a level of certainty for developers and the local community alike that can help to facilitate the delivery of good quality new development.

**Designations** Areas shown on the Policies Map to which specific policies apply (not allocations).

**Development Briefs** Prepared by the Borough Council as a detailed statement of its planning policies for a particular site and its aspirations in terms of uses, layout and design principles.

**Development Plan** Defined under S.38 of the Planning and Compulsory Purchase Act 2004. This is the prime consideration in the determination of planning applications. For Bedford Borough Council this is the Local Plan 2030; , the continuing policies of the Allocations and Designations Local Plan, saved policies from the Local Plan 2002. Minerals and Waste policies also form part of the development plan (see para. 2.1).

**Development Plan Document (DPD)** Spatial planning document prepared by the local planning authority that is subject to an independent public examination. They can cover a range of issues, and will set out the main spatial strategy, policies and proposals of the Council.

**Local Development Documents (LDDs)** Generic term for documents that can be included in the Development Plan and other planning documents. Collectively LDDs deliver the spatial strategy for the local planning authority area.

**Local Development Framework (LDF)** A portfolio of Local Development Documents that provided the framework for delivering the spatial strategy of the area. From 2012 the term Local Development Framework is no longer used. The portfolio of documents will normally be replaced by one document known as a Local Plan.

**Local Development Scheme (LDS)** Rolling three-year project plan for the preparation of Local Development Documents.

**Localism Act** Gives more power and responsibility to neighbourhoods and local community groups. It also proposed the revocation of regional planning guidance.

**Local Plan 2002** Statutory district-wide document prepared pre 2004 that sets out land use policies and proposals for the area.

**Local Plan** Since 2012, the term 'Local Plan' is once again used (replacing LDFs) to describe the document containing the Council's land use policies and proposals.

**National Planning Policy Framework** National planning policy which replaced all PPGs and PPSs in one document.

**Neighbourhood Development Plan** A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

**Policies Map** Illustrates policies and proposals in local development documents.

**Statement of Community Involvement (SCI)** Sets out the approach of the authority to involving the community in the preparation, alteration and review of Local Development Documents and in the consideration of significant planning applications.

**Strategic Environmental Assessment (SEA)** Environmental assessment of policies, plans and programmes required under the European SEA Directive 2001/42/EC.

**SuDS** Sustainable Drainage Systems maximise the benefits while minimising the negative impacts of surface water runoff on developments. The SuDS approach involves the management of water quantity to reduce the risk of flooding downstream and in-situ, and the reduction of pollution levels within that runoff. This is achieved by harvesting, infiltrating, slowing, storing, conveying, and treating runoff on site (preferably on the surface and not underground)

**Supplementary Planning Documents (SPD)** Non-statutory documents that expand upon adopted planning policies or proposals.

These replace Supplementary Planning Guidance.

**Supplementary Planning Guidance (SPG)** Non-statutory guidance prepared under the pre-2004 system to expand upon policies and proposals in the Local Plan 2002.

**Sustainability Appraisal (SA)** A social, economic and environmental appraisal of strategy, policies and proposals – required for all Development Plan Documents and, where necessary, Supplementary Planning Documents. To be undertaken jointly with Strategic Environmental Assessment.

**Sustainable Community Strategy** Sets out goals and aims to tackle identified pressing problems in the Borough around 7 themes: Thriving; Greener; Aspiring; Healthy; Safer; Inclusive; and Growing. The views of key stakeholders, communities and citizens have been sought to achieve a shared vision across the Borough.

## APPENDIX 7

### KEY CHANGES MADE TO THE LOCAL DEVELOPMENT SCHEME

The following table lists the key changes made to the Local Development Scheme 2018 and reasons for those changes.

Change	Reason
Throughout the document changes made to reflect the recent adoption of Local Plan 2030.	Factual updates.
Appendices 3 and 4 update references to refer to relevant SPD and add references to Sustainable Urban Drainage SPD	SPD is now complete.
Update Gantt chart in Appendix 5	To provide the local plan review timetable.
Removal of what was formally Diagram 1 which showed the relationships between local development documents	The diagram was unmanageable and had lost its usefulness.

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Borough Hall,  
Cauldwell Street,  
Bedford,  
MK42 9AP

**BY EMAIL ONLY:** [planningforthefuture@bedford.gov.uk](mailto:planningforthefuture@bedford.gov.uk)

28544/A3/SH

12<sup>th</sup> June 2020

Dear Sir/Madam,

**THURLEIGH NEIGHBOURHOOD DEVELOPMENT PLAN**  
**REGULATION 16 CONSULTATION**

On behalf of our Client, St Modwen Developments Ltd<sup>1</sup> (SMD), we provide representations to the Regulation 16 consultation on the Thurleigh Neighbourhood Development Plan Submission Version, dated March 2020 (the NDP).

SMD have land interests within the Thurleigh Neighbourhood Area, comprising Thurleigh Airfield to the north of Thurleigh village and the Former Officers' Mess Site on Keysoe Road. The NDP states, at paragraph 1.5, that it does not cover development of Thurleigh Airfield, which currently operates as a Business Park. Given this, our representations focus on the approach taken to the Former Officers' Mess Site, which comprises 1.82 hectares of previously developed land that is well related to the main built up part of Thurleigh village.

SMD support Thurleigh Parish Council in their preparation of a neighbourhood plan. However, we have concerns that should be addressed to ensure that the NDP meets the basic conditions of: having regard to national policies and advice; being in general conformity with the strategic policies of the development plan; and contributing to the achievement of sustainable development.

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<sup>1</sup> Please note the reference to 'St Modwens PLC' at paragraph 1.7 of the Thurleigh Neighbourhood Development Plan Submission Version should be 'St Modwen Developments Ltd'.

## **Section 8 Policies – Housing Policies**

SMD welcome that the NDP allocates land for housing growth, with Land at The Beeches allocated for 10 dwellings under Policy HS2 and Land at Hayle Field allocated for 20 dwellings under Policy HS3. However, we consider that the site assessment and selection process is inadequate, and that the Former Officers' Mess Site should be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations.

### **Site Assessment and Selection Process**

#### ***Site Assessment***

Paragraph 8.14 of the NDP sets out that: *"In determining which land to allocate for residential development, all sites put forward as part of the "Call for Sites" organised by Bedford Borough Council have been independently assessed in a manner that accords with the guidance on assessing sites for allocation, as set out by the NPPF and the Planning Practice Guidance."* The report Site Assessments (Mato' Design Associates, November 2018) forms one of the consultation documents.

In allocating sites for development, Planning Practice Guidance (Paragraph: 042 Reference ID: 41-042-20170728) states: *"A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria."* However, it is unclear from the Site Assessments report as to the criteria and scoring applied in the assessment of sites. The Site Assessments report uses a RAG (Red, Amber, Green) method of assessment, but the scoring process is not presented just the overall score, recommendation and concluding comments.

The RAG score for the Former Officers' Mess Site (Ref: 629) is similar to that for Land at The Beeches (Ref: 274) and Land at Hayle Field (Ref: 276). However, the recommendation for the Officers' Mess Site is Red, compared to Green for Land at The Beeches and Land at Hayle Field.

The comments on the Former Officers' Mess Site state: *"The site is isolated although the fact it is previously developed land means that it should be considered for some sort of development. However, due to its distance from the village (0.9km) and the absence of any footpath links it would be a poor choice for a housing site. Some sort of commercial use should be considered here."*

The above comments suggest that the key constraint is distance from the village combined with the absence of footpath links. However, we dispute that the Former Officers' Mess Site is distant from the village, with the settlement edge around 150m to the south and the centre of the settlement around a 10-minute walk from the Site. Furthermore, SMD are confident that a footway between the Former Officers' Mess Site and main built part of the village could be achieved within highway land. In this respect the Former Officers' Mess Site is no different to Land at The Beeches and Land at Hayle Field, which the Site Assessments report notes as needing new footpaths, and in the case of Land at The Beeches a crossing point link, to be supported.

#### ***Selected Sites – Policy HS2 Land at The Beeches / Policy HS3 Land at Hayle Field***

Planning Practice Guidance requires evidence to support policies within a neighbourhood plan stating (Paragraph: 040 Reference ID: 41-040-20160211) that: *"Proportionate, robust evidence should support the choices made ..."*

In addition to the NDP, the documents for consultation comprise: Basic Conditions Statement; Consultation Statement; Strategic Environmental Assessment Screening Opinion; Habitat Regulations Assessment; and the Site Assessments report. No evidence has been made available in respect of the housing allocations. For example, in respect of Land at Hayle Field the Site Assessments report suggests that the site boundary has been selected to reduce visual and landscape impacts, but no technical assessment is available to demonstrate this or justify the extent of the site. Moreover,



neither of the allocations is supported by an illustrative masterplan. Given the lack of evidence it is not possible to make a judgement on the suitability, or wider deliverability, of the allocated sites.

### ***Discounted Site - Former Officers' Mess***

The National Planning Policy Framework (NPPF) supports the use of previously developed land, in order to make effective use of land (Section 11) and to conserve and enhance the natural environment (Section 15). Moreover, Policy 46S, a strategic policy of the Bedford Borough Local Plan 2030 (adopted January 2020), sets out that: *"The Council will seek to maximise the delivery of development through the reuse of suitably located previously developed land ..."*.

The Former Officers' Mess Site comprises previously developed land. This is not disputed, and the remains of the buildings and associated infrastructure is clearly shown on the Aerial View (Drawing No. RG-M-02) provided at **Appendix 1**. This is a significant advantage of the Former Officers' Mess Site, over both of the allocated housing sites – that is, Land at The Beeches and Land at Hayle Field. Both of the allocated housing sites comprise greenfield land, and no evidence is presented as to the quality of this land, for example, whether it comprises BMV (Best and Most Versatile) agricultural land.

Linked to being previously developed land, a further advantage of the Former Officers' Mess Site is that whilst all sites – that is, the Former Officers' Mess and Land at The Beeches and Land at Hayle Field – will require sensitive development that respects the adjacent open countryside, development of the Former Officers' Mess Site will reintroduce built form onto the Site and, as such, is more appropriate to the historic structure and form of Thurleigh village. This is supported by the Basic Conditions Statement, which at Table 1 (in relation to a now deleted Policy EM1 for employment development), notes new development of the Former Officers' Mess Site as making a positive contribution to local character and distinctiveness.

Taking account of the assessment of Policy HS2 (Land at the Beeches) and Policy HS3 (Land at Hayle Field) within Table 1 of the Basic Conditions Statement, the Former Officers' Mess Site:

- Will provide a mix of housing, including affordable housing, in accordance with paragraphs 61 and 62 of the NPPF and Policies 58S and 59S of the Local Plan 2030.
- Is a deliverable site, of a size that can be built out quickly, in accordance with paragraphs 67 and 68 of the NPPF, and Policy 7S of the Local Plan 2030 which permits development outside of defined Settlement Policy Areas (SPAs).
- Could support the rural economy by helping to sustain local services and facilities, in accordance with paragraph 84 of the NPPF, noting that this specifically encourages the use of previously developed land where opportunities exist.
- Will be well-designed, including provision of a suitable access and landscaping, in accordance with paragraphs 124 and 127 of the NPPF and Policy 28S (and Policies 29, 31, 38 and 53) of the Local Plan 2030, noting, as set out above, that the Basic Conditions Statement notes new development of the Former Officers' Mess Site as making a positive contribution to local character and distinctiveness.

Furthermore, the Consultation Statement demonstrates community support for development of the Former Officers' Mess Site – for example, feedback from the initial village consultation, as presented in Appendix C of the Consultation Statement, demonstrates 66% of respondents supported housing development on the Former Officers' Mess Site. This is similar to the level of support for Hayle Field (68%) and significantly above that for The Beeches (46%).

As noted above, the Site Assessments report acknowledges that the Former Officers' Mess Site as previously developed land should be considered for some sort of development. To allocate greenfield sites, whilst leaving previously developed land that is equally suitable for housing development vacant is contrary to both national policy and advice and strategic policies of the Local Plan 2030.

Furthermore, the NDP fails to take an opportunity to achieve sustainable development by guiding development to the most sustainable location.

### ***Site Assessment and Selection Process - Conclusion***

For the reasons given above, we consider the site assessment and selection process is inadequate:

- (i) The process fails to clearly set out the methodology for site assessment, contrary to national policy and advice and, as such, does not robustly justify those sites selected and discounted as housing allocations.
- (ii) Linked to (i) above, the assessment of the Former Officers' Mess Site is incorrect and inconsistent with the assessment of Land at The Beeches and Land at Hayle Field, which has resulted in it being unreasonably dismissed as a suitable option for housing development.
- (iii) There is insufficient evidence to support the housing allocations contrary to national policy and advice and, as such, it is not demonstrated that the allocations are deliverable, which provides uncertainty as to how much of the allocated housing will come forward over the plan period.
- (iv) The housing allocations do not maximise the use of previously developed land contrary to national policy and advice and a strategic policy of the development plan, and which runs counter to achieving sustainable development.

### **Change necessary for the NDP to proceed**

SMD respectfully request that the Former Officers' Mess Site be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches (Policy HS2) and Land at Hayle Field (Policy HS3).

There are no known physical, environmental or infrastructure constraints to development of the Former Officers' Mess Site for housing. The Site is not at risk from flooding and is not subject to heritage designations or other notable environmental designations. There are no Public Rights of Way within, or immediately adjoining, the Site. There is a small sewage treatment works to the west, but discussions with Anglian Water have established that they will have no objection to development of the Site subject to the dwellings closest to Keysoe Road being set back.

SMD's proposals for the Former Officers' Mess Site have directly responded to community views expressed through the neighbourhood plan process and have evolved in consultation with the local community, including two presentations to Parish Council meetings in 2018. The first of these on the 8<sup>th</sup> January 2018 considered options for the Site, both for housing and employment use. The second was on the 21<sup>st</sup> May 2018 where a proposed housing scheme was presented. No objections were raised to the principle of development, with discussions focused on affordable housing provision, open space provision and potential transportation impacts.

An Illustrative Masterplan (Dwg No. RG-M-03 Rev A) is provided at **Appendix 2** to demonstrate how the Former Officers' Mess Site may come forward for development.

Directly responding to a preference for small and medium scale housing developments, a total of 15 new homes are proposed, comprising market and affordable housing to meet housing needs. Whilst the housing mix is to be determined, the Illustrative Masterplan shows how a mix of larger detached houses could be delivered, together with smaller semi-detached and terraced houses, which is in line with the Policy HS1 (New Housing Mix) of the NDP.

This results in a low-density development, which is also in line with Policy HS1 (New Housing Mix). There is ample space for on-plot parking and gardens, in line with Policy HS4 (Thurleigh Village

Design Statement). The Illustrative Masterplan also shows significant open space provision, which has the potential to meet the needs of future residents and provide a wider community asset. This will enhance the setting of the existing open space on Keysoe Road to the frontage of the Site, noted as the Memorial Garden in the NDP, which is in line with Policy RYS1 (Local Facilities and Services).

As shown on the Illustrative Masterplan, the proposed development will retain and enhance existing vegetation, which will assist the development to assimilate into the landscape. This is in line with Policy HS4 (Thurleigh Village Design Statement) and Policy LPA4 (Protection and Replacement of Existing Landscape) of the NDP.

The existing access on Keysoe Road will be utilised, and there is potential for improved pedestrian links along Keysoe Road in line with Policy LPA3 (New Development and Connectivity) of the NDP.

We acknowledge the concern within the Consultation Statement that: *"... if the Site is developed for residential dwellings then this leaves the field between this site and the last house on Keysoe Road open for infill development. It could be difficult to move the SPA to incorporate this site as there would be a large gap between the end of development on Keysoe Road and the Officers Mess site"*

However, we do not see why allocating the Former Officers' Mess Site for housing development would make it difficult to resist development on the field between the Site and the last house on Keysoe Road, as each case must be taken on its merits, taking account, for example, whether the land is brownfield or greenfield and, under Policy 7S of the Local Plan 2030, whether there is Parish Council support. Furthermore, existing vegetation to the boundary of the Former Officers' Mess Site provides a physical and defensible boundary containing development – an advantage of the Site when compared to the boundary of the allocated housing site, Land at Hayle Field, which lacks a clearly defined boundary to the east.

In respect of the SPA, the Local Plan 2030 gives guidance on defining SPAs, and sets out that *"The Settlement Policy Area boundary encloses the main built-up part of the village but excludes subordinate built-up areas that are detached from the main built-up area ..."*. As such, there is no need to incorporate the Former Officers' Mess Site within the SPA. Furthermore, as acknowledged at paragraph 8.39 of the NDP, the field between the Site and the last house on Keysoe Road could be considered for designation as a Village Open Space and, as such, afforded protection under Policy AD40 of the Bedford Borough Allocations and Designations Local Plan (adopted July 2013).

To conclude, the Former Officers' Mess Site is suitable for housing development. The proposals for the Site have evolved in consultation with the local community and the Illustrative Masterplan demonstrates how a scheme could come forward in compliance with policies within the NDP.

## **Section 8 Policies – Employment Policies**

The Thurleigh Neighbourhood Development Plan Pre-Submission Version, which was subject to Regulation 14 consultation between June and July 2019, allocated the Former Officers' Mess Site for employment development under Policy EM1. This allocation has not been carried forward to the NDP. SMD support that the Former Officers' Mess Site is not allocated for employment development in the NDP.

However, SMD have concerns with paragraph 8.57 of the NDP which states (our emphasis): *"Whilst the NDP working party wished to allocate the site of the former "Officers Mess" site, on Keysoe Road, for additional employment growth in the village, (with employment uses restricted to those classes that do not rely on the regular use of commercial traffic movements) they have been made aware by the landowner that this site is **not available** for this purpose."*

The Former Officers' Mess Site is available for development, but we do not consider employment to be an achievable or suitable use for the Site. These concerns were set out in the representations made on behalf of SMD to the Regulation 14 consultation, which were subsequently discussed at a meeting with the Parish Council on the 7<sup>th</sup> January 2020. The concerns raised were as follows:

- i. **Demand:** Policy EM1 sought to restrict employment uses to those not reliant on regular use of commercial traffic movement, which would constrain demand for employment use of the Site. Moreover, given the proximity to Thurleigh Airfield Business Park, it is difficult to foresee any demand for commercial floorspace on the Site. SMD, as any other developer, would simply not develop commercial space speculatively in this location. We therefore raised that it would be likely that the Site would remain vacant if allocated for employment development and, as such, an employment allocation would not make best use of previously developed land. If any interest in the Site was to come forward then this would likely be for low value uses, for example, lorry parking or car mechanics.
- ii. **Impact of development:** Whilst further work would be needed to quantify the impact, we raised concern that it would be likely that commercial development would have a greater highway impact than housing development, including the impact of HGVs, with the High Street/Keysoe Road junction of particular concern. In addition, commercial development may result in a more visually harmful built form, if designed to meet market demand.

Our representations to the Regulation 14 consultation set out that housing development would be a more appropriate and viable, and therefore deliverable, use of the Former Officers' Mess Site.

### **Change necessary for the NDP to proceed**

SMD respectfully request that paragraph 8.57 be amended as follows:

*Whilst the NDP working party wished to allocate the site of the former "Officers Mess" site, on Keysoe Road, for additional employment growth in the village, (with employment uses restricted to those classes that do not rely on the regular use of commercial traffic movements) they have been made aware by the landowner that whilst the Site is available for development, employment is not an achievable or suitable use ~~this site is not available for this purpose.~~*

In addition, as the Former Officers' Mess Site is available, and comprises previously developed land, it should be brought forward for development and, as set out above, SMD respectfully request that it is allocated for housing development, either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches (Policy HS2) and Land at Hayle Field (Policy HS3).

## **Section 9 Non Land Use Actions**

The aspiration for the Twin Reservoirs at Thurleigh Airfield to be protected and enhanced, as set out in Non-Land Use Action 2 of the NDP, with supporting text at paragraphs 8.43 and 9.4, is noted. As stated at paragraph 1.5 of the NDP, development of Thurleigh Airfield is subject to policies under the direct control of Bedford Borough Council and, as such, is not covered in the NDP, which is an approach supported by SMD. Nevertheless, SMD wish to assure the Parish Council and local community that they will continue to liaise with them in respect of development of Thurleigh Airfield, including any proposals that include the Twin Reservoirs.

## **Section 10 Monitoring and Review of the Plan**

Paragraph 3.4 of the NDP sets out that it covers the period to 2030 to align with the plan period of the Local Plan 2030. Accordingly, paragraph 10.1 goes on to state that the NDP will be "reviewed

*periodically to ensure that it addresses any changes in both national and local planning policies.”* However, the timetable for the review of the NDP does not align with the timetable for the review of the Local Plan 2030.

Policy 1 of the Local Plan 2030 commits Bedford Borough Council to an early review of the Local Plan 2030. This is due to the need for the Borough to plan for higher housing numbers. Under Policy 1 a review is to commence no later than one year after adoption of the Local Plan – that is, January 2021 – and an updated or replacement plan is to be submitted for examination no later than three years after adoption – that is, January 2023. The Local Development Scheme April 2020, provided at **Appendix 3**, shows that the review is underway, with an Issues and Options Consultation scheduled for July-September 2020. The timetable sets out that the new Local Plan will be adopted December 2023.

Notwithstanding the above, paragraph 10.3 of the NDP sets the first possible review of the NDP as 2025, with paragraph 10.4 giving the first commitment to a review as 2028. Paragraph 10.4 goes on to state that if a new plan is required this will be developed so it becomes effective in 2030.

Whilst there is no requirement to review or update a neighbourhood plan, Planning Practice Guidance (Paragraph: 084 Reference ID: 41-084-20190509) sets out that policies in a neighbourhood plan may become out of date, for example, if they conflict with policies in a local plan that is adopted after the making of the neighbourhood plan and that in such cases the more recent plan policy takes precedence.

### **Change necessary for the NDP to proceed**

We consider it would be prudent for the NDP to set out a clear commitment, in policy, to a formal review of the NDP in line with the timetable for the review of the Local Plan 2030 to ensure it remains up-to-date.

### **Conclusion**

SMD support Thurleigh Parish Council in their preparation of a neighbourhood plan, and support that the Former Officers’ Mess Site is not allocated for employment development (subject to modifications).

However, we consider that there are significant shortcomings in the NDP relating to the assessment and selection of sites for housing development, which undermine its ability to support sustainable growth of the village.

The site assessment process is not clear and, as such, does not robustly justify those sites selected and discounted as housing allocations. In particular, the Former Officers’ Mess Site is unreasonably dismissed as a suitable option for housing development and, consequently, the NDP fails to take an opportunity to guide development to a deliverable site that comprises previously developed land. Furthermore, there is insufficient evidence to support the housing allocations and, as such, it is not demonstrated that they are deliverable, which provides uncertainty as to how much of the allocated housing will come forward over the plan period.

To rectify this, and ensure that the NDP meets the basic conditions, we respectfully request that the Former Officers’ Mess Site be allocated for housing development either in addition to, or in place of one or both of, the proposed allocations – that is, Land at the Beeches (Policy HS2) and Land at Hayle Field (Policy HS3).

In addition, we consider it would be prudent to have a policy that commits the NDP to a formal review in line with the review of the Local Plan 2030 to ensure it remains up-to-date.

We would be grateful if you would take account of our comments, and we would welcome the opportunity to discuss these matters further. If you have any queries regarding the above, please do not hesitate to contact me.

Yours faithfully,

Associate Planner

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	HS1
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

☒ Oppose

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Policy HS1 (a) supports the new housing that should broaden choice and extend the opportunity to live in the village to a wide range of people. This aspiration is supported.

Criteria: (b) presumption in favor of a mix of 3 or more bedroom detached housing, 2/3 bedroom semi-detached or terraced housing and the provision of bungalows; (c) no buildings more than two stories high; (d) low density; and (e) promotion of 2/3 bedroom home are all considered too prescriptive.

Policy 59S of the Bedford Borough Local Plan 2030 requires a mix of dwelling size and type to meet the identified needs of the community including families with children, older people, people wishing to build their own homes and people with disabilities and special needs.

The restrictions that criteria b-e of HS1 seek to impose would prevent a mix of housing types coming forward resulting in the policy failing to be in 'general conformity' with Borough Local Plan.

Thurleigh is a successful settlement because its housing offer is varied. Developments like the existing block of flats, which are higher than two stories and represent high density development, provide for affordable accommodation which is an important part of the village having vitality and generate the demand for existing local services like the school. The level of restriction and prescription within the policy as drafted would prevent new developments targeted at those groups in highest housing need for example sheltered accommodation or affordable housing.



**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	HS2
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support with modifications

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Policy HS2 allocates land at The beeches for development on the grounds that it is: *"centrally located in the village, close to local amenities, and accessed from the High Street"*.

This is a sustainable site within the village and therefore, in accordance with paragraph 123 of the National Planning Policy Framework 2019, "a) plans should contain policies to optimize the use of land in their area and meet as much of the identified need for housing as possible".

The restriction of the allocation to 10 units of a specific mix is not supported by evidence. This policy fails to optimize the use of land able to provide sustainable development in the heart the village close to the school and the village hall. It is therefore considered that it fails to meet the basic conditions in that is contrary to national policies – Paragraph 123 of the NPPF.

The allocation of this site is supported, However, as arguably the most sustainable development site in the village, the density of new development coming forward on this site should be maximized. The wording of Policy HS2 should be amended to require that the site be brought forward at a minimum density of 40 -50 dwellings per hectare. This would ensure the best use is made of this sustainable site, and it would also ensure future development proposals include a variety of dwelling types (including smaller units such as flats) to avoid a low density development of large 4 bed executive homes.



**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	HS3
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support with modifications

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Policy HS3 includes unduly restrictive criteria, (c) states – “No buildings to be more than two stories high”. The reasoning for this is not explained. This is a gateway site and will be the entrance to the village. To impose a restraint on height in a context where there is a variety of development is unduly restrictive.

This development will generate additional need for children to access the school utilizing the footway along the High Street. In places this is narrow and the combination of the speed of vehicles and the narrowness of the path makes it unwelcoming to use. A criteria should be added to policy HS3 to require the development to make provision (s106) to improve the footpath links not just from the site to the existing footpath on the High Street, but also to address the increase footfall the development will bring by addressing pinch points between the development and the school.

The boundary for the allocation is drawn needlessly small. The extent of the allocation should follow existing natural boundaries. The suggested boundary line in the middle of the field doesn't show due consideration for the character of the land the existing strong boundary alignment around the field. The allocation should be increase in size to utilize the existing vegetation along the eastern edge of the field as the development boundary.

The policy should be amended to require that access is provided from the development to the sports field to the west.

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	HS4
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

☐ Oppose

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Policy HS4 includes unduly restrictive criteria - (c) seeks to impose height restrictions on new dwellings. This is unduly restrictive.

Paragraph 8.24 form the pre-amble to this policy and highlights the preference for new housing to complement the village style and character. However, it doesn't explain the rationale for limiting development height. This village already includes developments with height such as the flats and the converted Baptist Church. There is no reason to seek to restrict the height of new development.

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	HS5
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

☐ Support

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Supported

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	Policy IF1
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

☐ Support

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Supported

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	Policy IF2
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support with modifications

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

I would like to see the importance of creating a safe pedestrian link to the school prioritized and identified as a criteria for this policy

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	Policy RYS3
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support with modifications

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

I think is very important to support the provision of new or improved recreational facilities given the isolated position of the village and poor links meaning that many, particularly the young, will not be able to access sports and recreation facilities elsewhere.

My opposition to this policy is the wording which states that there should be no adverse impact on the amenity of surrounding residential properties. Planning should be a balance in which the benefits of providing facilities are weighed against other factors. I would like the policy to be reworded to state: "The provision of new or improved recreational facilities will be supported"

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	Policy LPA3
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

☐ Support with modifications

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Modification is requested. All new development should demonstrate suitable connectivity to allow for safe walking and cycling of children to the school.

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	NLUA1
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support with modifications

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

This policy fails to set out a clear aspiration of what is desired to address the local traffic issues.

I am very concerned about the sharp bends between the church and the village hall. Vehicle often take these bends too fast. The footpaths here is very narrow and it is part of the route many children will walk to and from school.

I would like to see the road here narrowed to a single lane and traffic lights installed in the same way as what happed next to the church in Renhold. Narrowing the roadway would allow for wider and safer footpaths to be installed for the school children. The traffic lights would also reduce the speed of traffic through the village which is a huge concern locally.



**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	NLUA8
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support with modifications

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

The list of priorities should have traffic and speed reduction as the most important criteria. I would like the first projects for s106 and CIL receipts to be average speed cameras or the High Street at the bends between the church and the village being narrowed to a single lane and traffic lights installed.

Speed of traffic through the village is a huge concern locally. The poor state of the footpaths along the High Street makes this worse. A parent with a pushchair and a school child can't walk 2 abreast on the footpath meaning that people often step out into the carriageway where the cars are very fast moving.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

The plan has correctly identified 2 sustainable locations for development which I support. It should therefore support the optimization of development on these (and other) sites and remove unduly restrictive policy criteria on height and unit numbers.

I believe this is necessary to ensure the neighbourhood plan meets the basic conditions of having regard to national policies. Failure to optimize the development of sustainable sites would be contrary to paragraph 123 of the NPPF 2019.

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*Yes, I wish to participate at an oral examination* ..... Yes

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

I would like the opportunity to put forward my concerns that the plans are not pushing development to a high enough density.

Without policies that force developers to optimise the density of the sites in the village with a variety of housing types, there is the potential that the Neighborhood Plan will just result in small provision of 4 bed executive home cul de sacs which would fail to support the broader needs of the village.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... Yes

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.22	Policy Reference:	HS3
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☒ **Oppose**
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

I have trouble with the PCC's comment that this proposed development is centrally located, when in fact you would need to extend the village boundary to accept the proposal?

The traffic on this stretch of road is extremely fast and very few drivers maintain the legal limit of 40mph on the road! The road traffic survey has never to my knowledge been set up over the proposed entrance of the site!

There is no need for this development on a "Greenfield" site, there are other "Brownfield" sites and other proposed development sites also within the village boundary that should be explored and used first.

The proposal of 20+ dwellings on this site, is not sustainable within the village, the first phase would be 20 dwellings as this is proposed on approx. 25% of the site, so if this was approved there would be further phases of build!

The village is currently used as a "rat run" for cars to avoid the clogged up A6, which always has traffic jams, we would become more than we currently are a commuter village. By using this site it will just add further cars into the system. By having more cars it will only add more pollution to our beautiful countryside.

In Bedfordshire we have some beautiful villages Thurleigh being one of them, do not turn them into small towns as some other villages have, such as Bromham.

Please do not allow building to go ahead on our countryside/ "Greenfield" sites as once you say yes, it is very difficult to say no to others who want to cash in on our countryside.

The entrance to this site is on a camber in the road and makes it very dangerous for cars both on the current road, and also if planning was given to people leaving the field.

I on a personal issue would lose privacy from my living room as it overlooks the proposed development.

There are no footpaths or lighting extending outside of the village boundary, where the proposed entrance would be.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

Take out the proposed Hayles Field as a development site for further housing within Thurleigh, use Brownfield sites first and also the other sites which are already confined within the village boundary.

Put up average speed cameras, not just around the village hall/ School but all the way along the High Street, all villagers count not just those with children. The payment of the cameras should be paid for Bedford Borough Council.

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... X ☒

~~*Yes, I wish to participate at an oral examination*~~ ..... ☐

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... X ☒

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☐ Oppose
- ☒ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

**CONSULTATION STATEMENT**

The submitted version of the Thurleigh NP differs significantly from previous versions (up to end 2018) and with the supporting Issues and Options Consultation Report. Based on prior consultations, these proposed three development sites in Thurleigh.

However, the current NP offers only two sites, though a design proposal for site (3) was submitted to the Parish Council but it isn't in the NP.

So in the NP we have:

- 8.10 Bedford Borough Council Settlement Hierarchy, has identified Thurleigh as a Group 3 village and, whilst the Bedford Borough Local Plan 2030 does not specifically require land allocations to meet Borough wide needs, it does enable local areas to bring forward development through the neighbourhood planning process. The parish of Thurleigh has indicated based upon community feedback, to allocate land for up to 30 new homes in the local plan period to 2030 to help sustain local services. This includes a local need identified by a Housing Needs Survey, commissioned by the Parish Council and undertaken by Bedfordshire Rural Communities Charity in 2016, for 7 units of affordable housing and 4 units of market housing.

Note that the Thurleigh community consultations were not informed that Bedford had removed its housing allocation at the time. The above paragraph therefore gives the wrong impression that we were and that this informed all consultations.

The NP current as of end 2018, and past versions available via the Thurleigh PC website had this:

- 4.15→The consultation on Bedford Borough local plan 2030 final submission does not require land allocation to meet Borough wide needs but permits local areas to bring forward development through the neighbourhood planning process. The parish of Thurleigh have indicated the preparedness to allocate land for up to 40 new homes in the local plan period to 2030 to help sustain local services.¶

And

8.18→A key purpose of the consultations undertaken during the neighbourhood planning process was to obtain views on the acceptability of the sites put forward as potential allocations for future housing in Thurleigh. The evidence collected has indicated that development to meet identified need in the village should take place on a number of small sites with access to local amenities, and that it should be delivered in a way that ensures that the right type of housing is built in the right locations, and that protects the village from uncontrolled, large scale, or poorly placed development. In terms of locations for growth (and in the context an acceptable level of growth), the Issues and Options consultation that was undertaken in November/December 2016 resulted in the following sites being considered as acceptable for allocation in the Neighbourhood Plan to meet housing needs.¶

ooooooooooooooooo.¶

- (1) → Land known as The Beeches, High Street, Thurleigh (Call for Site reference 274) for a small to medium size development of up to 10 dwellings.¶
- (2) → Land known as Hayle Field, High Street, Thurleigh (Call for Site reference 276) for a medium to large development of up to 20 dwellings.¶
- (3) → Land behind School, adjacent to the Village Hall (Call for Site reference 402), as a site for 11 dwellings to meet local need.¶

So prior to the Pre-Submission version consultations were based on 3 sites and 'indicated the preparedness to allocate land for up to 40 new homes' but now 'The parish of Thurleigh has indicated based upon community feedback, to allocate land for up to 30 new homes', and these on just two sites.

So,

1. Which statement version properly reflects the results of consultations as they both can't be right? 30 new homes or 40 ?
2. Why was Site 3 removed when it was in all prior NP versions and consultations ?
3. What is the intent of the proposal for Site 3 which the NP is silent on ?

These changes have not been explained in any available Thurleigh Parish Council documentation that I have found, or in the NP.

In my opinion the Thurleigh Consultation Statement cannot be relied upon for review or examination since prior consultations (pre-2019) were in a materially different context and an essential part of the NP, the number of sites, has significantly changed with no chronology, reconciliation or explanation offered in the NP.



**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

The NP should explain the rational for the fundamental change to the number of sites and provide a reconciliation of the consultations with the new proposal.

Correct 8.10 to remove the possibility that it may be interpreted that all consultations were undertaken in the knowledge that Bedford had a zero housing allocation to Thurleigh or that participants were made aware of the change to Bedford's policy (including the Steering Group).

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?**  
(please select one answer)

*No, I do not wish to participate at an oral examination* ..... ☒

*Yes, I wish to participate at an oral examination* ..... ☐

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.22	Policy Reference:	HS3
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☒ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

The Hayle Field site is not centrally located as stated in the Neighbourhood Plan. It is on the periphery of the main village and will be a linear extension of the village. It is agricultural land. It will also reduce the separation between the main village and Cross End, unlike The Beeches which is more in-fill.

I would question whether it has regard for Basic Condition #1.

In terms of the policy:

Policy: The following policy statement does not provide a constraint that can be tested or delivered:

- a) The design and layout respects and enhances the built, historic, local and wider natural environment;

How can a new build there 'enhance the....historic, local and wider natural environment'. What does it mean ? How can it be tested ? Suggest it is deleted.

Sustainability: Any housing development in Thurleigh is remote from adequate shopping and employment. The bus service is poor and most people rely on cars for transport. By the nature of the village additional housing is counter to 'sustainable development'. Without further evidence I do not see how this policy can say 'it will support the local economy (84)'. It doesn't provision for a source of employment, a shop or any other service.

Peripheral Location and Linear extension of the Village: A number of sites were proposed in the 'call for sites'. The Thurleigh Neighbourhood Plan did not consider all sites with equal weight, particularly those offered in the subsequent call for sites exercises.

From about 2015 the only sites considered with any weight were Hayle Field, The Beeches and the now removed site behind the school.

Site Assessment: Although a site assessment exercise was undertaken this was a 'desk top' exercise. There is no evidence as to the Parish council response to the site assessments such as to any subsequent dialogue or request for clarification or for further more thorough assessment.

One particular point regards Site 444, 'Land at High Street'. This site is on the other side of the High Street to Hayle Field and mirrors its location.

Hayle Field is given a 'RAG Score' of 52 in the Site Assessments Report and rated 'green'.

Site 444 scores 52 and is rated amber.

The difference in recommendation between these two seems to relate to the extent of the footpath out of the village.

The Site Assessments Report says for Site 444:

If the Hayle Field site is supported and developed and includes the recommended public footpath, it may be possible to provide a footpath and crossing point to link footpaths from both sites. These requirements would appear to deliverable. If the site is supported, the policy should set out specific requirements in the formal neighbourhood plan.

So

- a) On what basis was Site 444 not taken forward given its similarity to Hayle Field ?
- b) If Hayle Field is taken forward, does the Neighbourhood Plan provide any rationale for rejecting an application for development on Site 444.

I think this is unsafe.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

Re-present the rationale for the adoption of Hayle Field as opposed to more central locations offered in the call for sites.

Reconsider the exclusion of Site 444 from the selection and provide a robust rationale.

Consider why a combination of the similarly scoring and similarly located Hayle Field and Site 444 together should be regarded as unacceptable.

Review the policy wording and remove any 'motherhood' to ensure that the conditions are relevant, meaningful and testable.

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☒

*Yes, I wish to participate at an oral examination* ..... ☐

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**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.28	Policy Reference:	HS5
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☒ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

#### Policy HS5 - Affordable Housing Allocation

In the case of any, as yet, undelivered exception sites affordable housing will be subject, at all times (first and subsequent occupation) to conditions or a planning obligation to ensure that when social rented homes or shared ownership homes are allocated to qualifying candidates first priority is given to people with a familial or work connection to Thurleigh Parish and second priority is given to those with connections to surrounding Parishes and third priority to all other qualifying candidates. For all other development sites the Bedford Borough Council Housing Allocations Policy will apply.

Compliance NP Objective 1: Delivering Housing which both sustains the current and meets the future needs of the community  
BBLP 2030: 58s, 67s/ NPPF 63

1. The wording is peculiar and unclear. What does it mean by 'In the case of any, as yet, undelivered exception sites' ? If it was delivered it would exist and not be part of a plan. What is an 'exception site' ?
2. Policies HS2 and HS3 make explicit provision for affordable housing in accordance with current regulations and these satisfy Compliance NP Objective 1. As such there is no need for a policy like HS5. If the Neighbourhood Plan wishes additional provision of affordable housing it should adjust HS2 and HS3 accordingly.
3. As it is unclear and apparently unnecessary, this policy should be removed.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

Improve the wording to make it clear what is meant.

Clarify if it is to apply to the development at Hayle Field and The Beeches.

Explain what is meant by an 'Exception Site' and why such is not considered elsewhere in the Plan if it requires a policy all to itself.

Is an Exception Site being proposed elsewhere ? if so, clarify.

Suggest the policy be removed.



## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☒

*Yes, I wish to participate at an oral examination* ..... ☐

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.33	Policy Reference:	IF2
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☒ Support with modifications
- ☐ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

The Issues and Options Consultation Report produced during the development of the Plan was clear that existing parking should be addressed:

**Issue 7.1: Off-Street Parking Provision**

- 7.12 There is a need to address parking concerns at key locations in the village by safeguarding available sites and identifying where new parking might be provided. The provision of any new car parking must be sensitive to the function, character and identity of the village. This has led to the following **Policy Options**:

38 | Page

The Neighbourhood Plan response is wholly inadequate; first

- 8.33 It is acknowledged that there are problems of traffic congestion on village roads and the lack of parking in some areas. New development should seek to improve the management of traffic in the village where appropriate.

And then IF2 offering:

- b) They should assess the potential impact of this traffic on pedestrians, cyclists, road safety, parking and congestion within the Parish and, where necessary, include within their proposals measures to mitigate the impact
- c) Proposals which are likely to increase the impact of traffic on road users will need to demonstrate how that traffic will be managed.

Policy IF2 is an opportunity for addressing *NP Objective 2; managing both existing and future infrastructure* however IF2 doesn't do so as it only seeks to address new development, and then in vague and cursory fashion.

I think this policy fails compliance with NP Objective 2.

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

The Parish Council have proposals for the sites and are in a position to apply any measures, where necessary, to mitigate the impact. They know the number and nature of the developments and traffic impact should have been one of the issues they took into account in deciding location and size of developments. The NP is silent on any specific measures to manage this.

New developments will increase traffic. The developments will not be in a position to implement traffic management measures outside the boundaries of their own sites. The Thurleigh NP is the appropriate place to address how to manage the increase traffic through the village from the developments it proposes.

Addressing the parking issues in Keysoe Road would assist the development of the Officers Mess Site, policy EM1 (?).

There are parking and traffic management issues outside the school: these should also be recognised and addressed.

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☒

*Yes, I wish to participate at an oral examination* ..... ☐

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.29	Policy Reference:	IF1
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☒ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Thurleigh has a popular village school which is close to capacity and raises parking issues.

The Neighbourhood Plan does not address the village school or include it in its infrastructure policies.

What provision is made for anticipated future demand on the school, not least from the proposed developments?

What provision is made for future expansion of the school ?

Has any possible growth constraint on the school been addressed in determining the scale of additional development ?

Shouldn't these be addressed as part of NP Objective 2 ?

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

Address the requirements for the school including future expansion needs, parking and traffic management.

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☒

*Yes, I wish to participate at an oral examination* ..... ☐

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.52	Policy Reference:	RYS2
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☐ Oppose
- ☒ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

NP Objective 4 – ensuring that the village benefits from sufficient facilities and services.

Thurleigh doesn't have a shop or pub, but does have a Sports & Social Club.

Policy RYS2 offers future Parish Council support for new local services 'where they are appropriately located and do not cause harm or where the harm caused is outweighed by other benefits'.

The Neighbourhood Plan (NP) is an ideal place in which to identify and promote appropriate locations and be satisfied as to the limits of 'harm'. It doesn't do so. Such an anodyne response comprising a single sentence can hardly be taken to address NP Objective 4.

Furthermore, CIL money could be applied to expand the Social Club ( not just protect it as per RYS 1) and make it more amenable to those who miss the pub, and perhaps provide something for young people. The policy is silent on this, as is para 9:15 which addresses CIL application (in no particular order).

Where are the needs of the school addressed ?



**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**

I think the NP needs to address these matters more constructively if it is to claim it has addressed NP Objective 4.

Address the future needs of the school including traffic impact and increased demand from more development.

## PART C

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**If an oral examination is necessary would you like to participate?  
(please select one answer)**

*No, I do not wish to participate at an oral examination* ..... ☒

*Yes, I wish to participate at an oral examination* ..... ☐

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☐

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	8.57	Policy Reference:	EM1 ?
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☐ Oppose
- ☒ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

Thurleigh has a brownfield site at the old Officers' Mess site on Keysoe Road. The owner is keen to develop the site.

The Basic Conditions Statement refers to a policy 'EM1' relating to this site. I couldn't find this in the Plan itself.

The Consultation Statement has quite a long response from St Modwen including:

*St Modwen Developments Ltd have engaged with the Parish Council and local community in respect of development of the Former Officers' Mess Site, including two presentations at Parish Council meetings in 2018. The first of these on the 8th January 2018 considered options, both residential and non - residential, for the Site. The second was on the 21st May 2018 where a proposed residential scheme was presented. No objections were raised to the principle of the proposed development, with discussions focused on affordable housing provision, open space provision and potential transportation impacts.*

Para 87 of the Neighbourhood Plan (NP) states:

8.57 Whilst the NDP working party wished to allocate the site of the former "Officers Mess" site, on Keysoe Road, for additional employment growth in the village, (with employment uses restricted to those classes that do not rely on the regular use of commercial traffic movements) they have been made aware by the landowner that this site is not available for this purpose.

First, the final assertion that 'they have been made aware...' is a peculiar statement for a Plan such as this. Where is it attributed? How were they 'made aware' ?

Have the Parish Council forgotten about St Modwens' response in the Consultation Statement ?

Second, as a brown field site, the Officer's Mess should get rather more consideration than just this paragraph. There seems to be no policy. This site is an opportunity to reclaim the land and needs a more energetic and supportive approach than this one paragraph.

Third, Keysoe Road is the base for a haulage contractor (Elliotts), a Demolition Company (Jacksons) and an Equestrian Centre. These all rely on commercial traffic, a lot of it heavy. Why should the Officers' Mess site be treated less equitably than these existing users such that it can't have regular commercial traffic movements?

Fourth, the parking issues on Keysoe Road have been recognized. The NP offers no approach or policy for addressing that issue. To do so as part of the infrastructure policies would remove a constraint and improve the potential of the site.

If residential use is ruled out, the restriction on commercial traffic is a fundamental obstacle to any further use of this site and is discriminatory with respect to the existing businesses which put commercial traffic on the road now.

I do not believe that the NP addresses the NPPF requirements with respect to the re-use of under utilised land (118) or the use of brownfield land (119) as claimed in the Basic Conditions Statement.

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Provide Policy EM1.

Re-engage with St Modwen to find a constructive outcome.

Reconsider the infrastructure constraints and how parking issues in Keysoe Road could be improved.

## PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?**  
(please select one answer)

*No, I do not wish to participate at an oral examination* ..... ☒

*Yes, I wish to participate at an oral examination* ..... ☐

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*Please notify me* ..... ☒

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	Typos/clarifications	Policy Reference:	
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☐ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

I noted the following comments, typos and items that weren't clear in the Neighbourhood Plan. These are incidental to the review but they caused me to stumble as I read through the Plan.

Para 4:10. Is 'village envelope' the same as settlement policy area ?

Para 4.12. '....up to 30 new homes in the local plan period to 2030 to help sustain local services.' Is that the only reason ? What services are under threat ? ( there are hardly any left).

Para 4.15. '..making a decision'. Presume 'and' is meant.

Para 4.15, first bullet. I don't know what a plan-led system is or means here.

Para 4.15, third bullet. Words missing after 'quality' ?

Para 4.15. Does the NP encourage the use of brownfield land ? Where ?

Para 5.1. Unnumbered figure. I don't understand the figure title, 'Application..'. Correct ?

Para 6.5.4. What is offered for young people ?

Para 6.7. Missing 'and'.

Para 6.9. 'Accepted' by whom ?

Para 8.4. Where has 'under occupation' been addressed ? Is there any evidence of it in Thurleigh?

Para 8.6. "...in the these smaller..'

Para 9.4. '..ensure..'. How can this be ensured ?

**Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).**



## PART C

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**If an oral examination is necessary would you like to participate?  
(please select one answer)**

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*Yes, I wish to participate at an oral examination* ..... ☐

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*Please notify me* ..... ☒

**PART B – please include a separate form for each comment.**

**To which part of the document does your representation relate?**

Paragraph Number	4, 7 + 8	Policy Reference:	HS2 + HS3
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**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

- ☐ Support
- ☐ Support with modifications
- ☒ Oppose
- ☐ Have comments

**Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)**

PARA 4.12 states  
Up to 30 new homes in Thurleigh before 2030

PARA 7.2 states  
This delivers current + future needs of the community.

8.18 states Beeches site produces 10 homes  
Hayle Field site produces 20 homes

HOWEVER  
8.20 gives green recommendation to  
Beeches site producing ~~10~~ 18 homes  
Hayle Field producing 90 homes

THIS CANNOT BE CORRECT  
Also at least 5 homes have been produced in  
Thurleigh since this document was drawn up.  
One in High St, 4 flats in the old Chapel + One in  
Cross End

Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. 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. (Continue on a separate sheet if necessary).

The number of dwellings requested in Para 8.20 which have been indicated as green needs to be changed

Both Beeches from 18 to 10  
+ Hayle Field from 90 to 20.

Also as 5 dwellings have already been provided in the village since this document was written - I ~~question~~ question the need for providing the Hayle Field site at all as it is presently a green space.

## PART C

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**If an oral examination is necessary would you like to participate?**  
(please select one answer)

*No, I do not wish to participate at an oral examination* ..... ☒

*Yes, I wish to participate at an oral examination* ..... ☐

**Please note the Examiner will determine whether an oral examination is necessary.**

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ..... ☒

**From:**  
**To:** RE: Thurleigh Neighbourhood Development Plan  
**Cc:** 19 June 2020 09:54:14  
**Subject:**  
**Date:**

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To  
Planning Policy Team  
Bedford Borough Council

Subject: Thurleigh Neighbourhood Development Plan

Dear Madam/Sir:

Thank you for sending this letter to us. With respect to the proposed site location, it is remote from our strategic road network. We do not have any comment on this neighbourhood plan.

Regards

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW