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# APPENDICES

**Copies of the appendices are only available as hard copies from the Borough Council, and for inspection purposes at the Town Hall and public libraries**

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# CORRESPONDENCE

Letter to Inspectorate 23rd March 2001
Reply from Inspectorate 3rd April 2001
Letter to Inspectorate 19th April 2001
Subsequent reply from Inspectorate

# INSPECTOR'S REPORT ON OBJECTIONS TO BEDFORD BOROUGH LOCAL PLAN



## The Planning Inspectorate

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The Chief Executive  
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Your Ref:  
Our Ref: PINSM/W0205/429/2  
Date: March 2001

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Dear Sir,

### **BEDFORD BOROUGH LOCAL PLAN - REPORT ON OBJECTIONS**

1. I was appointed in December 1998 by the Secretary of State for the Environment to hold a public inquiry into objections to the 1997 Deposit Draft of the Bedford Borough Local Plan, which I refer to hereafter as the "Deposit Plan". The Inquiry sat on 63 days between Tuesday 16 February 1999 and 28 January 2000, following a Pre-Inquiry Meeting on 9 November 1998. That initial meeting, and a further procedural meeting on 30 November 1998 were held by Mr P S Norman. Having been appointed to hold the Inquiry, he had subsequently to withdraw to hold another Inquiry. Before, during and after my Inquiry I visited all the sites that attracted objections. The attached report recommends what actions the Council should take in respect of all objections, including counter objections, accepted by the Council.

2. The Plan will supersede the adopted Bedford Borough Local Plan (1993). It is set in the context of the approved Bedfordshire Structure Plan 2011. The Plan covers the

period to 2006 and is certified by Bedfordshire County Council as being in general conformity with the current Structure Plan.

3. The Plan was placed on deposit between 24 February and 7 April 1997. Of 2,209 representations made to the deposit draft, 1,898 were objections (report Appendices B and C). Following consideration of these objections the Council placed on deposit Proposed Changes (PIC's) 1-412 to the Plan between 28 September and 9 November 1998. During the Inquiry period the Council put forward further PIC's 413-422 in August 1999, which were also placed on deposit. PIC's 423-527 of January 2000 were discussed with the objectors/site owners and formally endorsed by the Council's Environment Committee, but not placed on deposit (report Appendices F, F1 and F2). I have taken note of all three sets of proposed changes in my conclusions. While I appreciate that non-advertised changes might have attracted some additional counter-objections to the 400+ duly made, I have made my conclusions in the context of the Council's revised thinking wherever possible. The substantial list of Proposed Changes generally emphasises the welcome readiness of the Council to discuss and sometimes amend matters within the Deposit Plan before and during my Inquiry.

4. Before and during the Inquiry 120 objections were conditionally withdrawn and 172 unconditionally withdrawn (report Appendix C); the latter are not dealt with in my report. In making my recommendations I have read and paid regard to all the representations made in support of the Plan and the Proposed Changes to it – 310 and 71 respectively - although my report does not expressly refer to them.

## REPORT FORMAT

5. This Local Plan report follows the sequence of the Deposit Plan's chapters. In each case, I present a brief summary of the nub of the objection, together with my appraisal and recommendation. Objections made in writing are given equal weight with those aired at the Inquiry. Apart from written and oral evidence I have taken account of all other material considerations, though I am obviously not aware of altered local planning circumstances since the Inquiry closed. I have considered the full range of matters raised in respect of each objection, even if there is no specific mention of every one in the report.

6. Where an objection impinges on more than one Plan policy or piece of text, and I consider the arguments to be inextricably linked, I deal with the whole case under what I regard as the main policy heading. Recommendations are, of course, based on the text of the Deposit Plan, referring where appropriate to the Council's Proposed Changes. My Chapter 4 (Housing) is split into four parts. I have first considered those objections with a major bearing on the matter of housing land supply and the merits of the Council's preferred allocations, and concluded on the shortfall in numbers. Secondly, I have examined the merits of all the objectors' alternative suggested sites, made under a number of policy headings, not all connected with the Housing chapter. The third section draws together my conclusions on housing numbers and recommended changes to the Plan. My fourth section considers all the other policies in the Housing Chapter.

7. My report takes account of the background of national planning policy advice current at the time of writing. Since the Inquiry closed such advice has been added to through PPG3 of March 2000, and the Draft Regional Planning Guidance for the South

East of December 2000. A consultation Draft revising PPG25 on development and flood risk of May 2000 could have implications for some housing land that I favour for development. The major flooding during the Winter of 2000-2001 happened while I was writing this report, and I have no knowledge if it has raised problems in Bedford not thought of during my Inquiry. It should be clear from my report if a particular national policy document I refer to was not taken into account in the evidence of the objector or the Council. The Council will, of course, study any revisions to national planning policy in legislation or planning advice before formally adopting the Local Plan.

8. In listing objectors and counter-objectors for each case, I have generally followed the order in which respondent names and numbers are set out in Appendix C – “Index of representations in Plan order”. This does not employ a system based on simple alphabetical or number order, unfortunately. It reflects the way the Council set up its data base, so that representations on any Plan policy or paragraph appear in the following order: re the whole plan area, re Bedford/Kempston, and then alphabetically by Parish.

## MAIN ISSUES

The main issues in my report concern the following:

### **Housing**

9. During the Inquiry I held a Round Table Discussion on housing land on 17 February 1999. The outcome of the discussion informed my consideration of objections to the wording of individual policies and site-specific objections in my Chapter 4. Sessions were held on the deliverability of the Deposit Plan’s housing sites proposed under policies H2-H23. These took place on 5-6 May, 3 June, and on 9 and 16 December 1999 (CD54).

10. Bedford Borough had not been able to show it had a 5 year housing land supply for some years past. The Structure Plan to 2011 is very prescriptive, in its text and the Key Diagram, as to where new housing development shall go. The Local Plan runs up to 2006. There is only a modest amount of previously-developed land for house building

11. At the same time, Bedford is seen in Regional Planning Guidance and the Structure Plan as a growth area for the County, taking pressures from the Luton/Dunstable area. It may be that the Structure Plan target is ambitious, but the Borough is not reneging on its role as growth area. My conclusions respect that thinking. The Council changed its stance early in the Inquiry period from claiming an over-supply in its Deposit Plan of 1135 units. It now “acknowledges that the yield from the supply in the plan period could show a notional shortfall of 555 units”, to quote the words it uses in proofs of evidence.

12. All but two feasible major sources of supply for the Plan period are green field sites on the urban fringe. H6, H7 and H8 are the three major, crucial sites and sit well with the very prescriptive Key Diagram. All three are required to provide much needed orbital road links amounting to a first stage western bypass for the town between the A421, A428 and the A6. There is no likelihood of government or county level public funds for roads that might have been publicly provided only a few years ago. At the end of my Inquiry, the Highways Agency’s requirements that the new roads be provided in

phase with construction of dwellings had not been conclusively agreed in a neat formula, but the parties concerned indicated no fundamental disagreement suggesting the matter was insoluble.

13. At the same time other housebuilding interests claimed great deficiencies of supply in the Plan period and their objections pressed the claims of other sites that do not approach the acceptability in Structure Plan terms of H6, H7 and H8.

14. The Council's search principles for suitable housing sites employ a hierarchy essentially the same as in paragraph 30 of PPG3. The additional sites for 700+ dwellings that I recommend to make the Structure Plan target attainable on the ground by the end of 2005 are also founded on PPG3 principles. The Council would benefit from undertaking an early urban housing capacity study on the lines indicated in PPG3, thereby strengthening the Plan for development control purposes. It is for the Council to decide whether it does this before or after adoption (the latter as a first step in updating the Plan from 2006-2011). Where individual policies need revision before adoption to take account of new PPG3, I say so explicitly in the text. I believe the allocations I recommend will prove as robust as possible in the local context, set against paragraphs 37-40 of PPG3.

#### Elstow

15. The Elstow Storage Depot site straddles the borders of Bedford Borough Council and Mid Bedfordshire District Council. In accordance with Structure Plan guidance it is proposed in the Deposit Plans of both Districts as the focus for a new settlement of about 4,500 dwellings with local services, community facilities and jobs, well integrated with road and rail. One Inquiry day was allocated to consider this matter, on 7 December 1999. My colleague Mr Parry, the Inspector at the Mid-Bedfordshire District Local Plan Inquiry, and I sat jointly at this session. After the closure of both Local Plan Inquiries we jointly produced a report independent of our later Local Plan Inquiry reports, sent to both Councils in February 2001. This report states our conclusions on the acceptability of the sites, the number of dwellings that could be built in the Plan periods up to 2006, and how the adopted Local Plans and their Proposals Maps should present Elstow material.

#### Rural Settlement Hierarchy

16. This matter, addressed under policy S7, deserves re-classification. I see merit in distinguishing "Selected Settlements" (Wootton, Stewartby, Shortstown/RAF Cardington) -all prime focuses for development in the Plan period - from a new hierarchy of villages. The latter would benefit from being objectively classified, by size and facilities, as "First Order Villages", "Second Order Villages" and "other Settlements". Size and facilities alone would not be triggers for new development, which would depend on specific policy factors.

17. A copy of this letter has been sent for information to the head of the Development Plans Branch of the Government Office for the Eastern Region, Heron House, 49-53 Goldington Road, Bedford MK40 3LL, and to the Planning and Development division of the Department of the Environment, Transport and the Regions, Eland House, Bressenden Place, London SW1E 5DU.

18. Finally, I wish to express my gratitude to all participants for their help and co-operation throughout the Inquiry, where strongly held views never led to discourtesy, and to the Council for providing me with a most efficient and sympathetic Programme Officer, Mrs Pamela Perceval-Maxwell. Without her drive, grasp of detail, ready wit and equanimity, we would all have found the Inquiry a much more arduous task.

Yours faithfully,

CHARLES HOILE

## CHAPTER 1

### OBJECTIONS TO THE CHAPTER ON STRATEGY, THE INTRODUCTION AND OTHER OBJECTIONS OF A GENERAL NATURE

#### LOCAL PLAN TIMESCALE

##### Objections and Key Issue

1.1 D H Barford & Co 269/1, City and St James Property Ltd 456/1, Alfred McAlpine Ltd 1082/5

Local Plan should extend or at least look ahead to 2011

##### **Council Reply**

1.2 The Council's written response is contained in Documents BBCEV 146, 148 & 598.

##### Appraisal

1.3 There would be a very significant delay in adopting an up to date Local Plan for the Borough if I were to accede to these objections; that factor in itself would lead me not to accede to them. However, there are also some positive virtues in adopting a plan running up to the end of 2005. There is one major priority for the future physical planning of Bedford and Kempston: the early implementation of a road capable of serving as a western bypass between the A421 in the south-east and the A6 in the north-west. Achieving that task, harnessed to significant new housebuilding in the strategic location of West Bedford is complex. So is the planning of a new settlement in the strategic location focused on Elstow Storage Depot. So also is development in less obviously attractive parts of the South West of Bedford Strategic Corridor. Activity in all these locations is fundamental to carrying out adopted Structure Plan strategy in its policy 33.

1.4 A local plan running up to the end of 2005 and focussed on those tasks seems to me the more effective vehicle to get desired development on the ground early on. A longer-term plan would have a larger number of housing sites, some much easier to deliver than those I have mentioned. I consider that, even if such a Plan contained phasing policies, the market would use all its considerable ingenuity to tackle the easiest identified sites rather than the hardest. As matters have turned out, the strategic sites identified in the Deposit Plan will all provide further yields after the end date of the Deposit Plan, which should give the market added certainty and continuity when it considers complex major development.

1.5 I also find that the Deposit Plan, together with proposed changes – “PIC’s” - put forward subsequently, does contain adequate contextual reference to the longer-term thinking of the Structure Plan in the formulation of its policies.

#### Recommendation

1.6 I recommend that no modification be made to the Local Plan in respect of these objections.

#### OBJECTIONS TO THE PLAN AS A WHOLE

##### Objections and Key Issues

1.7 Redland Aggregates Ltd 435/5 & /10, City & St James Property Ltd 456/3

- make the Plan shorter and less detailed, especially about site specific policies
- because certain developments are vital, acknowledge the element of overriding need affecting concerns such as protected parts of the natural environment, open spaces and sites of ancient monuments
- add “significant” in connection with statement of adverse impact on nature site, wildlife corridors and the like

#### Council Reply

1.8 The Council's written response is in Documents BBCEV 1100-1102.

#### Appraisal

1.9 The Council has not significantly reduced the size of its Local Plan in the light of objections. Any attempt to revise the Plan radically after receipt of my report would greatly delay its adoption. That would not really be feasible or desirable given, as one example only, the need to construct a clear achievable framework for housebuilders in the period up to 2006. However, in the light of what is said in Chapter 3 of PPG12, I have looked carefully at the wording and treatment of all policies in this Plan, to see if they are really necessary or poorly expressed, and recommended accordingly.

1.10 On the subject of claimed overriding need, the objector refers to such policies as NE3, NE18 and BE23. I do not agree with the thinking behind the objection, which finds no support in national policy advice. To express the desired sentiment would be to devalue the policy. Relevant matters of this kind can be put as part of the submission by an applicant for planning permission, and thoroughly argued during the negotiation period.

1.11 I concur with the Council's argument that the addition of the word “significant” would weaken policies, and it would not really help in the making of good decisions. I believe the word would commonly be understood, or be argued to mean, “of considerable amount”, with the implication that there exist tolerable amounts of harm that could not reasonably be opposed.

#### Recommendation

1.12 I recommend that no modification be made to the Local Plan in respect of these objections.

#### PARA.2.2

##### Objection and Key Issue

1.13 Bedfordia Developments Ltd 293/20

- many plans and policies too detailed and prescriptive

#### **Council Reply**

1.14 The Council's written response is contained in Document BBCEV 902.

#### **Appraisal**

1.15 I have considerable sympathy with this objection, and I have looked at the Plan in the light of national advice, notably in paragraphs 3.11-3.14 of PPG12. That is to say, I have examined policies to see if they have a necessary and precise function when they are site specific, and if they take account of advice that criteria-based policies are generally the best



way to give flexibility and simplicity. However, despite its specific advice, national policy expressed in PPG's still gives a local planning authority much latitude to deal with specific problems and circumstances.

#### Recommendation

1.16 I recommend that no specific modification be made to the Local Plan in respect of this objection.

#### PARA. 2.14

#### Objection and Key Issue

1.17 Martin Grant Homes (UK) Ltd 294/15

- to fundamental change has been made to Structure Plan since Draft Local Plan published

#### Council Reply

1.18 The Council's written response is in Document BBCEV 51.

#### Appraisal

1.19 The Council's stance is correct here: the sentiment expressed in the paragraph is that between the Draft and Deposit Plans the plan strategy was amended to reflect the adopted Structure Plan, particularly the concept of strategic corridors.

#### Recommendation

1.20 I recommend that no modification be made to the Local Plan in respect of this objection.

#### PARA. 2.16

#### Objection and Key Issue

1.21 Old Road Securities plc 393/4

- weight placed on correlation of infrastructure and development is wrong

#### Council Reply

1.22 The Council's written response is contained in Document BBCEV 901.

#### Appraisal

1.23 The objector acknowledges that key elements of infrastructure are lacking, especially in the road network. Like the Council, I take the view that this nettle must be grasped as soon as possible, especially as the Borough is now required by the adopted Structure Plan to bear a major burden accommodating growth from the south of the county. In terms of movement, notably a basic form of Western Bypass, the urban area must be made to function as well as possible. In an era when – by design – only the minimum necessary public money is made available to prime the development pump, the private sector has to be willingly harnessed to help achieve the task. The period of this Deposit Plan is one in which major infrastructure has

not only to be planned in detail but started on the ground. That is among the intentions of the adopted Structure Plan.

#### Recommendation

1.24 I recommend that no modification be made to the Local Plan in respect of this objection.

#### PARA. 2.20

#### Objections and Key Issues

1.25 Redland Aggregates Ltd 435/6, Mr GCW Beazley 1027/10

- **be more positive about preventing mineral resources being sterilised**
  - **improve town approaches to sustain the town centre, and give more emphasis to use of the Bedford to Bletchley line**

#### Council Reply

1.26 The Council's written response is contained in Documents BBCEV 530 and 1112.

#### Appraisal

1.27 The Redland objection is seeking a more developed and protective wording than that set down about minerals. Like the Council, I see no need to do that here, especially in view of the ability of the Minerals Plan to give focussed guidance.

1.28 Bedford Town is ill served by the poor quality of development and layout on many of its road approaches. I consider that the well-intentioned generalities of paragraph 2.20 could be made more pointed by reference to specific examples, and that the approaches to Bedford would be an example in criterion (f). I also see some benefit in specifically instancing rail routes and the regenerative potential of what is still perceived as an unglamorous means of transport in criterion (b) instead of merely using the very general word "transport". This would all help make the paragraph more pointed and less abstract.

#### Recommendation

1.29 I recommend that the Local Plan be modified to incorporate the points made in paragraph 1.28 above, but that no other modification be made in respect of these objections.

#### PARAS. 2.21-2.22

#### Objections and Key Issues

1.30 City and St James Property Ltd 456/100-101, Nettlecome Ltd 487/5

- insert text to make exception for development in the rural area where it is for community benefit
- restrain new development in villages outside the strategic corridors

#### Council Reply

1.31 The Council's written response is contained in Document BBCEV 998, 999 and Core Document 10.

## Appraisal

1.32 I endorse the way in which the Borough Council has consistently translated adopted Structure Plan development strategy into the detailed Borough context. The Deposit Plan has been certified as in general conformity with the former. It is also in line with national locational policy for housing in PPG3 of March 2000. There is no sensible reason to deny some development to villages outside the Strategic Corridor provided, as in this Plan, the Corridor Villages receive major development. It is hard to see how such settlements as Wootton and Stewartby could credibly have been allotted more development than they have in the plan period. Nor is there any case, except undesirable special pleading, to add to paragraph 2.21 in favour of development in the rural area.

## Recommendation

1.33 I recommend that no modification be made in respect of these objections.

## POLICIES S1 & S2 – THE URBAN AREA AND OPPORTUNITY SITES

### Objections and Key Issues

1.34 David Wilson Estates Ltd 144/5, Bedfordia Developments Ltd 293/2

- concern at whether Council powers can actually influence and resource re-use of brownfield land
- allocate the Opportunity Sites positively to provide certainty, albeit retaining a flexibility of use

## Council Reply

1.35 The Council's written response is contained in Documents BBCEV 1257 & 1258.

## Appraisal

1.36 The first objector is right in questioning whether the Council can actually perform useful actions to live up to its rhetoric. The Council makes clear that it acts with others in the real world to achieve its land use objectives. I find nothing wrong with the policy wording, which can be cited by others to galvanise the Council into action if they think it is dragging its feet.

1.37 As to the Opportunity Sites, I see the virtue of S2 as highlighting the Council's interest in the beneficial regeneration of run-down, under-used and derelict sites in the Urban Area at an early stage, and helping to form opinion in the development industry. I see the virtues of flexibility in the Council's loose treatment outweighing any disadvantage, especially as the virtues of mixed development are highlighted throughout the text.

## Recommendation

1.38 I recommend that no modification be made to the Local Plan in respect of these objections.

## POLICIES S2 AND LR1 – OPPORTUNITY SITES

### Objections and Key Issues

1.39 Riverside Tennis Club 288/1-/2

- identify 1.4 ha tennis club site as an Opportunity Site

- as well as the positive comment in para. 10.7, refer in LR1 to needs established by Eastern Council for Sport and Recreation

#### Council Reply

1.40 The Council's written response is contained in Document BBCEV13.

#### Appraisal

1.41 The Club wishes to relocate, with the much needed profits from any redevelopment going to fund new and improved facilities elsewhere. There is a continuing dialogue with the Borough Council about new premises, and sites have been offered. I have written evidence of current and recent interest by the Council in positively assisting the Club to attain its objectives. The objector's evidence is that market interest in the Club site has remained constant, but that the Club's desire to obtain an assured and suitable new site has prevented matters going further. There is no protective land policy covering the site.

1.42 I do not consider that situation of the Bedford LTC site close by to the north, where a planning permission for housing is being sought, affects the merits of these objections. It is the case, that despite text in policy S1 of the Plan, not every Opportunity Site is derelict or under-utilised: viz. Pilgrim Square. However, there seems no strong reason to make this functioning area an Opportunity Site, since this would not really seem likely to make its development more easy, and there could be many other site-owners seeking redevelopment aggrieved at not being so designated.

1.43 I agree with the Council's view that to make a specific reference in policy LR1 to needs set out by the ECSR - which might change as time goes on and, indeed, which have changed in the recent past - is unnecessary and over-specific.

#### Recommendation

1.44 I recommend that no modification be made to the Local Plan in respect of these objections.

### **POLICY S3 – THE URBAN FRINGE**

#### **Objections and Key Issues**

1.45 David Wilson Estates Ltd 144/7, Environment Agency Central Area 319/15, De Montfort University 419/1, J&J Design 263/11, CPRE 388/39

- no special justification for a quasi GB policy around Bedford and Kempston; merely say the extent of the Urban Area Boundary is an outer limit to expansion in the Plan period
  - refer to the floodplain policy
  - delete extension of the ASR; conflict with para. 2.26
  - land west of Midland main line enclosed by proposed A6/A428 link Road should go from ASR, but be urban open space
  - Biddenham, Harrowden, and large parts of Kempston rural should be shown outside the Urban Area

#### Council Reply

1.46 The Council's written response is contained in Documents BBCEV 22, 53 and 1113.

#### Appraisal

1.47 The fact that the 1993 adopted Local Plan establishes the concept of an Area of Special Restraint does not of itself mean the designation should continue indefinitely. In the Deposit Plan the already large area covered by the designation has expanded significantly, to become – in the words of one objector – a cordon around the Bedford/Kempston urban area. However, the ASR concept is not a Green Belt obtained by stealth. It is a mechanism for reinforcing the unacceptability of expanding the urban area and/or narrowing the open gap between Bedford/Kempston, and distinct villages and satellite settlements close by, other than on land specifically allocated in the plan period. It does not have the Green Belt characteristic of permanence, but it can only be officially adjusted when the development needs of the whole Borough are re-assessed in the making of a new Plan.

1.48 I agree with the Council that there is specific policy support for positive action in the adopted Structure Plan policy 1 “Strategy” to “...retain the physical identity of towns and villages...including those within the strategic corridor”. The Bedford housing allocations in this Plan have a very significant purpose for the future of the town; they require the private sector to concentrate much the greater part of their construction efforts on building housing around the western edge of town, within the line of a simultaneously constructed bypass road. Given the existence of a clear Urban Area Boundary, there may be an element of “belt and braces” in defining an ASR as a concomitant, reinforcing policy. However, I see it as shrewd and necessary, given the ingenuity of argument likely to be produced by applicants for development in locations contrary to policies in the Plan after its adoption.

1.49 It is also clear to me that the policy is not a local countryside designation of the kind discouraged in PPG7 at paragraph 4.16. It defines a gap preventing coalescence.

1.50 The Council took the view during the Inquiry that the use of different definitions in the adopted Structure Plan and Deposit Plan in respect of the “urban fringe” was causing difficulty. It has put forward PIC’s 423-427 changing references in paragraphs 2.21, 2.26, 2.31 and 2.33 to the “urban fringe” to “land adjoining the urban area” instead. I agree with the rewording; it brings consistency between the two plans by defining the urban fringe as a line of demarcation, as opposed to a zone of transition between the urban area and the countryside. It also resolves objections to ambiguity or lack of clarity in the wording of the Deposit Plan.

1.51 Bedford’s need for physical growth is implicit: both in the adopted Structure Plan policies for shifting the balance of development northwards in the County, and the absence of large enough amounts of previously developed land to meet such needs. The absorption of land at Biddenham, Harrowden and Kempston Rural is a consequence of a need to develop, albeit in ways which take an irreducible minimum of undeveloped land.

1.52 The lack of reference to floodplain policy in paragraph 2.29 is put right, to the satisfaction of Environment Agency Central Area, by new wording in PIC 6; this also satisfies de Montfort University.

#### Recommendation

1.53 I recommend that the Local Plan be modified to incorporate PIC’s 6 and 423-427, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

#### POLICY S4 – SOUTHWEST BEDFORD STRATEGIC CORRIDOR

#### Objections and Key Issues

1.54 David Wilson Estates Ltd 144/6, VE Parrott (Oakley) Ltd 273/10, Bellway Homes Ltd 275/19, Bedfordia Developments Ltd 293/4, David Wilson Homes 998/28, Old Road Securities plc 1022/ & 393/25, Jellis Trustees 286/4, Messrs Wisson & Crouch 287/4, City and St James Property Ltd 456/4

- Strategy Chapter should contain a new section about the Elstow Storage Depot proposals; indicate area of development with Inset map, not sketchy diagram
  - delete references to Wootton and Stewartby, which are unsuited for major housing allocations
  - Wilstead should be in the policy

#### Council Reply

1.55 The Council's written response is contained in Documents BBCEV 53, 599, 810, 903, 1103 & 1260-1263.

#### Appraisal

1.56 The David Wilson Estates objection about Wootton and Stewartby is made in the context of their arguments for another housing site at Elstow, and must be seen as emphasising comparative disadvantage with their favoured site: one which I have found seriously undesirable. I discuss objections seeking the specific inclusion of Wilstead in this policy under objections to S7 below, as the arguments seem to me better considered in the context of the Council's settlement hierarchy.

1.57 Stewartby is a settlement originally conceived on garden city lines, comparatively isolated, but, like Wootton, set indisputably within the South West of Bedford Strategic Corridor. It is an unavoidable fact that significant development in this industrial location has to go on peripheral green field land, as there is no suitable previously used land. The only specific evidence from objectors that Stewartby is not a good location for significant new housing appears to be adverse "environmental characteristics". The only specific example given to me was smell from the brickmaking process. Nothing more positively harmful was instanced. The Deposit Plan's key principles of development in H13 are quite elaborate and reflect a thorough planning consideration of the task. I take the view that the market will decide the matter one way or the other in this Plan period.

1.58 The work by the Council and others since publication of the Deposit Plan has advanced significantly. There is now an adopted Elstow New Settlement Planning and Development Brief (September 1999, Core Document 54H). The objections and counter-objections to PIC's introduced subsequently are discussed in the Joint Report by the Inspector holding the Mid-Bedfordshire Local Plan Inquiry and myself, submitted to both Councils in February 2001. I consider that the new wording for, and visual depiction of, the Elstow site are adequate, and that the Strategy chapter needs no further new text on the matter.

#### Recommendation

1.59 I recommend that no modification be made to the Local Plan in respect of these objections.

#### POLICY S5 – MARSTON VALE STRATEGY

##### **Objections and Key Issues**

1.60 City and St James Property Ltd 456/102-105, British Horse Society 369/50

- unsatisfactory wording in paras. 2.36-2.37 and the policy about anticipated contributions to landscaping and environmental improvements; Figure 3 is misleading and incomplete
  - there should be a reference to improved access in the Forest area

#### Council Reply

1.61 The Council's written response is contained in Documents BBCEV 1254, 1255 & 1264.

#### Appraisal

1.62 The Council has introduced a reference to improved access through PIC 8, and amended Figure 3 through PIC9, both to the satisfaction of objectors. As to the wording complained of in the policy and supporting text, I find nothing that implies that the private sector will be induced to make disproportionate or unrelated contributions as the Strategy is implemented.

#### Recommendation

1.63 I recommend that the Local Plan be modified to incorporate PIC's 8 and 9, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

### **POLICY S6 - SETTLEMENT POLICY AREAS**

#### **Objections and Key Issues**

1.64 Mrs S Wren 1205/1-2, Redland Aggregates Ltd 435/3, Mr SR Jarman 266/1, Henry H Bletsoe & Sons 1168/1 & /3-/6, Carlton & Chellington PC 145/1, Mrs J M Keron 1025/1, Mr I Geary 1112/2, J Roberts Esq 1107/1, David Wilson Estates Ltd 144/8, DH Barford & Co 269/2, Mr J Sawford 1171/1-2, Anglian Water Services 1045/1-/2, Bellway Homes Ltd 275/18, Bedfordia Developments Ltd 293/6, Mr J Tandy 1069/1, Mr & Mrs D Clayson 1108/1

- SPA's should include existing built-up, all garden land and farmyards, and have regard to all physical features, and bear in mind necessary physical development and the rural economy
  - there should be SPA's at settlements including Chawston, Wyboston, Melchbourne, Pertenhall, Bolnhurst, Keysoe, Bletsoe Brook End and Duloe
  - not practical if policy ignores long term needs – including expansion needs - of a settlement
  - all villages should have a SPA
  - use another name: confusion with Special Protection Areas
  - make a clear definition between open countryside and built form
  - recognise contribution of rural brownfield sites to development needs; include a policy for the countryside similar to "major developed sites" in Green Belt in PPG2, Annex C ; SPA's should include operational utility sites on the edge of settlements

#### Council Reply

1.65 The Council's written response is contained in Documents BBCEV 29, 39, 100, 145, 151, 171-174, 178, 183, 390, 401, 413, 1108, 1256 & 1269.

#### Appraisal

1.66 In addressing this Policy I have taken account of all the general points made about it by those objectors seeking development of individual sites. That last matter is dealt with in section 2 of my Chapter 4. Core Document 39A addresses the matter of Settlement Policy Areas through a Topic Paper. There is no definitive agreed method of devising an envelope around a settlement in the County or elsewhere. The Council's method has been to take a minimal attitude to defining the primary built framework of a settlement, looking for cohesion, and excluding more loose-knit development. If a place does not have what the Council calls a "readily identifiable primary built framework", it is washed over in policy terms and treated as

part of the open countryside for development control purposes. I understand and approve the logic of this.

1.67 Though tight settlement definition like this means that infill opportunities within the boundary are generally small, the Council is freer to create opportunities for growth by direct allocation. That matter I discuss in more detail below in examining objections to policy S7, but I see no objection to it in principle, given the adopted Structure Plan emphasis (policy 1) on restraint in the countryside and villages outside the strategic corridors. In the making of the next local plan up to 2011, this approach is robust enough to encompass a possible change of emphasis coming from Borough, County Council or National Government, which can be met by further direct allocations affecting the shape of the envelope. Policy H30 deals adequately with the local criteria for applying the national approved concept of "local needs" or "exception" housing, which cannot by definition be indicated on a Proposals Map. That concept is re-emphasised in the March 2000 version of PPG3.

1.68 Any application of a SPA policy to the range of small settlements in Bedford Borough is necessarily subjective, because no two places are directly comparable. I have looked at objections to see if there is marked inconsistency or unfairness in applying what I regard as the sound criteria set down in Core Document 39A. I have looked at all the settlements and parts of settlements where anomalies are claimed, with some care. I find that no settlement without a SPA has a strong planning case for acquiring one. The fact that the overall physical spread of one settlement without a SPA exceeds that of one which is allotted a SPA is not a critical issue, if the smaller settlement is more cohesive. In this report I have very seldom disagreed with the Council's chosen SPA line, which is a tribute to its consistency and judgement about loosely knit development on the edge of the primary built framework. The criteria employed necessarily exclude certain peripheral parts of a freehold land parcel – most commonly a domestic garden or yard area - if they are assessed as disproportionately large and open, with significant development potential.

1.69 I see no planning need for Anglian Water Services' suggested policy, which is prompted by the objector's desire to redevelop surplus operational land in open countryside. Individual cases should be decided on their planning merits, with careful consideration of the actual harm that might be occasioned by a breach of specific policy.

1.70 The evidence on the ground is that Elstow better fits the description of a quasi-rural village, than an element of the built development on the town's southern fringe. Nevertheless, there is an anomaly between the designation of the Elstow SPA on the Proposals Map, and the wording of the policy and supporting text of S6. This needs to be addressed to cover the circumstances of both Biddenham and Elstow, as distinct places that are not wholly surrounded by countryside.

#### Recommendation

1.71 I recommend that the Local Plan be modified as indicated in paragraph 1.70 above, but that no other modification be made in respect of these objections.

#### POLICY S6 - WILSTEAD

#### Objection and Key Issue

1.72 BT plc 170/15

- the boundary of the telephone exchange at western end of Wilstead Way, Wilstead, should be within SPA

#### Council Reply

1.73 The Council's written response is contained in Document 170.15/S/S6 – CW.



## Appraisal

1.74 The evidence is that the Council will include the whole boundary of the exchange within the SPA through PIC 526, with which the objector is satisfied.

## Recommendation

1.75 I recommend that the Local Plan be modified to incorporate PIC 526, as set out in Core Documents 11, 11A and 11B.

## POLICY S7 – RURAL SETTLEMENT HIERARCHY

### Objections and Key Issues

1.76 Wimpey Homes Holdings 265/7 & /9, Bedfordia Developments Ltd 293/5, /35 & /39, Alfred McAlpine Developments Ltd 1082/2, VE Parrott (Oakley) Ltd 273/1 & /6, DH Barford & Co 269/3, Mr & Mrs CD Clayton 13/3, Charles Wells Ltd 289/1, Mr D Howard 1109/2, Eastwood Riseley Farms Ltd 1111/2, David Bates 1080/4-/5, G Harrison 341/3, Banks Family Settlements 471/2, , David Wilson Estates Ltd 144/9, Sharnbrook PC 372/4, Nettlecombe Ltd 487/6, Old Road Securities plc 393/24-/25 & /48, RW Fettes 1159/1 & /3, Jellis Trustees 286/4, Messrs Wisson & Crouch 287/4

- need for more sophisticated hierarchy with third tier, to accommodate settlements like Cotton End
- delete last sentence of para. 2.52: absence of bypass does not limit Great Barford's capacity for development
- Knotting should be a "B" Village, and there should be a qualified presumption in favour of non-harmful development
- Milton Ernest should be an "A" Village
- Oakley should be an "A" Village
- Riseley should be an "A" Village, and have an extended boundary to serve workers at emerging Thurleigh centre
- more clarity, detailed explanation and more robust and defensible criteria needed in categorising "A" and "B" Villages
- the classification stops Wyboston providing leisure sites and cultural activities and is too limiting
- Sharnbrook should not be developed
- Biddenham should be a "B" Village
- Duloe should be a "B" Village
- Elstow should be a "A" village, but constraints mean that Clapham and Great Barford should be removed from the "A" list
- the policy should allow for development in "other settlements" with particular environmental or community benefit e.g redundant farmyards or very good design
- alter the wording and thrust of para. 2.53 re Sharnbrook, which has altered from what was in Draft Plan
- alter the wording of para. 2.54's first sentence about Shortstown
- Wilstead should be in the strategic south west corridor

## Council Reply

1.77 The Council's written responses are contained in Documents BBCEV 43, 44, 64, 84, 90, 112, 181, 184, 359, 404, 405, 414, 416, 448, 476, 479, 587, 611, 903, 1114, 1235-1237, 1260 and 1261.

## Appraisal

1.78 The Council has put forward pre-Inquiry Change PIC16 amending para. 2.53 concerning Sharnbrook, producing Counter Objections from Bedfordia Developments Ltd 293/P63 and Davison & Pack 1253/P6. PIC17, amending para. 2.54 concerning the “A” Village of Shortstown, produced Counter Objections from Potton Developments Ltd 268/P13, Bellway Homes plc 275/P43, Defence Estate Organisation 1254/P16 and Forthprice Ltd 1256/P1. PIC18, amending para. 2.57 concerning Wymington, produced a Counter Objections from Potton Developments Ltd 268/P14.

1.79 In the Draft Local Plan ( Core Document 1) the Council had a clear preference for accommodating development outside the urban area of Bedford/Kempston in “Strategy Villages”. Those judged to be suitably sized and well located, with the potential for becoming more self-sufficient were Bromham, Wootton, Stewartby, Wilstead and Shorstown/RAF Cardington. To these were added two others. Clapham had been constrained from growth in recent years because of a drainage problem, since rectified. Sharnbrook was seen as being a larger than usual focus for its rural hinterland. With the advent of the adopted Structure Plan in March 1997 the concept had to change.

1.80 The acknowledgement of the South West of Bedford Strategic Corridor emphasised the key role that had to be played by Wootton and Stewartby. They were the subject, with the new settlement based on Elstow, of Deposit Plan policy S4. The Council then chose to divide all settlements into one of the following categories: “A” Villages, “B” Villages with specifically identified development sites within their Settlement Policy Areas, “B” Villages without identified sites, and “other settlements” regarded in policy terms as forming part of the open countryside.

1.81 By the end of my Inquiry, I had become increasingly unimpressed by the utility of the classification. The “A” Villages are not clearly superior in facilities for the community than one or two outside that category- Oakley for one.

1.82 Bromham is a large satellite village very close to Bedford, that has had major housing growth in recent years. Growth additional to the 45 or so dwellings from allocation H15 would be very close in distance to the major H6, H7 and H8 sites, and I believe that the Plan should state specifically that Bromham’s growth should be held in check until those sites are virtually built out.

1.83 Wilstead is another large village. It lies just outside the South West of Bedford Strategic Corridor, and at its northern end – part of the village fringe but outside the Settlement Policy Area boundary - a straggle of linear development runs very close to the Elstow New Settlement Brief Area. The Council has allocated the Luton Road site with 86 dwellings, and this was effectively given planning permission before the close of my Inquiry. It is plain to me that the Plan should emphasise that no more significant growth should be allowed in the village while the Elstow settlement is establishing itself in this Plan period.

1.84 Great Barford was added to the new “A” category, though not previously a strategy village. Whatever its intrinsic merits as a settlement, it is effectively debarred from major development in the Plan period by the absence of a bypass, so that the course of the A421 through Great Barford village is a traffic bottleneck. The evidence of the Highways Agency is that bypass construction will not begin until well into the Plan period, and that it opposes all development other than the 25 or so dwellings from the H18 New Road allocation.

1.85 “A” Villages are said in policy S7 to be “well located settlements with a good range of facilities and community provision which, subject to constraints, may have capacity to accommodate development”. However, I have identified good reasons why Bromham, Wilstead and Great Barford should be flagged up in the Plan as being positively disfavoured in the Plan period – and perhaps beyond - for major development.

1.86 A better way of establishing a hierarchy in this structure plan period would be to have a category of “**Selected Settlements**”, apart from the defined urban area of Bedford/

Kempston. These would be Wootton and Stewartby in the Strategic Corridor, Shortstown/RAF Cardington as a major opportunity to improve a settlement with much surplus and developable previously-developed land, and that part of Elstow New Settlement lying within the Borough. These are all prime focuses for development in the Plan period. There will need to be some redrafting of the policy and supporting text to S4 and S5 above.

1.87 Other villages and settlements would be more logically divided in to three categories. The top category would be **First Order Villages**. These would be classified in terms of size and amenities such as Lower School provision, shopping and community facilities, proximity to significant local work opportunities, public transport connections and proximity to road and rail corridors. The case for Plan allocations would be clearly made in the Plan's text, on their merits, taking account of long term environmental inhibitions on growth - such designations as landscape protection, nature conservation, River Protection Areas, Area of Special Restraint round Bedford/Kempston – and shorter term or specific inhibitions, including factors like major recent growth, and priorities and policies in higher level guidance and plans. The criteria in paragraph 70 of PPG3 would be relevant here.

1.88 Under the classification I have outlined, Oakley would fit into this First Order Village category, although the many significant inhibitions on growth would effectively rule out significant expansion. In fact, classification as a "First Order Village" would not necessarily be a developer's passport to expand. My site visits and careful reading of the evidence lead me to conclude that none of the other villages put forward by objectors for "A" status has a strong case for upgrading to "First Order Village" although, in classifying Riseley and Sharnbrook, proximity to large employment sites would be a significant criterion. It would be for the Council to define its own size threshold for a village to enter this category, where the population is between one and two thousand inhabitants.

1.89 The second category, **Second Order Villages** would correspond to the Deposit Plan's "B" Villages. The criteria in paragraph 70 of PPG3 would also be relevant here, and could influence some alteration of the supporting text in the Deposit Plan's paragraph 2.56. Those settlements where the Council has allocated small development sites could continue to be distinguished from the others in the text. My site visits and careful reading of the evidence lead me to conclude that none of the other villages put forward by objectors for "B" status has a strong case for upgrading to "Second Order Village".

1.90 The third category, "**Other Settlements**" would remain as described in paragraph 2.58 of the Deposit Plan. I find no tenable case for new words facilitating new building in these small entities, or scatters of development. Proposals of whatever scale in these places would need to be argued on their merits in a policy context of the land being part of the greater open countryside.

#### Recommendation

1.91 I recommend that the Local Plan be modified to incorporate modifications to the policy wording and supporting text of S7, with consequent textual implications for the wording of policies S4 and S5 and elsewhere, as set out in paragraphs 1.82-1.83 and 1.86-1.90 above, but that no other modification be made in respect of these objections.

#### PARAS. 2.59-2.60 RE EMPLOYMENT

#### Objections and Key Issues

1.92 Bedfordia Developments Ltd 293/13, Anglia Water Services 1045/3,

- general support, but in defining employment sites within villages pay regard to ability of settlements to accommodate adequately and absorb these uses
- refer to potential of brownfield sites for more sustainable mixed use development

## Council Reply

1.93 The Council's written response is contained in Documents BBCEV 31, 531, 612, 613 and 1115.

## Appraisal

1.94 Both the objections are more in the nature of comment than major objection. The first bullet point seems to me already well covered in the thinking behind policy E17. The second bullet point is taken up elsewhere, in paragraph 2.20 and policy BE2. Re-statement is unnecessary.

1.95 The Council has put forward PIC 19, adding specific mention of Elstow New Settlement, to Shorstown/Cardington and Thurleigh Airfield. This has produced Counter Objections from Potton Developments Ltd 268/P15, Bellway Homes Ltd 275/P42 and the Defence Estate Organisation 1254/P15. These all make a point that the Council should accord a similar status to Shorstown/Cardington as it does to Thurleigh. I have generally agreed with the stance of the Counter-Objectors in discussing allocation H9 below. However, the gist of the amended text can stand, although it needs updating after the September 1999 publication of the adopted Elstow Brief.

## Recommendation

1.96 I recommend that the Local Plan be modified to incorporate the gist of PIC 19, as set out in Core Documents 11, 11A and 11B though brought up to date, but that no other modification be made in respect of these objections.

## POLICY S8 – SUPPLEMENTARY PLANNING GUIDANCE

### Objections and Key Issues

1.97 City and St James Property Ltd 456/21 & /31, Old Road Securities plc 393/26, Trustees of the Whitbread Harrowden Settlement 418/7, Podington Garden Centre 993/1, Bedfordia Developments Ltd 293/9, SC Whitbread 417/4, GOER 516/1, Trustees of the Elstow Allotment Settlement 944/5-6,

- distinguish between aspirations in development briefs through SPG and the over-detailed policies
- delete “important”
- unnecessary policy
- promote reasoned objections to SPG in Plan process as important material considerations
- reword policy
- Community and other facilities should only be sought in limited circumstances, where necessary and commensurate with the specific development

## Council Reply

1.98 The Council's written response is contained in Documents BBCEV 182, 233, 588, 589, 614, 906, 907, 1110 and 1238.

## Appraisal

1.99 The Council has put forward PIC's 20 and 21 amending paragraph 2.62 and the policy wording. The latter produced a Counter Objection from City and St James Property Ltd 456/P111. The reworded policy results from specific GO-East advice, and I see no impropriety in using the word “important”, about advice that is technically outside the Plan

process but material to the making of decisions. Its role and weight are set out in PPG12, at paragraphs 3.15-3.18 and this could be usefully alluded to in that part of the Plan's chapter on Implementation, where up to date supplementary planning guidance at the time of adoption is listed. I take account of the criticism of over-detailed policies in the Plan, and it forms part of my critical appraisal of individual policies in this report. However, this policy is short and informative to Plan users, justifying its place.

#### Recommendation

1.100 I recommend that the Local Plan be modified to incorporate PIC's 20 and 21, as set out in Core Documents 11, 11A and 11B, and my comment in paragraph 1.99 above, but that no other modification be made in respect of these objections.

#### POLICY S9 – PROVISION OF COMMUNITY AND OTHER FACILITIES

##### Objections and Key Issues

1.101 Trustees of the Elstow Allotment Settlement 944/9, DH Barford 269/4, Old Road Securities plc 393/27, BT plc 170/4, J & J Design 263/12, Bedfordia Developments Ltd 293/10, SC Whitbread 417/5, Trustees of the Whitbread Harrowden Settlement 418/8, Bedfordshire County Council 436/4, City and St James Property Ltd 456/2 & 5, Twigden Homes, Eagle Homes & Connolly Homes 1090/4

- "acceptability" should not be said to depend "heavily" on planning benefits offered
- only to be commensurate with the requirements of specific proposals
- cross refer to appropriate development site policies
- make specific reference to educational and library provision
- should accord with/make direct reference to Circular 1/97
- replace "seek" with "encourage"
- inconsistent with Structure plan policy; developer contributions for public transport provision should cover revenue support
- delete "necessary"
- paragraph 2.1 should refer to Circular 1/97, perhaps after general policies

#### Council Reply

1.102 The Council's written response is contained in Documents BBCEV 41, 68, 239, 478, 615-622, 908-910, 1116 & 1239.

#### Appraisal

1.103 The Council has put the policy in the Strategy chapter to avoid unnecessary repetition throughout the Plan's site specific policies. It responded to initial objections with some rewording of the supporting text and policy in PIC's 22-24, the last producing Counter Objections from Marsh Leys Farms Ltd 272/P1, Bellway Homes Ltd 275/P46, St Albans Diocesan BOF 292/P8, Bedfordia Developments Ltd 293/P64, Old Road Securities plc 393/P107, City and St James Property Ltd 456/P112, McCann Homes 1252/P1 & Forthprice Ltd 1256/P6.

1.104 There is general concordance with the content of adopted Structure Plan policy 25 on the same topic. I find the Council's term "social and physical infrastructure" a useful portmanteau phrase for all the matters about which developer contributions would be sought. I find no need to complicate matters by cross-reference to site-specific policies. I do believe that the policy wording would be improved by a reference to concordance throughout the Plan's life with the principles set down about this controversial subject in national policy advice.

1.105 Consequently, although I consider that the amended supporting text is fair and acceptable the policy itself would be better reworded as follows:

“In accordance with the principles set down in current published national policy advice, the Borough Council will seek provision of community and other facilities in tandem with development with planning permission. Where appropriate and necessary, it expects development to contribute directly to the capital and/or revenue costs of consequent social and physical infrastructure provision”.

#### Recommendation

1.106 I recommend that the Local Plan be modified to incorporate PIC's 22 and 23, as set out in Core Documents 11, 11A and 11B, and the policy wording set down in paragraph 1.105 above, but that no other modification be made in respect of these objections.

## CHAPTER 2

### OBJECTIONS TO THE CHAPTER ON NATURAL ENVIRONMENT

#### INTRODUCTION

##### Objection and Key Issue

#### 2.1 Bedfordshire County Council 436/64

- in 3.1 concepts extend to cultural heritage as well; as an irreplaceable asset the concept of replacement of a critical resource does not apply

#### Council Reply

2.2 The Council's written response is contained in Document BBCEV 1240.

#### Appraisal

2.3 I consider the Council's intention, in PIC 104, to add the words "and sustainable" after "positive" in paragraph 4.4.4 of the Built Environment chapter, an adequate response.

#### Recommendation

2.4 I recommend that the Local Plan be modified to incorporate PIC 104, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of this objection.

### **POLICY NE1 – ENVIRONMENTAL PROTECTION; POLICY NE2 – COMPENSATION FOR ENVIRONMENTAL LOSSES; POLICY NE3 – SSSI'S AND LOCAL NATURE RESERVES; POLICY NE4 – COUNTY WILDLIFE SITES & REGIONALLY IMPORTANT GEOLOGICAL/ GEOMORPHOLOGICAL SITES**

#### Objections and Key Issues

2.5 DH Barford & Co 269/5, Mr Hanbury-Higgins 527/4, David Wilson Estates Ltd 144/10, BT plc 170/17, J & J Design 263/13, NFU 321/1 & /2, David Wilson Estates Ltd 144/11 & /50-51, CPRE 388/36, Redland Aggregates Ltd 435/7, City and St James Property Ltd 456/85-88 & /94-96, Bedfordshire County Council 436/45, Old Road Securities plc 393/8, Parkbury Investments Ltd 1078/5, Shanks & McEwan (Southern) Ltd 88/1, Mr & Mrs BR Collins 59/1, Mr KG Cook 777/2

#### Re NE1:

- state development will not be permitted where prejudicial to the stated criteria
- too restrictive of development in the open countryside
- wrong to raise local interest sites to level of those statutorily protected
- should say "protect or enhance" and replace "value with "importance, worthy of retention"
- say "where appropriate" at start of policy and redraft (iii) to reflect the tests of Circ.1/97
- clarify where necessary or appropriate in (iii)

#### Re NE2:

- should not seek replacement asset of "enhanced value"

- add “important” to describe the list of matters lost in line 2
- ambiguous and weak; strengthen first words, delete “some or all” in third sentence; reword (ii) as “diversity of species habitat, soil type and quality, including rarity and local significance”

The Council has put forward PIC 73, adding a paragraph before the policy relating to then effect on the policy of Circular 1/97. This produced counter-objections from St Albans Diocesan BOF 292/ P11, McCann Homes 1252/P4, Marsh Leys Farms Ltd 272/P3, Bellway Homes Ltd 275/P30, Bedfordia Developments Ltd 293/P48, Old Road Securities plc 1022/P18, and Defence Estate Organisation 1254/P3 object to PIC73: recognition of Circular 1/97 advice is welcomed, but contradicts other references in Plan about provision of social and community infrastructure. The Council has also put forward PIC 406 to satisfy the EACA objection.

Re NE3:

- wrong to imply blanket refusals the consequence of conflict
- distinguish very clearly between local and national designations

The Council has put forward PIC's 30 and 32, renumbering paragraph 3.10 as 3.14 and amending it; also deleting policy NE3 and replacing it with two new policies numbered NE1 and NE2. These produced Counter Objections from Bedfordshire County Council 436/P91-/92, and English Nature 87/P14. Consequently, the Council put a further clarification of text into new policy 32, and made reference to Bromham Lake LNR in the text.

Re NE4

- balance conservation interests with legitimate development interests; make clear that CWS's are not statutory designations
- regionally important geological/geomorphological sites can also include archaeologically sensitive sites
- former brick pits adjoining Castle Dairy Farm, Renhold, have not been ecologically evaluated and do not warrant CWS status
- delete CWS status from land at Lodge Road/Odell Road, Sharnbrook
- policy should recognise transient nature of wildlife interest on unrestored mineral workings
- revise and reword policy; absorb general statements in NE4 into more specific policies
- land east of Hooked Lane and at rear and west of Northwood Farm should not be CWS; allocation 10 years old and changed circumstances
- reinstate as CWS land at Wilstead Meadows: archaeology, flora and fauna are special.
- apparent conflict between CWS designation south-west of Elstow North landfill site and its future use
- extent of CWS at Coronation Pit appears to overlap employment site there

The Council has put forward PIC 39, revising the County Wildlife Site boundary at Sharnbrook Castle Close. This is a matter where the County Council, not the Borough Council makes the decision, but it has produced Counter Objections from Bedfordia Developments Ltd 293/P62, Dr A Penman 1114/P2 and Davison & Pack 1253/P1 & P5. The recasting of NE4 within NE3 has drawn objection from Willington PC 245/P4

Council Reply

2.6 The Council's written response is contained in Documents BBCEV 92, 234-236, 283, 389, 509-513, 532, 689-699, 813, 992, 995 and 1117-1120.



## Appraisal

2.7 The Council has wisely accepted the merits of making the policy style one stating that development will not be permitted where it offends stated criteria. The contents of the present policy NE1 are absorbed into three new policies, in hierarchical order, respectively affecting SSSI's, protected animal and plant species, and various sites of other than national designation by PIC's 26, 32 and 36. I find no significant planning reason why those policies should not refer to "protection and enhancement", or "value" rather than "interest".

2.8 Policy NE2 is shifted in order and would become new NE8, with revised wording, through PIC 27, and has the Circular 1/97 context in new supporting text. I find both changes unobjectionable, and the words in the policy: "a replacement asset of a comparative or enhanced nature" seems to me in no way improper in this context.

2.9 I find no objection to Deposit Plan policy NE4 that has sufficient force to merit change of wording or emphasis, or additional text. It is the County Council, not the Borough Council, which is responsible for designation of a County Wildlife Site. The wording of new NE3 has incorporated advice from English Nature, and appears adequately firm and realistic.

## Recommendation

2.10 I recommend that the Local Plan be modified to incorporate PIC's 22, 25-36, 45-46, 68-69, 73 and 428-432, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

## **POLICY NE6 – TREES, HEDGES AND WOODLAND**

### **Objections and Key Issues**

2.11 DH Barford & Co 269/6, Country Style Inns 1146/6, David Wilson Estates Ltd 144/13, David Wilson Homes 998/7, Bellway Homes Ltd 275/5, Bedfordia Developments Ltd 293/26

- amend to say can secure requirements through conditions and use of legal agreements only necessary exceptionally
- landscape features should be demonstrably of significance, making policy more objective
- delete "which it considers"; also "or adjacent" to a site, as this may involve third party land

## Council Reply

2.12 The Council's written response is contained in Documents BBCEV 97, 237, 514 and 911-913.

## Appraisal

2.13 The Council has put forward PIC 53, which renumbers the policy within the chapter, and also removes "woodland" from the policy, so that it deals only with trees and hedges. It has also subsequently taken the view, wisely in my opinion, that legal agreement need only be sought when planning conditions are not sufficient. Its last thoughts are that the second sentence of the policy should read: "Where development is permitted, conditions will be applied and, where appropriate, legal agreements sought to:-...". I endorse this further alteration.

2.14 Objectors would like to make this policy somehow more objective, but I think that the Council is taking a reasonable stance. It is stating an aspiration about a subjective matter: the value of a particular feature, or features, in a particular context. It is in the normal

discussion and negotiation with a particular developer that the merits of new planting, rather than retention of existing features, can take place. Often, the reasonable requirements that development should be space efficient will mean that certain natural features on a site are hard, if not impossible, to retain in practice. Another factor that makes this subject difficult to pin down in words is the age and expected life of any particular trees or hedges, which will often mean a mix of retained and new planting on a development site. Any aspiration by the Council to have off-site planting will be tempered by the realities of ownership and particular circumstances.

#### Recommendation

2.15 I recommend that the Local Plan be modified to incorporate PIC 53, further amended by the words set out in paragraph 2.13 above, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

### POLICY NE9 – WILDLIFE CORRIDORS

#### Objection and Key Issue

##### 2.16 Railtrack Property 366/6

- the policy should exclude Railtrack's necessary operational activity

#### Council Reply

2.17 The Council's written response is contained in Core Document 10.

#### Appraisal

2.18 The Council has acknowledged the objector's needs and put forward PIC 62, which adds words to the policy's second sentence allowing for essential development.

#### Recommendation

2.19 I recommend that the Local Plan be modified to incorporate PIC 62, as set out in Core Documents 11, 11A and 11B.

### NEW PARAGRAPH 3.28 INTRODUCED BY PIC 70

#### Counter-Objection and Key Issue

##### 2.20 Forthprice Ltd 1256/P7

- re the new paragraph of supporting text before the renumbered and transposed policy on replacement provision for new development involving environmental loss: amend to include qualitative assessment, so that it relates to proposals involving the loss of elements recognised to have environmental merit

#### Council Reply

2.21 The Council's written response is contained in Document BBCEV 996.

#### Appraisal

2.22 The new paragraph refers to the Deposit Plan's policy NE2, on the subject of replacement provision. The words of that policy require a detailed survey of the affected site

before any works are carried out. Such a survey seems to me to be the qualitative assessment the objector seeks, and there is no need to reword the text complained of.

#### Recommendation

2.23 I recommend that no modification be made to the Local Plan in respect of this objection.

### POLICY NE12 – LANDSCAPING PROVISIONS

#### Objection and Key Issue

2.24 David Wilson Estates Ltd 144/12

- unclear what compensatory provision is required by the policy; must avoid off-site provision

#### Council Reply

2.25 The Council's written response is contained in Document BBCEV 515.

#### Appraisal

2.26 I consider that the words of the policy are suitably flexible and reasonable. If, exceptionally, the Council considers that a scheme might benefit from off-site landscaping, it will in reality be constrained by practical realities, and the attitude of a developer.

#### Recommendation

2.27 I recommend that no modification be made to the Local Plan in respect of this objection.

### POLICY NE14 – AREA OF GREAT LANDSCAPE VALUE

#### Objections and Key Issues

2.28 Mr D Richardson 114/5, J Roberts Esq 1107/2, The Phelps Family 218/2, NFU 321/4, Phillips Planning Services 342/4, Mr Hanbury-Higgins 527/5, Rural Development Commission 51/1, Mr & Mrs D Clayson 1108/3, Mr DW Smith 23/2 & 189/3

- broad brush policy and over-extensive/too restrictive designation, including land close to settlements needed for natural expansion; should refer to socio-economic factors
- give less attention to local designations, as PPG7 says
- word policy less negatively
- delete land close to built-up areas of AGLV-affected villages suitable for future development

#### Council Reply

2.29 The Council's written response is contained in Documents BBCEV 78, 92, 96, 106, 238, 240, 409, 413, 419 and 1121.

#### Appraisal

2.30 Several objectors seeking to develop in open countryside have objected to this policy among others, and I have dealt with all such representations in the context of the site-specific proposal (nearly all in my Chapter 4, section 2). Here I deal with objections to the basis of the policy. Areas of Great Landscape Value are indeed very broad-brush designations, even though the Borough Council defines precisely what the County Council sets out in broader terms on its Key Diagram. The designation is below the level of national excellence required for AONB's, but significant within the context of a particular County. Questioning of the principles of the AGLV designation in Bedfordshire needs to be made when the structure plan is next rolled forward. I think it would be a good idea to re-examine the value of the policy rigorously then, at the objection stage. However, my extensive visits within Bedford Borough suggest to me that the translation of the designation to precise boundaries has been done well and without noticeable anomalies.

2.31 An AGLV designation washes over open countryside and villages, so it seems plain to me from the wording of adopted Structure Plan policy 7 that an individual development proposal would have to be intrinsically and seriously unsympathetic to its physical context to merit refusal under this heading. Development sympathetic to the landscape character is not discouraged, as is instanced by Borough Council designations for specific future developments within the AGLV. In fact, attractive buildings and settlements could add to the special character of an AGLV, and the policy has a use in examining new development within it in a larger-scale context than the simple relationship with the adjoining fabric. The policy also has value in signalling which parts of the landscape should be priority areas for preparing and promoting conservation, enhancement and management measures. Consequently, NE14 does add something distinctive and valuable to the other policies in the Natural Environment chapter.

2.32 The Council has put forward PIC 74, qualifying the policy in a way that reflects its sub-national status, by allowing for a development that can be justified for other strong reasons, even though it falls short of NE14 criteria. I consider this to be reasonable, without unduly weakening the policy.

#### Recommendation

2.33 I recommend that the Local Plan be modified to incorporate PIC 74, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

#### POLICY NE15 – RIVER PROTECTION AREA

##### Objections and Key Issues

2.34 Lutea Trustees Ltd 1106/2, Mr A Cardus 1213/2, Laing Homes Ltd 134/11, Davison & Co (Barford) Ltd 284/1 & /3, Alfred McAlpine Developments Ltd 1082/4, CPRE 388/79, Biddenham Society 122/2, Bedfordia Developments Ltd 293/33, Environment Agency Central Area 319/18, Redland Aggregates Ltd 435/9

- challenge the criteria used
- policy needs tightening; meaning unclear and can be misinterpreted
- redraft to emphasise status as lower rather than higher order landscape and nature conservation
- designated area too small; include other land
- adapt policy to give positive support for new proposals with a recreation/leisure function that contribute to river landscape
- acknowledge mineral extraction as compatible with the policy
- remove from the RPA that part of the former pig farm at Oakley Road, Clapham, within the village Settlement Policy Area boundary
- acknowledge floodplain of the Ouse extends beyond the designation of the RPA

#### Council Reply

2.35 The Council's written response is contained in Document BBCEV 22-23, 26, 133, 352-353, 378 & 1122-1123.

#### Appraisal

2.36 I support the Council's intention to preserve the character of the Borough's riverine area. The sinuous course of the Ouse is a major physical fact in Bedford town and the open countryside outside. The river enhances the appearance of the Borough to an unusual degree, and a policy centred on keeping that interest undiminished seems to me worth its place in the Local Plan, despite PPG7's advice in its paragraph 4.16. The undeveloped areas alongside have an attractive physical character, derived from its presence. These areas also need strong policy protection to conserve their appearance, and their function as essential areas for wildlife resources, drainage and flood protection. This policy would focus the mind of plan-users on this particular, but many-faceted, subject: one significantly distinct from other subjects in this Plan chapter. Boundary definition has clearly involved some subjective choice in places. Sometimes it has been narrowed, as in the area of housing allocation H8, beyond what an untrammelled survey would have suggested. However, in no case has it been reduced to a mere token area, and it appears to encompass all the floodplain.

2.37 The need for special protection of particular land is well argued in the text of the Plan. It differs in type and effect from other national and sub-national designations mentioned, even when there are physical overlaps. For clarification, and in response to objections, the Council has put forward PIC's 75-77, 91 and 433. These improve the supporting text and policy wording, and include a qualification of the policy in a way that reflects its sub-national status, by allowing for a development that can be justified for other strong reasons, even though it falls short of NE15 criteria. I consider this to be reasonable, without unduly weakening the policy. PIC 91 specifically acknowledges the positive aspects of landscape restoration following mineral working, through new supporting text.

2.38 The very attraction of the Ouse may well prompt applications to develop buildings and facilities nearby. This policy could not be made more positively welcoming to such development, without fatally weakening its effect. As worded, it will show potential developers the important constraints to be kept in the foreground of their minds when evolving a concept into physical form. The facility proposed must not be allowed to diminish the locational attraction.

2.39 Laing Homes seeks a specific boundary revision at Clapham, where a site lies within both the Settlement Policy Area and the RPA. The objection also seeks a prohibition on any area within a SPA being part of a RPA. The site is a former pig farm, and it is the northern part, which contains redundant buildings, that has been included in the SPA. It is indisputably the case that the site lies close to the Ouse and within its area of visual influence. The unpleasing appearance of the caravan park to the east, also within the RPA, does not affect the aptness of the designation being applied in this area south of Oakley Road. The Council itself states that development might be accommodated on the land, but it would obviously have to be very well thought out. I see nothing unfair or anomalous about that. In my opinion the two designations can logically coexist, here and elsewhere in the Plan area.

#### Recommendation

2.40 I recommend that the Local Plan be modified to incorporate PIC's 75-77, 91 and 433, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

#### POLICY NE16 – FLOOD PLAIN PROTECTION

##### Objections and Key Issues

2.41 Environment Agency Central Area 319/13, NFU 321/5

- not consistent with Environment Agency policies about development on floodplain; reword
- criterion (iii) about wildlife habitat is superfluous

#### Council Reply

2.42 The Council's written response is contained in Document BBCEV 1124.

#### Appraisal

2.43 The Council has put forward PIC 79, which recasts the wording of the policy in accordance with the draft provided by the Environment Agency. The latter considers that the new words are consistent with its policy and the provisions of Circular 30/92. I see no necessity to delete reference to the protection of wildlife habitat, given the policy's provision that appropriate mitigation and compensatory measures can make a development acceptable.

#### Recommendation

2.44 I recommend that the Local Plan be modified to incorporate PIC 79, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

### POLICY NE17 – URBAN OPEN SPACES AND WILDLIFE CORRIDORS

#### Objections and Key Issues

2.45 UCC for Cauldwell and Kingsbrook 230/2 & /5-/6, Mr SC Whitbread 375/5, Richard Wingfield 415/1, Frederick Ray Trust 791/1, Trustees of the Elstow Allotment Settlement 944/7-/8, Calendar Group 958/2, Warmingtons 1145/4, de Montfort Univ 419/2, Redland Aggregates Ltd 435/1, BT plc 170/19, DH Barford & Co 269/15, Bedfordshire County Council 295/5, Twigden Homes, Eagle Homes & Connolly Homes 1090/5

- allocate allotment at west end of Mile Road as green space for public use
- want Meltis, Cutler Hammer and Hairlok sites to retain current status
- no reference is made to former Silver Jubilee Middle School
- application of policy to Whitbread land north of Cardington Road is too restrictive and inappropriate - should be Gateway site
- delete allotments at Queen's Park
- delete Rays Close, Bedford, which has planning permission
- delete land south of Cardington Road; could be employment land
- delete notation over whole of south end, Miller Road, Kempston; housing reasonable on part
- delete land south of Goldington Road; could be new sports facilities together with commercial use
- delete part of site at junction of Mile End Road and High Street, Elstow
- insufficiently flexible about actual recreational requirements and contra para. 42 of PPG17; delete words about loss or partial loss of an urban open space
- areas included in the adopted Minerals and Waste Local Plan for mineral extraction should be identified as acceptable for development
- too restrictive to prevent the development of all open space between or adjacent to buildings; change wording of (i) and (ii)
- those sites considered to merit protection
- basis of policy questioned: does not accord with national advice, not objectively assessed, seeks to sterilise land capable of going to meeting development requirements; does not make provision for enhancement as proposed in the policy

## Council Reply

2.46 The Council's written response is contained in Documents BBCEV 186, 388, 516-517, 518, 700, 914-915, 1125-1126 and 1129-1130.

## Appraisal

2.47 The Council has put forward pre-Inquiry Change PIC 84, rewording the first criterion of the policy, producing Counter Objections from Old Road Securities 393/P99 and Twigden Homes, Eagle Homes & Connolly Homes 1090/P27. As reworded, the policy and supporting text are considered by the Council to deal with exceptional circumstances, to include some development. I support the purpose of the amended policy. However, I consider that there needs to be explicit reference in the policy to circumstances where proposed development affects part of the urban open space. I think this could be done by adding to the revised criterion (i) the words: "unless the proposals are able to provide a replacement of at least equal value, in terms of the above qualities". The Council may wish to consider whether alteration also needs to be made to the supporting text.

2.48 In other respects I consider that the supporting text should describe more clearly the criteria that lay behind the choices of the actual spaces shown on the Proposals Map. Also, in the supporting text to NE17 and NE18, any qualitative as well as locational difference between "Important" Open Spaces and Urban Open Spaces must be set out clearly to enlighten the Plan user.

## Specific Sites

2.49 The Mile Road allotment site has been given planning permission for housing with some open space, accurately reflected on the Deposit Plan Proposals Map. At the former Meltis site a planning permission has been given, resulting in a small loss of open space. PIC 81 reflects this reality. The Hammer and Hairlok sites have come forward for redevelopment, and I accept the Council's statement that they have been considered against plan policies emphasising the retention of employment sites. The Silver Jubilee Middle School site has been given planning permission for housing with open space. The land south of Goldington Road is now sensibly proposed for exclusion from the urban area following the demise of the Norse Road Link, and I find the new boundary line shown in PIC 510, extending only so far east as the river, entirely logical. The Council has put forward PIC 80 to amend the UOS designation at Rays Close, reflecting the planning permission on part of the land. At Miller Road, Kempston the Council has put forward PIC 503A, to reflect the planning permission for housing.

2.50 Planning permission has been given for housing on part of the site at junction of Mile End Road and High Street, Elstow. The designation on the Deposit Plan Proposals Map seems to me visually justified on the ground and it helps, albeit in a small way, to keep Elstow distinctive as a settlement.

2.51 The land south of Cardington Road is not a site of great beauty, but it is a civilising break in this part of the urban fabric, between employment and housing areas, which would be poor neighbours if closely adjoining. I think its designation is compatible with some modest future development that still retained a tangible open gap.

2.52 The Whitbread land north of Cardington Road lies just south of the Ouse and within the designated Bedford River Valley Park. It does have a gateway function. However, in this Plan period at least I consider that the pleasing appearance of the land, and the possibility of positive action to further enhance its attractions under the RVPA policy, merit retention of the designation. A specific partial development proposal could still be argued on its merits, with attention paid to the criteria of policies NE17 and NE23.

2.53 The allotments at Queen's Park are said by the Council to have amenity, recreational and habitat value. Having seen the site, I see no reason to disagree with that view. The Council also says it is a statutory allotment site, which reinforces the sense of the open space designation.

#### Recommendation

2.54 I recommend that the Local Plan be modified to incorporate PIC's 80, 84, 503A and 510, as set out in Core Documents 11, 11A and 11B, with additional amendment as indicated in my paragraphs 2.47-2.48 above, but that no other modification be made in respect of these objections.

#### POLICY NE17 – URBAN OPEN SPACE AT MANTON LANE, BEDFORD

#### Objection and Key Issue

##### 2.55 Texas Instruments 522/7

- unduly restrictive; fails to acknowledge where other planning benefits justify loss of, or adverse benefits upon Urban Open Space; delete landscaped areas within Texas Instruments East Site

#### Council Reply

2.56 The Council's written response is contained in Document BBCEV 2.

#### Appraisal

2.57 The Council has put forward pre-Inquiry Change PIC84 , producing Counter Objections from Western Atlas International Ltd 1260/P1, and Texas Instruments Ltd 522/P8.

2.58 Since the Deposit Plan was objected to in respect of the Manton Road premises of Texas International, the majority of the west site has been sold to Western Atlas International Inc, who wish to maintain the objections. These premises are notable in architectural and landscape terms in the area of Bedford in which they lie: a visually integrated and attractive business complex, set back from the street edge behind generous areas of grassed and planted bank. The Council acknowledges that a part of the open land at the TI east site has planning permission for car parking and will amend the Proposals Map accordingly. It is also the case that the Proposals Map is not accurate in showing precise Urban Open Space boundaries here.

2.59 The two parties' response to the Pre-Inquiry Change is that designating land adjacent to the west and east site buildings, and in the south west corner of the site is unrealistic: the land not contributing to townscape character, but its proposed status inhibiting changing uses on the site. There is a desire to keep open options to develop within the open land between the buildings and Bedford Modern School.

2.60 I appreciate the quality of the site, and its function as a visual break in the urban fabric. I do not find that there are any other functions described in paragraphs 3.38-40 of the Deposit Plan relevant to this site. The land is private, the buildings have no protection from demolition on grounds of architectural quality, and it is not unreasonable to expect further adaptation of the site, so that the buildings on it remain viable for their owners in changing economic circumstances.

2.61 There is at present a strip of landscaped open ground 100 feet wide along the Manton Lane frontage subject to a restrictive covenant dating back to 1965, prohibiting any development on the land without the Council's specific consent. I consider that that the



covenant area should form the physical basis for a redrawn area of Urban Open Space on the whole of the original Texas Instrument site. This is because I conclude, on townscape grounds, that this is the open area of real interest and value to the public. The designation could be adapted in detail to follow the façade of Block C nearest to Manton Lane, but it should not extend into the areas between buildings.

#### Recommendation

2.62 I recommend that the Plan be modified to redraw the Urban Open Space designation on the objectors' sites by action as recommended in paragraph 2.61 above.

#### POLICY NE18 – CRITERIA FOR DEVELOPMENT

##### Objections and Key Issues

2.63 Rural Development Commission 51/2, Texas Instruments Ltd 522/3, Old Road Securities plc 393/18, DH Barford & Co 269/16, BT plc 170/20

- unduly restrictive; may be other planning benefits to outweigh this consideration
- inflexible: say “normally” and “important open space”
- when read with NE17 and H25, this displays a two tier approach to safeguarding important open space; identify sites on Proposals Map

#### Council Reply

2.64 The Council's written response is contained in Documents BBCEV 187, 189, 519, 916 and 1131.

#### Appraisal

2.65 I understand and agree with the Council's stance that it is impossible to show every piece of open land that may have a degree of local significance on the Proposals Map. A criterion-based policy is necessary. I do not think it would be possible for the text to establish succinctly or comprehensively when identified criteria might be set aside. As I have said in paragraph 2.48 above, the supporting text needs to explain the Council's thinking on spaces better than it does. I do not consider that the tone of the policy and supporting text goes against the thrust of current local and national policy to maximise previously-developed, damaged or under-used land. Nor do I think it necessary to state that on occasions, other planning benefits may justify the loss of open space between or adjacent to buildings. However, the onus will be on the Council to establish the real local value of the factor they identify as liable to harm. Inserting the words “normally” or “important” into the policy would not help to clarify or refine it.

2.66 Text in the last two sentences of paragraph 3.42 of the Deposit Plan is confusing and needs alteration. It is said that in Important Open Spaces and Urban Open Spaces there are undoubtedly important spaces such as churchyards that have been omitted because the Council thinks they are “unlikely to be under pressure”. This needs revision for two reasons. If a space is important - and a churchyard obviously is - it should always be recorded as such. Also, there can be no guarantee that the Council has correctly assessed that development pressure is unlikely.

#### Recommendation

2.67 I recommend that the Local Plan be modified as indicated in my paragraph 2.66 above, but that no other modification be made in respect of these objections.

#### POLICY NE19 – WYBOSTON LAND SETTLEMENT AREA

## **Objection and Key Issue**

2.68 NFU 321/6

- this is no longer a unique area and no need for a separate policy; do not impede diversification

Council Reply

2.69 The Council's written response is contained in Document BBCEV 1132.

Appraisal

2.70 I agree with the Council that this area is very distinctive, and that it could evolve into an indifferent and isolated settlement if it were over-developed. However, the word "unique" – nearly always a dangerous one - in the supporting text leads me to conclude that its uniqueness is under-explained. There should be a brief but considered analysis of what qualities make the land use pattern distinctive and what might harm them. Doing this well should result in the Council being able to defend its policy better against unsympathetic planning applications.

Recommendation

2.71 I recommend that the Local Plan be modified to as described in paragraph 2.70 above, but that no other modification be made in respect of this objection.

## **POLICY NE20 – DEVELOPER CONTRIBUTIONS FOR IMPROVEMENTS**

### **Objections and Key Issues**

2.72 Old Road Securities plc 393/33 & 1135/6 & 1022/4, Country Style Inns 1146/7, David Wilson Estates Ltd 144/14, David Wilson Homes 998/5, VE Parrott (Oakley) Ltd 273/9, Bellway Homes Ltd 275/24, Bedfordia Developments Ltd 293/17, Hallam Land Management 455/1

- delete; inappropriate for local plan and unreasonable
- only require such contributions within the context of conditions of a planning permission; must be necessary and reasonable and directly related to the development

Council Reply

2.73 The Council's written response is contained in Documents BBCEV 101, 520-522, 917-919 and 1133-1135.

Appraisal

2.74 There is nothing inherently objectionable about the wording of the policy, and the Council has referred to the publication "Conservation Issues in Local Plans" in which one on these lines is endorsed. A local plan policy is the best way to be explicit about such an intention. The Council has put forward PIC 86, which refers the Plan user to new paragraphs 3.28-3.31, dealing with compensation for loss of environmental features as a result of development; these paragraphs say that what is sought should relate in scale and development to the proposed development, in line with Circular 1/97. It is not necessary to be specific about whether these are sought through conditions or obligations, although the presumption should be that an obligation is only necessary where the matter cannot be satisfactorily dealt with by a condition alone. The reference in the policy to "developer

contributions" confirms that the context for action will be one of a specific development proposal.

## Recommendation

2.75 I recommend that the Local Plan be modified to incorporate PIC 86, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

## POLICY NE21 – MARSTON VALE COMMUNITY FOREST

### Objections and Key Issues

2.76 Marston Vale Community Forest 361/1 & /4, City and St James Property Ltd 456/19 & /27-/29, Trustees of the Elstow Allotment Settlement 944/1, NFU 321/8, British Horse Society 369/52, SC Whitbread 417/1, Trustees of the Whitbread Harrowden Settlement 418/1, Redland Aggregates Ltd 435/4

- delete the word "project" in para. 3.47
- in para. 3.51 make a factual change to say "increasing woodland cover to 30% of the area over 40 years (by 2035)"
- show diagrammatic map between paras. 3.50 and 3.51 with Community Forest area and MSVA
- in 3.52 make more clear that the Forest Plan is advisory only
- in 3.53 mention London Brick Property Ltd's voluntary contributions of land and tree planting
- redraw this broad brush area to accommodate future expansion
- distinguish between environmental enhancement sought by way of planning obligations and what is provided voluntarily
- policy inappropriately drafted and inconsistent with other Plan policies
- comments in policy about seeking contributions towards its implementation exceed PPG7 guidance
- not enough financial incentives to landowners to implement; also legislative uncertainty about access
- fear of more restrictions on farm diversification and agricultural development
- public access should be mentioned in policy and para. 3.52
- acknowledge existing minerals workings in the area and that part is allocated in the adopted Minerals and Waste Local Plan

## Council Reply

2.77 The Council's written response is contained in Documents BBCEV 74, 243-244, 368, 375-377, 477, 523, 533-534 and 1137.

## Appraisal

2.78 The boundaries of the Marston Vale Community Forest are set out in the Forest Plan (CD108) which is a non-statutory document with no direct statutory implications for the planning process. Its timetable for renewal does not coincide with that of the Local Plan, and a relaunch of the Forest Plan was programmed for April 2000. The Council has very fairly said that it will specifically incorporate any significant changes before adoption. It can do no more than record the Forest Plan's objectives. This Plan is an important factor in all planning decisions affecting the Forest area.

2.79 The Council has put forward pre-Inquiry Changes PIC87-91 and 434. These include corrections of factual errors, and clarification though new insertions into the text. Though the tone of objections is fear of unfair impositions, the thrust of the policy (with the omission of the

word “project”) seems to me fully to accord with the spirit and intentions of the last sentence of policy 17 in the adopted Structure Plan. As contributions could only be sought from proponents of new development, it is not unfair or unduly onerous.

#### Recommendation

2.80 I recommend that the Local Plan be modified to incorporate PIC’s 87-91 and 434, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

#### POLICY NE22 – BEDFORD LINEAR PARK

##### Objections and Key Issues

2.81 Redland Aggregates Ltd 435/8, British Horse Society 369/49, Anglian Water Services 1045/4

- mention the contributions to the aims of the policy made by mineral workings
- should show additional bridleways on Inset 28, linking in with existing ones
- not made clear how intended public access squares with private land ownership

#### Council Reply

2.82 The Council’s written response is contained in Documents BBCEV 920 and 1138.

#### Appraisal

2.83 The Council has put forward PIC’s 91 and 92. The former satisfies Redland by inserting a new paragraph on mineral workings after the Deposit Plan’s 3.49. The latter satisfies the BHS, by specific mention of walking, cycling and riding as informal recreations in paragraph 3.55. In PIC’s 436-438 the Council has usefully clarified the area concerned in this policy as “countryside on the edge of the urban area”, instead of the “urban fringe”. The result of the reworded supporting text is clarification that the policy is low-key but multifaceted, and would be implemented over time when opportunities arise. I see no point in going into great detail about the ways in which opportunities might present themselves.

#### Recommendation

2.84 I recommend that the Local Plan be modified to incorporate PIC’s 91-92 and 436-438, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

#### POLICY NE23 – BEDFORD RIVER VALLEY PARK

##### Objections and Key Issues

2.85 FRCA 320/1, Mr AN Polhill 222/4, Redland Aggregates Ltd 435/2, Mr BL Saunders 1095/1, The Stokes Family 166/3

- change preamble and policy to acknowledge constraints to activities stemming from much of the land being the best and most versatile agricultural land
- designation too extensive; includes inappropriate land such as agricultural river lands south of A428
- Park is broad brush designation and has no formal planning standing; not important wildlife resource or wetland habitat
- delete inclusion of dwellings including Dog House, Bedford Road, Cople

## Council Reply

2.86 The Council's written response is contained in Documents BBCEV 83, 241, 282 and 383.

## Appraisal

2.87 The policy and supporting text have been altered to mention safeguards to good agricultural land and sites of archaeological importance, through PIC's 93-94. The new wording makes it apparent that the realisation of the stated objectives would only be possible in the context of otherwise acceptable planning proposals. This is a broad-brush designation, and I have looked carefully at the extent of the designation east of Bedford, especially in the broad corridor between the A428 and the A603. However, I conclude that the extent of the designated land fits the variety of recreational opportunities that would be pursued in the vicinity of the Ouse, and is not overlarge. The advertising of the Council's aspirations in the Local Plan in this way is prudent, and will guide the thinking of potential applicants for any development.

## Recommendation

2.88 I recommend that the Local Plan be modified to incorporate PIC's 93-94, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

## POLICY NE24 – WATER RESOURCES

### Objections and Key Issues

2.89 Environment Agency Central Area 319/16-/17 & /19, Anglian Water Services 1045/5

- re para. 3.60, water is actually a renewable, not a non-renewable, resource
- mention minerals and waste matters in para. 3.60; point out need to ensure mineral resources and sites suitable for waste disposal not sterilised by other development, bearing in mind MW4 and MW30
- say "water quantity and quality" in second sentence of para. 3.61 and amend para. accurately to reflect the respective roles of the Environment Agency and Anglian Water Services
- refer to further work being carried out to assess risks to water resources

## Council Reply

2.90 The Council's written response is contained in Document BBCEV 1141.

## Appraisal

2.91 The Council has acceded to all these objections seeking factual corrections in the text. It has put forward PIC's 95-100 inclusive to correct, clarify and give additional guidance about what it now calls "natural resources".

## Recommendation

2.92 I recommend that the Local Plan be modified to incorporate PIC's 95-100, as set out in Core Documents 11, 11A and 11B.

## PARAS. 3.64-3.65 & POLICIES NE26-NE27 – SOIL AND LAND ISSUES

## Objections and Key Issues

2.93 Twigden Homes, Eagle Homes & Connolly Homes 1090/23, Old Road Securities plc 393/34, FRCA 320/4, Mr GCW Beazley 1027/3, NFU 321/11, CPRE 388/78

- Plan should mention that low grade land is important to some agricultural businesses, and its loss could be detrimental
- policy should not protect agricultural land rather than the natural environment; low grade agricultural land often has the greatest nature conservation value
- include statement about the need to lose significant areas of at least 3A land at Bedford for housing and employment land
- impractical to restrict development on Grade I, II and IIIa land; the appraisal system needs updating
- exclude the word “built” from the first line of the policy

## Council Reply

2.94 The Council's written response is contained in Documents BBCEV 4, 108, 242, 351, 378, 524, 704-705, and 1139.

## Appraisal

2.95 In response to the NFU's objection, the Council put forward pre-Inquiry Change PIC101, which effectively incorporates text from PPG7 into Plan paragraph 3.65. This produced Counter Objections from Davison & Co (Barford) Ltd 284/P7, Bedfordia Developments Ltd 293/P65, Old Road Securities plc 393/P106, and The Babour Partnership 1251/P1. I do not believe the additional words add much of importance or real meaning to the text. Therefore, unless the Council can convince itself that they would actually make a difference to the considerations it would already bear in mind when making a planning decision, I suggest they are omitted from the adopted Local Plan.

2.96 I do not agree that the text should make any additional statement about the inevitability of losing good agricultural land to built development. The Deposit Plan text already covers the matter quite adequately and more words, which could be read as an open or tacit invitation to look first for green field sites rather than previously-developed land, would be gratuitous and contrary to national and local policy. I agree with the Council's statement that need should be demonstrated on a site by site basis.

2.97 The removal of the word “built” in the first line of NE26 through PIC 102 greatly improves the policy. NE27 would also be improved through PIC 103 taking up the point of CPRE's objection. Though I do not believe that there is a need to reword NE26 in accordance with Mr Beazley's suggestion, I consider it would be helpful for the supporting text to mention that an up to date detailed survey may be required by the Council, to establish the precise agricultural value of a particular site.

## Recommendation

2.98 I recommend that the Local Plan be modified to incorporate PIC's 101-103, as set out in Core Documents 11, 11A and 11B, and the suggestions I make in paragraphs 2.95 and 2.97 above, but that no other modification be made in respect of these objections.

## POLICY NE29 – UNCERTAIN CONSEQUENCES OF DEVELOPMENT

## Objections and Key Issues

2.99 Old Road Securities plc 1135/5, David Wilson Estates Ltd 144/15

- inappropriate; delete or reword
- introduces a requirement over and above those in 1988 Town & Country Planning (Assessment of Environmental Effects) Regulations; delete, as a further obstacle to development

### **Council Reply**

2.100 The Council's written response is contained in Documents BBCEV 525-526.

#### Appraisal

2.101 The policy and supporting text merely outline a situation where the Council may require particular environmental information to make the best decision possible. It is a signal of intentions that do not seem to me either improper or over-bureaucratic in principle, although there might be particular requests that appear unreasonable, which applicants could dispute.

#### Recommendation

2.102 I recommend that no modification be made to the Local Plan in respect of these objections.

### **PROPOSED NEW POLICIES**

### **Objections and Key Issues**

2.103 Bedfordshire County Council 436/5

- there is no reference to the Recycling Plan the Council is preparing; there are a number of areas in the Plan where recycling could be encouraged, to increase sustainability, particularly concerning demolition/construction issues

#### Council Reply

2.104 The Council's written response is contained in Core Document 10.

#### Appraisal

2.105 The Council has put forward PIC's 443-444, which add a further criterion to policy BE30, as well as additional supporting text. These meet the County Council's wishes and are useful additions to the text.

#### Recommendation

2.106 I recommend that the Local Plan be modified to incorporate PIC's 443-444, as set out in Core Documents 11, 11A and 11B.

## CHAPTER 3

### OBJECTIONS TO THE CHAPTER ON THE BUILT ENVIRONMENT

#### POLICY BE3 – ESTABLISHMENT OF MORE SELF-SUSTAINING COMMUNITIES

##### Objections and Key Issues

3.1 Mr A Cardus 1213/1, David Wilson Estates Ltd 144/19, British Horse Society 369/3

Tighten to ensure Riverfield Drive gets benefit from some community facilities provided on remaining segments of estate land: open space/leisure

Policy too over-prescriptive if a site is close to existing employment and community uses; cannot ensure ready access to public transport; affordable housing only if required

Require public right of way/bridleway in new developments where appropriate

##### Council Reply

3.2 The Council's written response is contained in Document BBCEV 539 and 1142.

##### Appraisal

3.3 Mr Cardus addresses deficiencies in a particular area. The evidence is that the Council has already given outline or detailed planning permissions throughout the Riverfield Estate area, and I can take no useful action about his concerns.

3.4 The Council has put forward two PIC's. PIC 105 amends supporting text to refer to the need to take account of the extent, nature and suitability of existing uses and services. PIC 106 makes specific mention of bridleways in the policy criteria. I find the arguments put forward by David Wilson Estates are unconvincing. The amended policy is not rigid, but does put up a number of qualities to be aimed at in diversifying "major new housing development". None of these is exceptionable or unreasonable.

##### Recommendation

3.5 I recommend that the Local Plan be modified to incorporate PIC's 105-106, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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#### POLICIES BE4, H32 AND PROPOSALS MAP – OTHER USES IN RESIDENTIAL AREAS

##### Objections and Key Issues

3.6 de Montfort Univ 419/3, /5 & /12, GOER 516/2

Devise a supplementary policy designating University Areas of Influence where university-related development acceptable subject to BE4 criteria

show the Lansdowne Campus/Polhill Campuses specifically on the Proposals Map



a supplementary policy requested to provide for student accommodation in locations well related to university campuses and facilities

Say "may be acceptable", not "will"

#### Council Reply

3.7 The Council's written response is contained in Documents BBCEV 190 and 474.

#### Appraisal

3.8 The Government Office objection is a suggestion that does not seem to me crucial for the policy to work. The Council thinks its wording is properly positive, and only events can prove if it is right. If it is not, the matter can be re-addressed in the next local plan.

3.9 De Montfort University wants to see more specific planning policies to identify the important role of the university to the town. However, as it says, it is only now beginning to frame its objectives for future development, and cannot foresee the physical impacts. The four land-extensive Harpur Trust Schools in Bedford appear to operate satisfactorily without specific policies. As BE4 and H32 are both drafted in a relatively inclusive way, I see no reason why the University cannot formulate its future concepts within their provisions. This situation may need to be reviewed when the Plan expires at the end of 2005, in the light of more advanced or worked-up schemes for physical expansion. I see no real need at present to devise a policy bearing on student accommodation. Insofar as student needs are for a particular mix or range of housing, the present wording of H32 and its supporting text appear to be quite adequate.

#### Recommendation

3.10 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### POLICY BE5 – AREA OF SPECIAL RESTRAINT

##### Objections and Key Issues

3.11 David Wilson Homes 998/3 & /30, Bedfordshire County Council 295/8 & /9 (includes objection to S3), Mid Beds DC 400/1, City & St James Property Co Ltd 456/15 The Bedford Charity 345/4, Mr J Watson 1201/1, City and County Developments

1077/4, Bedfordia Developments Ltd 66/4 & 293/1 & /23, GOER 516/3, Anglian Water Services 1045/6, Old Road Securities plc 393/66-/67, J & J Design 263/8, Bellway Homes Ltd 275/7, Phillips Planning Services 342/2, Administrators of FP Tinsley Dec'd 349/5, Ian Laing 1074/2

Unnecessary and superfluous in light of S3/S6; contra PPG7 advice; delete

for the sake of long term requirements replace ASR with a notation protecting areas of land of established importance

Amounts to a quasi Green Belt, unjustified by national or Structure Plan policy

Implies that development elsewhere in the countryside might be acceptable

Contra Structure Plan which accepts peripheral expansion of urban area; policy takes inadequate account of the future needs; will lead to increased pressure on non-developed land in urban area; could say "within the ASR defined on the Proposals Map, new development will be strictly controlled having regard to the special features protected by the policy"

Unnecessary to say planning policies will be strictly implemented, as this should apply to whole Plan; reword to achieve what is desired

Do not preclude improvement/expansion of existing operational water company sites, nor non-impactful redevelopment

May lead to further development pressures in Mid Beds District

add to para. 4.11 that sport, leisure and ancillary facilities to be considered on merits

Delete County Council owned land north of Beverley Crescent as it is private playing fields

Delete land south of Highfield Road, Oakley

Delete Castle Dairy Farm, Renhold from within the ASR

#### Council Reply

3.12 The Council's written response is contained in Documents BBCEV 29, 37, 95, 123, 128, 136, 150, 245, 303, 417-418, 461, 463, 586, 925, 1143-1144 and 1259.

#### Appraisal

3.13 The Council has put forward pre-Inquiry Change PIC107 in response to GO-East, adding an emphasis on the importance of S3 and H26 in the operation of this policy. PIC's 441-442 replace the imprecise words "around the urban fringe" with the clearer phrase "between the urban edge and the satellite settlements".

3.14 Because of the very limited opportunity for significant housing development within the Urban Area Boundary of Bedford/Kempston in this Plan period, prime attention focuses on the least damaging forms of urban extension. The inevitability of urban extension is recognised in the wording of adopted Structure Plan policy 33. The decision of the Council consciously to avoid coalescence with the satellite settlements close by – whether large villages or small "ends" - is eminently defensible. The concept of an Area of Special Restraint underlines and reinforces the Council's determination to keep the latter's essential physical and social identity. It is not a quasi Green Belt or a local countryside designation; it is a reinforcement of the Plan's specified housing allocation sites, as well as an implicit statement that development should go only in specified and carefully chosen locations. The concept has been expanded into more of a girdle around Bedford/Kempston since it was launched in the 1993 Local Plan, but in this report I examine all the specific objections on their own merits, while also taking account of the integrity and common sense of the overall concept.

3.15 I see no reason to believe that the existence of an ASR has any adverse implications for adjoining Districts, provided that Bedford's plan contains realistic and implementable housing allocations to meet the structure plan requirement through the local plan period. If this happens, there should be no marked tendency or justification for developers to put greater pressure on outer satellite settlements or locations outside the Borough. After the effective life of this Deposit Plan, paragraph 7.13 of CD 39C suggests that site-specific ASR designations may be revised to complement future housing allocations, made in the light of future Regional Guidance and Structure Plans. I consider that this, and other essential differences from the green belt concept and the kind of undesirable local countryside designations mentioned in

PPG7, should be succinctly explained in the supporting text. That text should also say why the lack of permanence associated with green belts does not weaken the force of the policy. It is implicit that sport and leisure proposals would be considered on their merits.

#### Site Specific Objections

3.16 There can logically be no exceptions to the policy for particular owners, such as Anglian Water Services. They must argue a particular case on its merits. The suggested removal of Castle Dairy Farm, Renhold, from the ASR designation south of the A428 has no planning merit. The larger designation within which it sits has a clear purpose, reinforcing the conclusive end to built development on the outer south-eastern edge of Bedford's Southern Bypass. To take it out would serve no purpose but to attract applications for development.

3.17 The ASR designation extends as far north as the south side of Highfield Road, Oakley, including the Bedfordia site, now with planning permission for 8 industrial units given since the objection was made. As the Council says, it is within a wedge of land separating Oakley from Clapham. However, the site, which has had development on it for many years past, lies within the northern boundary area of the ASR. Defining the precise boundary of a policy area is not always straightforward. The Council does allow the designation to wash over a number of modest clusters and scatters of buildings in the open countryside, and seems to favour boundaries such as roads and strongly defined field hedges, rather than tracing round a particular site. I see no reason to make an exception here, especially as the policy has not prevented an otherwise unobjectionable existing site in open countryside being regenerated.

3.18 The Council has conceded the merits of the County Council argument that its land north of Beverley Crescent, Bedford, is inappropriately categorised as ASR. I agree. By means of PIC's 109 and 442 the designation is deleted and the land shown instead as Urban Open Space, which I consider appropriate.

#### Recommendation

3.19 I recommend that the Local Plan be modified to incorporate PIC's 107, 109, 441 and 442, as set out in Core Documents 11, 11A and 11B, and my comments in paragraph 3.15 above, but that no other modification be made in respect of these objections.

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#### POLICIES BE5, S3, BE5 & NE15 – AREA OF SPECIAL RESTRAINT ET AL

#### Objections and Key Issues

3.20 Mr GCW Beazley 1027/13-/15

Delete 60 acres of Mollivers Farm, Bromham, south of the former rail line, from the ASR and the River Protection Area

Farm should go from the ASR as it is a gravel extraction site

ASR's should be as small as possible to be most effective

If objections not accepted, show the site as a borrow pit for the Clapham A6 Bypass

#### Council Reply

3.21 The Council's written response is contained in Document BBC EV4.

## Appraisal

3.22 The objector considers that the land's inclusion in the ASR cannot possibly assist in the avoidance of coalescence between Oakley and Bromham villages. These are about 1 km apart, and the southern boundary of the land on Oakley Road is only about 120 m from the end house within the Bromham SPA.

3.23 The objector has expectations that the site contains areas of gravel that may be used in connection with works for the Clapham Bypass scheme in the near future. He fears that the ASR designation may prove confusing to the public if there is major activity on the site. The same argument holds for removing the site from the River Protection Area.

3.24 The Council says that the ASR is seeking to prevent the coalescence of Bromham and Oakley, not coalescence with Bedford. The inter-village gap is narrow, and I find the designation conservative and reasonable. If there were to be works to the land in connection with road building, these would be for only a very few years at most, and the land would revert to open status afterwards. I fail to see how this is a serious argument against ASR designation. In any event, the written evidence of the County Council suggests that mineral extraction from the objection site is only a possibility at best.

3.25 The objection site's visibility, or relative lack of it, from Oakley Road seems to me not specially relevant to the soundness of the designation. Restriction of the ASR to land running southwards from Oakley to the line of the dismantled railway would be illogical; to me this would seem to put the objection site into some unexplained category of potentially developable land.

3.26 The wish to remove River Protection Area status from the objection site seems to stem from the desire to free the land from all countryside and environmental designations, rather than a reasoned case against policy NE15. The RPA's coverage of open land between a major loop of the Ouse appears to me a logical and conservative area of RPA designation.

## Recommendation

3.27 I recommend that no modification be made to the Local Plan in respect of these objections.

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## POLICIES BE6 & BE7 – RENEWABLE ENERGY

### Objections and Key Issues

3.28 ETSU (for DTI) 782/5-/6, CPRE 388/74

In para. 4.13 mention DTI funded renewable energy study of Eastern Region and provide detailed guidance about sources of renewable energy

(vi) of BE7 should be more positive about dismantling and removal

### Council Reply

3.29 The Council's written response is contained in Documents BBCEV 192, 251 and 252.

## Appraisal

3.30 It appears to me that the Deposit Plan text deals adequately with the CPRE's concerns, without a need for rewording. The Council has put forward PIC 108, inserting informative text in paragraph 4.13, to meet the point made by ETSU.

#### Recommendation

3.31 I recommend that the Local Plan be modified to incorporate PIC 108, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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### POLICY BE8 – ENERGY EFFICIENT LAYOUTS

#### Objections and Key Issues

3.32 ETSU (for DTI) 782/7, David Wilson Estates Ltd 144/17, David Wilson Homes 998/8, DH Barford & Co 269/7, Bellway Homes Ltd 275/12, Old Road Securities plc 393/39 & 1135/4, Woods Hardwick Ltd 29/4, Westbury Homes (Holdings) Ltd 1151/1

mention DTI funded renewable energy study of Eastern Region and provide detailed guidance about sources of renewable energy

delete as superfluous; factors in 4.15 already taken account of through normal development control and building regulations

premature in absence of clearly defined energy efficient layout criteria in the Plan; insert these

too restrictive/prescriptive and will make new development blandly uniform

#### Council Reply

3.33 The Council's written response is contained in Documents BBCEV 193-194, 253, 304-305, 307, 464, 680, 682, 1145 and 1146.

#### Appraisal

3.34 I see no reason why the Council should not use a planning policy to signal clearly to developers of significant sites that it is looking for energy efficient layouts wherever possible. It does not seem to me a vital matter for inclusion in the Plan, but I believe it rises above the merely faddish. The contents and annexes of PPG22 "Renewable Energy" seem to me to provide justification for a well-conceived policy on these lines. The contents of PIC 108, which I approved above, effectively carry an endorsement of passive solar energy in this part of England. The desired effect is hardly contentious, though the site-specific practicalities will probably always excite some argument, and may not always prove practicable. The Council has put forward pre-Inquiry Change PIC110, rewording the policy in a more aspirational and less officious way, citing the absence of detailed supplementary planning guidance as a reason for change. This produced Counter Objections from McCann Homes 1252/P2, Bellway Homes Ltd 275/P47 and Hallam Land Management 455/ P28, but the arguments in these still centre on opposition to any policy in principle.

#### Recommendation

3.35 I recommend that the Local Plan be modified to incorporate PIC 110, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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## POLICY BE10 – REVIEW OF EXISTING CONSERVATION AREAS

### Objections and Key Issues

3.36 English Heritage 1/1, BT plc 170/16, CPRE 388/73

include a commitment to carry out conservation area appraisals where necessary

exclude BT telephone exchange at 100 High St, Riseley from conservation area

"review" may be seen as withdrawing or reducing extent of areas allowed to deteriorate

### Council Reply

3.37 The Council's written response is contained in Document BBCEV 1164.

### Appraisal

3.38 The Council has put forward PIC's 111-113 in response to original objections, making alterations to the policy wording, supporting text and Proposals Map. CPRE is content with the amended text, although its specific objection has not resulted in rewording. I find that the Changes are all improvements.

### Recommendation

3.39 I recommend that the Local Plan be modified to incorporate PIC's 111-113, as set out in Core Documents 11, 11A and 11B.

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## POLICY BE11 – NEW DEVELOPMENT IN CONSERVATION AREAS

### Objections and Key Issues

3.40 BT plc 170/3, CPRE 388/71

change criterion (i) removing the words "maintaining and enhancing"

change wording of (vii) as economic regeneration is not a primary objective

### Council Reply

3.41 The Council's written response is contained in Document BBCEV 3.

### Appraisal

3.42 The Council has put forward PIC 114, which rewords the policy to make it more purposeful, in line with national policy. I do not find that criterion (vii) contains any real distortion of the policy, i.e. to favour economic regeneration above enhancement of the character or appearance of a conservation area. Economic regeneration is a real factor, but just one among a number that the Council will consider.

## Recommendation

3.43 I recommend that the Local Plan be modified to incorporate PIC 114, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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## POLICY BE12 – ILLUSTRATIVE MATERIAL FOR CONSERVATION AREA PROPOSALS

### Objections and Key Issues

3.44 Woods Hardwick Ltd 29/2, City Centre Restaurants 227/9

redraft to avoid presumption of not granting permission in conservation areas

introduce flexibility to avoid excessive detail

### Council Reply

3.45 The Council's written response is contained in Documents BBCEV 246 and 1148.

### Appraisal

3.46 The control of development in conservation areas will necessitate accurate and detailed plans of proposed physical change to structures. The Council has put forward PIC's 115 and 116, which change the policy from a flat statement that outline planning permissions will not be granted for proposals within conservation areas, to a more reasoned phraseology which is still properly rigorous. It appears to me that the latter introduces all the necessary flexibility consonant with proper control.

## Recommendation

3.47 I recommend that the Local Plan be modified to incorporate PIC's 115 and 116, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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## POLICY BE13 – DEMOLITION IN CONSERVATION AREAS

### Objection and Key Issue

3.48 BT plc 170/2

places undue restrictions; make clear that presumption is in favour of retaining buildings that make a positive contribution to the character or appearance of the conservation area

### Council Reply

3.49 The Council's written response is contained in Documents BBCEV 683 and 1149.

### Appraisal

3.50 The Council has put forward PIC117, producing a Counter Objection from BT plc 170/P31. It accepts the policy's changed reference to buildings and structures making a positive contribution, but wants the policy to refer to such buildings alone. I agree that the Council's resistance on this point is reasonable and defensible. However, the policy would be improved by altering the phrase in the penultimate sentence from "...will need to prove..." to "...will need to demonstrate...".

#### Recommendation

3.51 I recommend that the Local Plan be modified to incorporate PIC 117, as set out in Core Documents 11, 11A and 11B, and the re-phrasing suggested in paragraph 3.50 above, but that no other modification be made in respect of this objection.

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### POLICY BE14 – PREMATURE DEMOLITION

#### Objections and Key Issues

3.52 Bedfordshire County Council 436/13, Bellway Homes Ltd 275/4

minor modification needed to cater for demolition without replacement that is still of benefit to conservation area

requirement for a contract to be let before demolition is excessive , unreasonable and unenforceable

#### Council Reply

3.53 The Council's written response is contained in Documents BBCEV 308 and 465.

#### Appraisal

3.54 The Council has put forward PIC's 118-120, which accept the case that particular exceptional cases may justify demolition without a guaranteed replacement. Given that other demolition can blight part or all of a conservation area, if it leaves a prominent gap indefinitely, I consider that the tough attitude displayed here is defensible and prudent. No doubt the Council will monitor its effects in practice before a successor Plan is produced.

#### Recommendation

3.55 I recommend that the Local Plan be modified to incorporate PIC's 118-120, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

### POLICY BE16 – NEW ADVERTISEMENTS AND SHOPFRONTS IN CONSERVATION AREAS

#### Objection and Key Issue

3.56 English Heritage 1/3

include relevant parts of advice on advertisement control from design guidance, or as annex to Plan



### Council Reply

3.57 The Council's written response is contained in Document BBCEV 1150.

### Appraisal

3.58 The objector seems to be aiming for a standard of completeness that is not really necessary, given the helpful content of the supporting text and the specific references to published supplementary planning guidance. Nothing in PPG12 of 1999 or its predecessor suggests a need to change, although it would be advisable to update references in the supplementary planning guidance to relevant parts of the eventual adopted Local Plan.

### Recommendation

3.59 I recommend that no modification be made to the Local Plan in respect of this objection.

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## POLICY BE17 – RETENTION OF LISTED BUILDINGS

### Objection and Key Issue

3.60 NFU 321/12

recognise in Plan text the real costs and difficulties of maintaining listed buildings on farms, sometimes redundant

### Council Reply

3.61 The Council's written response is contained in Document BBCEV 1151.

### Appraisal

3.62 The Council has put forward PIC 123. This meets the objection, without any material weakening of the intentions of the policy.

### Recommendation

3.63 I recommend that the Local Plan be modified to incorporate PIC 123, as set out in Core Documents 11, 11A and 11B.

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## POLICY BE18 – DEMOLITION OF LISTED BUILDINGS

### Objections and Key Issues

3.64 English Heritage 1/5-/6, Bedfordshire County Council 436/3, David Wilson Homes 998/23

delete (ii)

amend references to "listed building consent" to "consent" in line with PPG15

amend text re partial demolition in line with Shimizu judgement

try for a more appropriate and tighter form of wording

#### Council Reply

3.65 The Council's written response is contained in Documents BBCEV 309, 466 and 1152-1153.

#### Appraisal

3.66 The Council has put forward PIC's 124 and 125 in response to the objections, accepting the implications of the Shimizu judgement in the first sentence of the policy, and tightening criterion (iii). Criterion (ii) of the policy appears to have survived revision although it has effectively been replaced and improved by PIC 125. It is not needed. I agree with the Council that it is not necessary to make any other alteration to the wording.

#### Recommendation

3.67 I recommend that the Local Plan be modified to incorporate PIC's 124-125, as set out in Core Documents 11, 11A and 11B, and omit criterion (ii), but that no other modification be made in respect of these objections.

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### POLICY BE19 – CRITERIA FOR LISTED BUILDING CONSENT APPLICATIONS

#### Objections and Key Issues

3.68 English Heritage 1/7, Bedfordshire County Council 436/83

consider inclusion of sections on: tackling neglect and at-risk listed buildings; need for traditional and appropriate repair and where consent is needed for repair; flexibility in implementing highway standards and building and fire regulations

amend references to "listed building consent" to "consent" in line with PPG15

#### Council Reply

3.69 The Council's written response is contained in Documents BBCEV 310 and 1154.

#### Appraisal

3.70 Although Section 54A does not apply to applications for listed building consent or conservation area consent, local plans need to include aspects of conservation policy that are relevant to planning control decisions in this field. I agree with the Council that it is not absolutely necessary to cover neglect of listed buildings, or a flexible approach to implementing highway standards and building and fire regulations. The Council has put forward PIC 127, which I support, expanding the supporting text on matters of detail in applications, and on traditional methods of building and repair. I also agree with the Council's stance on using the term "listed building consent" in the interests of clarity to plan-users.

#### Recommendation

3.71 I recommend that the Local Plan be modified to incorporate PIC 127, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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## POLICY BE20 – CHANGE OF USE OF LISTED BUILDINGS

### Objection and Key Issue

#### 3.72 English Heritage 1/2

policy or explanatory text should be expanded to give more guidance on appropriate uses, as per PPG15

### Council Reply

3.73 The Council's written response is contained in Document BBCEV 1155.

### Appraisal

3.74 The Council has accepted the force of the objection and put forward PIC 126, adding text to paragraph 4.36.

### Recommendation

3.75 I recommend that the Local Plan be modified to incorporate PIC 126, as set out in Core Documents 11, 11A and 11B.

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## PARAGRAPH 4.37 – SETTING OF LISTED BUILDINGS

### Objection and Key Issue

#### 3.76 Bedfordshire County Council 436/76

distinguish curtilages and the controls applying to them from the settings; do not treat in isolation

### Council Reply

3.77 The Council's written response is contained in Document BBCEV 536.

### Appraisal

3.78 The Council has put forward PIC 121, adding to paragraph 4.32 the information that control also extends to any object or structure fixed to the building and ancillary to it. This is an adequate response.

### Recommendation

3.79 I recommend that the Local Plan be modified to incorporate PIC 121, as set out in Core Documents 11, 11A and 11B.

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## POLICY BE22 – RECORDING OF LISTED BUILDINGS

### Objection and Key Issue

#### 3.80 English Heritage 1/8

include advice from PPG15 about recording features destroyed in the course of works

### Council Reply

3.81 The Council's written response is contained in Document BBCEV 1156.

### Appraisal

3.82 The Council has put forward PIC 128, adding this information to paragraph 4.38, in the supporting text to the policy.

### Recommendation

3.83 I recommend that the Local Plan be modified to incorporate PIC 128, as set out in Core Documents 11, 11A and 11B.

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## POLICIES BE23 – ARCHAEOLOGICAL PROTECTION, BE24 – ARCHAEOLOGICAL EXAMINATION/EVALUATION IN ASSESSMENT OF DEVELOPMENT & BE25 – MINIMIZING EFFECTS AND RECORDING

### Objections and Key Issues

3.84 Re BE23: Bedfordshire County Council 436/48 & /78, English Heritage 1/10 & /12, David Wilson Estates Ltd 144/16

in 4.40 mention County Council as a source of further information

change order of BE32-BE25, and in BE23 include presumption against proposals having an adverse effect on Scheduled Ancient Monuments and other nationally important archaeological remains

show Scheduled Ancient Monuments on the Proposals Map

too loosely drafted; define what constitutes an important archaeological site, monument and setting

too narrowly drafted; nothing about enhancing or managing the cultural heritage

3.85 Re BE24: House Builders Federation 454/3, English Heritage 1/9, David Wilson Estates Ltd 144/23, J & J Design 263/6, Bedfordshire County Council 436/55

identify and be concerned only with areas of archaeological interest

results of desk-top assessment and any field assessment must be submitted with any application; early assessment is of key importance

only apply to sites with where records indicate a presence, or the County requires an evaluation

too narrowly drafted; nothing about enhancing or managing the cultural heritage

3.86 Re BE25: Bedfordshire County Council 436/39, English Heritage 1/11, David Wilson Estates Ltd 144/22

too narrowly drafted; nothing about enhancing or managing the cultural heritage

amend order of BE23-BE25; extend to less important remains; safeguard other archaeologically significant sites and settings; seek preservation in situ or provision for excavation/recording

delete (i) of policy: does not follow on from preceding text, which says preservation in situ not always warranted or desirable

#### Council Reply

3.87 The Council's written response is contained in Documents BBCEV 247, 311-313, 467, 537 and 1157-1160.

#### Appraisal

3.88 The Council has put forward PIC's 129-135. The effect is: to reorder the policies, to refer to enhancing sites of archaeological interest; to refer to the need to consider future management and maintenance of sites; and to require archaeological evaluation "where appropriate";

3.89 I do not think it would be easy or worthwhile to put on a map a meaningful display of areas of archaeological interest, but PIC 131 refers to these in a manner helpful to plan users. The Deposit Plan text for policy BE25 is coherent and sensible; the effect on archaeological remains underlying or surrounding a development should be kept to the minimum, even if certain areas have to be disturbed or removed. The Council has chosen a form of wording that does not specifically distinguish the treatment for Scheduled Ancient Monuments and nationally important remains on the one hand, and other types of remains on the other, as preferred by English Heritage. However, in reality there is a wide spectrum of interest and actual archaeological significance in sites that are not included in the relatively modest list of SAM's, and I suspect that this will continue to be the case even after the list is reviewed. The wording now chosen by the Council does not cause confusion, and I see no reason to insist on further alteration.

3.90 However, instead of the text in PIC's 131-132, I do consider that it should be made clear which authority is the initial port of call for information and advice on proposals with archaeological implications; also, whether that authority is a "one stop shop" and, if not, the split of responsibilities as this impinges on inquirers and applicants.

#### Recommendation

3.91 I recommend that the Local Plan be modified to incorporate PIC's 129-130 and 133-135, as set out in Core Documents 11, 11A and 11B, and the advice in my paragraph 3.90 above, but that no other modification be made in respect of these objections.

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#### POLICY BE26 – HISTORIC PARKS AND GARDENS

### Objection and Key Issue

3.92 English Heritage 1/13

show these on the Proposals Map, as PPG12 advises

### Council Reply

3.93 The Council's written response is contained in Document BBCEV 1161.

### Appraisal

3.94 The Council has put forward PIC 137, which meets this objection.

### Recommendation

3.95 I recommend that the Local Plan be modified to incorporate PIC 137, as set out in Core Documents 11, 11A and 11B.

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## POLICY BE27 – BARN CONVERSIONS

### Objections and Key Issues

3.96 Bedfordshire County Council 436/62, Mr GCW Beazley 1027/20, Anglian Water Services 1045/7, CPRE 388/69

should refer to all rural buildings, in conformity with PPG7

indicate that where conversion meets criteria, small scale rural employment will be preferred to residential

emphasise aim of retaining as agricultural or related use

confine preservation to the exterior only

### Council Reply

3.97 The Council's written response is contained in Documents BBCEV 538 and 1162.

### Appraisal

3.98 I find the tenor of the policy and supporting text to be in accord with national planning guidance expressed in PPG7, including the general disfavour and caveats expressed about residential re-use. Other types of rural buildings are covered by policy E18. I find no sensible case for removing or downgrading the need to respect the architectural interest of the interior of an historic agricultural structure.

### Recommendation

3.99 I recommend that no modification be made to the Local Plan in respect of these objections.

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## POLICY BE28 – NEW AGRICULTURAL BUILDINGS

### Objection and Key Issues

#### 3.100 Mr GCW Beazley 1027/21

rewrite policy, which is not objected to as far as it goes; encourage maintenance of farm buildings where adjacent to Settlement Policy Areas, especially declining or disused farm sites, by including them within these areas

farm buildings are clearly part of the built environment, not the countryside; instances include Grange Farm, Cople, and the eastern edge of Pavenham

specifically encourage erection of new replacement livestock buildings adjacent to settlement as part of SPA, though conveniently distanced from dwellings

buildings associated with arable production may be similarly sited where appropriate, or in open countryside

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### Council Reply

3.101 The Council's written response is contained in Document BBCEV 4.

### Appraisal

3.102 As drafted, Deposit Plan policy BE28 is concerned with design. The objector is seeking a policy acknowledgement of his view of the hard facts of rural life. The Council says it has looked at the definition of SPA's not on the basis of including or excluding village edge farms as a matter of policy, but on the latter's contribution to a recognisable mass of development, distinct from undeveloped areas or more loosely knit development. More generous definition of boundaries, necessitating inclusion of intervening undeveloped land, is effectively an invitation to develop on the latter. The Council's present stance is to err on the side of tightly drawn boundaries, even to the extent of not including all of large existing gardens.

3.103 I cannot see how a policy could be devised as the objector wishes, friendly and supportive towards a farming industry in the throes of change, that would not be invidious and lead to contortions of established planning policy. The assessment of what land to include in a SPA always has an element of subjectivity. However, the Council has set out its principles in CD39A, and I find these equitable and fair, and certainly not biased to one kind of landowner. The exclusion of farm complexes from within SPA boundaries at Cople and Pavenham appears to me generally justified, as they are loosely knit development on the village fringe. I have looked at other places mentioned in the evidence: the old employment land and garden centre at Milton Ernest, and the farm buildings at Swineshead. None of the examples quoted seems to me to make a good case either to expand the present policy or create a new one on the lines desired by the objector.

### Recommendation

3.104 I recommend that the Plan should not be modified in response to this objection.

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## POLICY BE29 – PROMOTION OF GOOD DEVELOPMENT

### Objections and Key Issues

3.105 Bellway Homes Ltd 275/11, Country Style Inns 1146/1, David Wilson Estates Ltd 144/21, David Wilson Homes 998/10, Westbury Homes (Holdings) Ltd 1151/4

specify the "other measures"

council should not be over-prescriptive or rigid; say this in lower-case, not as a policy

### Council Reply

3.106 The Council's written response is contained in Document BBCEV 314, 472 and 926.

### Appraisal

3.107 Good design is a subjective matter, but one that no person can sensibly oppose in principle. My time in Bedford has convinced me that the urban area in particular has suffered from many unworthy, badly designed and insensitively sited developments, especially in the post war period. Recent residential developments by volume builders, in prominent places in the Borough, seem to me too often to perpetuate this legacy of commonplace design and indifferent layout. Thus, I am less than impressed by these objections. The policy and supporting text are generally sound and supportable. I think the policy wording would be improved by the rephrasing the last sentence and adding another, to read: "The Council will promote good design by means of design guides, good design principles and other appropriate measures that it will publicise".

### Recommendation

3.108 I recommend that the Local Plan be modified to incorporate the rewording set out in my paragraph 3.107 above, but that no other modification be made in respect of these objections.

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## POLICIES BE30 – CONTROL OF NEW DEVELOPMENT & BE31 - STATEMENT OF URBAN DESIGN PRINCIPLES

### Objections and Key Issue

3.109 Re BE30: House Builders Federation 454/5, David Wilson Estates Ltd 144/20

delete policy, as already covered in supplementary planning guidance

Re BE31: Bellway Homes Ltd 275/10, Old Road Securities plc 393/40 and 1135/3, House Builders Federation 454/11, Country Style Inns 1146/5, Woods Hardwick Ltd 29/1, David Wilson Estates Ltd 144/29, David Wilson Homes 998/11, Safeway Stores plc 171/6, J & J Design 263/4, Bedfordia Developments Ltd 293/11, Westbury Homes (Holdings) Ltd 1151/3

unnecessary/inappropriate; delete

council should specify these principles

should explain what is required for different types and scales of development, as in PPG1, Annex A

PPG1 says only helpful, not mandatory



### Council Reply

3.110 The Council's written response is contained in Documents BBCEV 195-196, 248-249, 315-316, 469, 471 and 927.

### Appraisal

3.111 Policy BE30 covers certain matters on which the Council has not issued supplementary planning guidance. It is not definitive, as its opening statement makes clear, but I agree that it is a useful checklist. No objector claims that a particular matter named is unimportant, though clearly not all matters are universally relevant. On the whole I think the policy will help bring about better development. So will BE31. Paragraph A4 of Annex A of PPG1 shows how modest an effort would be needed for straightforward or small-scale proposals. The cost will be very small in relation to the total expenditure on an application, and the conscious thought process that it requires should produce a better design and contextual awareness. There is adequate justification for the policy in PPG1, and I believe it may help diminish a real problem of poor architectural quality in the Borough. PIC 142 helpfully expands the supporting text on this matter. PIC's 139, 140 and 141 also expand the supporting text helpfully, but I am unable to understand the meaning of the words "capturing some architectural gem" in PIC 140. Rephrasing or omission is required to make the PIC acceptable.

### Recommendation

3.112 I recommend that the Local Plan be modified to incorporate PIC's 139, 141 and 142, as set out in Core Documents 11, 11A and 11B, and a reworded PIC 140, but that no other modification be made in respect of these objections.

### POLICIES BE33 – GATEWAYS & BE34 – ROAD AND RAIL CORRIDORS INTO TOWN

#### Objections and Key Issues

3.113 Re BE33: Warmingtons 1145/3, Old Road Securities plc 393/19 and 1135/2

should recognise more strongly the gateway advantages created by new development and architectural treatment

inappropriate/unnecessary; delete

Re BE34: Old Road Securities plc 393/20 and 1135/1, Railtrack Property 366/8

inappropriate/unnecessary; delete

concerned in so far as it may affect safe and efficient running of rail traffic; may go against aim of designing out crime

### Council Reply

3.114 The Council's written response is contained in Documents BBCEV 317-320 and 470.

### Appraisal

3.115 The Council has put forward PIC's 143 –144, which have reinforced wording to the supporting text to meet the points made by Warmingtons and Railtrack. Old Road Securities do not elaborate on their opposition to the policies in any coherent way. I see no reason to omit either policy.

## Recommendation

3.116 I recommend that the Local Plan be modified to incorporate PIC's 143-144, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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## POLICY BE35 – ACHIEVING QUALITY IN RESIDENTIAL LAYOUTS

### Objections and Key Issues

3.117 City and St James Property Ltd 456/58 & /106-/109, Bellway Homes Ltd 275/25-/26, Bedfordia Developments Ltd 293/14, David Wilson Estates Ltd 144/28, David Wilson Homes 998/9 & /12, Westbury Homes (Holdings) Ltd 1151/5 & /7, Old Road Securities plc 393/38, House Builders Federation 454/7, J & J Design 263/5, Hallam Land Management 455/5

wording of paras. 4.69-4.71 presents supplementary planning guidance material in a generalised way

amend para. 4.71 to give detailed assessment of individual sites

assumptions on car parking space in 4.71 are over-rigid and descriptive; a contrast with the non-prescriptive approach for development densities elsewhere in the Plan; there are implications for the allocations in policy H1 and Table H3, which seem to be of little weight

proposed removal of permitted development rights in para. 4.72 viewed with great concern: only valid if protecting features or environments of great importance

criteria (iv) (vi) and (x) of policy over-prescriptive and beyond PPG1 advice

car parking per hectare unreasonable as a control over density: unlikely to result in welcome diversity, mixed layouts or meeting market needs; not in the interests of sustainability

define "estate development"; object to application of policy regardless of site size and should allow for smaller schemes

open the policy with "where appropriate"

policy should not be applied to all "new residential estate development"

in criterion (i) the repetition of borrowed design characteristics might itself lead to unwanted uniformity; (ii) is meaningless, as already taken account of; (iv) is self-fulfilling and thus unnecessary

amend policy to encourage diversity of design approach and innovation

### Council Reply

3.118 The Council's written response is contained in Documents BBCEV 1, 254, 321, 469, 473, 540-541, 684, 815, 929 and 1165-1166.

### Appraisal

3.119 The Council has put forward pre-Inquiry Changes PIC146-150, refining the wording of the supporting text and policy; the first Change producing a Counter Objection from City and

St James Property Ltd 456/P113. The less than helpful word "estate" disappears. Particular circumstances in which the Council might decide to remove permitted development rights are set out. Car parking density is redefined as "up to 70 car spaces per hectare", which is more sustainable and recognises differing locations and circumstances. The Council sensibly introduces new text, outlining circumstances in which removal of permitted development rights might be justified.

3.120 Both the policy and supporting text are wordy, and I have considered whether too much is said, to too little affect. My conclusion is that the amended text may well improve the quality of poor submitted schemes. The words used do not fetter good and imaginative designs, and their proponents should argue vigorously if they consider the Council is misinterpreting its own advice. However, the Council should reflect on just how effective the policy has been when the Local Plan is next revised and, if necessary, refine or shorten it in the light of experience.

3.121 To be defensible and robust throughout the Plan's life, the text needs to make specific mention of the quantitative advice in paragraphs 57-62 of PPG 3 of March 2000 and how the Deposit Plan text is consistent with it; also to make all references to "net developable area" compatible with what is said in Annex C of PPG 3 about net housing development. Any change in text should also be carried through to the Housing chapter, particularly paragraphs 5.13-5.14. It should not be too hard to reflect the national policy thrust towards efficient use of housing land, while at the same time emphasising the need to avoid plots that have inadequate space relative to the size of the dwelling.

#### Recommendation

3.122 I recommend that the Local Plan be modified to incorporate PIC's 146-150, as set out in Core Documents 11, 11A and 11B, and the comments made in my paragraphs 3.120-3.121 above, but that no other modification be made in respect of these objections.

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### POLICY BE36 – SPACE ABOUT DWELLINGS

#### Objections and Key Issue

3.123 Hallam Land Management 455/2, City and St James Property Ltd 456/57

restriction of permitted development rights should only be used exceptionally, but the policy is inappropriately widespread; delete

#### Council Reply

3.124 The Council's written response is contained in Documents BBCEV 250 and 928.

#### Appraisal

3.125 I consider that the additional text inserted by PIC 147 into paragraph 4.72 helpfully illustrates the sort of circumstance where permitted development rights might be withdrawn. The wording of the policy does not seem excessive to me.

#### Recommendation

3.126 I recommend that no modification be made to the Local Plan in respect of these objections.

\*\*\*\*\*

## POLICY BE37 - OVERDEVELOPMENT

### Objections and Key Issue

#### 3.127 City and St James Property Ltd 456/50-/53

over-development not defined; at a time when government is seeking to increase densities, this policy could be regarded as a green light to reduce them; rephrase or delete policy and supporting text

### Council Reply

3.128 The Council's written response is contained in Documents BBCEV 452-454.

### Appraisal

3.129 I find that the words used in the policy and supporting text set out clearly and adequately what inappropriate over-development means. Making the best use of land should not entail building that is disrespectful of its context or cramped in appearance. The policy need not prove inimical to the achievement of the higher densities instanced in PPG3, but the supporting text should set the policy within the advice in the PPG.

### Recommendation

3.130 I recommend that no modification be made to the Local Plan in respect of these objections.

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## POLICY BE38 – ON AND OFF-SITE LANDSCAPING

### Objections and Key Issues

3.131 City and St James Property Ltd 456/59-/62, Bellway Homes Ltd 275/9, Old Road Securities plc 393/21 and 1135/7, Country Style Inns 1146/3, David Wilson Estates Ltd 144/27, David Wilson Homes 998/13, BT plc 170/5, Bedfordia Developments Ltd 293/18, Westbury Homes (Holdings) Ltd 1151/2

re-word policy and supporting text; "commuted sums" or "long term maintenance and management of landscaped areas" are closely related to the issue of appropriate planning obligations

delete policy; requirement for landscaping of off-site land impractical; involves third party land

inconsistent with Circular 1/97; amend text to reflect Circular, saying "where considered appropriate and necessary"

### Council Reply

3.132 The Council's written response is contained in Documents BBCEV 323, 325-328, 468, 545-547, 685 and 930.

### Appraisal

3.133 The Council has put forward pre-Inquiry Change PIC 151, which deletes the policy's second sentence in order to state an intention to negotiate for commuted sums to maintain landscaped areas in the longer term. This produced a Counter Objection from City and St James Property Ltd 456/P114. However, I find the altered wording quite acceptable.

3.134 I agree with the Council's contention that the wording of the policy, as revised by the PIC, does not imply a requirement for off-site landscaping. However, the policy would be improved and further clarified by amending part of the first sentence to read: "...on-site and, if practicable and necessary to make the development visually acceptable, off-site landscaping...".

#### Recommendation

3.135 I recommend that the Local Plan be modified to incorporate PIC 151, as set out in Core Documents 11, 11A and 11B, and the altered wording I suggest in my paragraph 3.134 above, but that no other modification be made in respect of these objections.

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### POLICY BE39 – SUBMISSION OF LANDSCAPING DETAILS

#### Objection and Key Issue

3.136 David Wilson Estates Ltd 144/26

delete as unnecessary, its outlines already considered as part of normal development control practice

#### Council Reply

3.137 The Council's written response is contained in Document BBCEV 469.

#### Appraisal

3.138 The Council's defence of making this matter into a specific policy is the desire to elevate landscaping proposals into an integral design consideration rather than an afterthought. Because it fits with other policy proposals aimed at positive improvement in new development to upgrade the physical environment of the Borough, I support its inclusion, though its efficacy should be reviewed when the Plan is next updated.

#### Recommendation

3.139 I recommend that no modification be made to the Local Plan in respect of this objection.

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### POLICY BE42 – EXTERIOR LIGHTING

#### Objections and Key Issues

3.140 CPRE 388/67 & /72, Old Road Securities plc 393/64

in para. 4.89(d) policy should read "Road Lighting and the Environment"

should be a clear statement of intent to enforce

there is a lack of discrimination between lighting acceptable in town and country

should require security lighting to be triggered not permanent

should require amenity lighting to be extinguished between midnight and dawn

say that permitted development rights for exterior lighting in respect of certain commercial and industrial premises may be withdrawn to bring exterior lighting within the scope of this policy

reword to specify full planning applications or appropriate reserved matter applications for the sake of clarity

#### Council Reply

3.141 The Council's written response is contained in Documents BBCEV 5 and 329.

#### Appraisal

3.142 The Council has put forward PIC's 152 and 448-450 to meet the gist of objections from the CPRE, concentrating on controlling new development, and setting out judicious criteria to minimise light pollution. I consider the new wording well judged and agree with the Council that the Plan itself can realistically say nothing more effective about existing unsatisfactory installations. The new wording is appropriate to both full and outline planning applications.

#### Recommendation

3.143 I recommend that the Local Plan be modified to incorporate PIC's 152 and 448-450, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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### POLICY BE43 – SPACES AROUND BUILDINGS

#### Objections and Key Issues

3.144 City and St James Property Ltd 456/6 & /55-/56, Old Road Securities plc 393/22 and 1135/8, David Wilson Estates Ltd 144/25, BT plc 170/6,

policy and supporting text need to refer to planning obligations and Circular 1/97 about developer contributions to existing spaces and future maintenance

delete; inappropriate and unnecessary

#### Council Reply

3.145 The Council's written response is contained in Documents BBCEV 330-333, 548-549 and 686.

#### Appraisal

3.146 The Council has put forward pre-Inquiry Change PIC 153, giving the policy a new last sentence to conform with the provisions of Circular 1/97. This produced a Counter Objection from City and St James Property Ltd 456/P115 about precise wording, rather than principle. I find nothing inappropriate about the aspirations of the policy and believe it should lead to

appreciable urban design benefits. The text of the PIC does not need further verbal refinement to be effective and appropriate.

#### Recommendation

3.147 I recommend that the Local Plan be modified to incorporate PIC 153, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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### POLICY BE44 – PUBLIC ART

#### Objections and Key Issues

3.148 Old Road Securities plc 393/23, David Wilson Estates Ltd 144/24, BT plc 170/7, J & J Design 263/7, City and St James Property Ltd 456/7

delete as inappropriate/unnecessary

make clear developer contributions must be necessary and reasonably related to proposed development

a decision must be made on planning merits, regardless of the provision of "new works of visual art or craft"

say "encourage, not "seek"

#### Council Reply

3.149 The Council's written response is contained in Documents BBCEV 334-336 and 687.

#### Appraisal

3.150 The Council has put forward pre-Inquiry Change PIC 154, giving the policy a new last sentence to conform with the provisions of Circular 1/97. This produced a Counter Objection from City and St James Property Ltd 456/P116 about precise wording, rather than principle. Again, I find nothing inappropriate about the aspirations of this policy and hope it will lead to appreciable benefits. The text of the PIC does not need further verbal refinement to be effective and appropriate.

#### Recommendation

3.151 I recommend that the Local Plan be modified to incorporate PIC 154, as set out in Core Documents 11, 11A and 11B, but that no other modification be made in respect of these objections.

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### POLICY BE47 – OVERHEAD POWER CABLES

#### Objections and Key Issues

3.152 City and St James Property Ltd 456/63-/64, House Builders Federation 454/6, National Grid Company 714/1, David Wilson Estates Ltd 144/30, J & J Design 263/9

supporting text and policy give no implementable guidance re development, particularly about distances

no justification; delete

better in chapter on utilities and telecoms; policy stance is contra national guidance

#### Council Reply

3.153 The Council's written response is contained in Documents BBCEV 6, 337-338 and 816.

#### Appraisal

3.154 The Council has put forward PIC's 450A and 450B, withdrawing mention of a stance of prudent avoidance from the text, and radically rephrasing the policy wording and supporting text. Its intention is now stated by the Council as reducing adverse environmental effects, while highlighting the sources of advice to be taken into account. The supporting text points out the realities of the Council's powers in relation to its aspirations in a fair and informative way. The policy now states specifically its intention to seek visual amelioration of proposed power lines, towers and sub-stations. I consider that the PIC text is appropriate to a local plan, but I agree with the NGC representation that the last phrase of the last sentence of the amended policy could be improved, in my opinion by using the words: "...in determining proposals for development in proximity to overhead power lines".

#### Recommendation

3.155 I recommend that the Local Plan be modified to incorporate PIC's 450A and 450B, as set out in Core Documents 11, 11A and 11B, with the title changed to "Overhead Power Lines" and with alterations to the last sentence of the policy as set out in my paragraph 3.154 above, but that no other modification be made in respect of these objections.

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#### SUGGESTED NEW POLICY

##### Objection and Key Issue

3.156 Countryside Commission 336/2

draw attention to encouragement of Countryside Design Summaries and Village Design Statements in PPG7 through a specific policy

##### Council Reply

3.157 The Council's written response is contained in Document BBCEV 1163.

#### Appraisal

3.158 The Council has specifically covered these concepts in paragraph 4.7, which states that they might be put in hand, but only if resources permit. However, the Council says that a pilot study is feasible. That step might be mentioned in the adopted Local Plan

#### Recommendation

3.159 I recommend that no modification be made to the Local Plan in respect of this objection, unless what I suggest in paragraph 3.158 above is achievable.



## CHAPTER 4

### OBJECTIONS TO THE CHAPTER ON HOUSING

#### Preamble

I deal with the complex housing matters in this Plan as follows:-

**First**, in Section 4.1, I set down the details of formal objections made to policy H1, and its accompanying paragraphs 5.1-5.16, which deal with the housing supply situation overall. I go on to examine all the objections to the allocated housing sites in the Plan that are the subject of policies H2-H23. I then reach conclusions on their acceptability, the realism of the Council's anticipated housing yield from them in the Plan period up to the end of 2005, and the actual shortfall in numbers. The findings of the joint Elstow Storage Depot report of February 2001 are taken into account in this section.

**Second**, in Section 4.2, I examine the merits of other sites put forward by objectors, and recommend those I consider should also be developed in the Plan period to meet a shortfall.

**Third**, in Section 4.3, I draw together all my conclusions on housing numbers and recommend changes to policy H1 and paragraphs 5.1-5.16.

**Fourth**, in Section 4.4, I consider objections to the remaining policies, from H24 to H39, in the Housing Chapter.

#### Section 4.1

#### DETAILS OF FORMAL OBJECTIONS MADE TO POLICY H1, AND ITS ACCOMPANYING PARAGRAPHS 5.1-5.16

#### POLICY H1 AND PARAGRAPHS 5.1-5.16 – THE OVERALL HOUSING LAND SUPPLY

##### Objections and Key Issues

4.1.1 Potton Developments Ltd 268/3, VE Parrott (Oakley) Ltd 273/11, David Wilson Estates Ltd 144/43, DH Barford & Co 269/8, St Albans Diocesan BOF 292/1, Old Road Securities plc 393/3, /13, /30, /32, /47 & /65, Richard Wingfield 415/5, Bedfordshire County Council 436/1, House Builders Federation 454/2, Hallam Land Management 455/14 & /18, Mr & Mrs R McCartie 1070/2, Bedfordia Developments Ltd 293/36-/37 & /40, Wimpey Homes Holdings 265/2 & /14, Bellway Homes Ltd 275/6, /8, /14 & /22, Phillips Planning Services 342/3 & /5, Biddenham, Bromham and Kempston Rural Parish Councils 383/1, CPRE 388/66, Kempston Rural PC 397/2, Oakley PC 423/1, City and St James Property Ltd 456/65-/69, /71 & /74-/76, David Wilson Homes 998/4, /14, /20 & /27, Twigden Homes, Eagle Homes & Connolly Homes 1090/8 & /19-/20, WA Lyon & Ptnrs 1200/2

enlarge the housing provision with corresponding reduction in employment land provision

Plan makes inadequate provision to meet structure plan requirements

many committed or allocated sites not available wholly or partially for development during Plan period

more immediately available small and medium sized sites should be allocated, because of long lead-in times for strategic sites

allocate more sites in larger villages to meet the shortfall

Plan fails to emphasise the importance of having an adequate 5 year housing land supply, which has not been available for many years

discrepancies in the figures between tables, especially concerning fall-in sites and opportunity sites

should refer to archaeological constraints on most of the allocated sites

allocate additional 5,614 dwellings to ensure meeting the strategic housing requirement within the Plan period (BDL)

double counting in respect of small sites

should be flexibility allowance in respect of Table 2

clarify discrepancy between Table H2 and sites allocated in Adopted Plan;

include allowance for future losses in Table H2; omit small sites from outstanding planning permissions in Table H2; omit Opportunity Sites from Table H2

excessive detail and implied level of prescription in designating sites for <10 dwellings and <0.4 ha; risks Plan becoming out of date before adoption and undermining estimates for "fall in"

the number of dwellings in Table H3 should be indicative; actual number for each site will be a matter for detailed development control

5425 dwellings an unjustified excess over structure plan figures; unacceptable consequences likely; over-provision is contrary to the overall aim of the Plan

paras. 5.22-5.27 makes some misleading comments e.g. that successive Structure Plans envisage outer alignment of proposed Western Bypass

do not over-provide housing to facilitate investment towards provision of the Western Bypass; would far exceed needs of the community and aggravate Bedford's transport problems; objection in principle to this type of planning gain

the excess in Table H3 over SP requirements comes about through allocations of 1,000+ outside the SW of Bedford Strategic Corridor; following the structure plan means that development in such villages should be restrained; thus, severely restrict Shortstown and other villages and increase allocations for Wootton and Stewartsby

a fault in the methodology to calculate the net developable area of a site; Table H3 should also include the gross area

paras. 5/14-5.15 at odds with normal practice and have effect of reducing densities; no national planning guidance to justify this posture; drop the term "net developable area" and give appropriate net residential density standards

## Council Reply

4.1.2 The Council's written response is contained in Documents BBCEV 1, 15-16, 18-19, 27-29, 31, 33-34, 36, 37, 40, 46, 50-51, 53-56, 58, 60-61, 64-66, 70-71, 77-80, 82-83, 85-89, 92-93, 103-104, 106, 108-109, 111-112, 114, 116, 121, 123, 126, 128, 130, 132, 144-145, 147, 154, 160, 166, 168, 197-200, 255, 351, 359-360, 379, 382-383, 386, 392, 409-410, 412-413, 416, 448, 457, 459, 476-477, 479, 481-482, 550-553, 556, 712-726, 817, 863- 867, 931-938, 959-960, 994, 1094-1095 and 1277.

4.1.3 In respect of the policy and supporting paragraphs 5.1-5.16, the Council has put forward pre-Inquiry Changes PIC156-PIC168 inclusive. These produced Counter Objections from the following:

### re PIC156

Twigden Homes, Eagle Homes & Connolly Homes 1090/P29

### Re PIC157

Marsh Leys Farms Ltd 272/P8, Bellway Homes Ltd 275/P33, St Albans Diocesan BOF 292/P14, Bedfordia Developments Ltd 293/P52, City and St James Property Ltd 456/P118, Old Road Securities plc 1022/P24, Defence Estate Organisation 1254/P6

### Re PIC158

Marsh Leys Farms Ltd 272/P9, Bellway Homes Ltd 275/P34, St Albans Diocesan BOF 292/P15, Bedfordia Developments Ltd 293/P53, City and St James Property Ltd 456/P119, Old Road Securities plc 393/P88 and 1022/P25, Twigden Homes, Eagle Homes & Connolly Homes 1090/P30, Defence Estate Organisation 1254/P7 & P20, Westbury Homes (Holdings) Ltd 1032/P4

### Re PIC159

Marsh Leys Farms Ltd 272/P10, Bellway Homes Ltd 275/P35, St Albans Diocesan BOF 292/P16, Bedfordia Developments Ltd 293/P54, Old Road Securities plc 393/P89 and 1022/P26, Twigden Homes, Eagle Homes & Connolly Homes 1090/P31, Defence Estate Organisation 1254/P8, Westbury Homes (Holdings) Ltd 1032/P5

### Re PIC160

Marsh Leys Farms Ltd 272/P11, Bellway Homes Ltd 275/P36, St Albans Diocesan BOF 292/P17, Bedfordia Developments Ltd 293/P55, Old Road Securities plc 393/P90 and 1022/P27, City and St James Property Ltd 456/P120, Twigden Homes, Eagle Homes & Connolly Homes 1090/P32, Defence Estate Organisation 1254/P9, Westbury Homes (Holdings) Ltd 1032/P6

### Re PIC161

Marsh Leys Farms Ltd 272/P12, Bellway Homes Ltd 275/P37, St Albans Diocesan BOF 292/P18, Bedfordia Developments Ltd 293/P56, Old Road Securities plc 393/P91 and 1022/P28, Hallam Land Management 455/P29, City and St James Property Ltd 456/P121, Twigden Homes, Eagle Homes & Connolly Homes 1090/P33, Defence Estate Organisation 1254/P10, Westbury Homes (Holdings) Ltd 1032/P7

### Re PIC162

Marsh Leys Farms Ltd 272/P13, Bellway Homes Ltd 275/P38, St Albans Diocesan BOF 292/P19, Bedfordia Developments Ltd 293/P57, Old Road Securities plc 393/P92 and 1022/P29, Hallam Land Management 455/P30, City and St James Property Ltd 456/P123, Twigden Homes, Eagle Homes & Connolly Homes 1090/P34, Defence Estate Organisation 1254/P11, Westbury Homes (Holdings) Ltd 1032/P8

Re PIC163

Marsh Leys Farms Ltd 272/P14, Bellway Homes Ltd 275/P39, St Albans Diocesan BOF 292/P20, Bedfordia Developments Ltd 293/P58, Martin Grant Homes (UK) Ltd 294/P33, Old Road Securities plc 393/P93 and 1022/P30, City and St James Property Ltd 456/P122, Twigden Homes, Eagle Homes & Connolly Homes 1090/P35, Defence Estate Organisation 1254/P12, Westbury Homes (Holdings) Ltd 1032/P9

Re PIC164

Marsh Leys Farms Ltd 272/P15, Bellway Homes Ltd 275/P40, St Albans Diocesan BOF 292/P21, Bedfordia Developments Ltd 293/P59, Old Road Securities plc 393/P94 and 1022/P31, City and St James Property Ltd 456/P125, Twigden Homes, Eagle Homes & Connolly Homes 1090/P36, Defence Estate Organisation 1254/P13, Westbury Homes (Holdings) Ltd 1032/P10

Re PIC165

Potton Developments Ltd 268/P16-/P17, Forthprice Ltd 1256/P2, Marsh Leys Farms Ltd 272/P16, Bellway Homes Ltd 275/P41, St Albans Diocesan BOF 292/P22, Bedfordia Developments Ltd 293/P60 & /66, Phillips Planning Services 342/P14, Administrators of FP Tinsley Dec'd 349/P14, Old Road Securities plc 393/P95 and 1022/P32, Hallam Land Management 455/P31, City and St James Property Ltd 456/P124, D Stewart 1076/P10, City & County Developments Ltd 1077/P14, Twigden Homes, Eagle Homes & Connolly Homes 1090/P37, McCann Homes 1252/P3, Davison & Pack 1253/P2, Defence Estate Organisation 1254/P14, Westbury Homes (Holdings) Ltd 1032/P11, Mr & Mrs R McCartie 1070/P6

Re PIC166

Marsh Leys Farms Ltd 272/P4, Bellway Homes Ltd 275/P29, Davison & Co (Barford) Ltd 284/P5, St Albans Diocesan BOF 292/P10, Bedfordia Developments Ltd 293/P47, Old Road Securities plc 1022/P19, Davison & Pack 1253/P4, The Babour Ptnrship 1251/P2, Defence Estate Organisation 1254/P2,

Re PC167

Martin Grant Homes (UK) Ltd 294/P32, Old Road Securities plc 393/P97, City and St James Property Ltd 456/P126, Twigden Homes, Eagle Homes & Connolly Homes 1090/P38

Summary of events concerning overall housing figures after the publication of the Deposit Plan

4.1.4 Bedford Borough is seen in the County Structure Plan as a growth area for the County, taking pressure off the Luton/Dunstable area. The Borough has not been able to show that it possesses a 5 year housing land supply for some years past. The Structure Plan and its Key diagram are unusually prescriptive as to the location of new housing development in the Borough. The locational strategy is to focus development at locations in and adjoining the main urban areas of Bedford and Kempston, and in the south west of Bedford strategic corridor.

4.1.5 The Deposit Draft of the Local Plan relies on the achievement of several large allocations, on land that accords with the Structure Plan's locational advice and Key Diagram. All need the early provision of significant new physical infrastructure, notably roadworks. The Deposit Plan is unusual in the amount of opposition it has occasioned from the housebuilding industry. The nub of the objections is not so much the principle of the allocations, rather the realities of the rate of development likely to be achieved in the Plan period to the end of 2005.

4.1.6 Among the factors for delay mentioned are: the time that the Council will spend translating outline proposals into acceptable detailed schemes with planning permission in accordance with detailed design briefs; the staff implications of processing major proposals; and the complications of some allocations being promoted by land owners or development agencies rather than house builders. Since major sites also have effects on the workings of the trunk road system, the Highway Agency needs to be satisfied and to have its essential demands met before schemes can go ahead.

4.1.7 The objections of those in the housebuilding industry assume that the achievement of a higher build rate than hitherto is feasible and necessary; they discount the possibility of limited market demand. Given long experience of the realistic rates at which even large sites can be developed, housebuilding objectors see allocation of further development land that can be developed expeditiously as the only way to achieve the Structure Plan target. It is their view that such sites can run in parallel with the major Deposit Plan allocations, while not impacting adversely on market demand, rate of development or the implementation of those allocations.

4.1.8 After the publication of the Deposit Plan, the Council published a Topic Paper on Housing (CD39D) in December 1998, updating the Council's figures to reflect a base date of 1/1/98 as in the Council's pre-Inquiry Changes, and then a subsequent update to 30/9/98. The Council's calculations in the Topic Paper's updated Table H2 of the Deposit Plan are as follows.

Structure Plan 2011 for the period 1991-2006	11,700
Less completions 1991-30/9/98	4,749
Outstanding planning permissions at 30/9/98	2,136
Local Plan allocations to 1996	154
Estimated future supply from fall-in	525
<b>Total</b>	<b>7,564</b>
Balance to be allocated to 2006	4,136

4.1.9 At that stage the Council claimed that the revised figures showed an over supply of 33% of the dwelling requirement, rather than the 26% in the Deposit Plan. It held that the new figure provided sufficient flexibility in the calculation as not to warrant an additional flexibility allowance.

4.1.10 During my Inquiry I held a Round Table Session on Housing on 17 February 1999 (CD54B), and three deliverability sessions, 6 May, 3 June and 9 December 1999. By the time of the first deliverability session, the Council had taken stock of its position and changed its thinking. The new position acknowledged that, in arriving at conclusions on deliverability, the yield from the supply in the Plan period could show a notional shortfall of 555 units. It is held that such a shortfall is modest; and that it may not materialise in reality, because it may be made good by such factors as increased densities, fall-in and an upturn in market demand. It is said that the notional shortfall would cause no harm but, if I disagree with this, I should first consider the inclusion of brownfield land at Shortstown, on the east side of the A600. This

land includes the RAF establishment, part of the Driving Standards Agency holding and other privately held land.

4.1.11 The calculations relied on by the Council to arrive at this figure continued as follows:-

LOCATION	
H2 - Britannia Iron Works	180
H3 - Austin Canons	25
H4 - Ford End Road	0
H5 - College Street	20
H6 - Biddenham Loop	675
H7 - Land West of Kempston	450
H8 - Land north of Bromham Road	560
H9 - Shortstown	170
H11 - Fields Road north, Wootton	240
H12 - Berry Farm, Wootton	126*
*allows for the 114 in "adopted Local Plan allocations	
H13 – Stewartby	240
H14 - Elstow Storage Depot	375
H15 - Northampton, Road, Bromham	45
H16 - Bromham Hospital	65
H17 - Clapham Folly	170
H18 – New Road, Great Barford	25
H19 – Yelnow Lane, Sharnbrook	25
H20 – Clay Piece, Sharnbrook	41
H21 – Luton Road, Wilstead	50
H22 – Meadway, Harrold	0
H23 – Village Sites	90
H23 – Canons Close	9
UNITS TO BE DELIVERED	3581
SHORTFALL ON UNITS	1909
ALLOCATED ABOVE	(TOTAL 5490)
TOTAL PROVISION	11145
STRUCTURE PLAN REQUIREMENT	11700
DIFFERENCE	555

4.1.12 At the Deliverability sessions the Council also produced evidence following its commissioning of a "Bedford Housing Market Study" dated April 1999, produced for it by Roger Tym & Partners, aimed at investigating objectively the local housing market and considering both demand and supply.

4.1.13 The Tym Study finds that housing completions in Bedford have rarely exceeded 400 dwellings per annum since 1990, and have averaged about 450 in the three years 1995-1997. It is said that this level of performance is not dissimilar to other comparable districts save those where there has been positive promotion of development and a buoyant local economy – not the case in Bedford. Manufacturing jobs have been lost in the 1990's, without consequent replacement in the same sector, and there have been only limited gains in service sector jobs.

4.1.14 The Study says that the ONS population projections, which are largely demographically produced and based on past migration trends, show a relatively modest growth. However, the County Council suggests an enhanced rate of population growth, and an increase in the working age population. The County Council foresees a projected increase in pop fuelled by in-migration, which is likely to average 750 per annum, compared with a similar outflow of people in the period 1991-1996.

4.1.15 In Bedford, the Study finds average house prices higher than in Northampton, but lower than Cambridge. There is said to be a reasonable breadth of supply and no obvious gaps, but reports from estate agents of a shortage of properties from £60,000-£100,000. Using available data on the demand for housing both from first time buyers and trade-up purchasers, Tym estimates a potential demand for the purchase of some 487-672 new build dwellings annually. If account were taken of the need for affordable housing, the total annual housing requirement over the period of the Local Plan is seen as likely to be about 650-830 dwellings in round figures. This however, compares with a residual housing requirement of 993 (at September 1998).

4.1.16 The study finds this residual requirement at the top end of the range of developments likely to come forward over the Plan period. It finds no evidence that the demand for new housing can be boosted by further increase in the Borough housing target, or the range of sites to be allocated. It regards the range of sites identified in the Deposit Plan as reasonable. Although the more strategic sites have substantial infrastructure requirements, it sees no fundamental lack of viability. Dilution of the level of demand by dispersing development on to additional sites is not recommended.

4.1.17 By the close of my Inquiry I obtained final estimates of the amount of new housing that could be delivered for occupation in the Borough up to 2006 from the Borough Council and objectors. The base date for calculation is 31 December 1998. They are found on the Summary Table of Respective Positions on Housing Delivery in Table 1 on page 236 below.

4.1.18 I now turn to examine, in Plan order, the Deposit Plan's significant allocated sites H2-H23, in the Deposit Plan in the light of specific objections and the above representations.

## **OBJECTIONS TO POLICIES CONCERNING ALLOCATED SITES AND AFFECTING THE STRUCTURE PLAN REQUIREMENT**

### **POLICY H2 – BRITANNIA IRON WORKS**

#### **Objections and Key Issues**

4.1.19 David Wilson Estates Ltd 144/32, UCC for Cauldwell and Kingsbrook 230/1, Environment Agency Central Area 319/28 & 30-/34, Old Road Securities plc 393/44, Bedfordshire County Council 436/20, Twigden Homes, Eagle Homes & Connolly Homes 1090/10

doubts about deliverability: ground problems and lack of market interest; a possible retail interest in the site; housing alone not viable; possible solution through single bed Housing Association units

acknowledge that part of the site is within floodplain

not enough green space or play space envisaged

mention need for lower school provision contributions if a family housing site

#### Council Reply

4.1.20 The Council's written response is contained in Documents BBCEV 18, 27, 28, 421, 868 and 1242.

#### Appraisal

4.1.21 The situation at the end of the Inquiry was that a planning application for 105 dwellings on part of the site was under consideration. Anecdotal evidence from objectors during the Inquiry raised the possibility of site pollution and its expense implications. It was also hinted that developers would prefer other uses on site. No evidence has been submitted by the site owners supporting these theories. What is certain is the need for Bedford to make the most of limited opportunities for suitable brownfield sites in the urban area to provide housing at the higher densities instanced in new PPG3, para. 58. I see site H2 as a test case for Bedford. The Council's attitude and persistence in bringing about 180 or more dwellings on the site will send a very important signal to the local building industry, even if this means fighting public inquiries or investigating compulsory purchase powers to achieve the desired result.

4.1.22 The Council has put forward PIC168, which would satisfy the objection of the Environment Agency in respect of sites H2, H3, H6, H7, H8 and H15 by bringing attention to the floodplain constraints. I do not support any new wording to satisfy the objection that seeks more open space on site than the Deposit Plan text implies. The Policy's principle of development (v) implies a good standard of open space for site residents, but the priority must be housing provision, and the deficiencies suffered by the local community nearby cannot reasonably be met on this site.

4.1.23 As to the County Council objection, I find the text in Deposit Plan paragraph 5.16 adequate as an indication to developers of the need for school provision to be taken into account as a factor in the planning balance

#### Recommendation

4.1.24 I recommend that the Local Plan be modified to incorporate PIC 168 as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICY H3 – AUSTIN CANONS

#### Objection and Key Issue

4.1.25 Bedfordshire Pilgrims Housing Association 379/4



Austin Canons House blighted and beyond being re-used

#### Council Reply

4.1.26 The Council's written response is contained in Document BBCEV 18, 27, 28 and 869.

#### Appraisal

4.1.27 My information is that a planning application to achieve 25 dwellings was granted consent on 22 July 1999, subject to conclusion of a planning obligation. It is therefore not necessary for me to take a view on this 1997 objection about the merits of refurbishing Austin Canons House.

#### Recommendation

4.1.28 I recommend that no modification be made to the Local Plan in respect of this objection.

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### POLICY H5 – LAND AT COLLEGE STREET, KEMPSTON

#### Objections and Key Issues

4.1.29 David Wilson Estates Ltd 144/31, Cyclists' Touring Club 711/35

believed to have access constraints and currently in employment use, so deliverability questioned

no cycle link between College Street and Northdale Close is included

#### Council Reply

4.1.30 The Council's written response is contained in Document BBCEV 18, 27 and 28.

#### Appraisal

4.1.31 My information is that outline planning permission for 30 two-bedroomed flats was given on 6 May 1999. Assessment of the merits of including a cycle connection is best made by the Council, after consultation with relevant parties. It is not a matter on which I can comment authoritatively or usefully at this stage.

#### Recommendation

4.1.32 I recommend that no modification be made to the Local Plan in respect of these objections.

### PARAS. 5.22, 5.23 & 5.25 – HOUSING SITES ADJOINING THE URBAN AREA

#### Objections and Key Issues

4.1.33 Old Road Securities plc 393/29, /31 & /51

delete last sentence of para. 5.22

do not refer to Marsh Leas Farm land within para. 5.23

clarify "may " in last sentence of 5.25

#### Council Reply

4.1.34 The Council's written response is contained in Documents BBCEV 554, 970 and 971.

#### Appraisal

4.1.35 The last sentence of 5.22 is fact-based, and appropriate as lower-case text in the Plan. As to the reference objected to in paragraph 5.23, though Policy E7 would be amended by a number of PIC's, I find no fault with the wording of the former. The word "may" in para. 5.25 still seems appropriate to me. The latest pronouncement on the Western Bypass during my Inquiry came in DETR Press Release 1219 of 16 December 1999. This matter is best resolved by the Council reviewing the up to date situation as the Plan approaches adoption.

#### Recommendation

4.1.36 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### POLICY H6 – BIDDENHAM LOOP

##### Objections and Key Issues

4.1.37 David Wilson Estates Ltd 144/37, Wimpey Homes Holdings 167/1, Bellway Homes Ltd 275/17, Biddenham, Bomham and Kempston Rural PC's 383/2, CPRE 388/101, Old Road Securities plc 393/68, Richard Wingfield 415/11 & /13, Bedfordshire County Council 436/8, Cyclists' Touring Club 711/31, David Wilson Homes 998/16-17, Twigden Homes, Eagle Homes & Connolly Homes 1090/11, Lutea Trustees Ltd 1106/6, WA Lyon & Ptners 1200/3

questionable delivery of 1450 units, due to technical, legal and marketing constraints

no requirement for mixed scheme, particularly employment, which is important in a peripheral location

Plan wrongly seeks to accord the development brief the status of the development plan and delegate decisions to the guidance

concern that development may take place without complete link between A428 and A421

Biddenham Loop Development Brief may need amendment re matters of housing capacity and developer contributions

concern that requirement for a complete link is too inflexible

wrong that only access for private and goods vehicles is via a dual carriageway road

estimates of housing capacity should be minimum figures

there is inconsistency in the references made to the infrastructure in the key development principles

new cycle link across the western end of the island is shown on fig.20 but not on figs. 9 & 10

include site immediately to the south proposed by Lutea Trustees

#### Council Reply

4.1.38 The Council's written response is contained in Documents BBCEV 16, 17, 18, 27, 28, 46, 53, 55, 424, 870, 939 and 940.

#### Appraisal

4.1.39 Sites H6, H7 and H8 have been chosen as focuses of development, within the line of the Western Bypass, specifically to bring about key elements of infrastructure. In the case of H6, the Biddenham Loop Development Brief (CD50) was adopted as supplementary planning guidance after formal consultation in July 1994. It predates the Deposit Plan and has been used in development control decisions. Specific reference to a development brief in the wording of the Policy does not give it the status of the Policy itself, but shows it to be an important material consideration. There is no attempt to delegate decisions to the supplementary planning guidance.

4.1.40 The construction of the single-carriageway phase of the Western Bypass is to be largely privately funded. At the end of my Inquiry the position was that the Government had issued a Press Notice (1219) on 16 December 1999. This announced acceptance of 21 new major public transport and road schemes, accepted for funding for the first time, as part of the Local Transport settlement for 2000. The Western Bypass A428-A421, simply described as an "urban relief road", was one of the 21. A future provision of £2 million is made, bringing total public funding to only £2,916,000 out of the overall costs of c.£18 million, when previous expenditure is taken into account. Routeing in principle was established by the Government's preferred route announcement in 1994. The application to build the single carriageway link of the Western Bypass was made during my Inquiry, and I have no knowledge of the subsequent process or the outcome.

4.1.41 Part of the H6 site was allocated in the 1993 Adopted Local Plan. I find no serious objection to the development of the entire allocation in the next few years, at the Council's estimated capacity of at least 1,450 dwellings, additional to the 250 already given planning permission and under development. I say "at least 1,450" in view of Government advice in new PPG3 to look for higher densities where possible. The first 1.5 km of bypass/link road has been constructed.

4.1.42 Despite the long duration of my Inquiry, at its end the developers of the H6 and H7 sites had not reached agreement about how development would proceed overall, nor an acceptable and precise method of financing the building of the bypass road in synchronisation with the development. However, a conservative but realistic estimate of future events would seem to me to run as follows. I assume the consideration of my report by the Council in the first half of 2001, permission for the Bypass, and a detailed planning permission and executed planning obligation by the end of Summer 2001. There should be initial completions on site by the Summer of 2002 at the latest. Of the estimates of deliverability in Table 1 at page 236 of this report, I find that of DPDS/MRP the most realistic. I consider that their figure of c.520 dwellings, based on about 150 completions per year, could be attained in the plan period to 2006.

4.1.43 At the end of the Inquiry, the Council had put forward PIC 453; this recast the text of this policy to reflect the Highways Agency's agreement that an acceptable principle of development could be completion of the distributor link southwards to the A421 prior to the occupation of the 701<sup>st</sup> dwelling sanctioned by the Policy. There would be a requirement to ensure completion, funding and phasing of the road. There is rewording to sharpen up the text about the provision of park and ride facilities and the public transport service required. The rewording also has the desirable effect of co-ordinating the message and language of

this policy and H7 and H8 about infrastructure matters. Mention is made of footpath and cycle provision to be implemented, and I am satisfied that good facilities fully linked to the rest of the urban area can be ensured in a detailed scheme. I consider the specific case for allocating Lutea's adjoining land for development in paragraphs 4.2.23-26 below.

4.1.44 I am aware that during the composition of this report, the Council and all parties interested in the development of this site will be negotiating matters further. The wording of the Policy may well change further before it is incorporated in the Adopted Local Plan. However, I find this latest text fully recommendable.

#### Recommendation

4.1.45 I recommend that the Local Plan be modified to incorporate PIC 453, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY H7 – LAND WEST OF KEMPSTON

#### Objections and Key Issues

4.1.46 Bedfordia Developments & Bedfordshire CC 136/1-/3, David Wilson Estates Ltd 144/36, British Horse Society 369/12, Biddenham and Kempston Rural PC's 383/3, CPRE 388/75 & /102, Old Road Securities plc 393/70, Kempston Rural PC 397/4, Bedfordshire County Council 436/9, Cyclists' Touring Club 711/1 Mrs P Livingstone 991/1, Mrs G Summers 992/1, Mr & Mrs BAH Seale 1000/1, Mr & Mrs AC Hinckley 1001/1, Mrs J Guy 1002/1, Mr & Mrs A Macfarlane 1003/1, M & Mrs PC Catterill 1011/1, Mr & Mrs NA Bichener 1029/1, FD Holman 1043/1, Twigden Homes, Eagle Homes & Connolly Homes 1090/12, Mr & Mrs D Blatchford 1099/1, Mr & Mrs JG Dancer 1119/1, JA Rosborough 1123/1, Mr & Mrs JC Jackson 1124/1, GR Church & M Keirs 1125/1, DR & Mrs RI Jones 1127/1, TA Kimber 1140/1, Mr & Mrs JD Bettell 1144/1, Mr & Mrs U Licchelli 1193/1, S Gaylor 1194/1, WA Lyon & Ptnrs 1200/4

economics of the link between policy and detailed requirements of brief not discussed with landowners; must allow sufficient cash flow to aid construction of the road

development should not be linked to provision of the whole road before occupation of houses

raise site capacity to 800

marginal viability at best and made worse by the requirements of (ii) – (x)

cannot adopt a brief before proper consideration is given by the local plan process; bypass alignment is unduly westerly, and development should be limited to land east of The Bury to increase the buffer zone

roundabout at cemetery road too great in size; access to and from bypass should be possible from new development to alleviate traffic congestion in Kempston

second carriageway to western bypass will cause coalescence of settlement

inconsistency in the references made to the infrastructure in the key development principles; policy should mention providing a new lower school and extension to middle school

new cycle link across the western end of the island is shown on fig. 20 but not on figs. 9 & 10

should mention cycle link with Biddenham Loop development and wider area

designate Church Walk as a cycle route link

too much road noise and traffic increase; cycle track and path too close to Hill Rise houses; local community centre will mean noise and distraction; ASR should not be developed; community forest should be behind Hill Rise; fear crime and loss of wildlife and drop in existing property values

do not remove land from the ASR as designated in 1993 Plan, in particular west of Kempston

keep Kempston Rural rural; need for housing is disputed

if development really necessary, put school at top of the area to join with Hastingsbury, not near major road

include measures to attenuate night sky light pollution

development north of Ridge Road a desecration of hamlet of Church End and river valley

new school would have detrimental effect on catchment area of Balliol School

traffic congestion along Kempston High St

2 ha allocation west of Kempston not needed, given Marsh Leys allocation

#### Council Reply

4.1.47 The Council's written response is contained in Document BBCEV 14, 15, 17, 18, 22, 26-28, 53, 55, 137, 412, 425, 484, 820, 871-883, 941 and 942.

#### Appraisal

4.1.48 The general remarks I made in paragraphs 4.1.39-40 above, about the background to the two sites H6 and H7, and the position about the Bypass, are also relevant here. The Council's estimated capacity for this site is 730 dwellings on 28.5 ha: part of the strategic allocation of 2,700 dwellings west of Bedford. The 1993 adopted Local Plan showed an alignment for the Bypass, but did not allocate the site. A draft "Land West of Kempston Development Brief" (CD55) had not been updated or approved by the end of my Inquiry. The Council initially put forward pre-Inquiry Change PIC173, producing a Counter Objection from Bedfordia Developments & Bedfordshire CC 136/P5. By the end of the Inquiry, the wording of the Policy and of paragraph 5.28 had been rewritten in PIC's 454-455.

4.1.49 The principle of the A428-A421 link is established. Highways Agency evidence makes it clear that whether or not housing development at H7 precedes work on the E7 Marsh Leys employment allocation, access to the A421 can be effected within the E7 site, bypassing the existing Aquarti roundabout. All necessary land is in the control of landowners, who seem to be very willing to develop.

4.1.50 The H7 allocation, and the routeing and local consequences of an initially single carriageway western bypass, have caused understandable worry to and opposition from the Parish Councils and certain local residents, especially those living on or near the existing edge of Kempston. As there is clearly no intention by Central Government to give more than minimal public funding of the road cost, there is really no alternative to adding to local traffic through a couple of hundred new houses on H7 before a single carriageway bypass road can be completed.

4.1.51 My site visits and consideration of the evidence convince me that the development of H7 at anything up to 50 dwellings per ha (the figure mentioned in paragraph 58 of new PPG3) is inevitable and necessary for Bedford to grow in the least environment harmful manner. It was said in evidence by the Council that the 730 dwelling figure is neither a maximum nor a minimum, but has flexibility. That order of growth is required by adopted Structure Plan dwelling totals. I do not rule out the possibility of the site accommodating up to 800 dwellings when fully developed in the Plan period after 2006, but I see no real need to require alteration of the 730 figure in this Plan. The situation is best reviewed in preparation of the next Local Plan, when detailed planning permissions have been issued and implemented on parts of H7. At that stage there will be certainty about all the really necessary constituents of the scheme, and the housing numbers could well rise above 730. The Council's draft Brief shows a 2 ha area within the site for employment uses. This is modest in size, and market interest is not foreseeable at the present, but on sustainability grounds alone there seems no good planning case for its removal in favour of more dwellings.

4.1.52 The detailed alignment of the Bypass through H7 will be crucial for local residents, and real concerns about such matters as the detailed layout of development areas, open spaces, internal roads, roundabouts, light pollution, paths and cycleways can only be resolved through detailed planning applications. I would expect these to be made under the strong influence of a definitive Development Brief, prepared in active consultation with local residents and Parish Councils. It may be at an advanced draft stage by the time my report is received by the Council. The alignment of the Bypass through H7 may well have been decided by the time this report is received. However, I can see no intrinsic planning or landscaping objection to the road route shown in the Local Plan: running east of the Bury, and crossing Ridge Road at a point nearer to the fringe of the small entity known as Gibraltar than to Hill Rise. Gibraltar is not an attractive place, and it is difficult to see how the view west from the Bypass as it goes past Gibraltar can be made to seem convincingly rural. However, that is an intrinsic problem, whatever the new road's alignment. My concerns are that the detailed planning of the road, and the depth and quality of landscaping, should both be of the highest standard possible – more generous than the norm for such a road. The resulting rural-urban boundary should look firm and unshakeable for the foreseeable future, as the new planting matures.

4.1.53 PIC 454 recasts the text of the Policy to reflect the Highways Agency's agreement that an acceptable principle of development could be completion of the distributor link southwards to the A421 prior to the occupation of the 201<sup>st</sup> dwelling sanctioned by the Policy. There would be a requirement to ensure the road's completion, funding and phasing. I realise that hardheaded negotiations will continue as I write this report, and that agreement on the viable formula to get agreement may involve further textual change in the Adopted Local Plan. However, I see no intrinsic unfairness in the Policy wording set down on this matter, nor in the text of PIC 455 about the necessary cost mechanism and the assurances about completion of the new road.

4.1.54 The Council's amended wording includes provision of a network of footpath/cycle routes incorporating the Sustrans route, and specific connections to destinations outside, as key principles of development. I find this quite adequate for the text of a local plan that will guide a detailed planning brief, updating the draft brief of 1995 (CD53).

4.1.55 As to the actual physical delivery of dwellings on this site in the Plan period, I am assuming the consideration of my report by the Council in the first half of 2001, after the receipt of planning permission for the Bypass, and a detailed planning permission and executed planning obligation by the end of Summer 2001. There should be initial completions on site by the Summer of 2002 at the latest. Of the estimates of deliverability in Table 1 at page 236 below, I find that of DPDS/MRP the most realistic. I consider that their figure of some 390 dwellings, based on about 100 completions per year, could be completed in the plan period to 2006.

Recommendation

4.1.56 I recommend that the Local Plan be modified to incorporate PIC's 454-455, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY H8 – LAND NORTH OF BROMHAM ROAD, BIDDENHAM

### Objections and Key Issues

4.1.57 WI Clark 2/1, Mr & Mrs G Henshilwood 45/1, The Biddenham Society 122/1, David Wilson Estates Ltd 144/35, Bellway Homes Ltd 275/3, Bedfordia Developments Ltd 293/22, Martin Grant Homes (UK) Ltd 294/8, English Sports Council East 297/6, The Bedford Charity 345/2-/3 & /7, British Horse Society 369/13, Biddenham and Kempston Rural PC's 383/4, CPRE 388/39, /65, /75 & /79, Old Road Securities plc 393/2 & /31, Richard Wingfield 415/2-/3, Biddenham PC 428/1, Bedfordshire County Council 436/10, Bromham PC 443/2-/3, Hallam Land Management 455/6, /10-/12, /16 /19-/20 & /25, Sir N Lyell QC MP 568/1, Cyclists' Touring Club 711/19, Dr P Pattison 786/1, Mr & Mrs SH Wisdom 788/1, F Tizzani 789/1, PG Willis 790/1, Janet Smith 793/1, S McNamara 796/1, C Jones 797/1, WA Maxwell 798/1, BJ Ashton 801/1, Mrs V Howlett 803/1, IA King 804/1, RJ Caunt 806/1, C Hollands 809/1, DT Young 813/1, EB Suckley 815/1, G Watson 817/1, D Olney 818/1, LH Davis 819/1, AM Mackenzie 820/1, R Ebbs 821/1, BA Henry 822/1, VW Mannion 831/1, Mrs D Davies 832/1, RR Burgess 833/1, EJ Feasey 836/1, GJ Dyke 840/1, A Hodgson 841/1, SF White 844/1, Mrs EA Clark 845/1, Apsley Guise and Woburn Sands Golf Club 847/1, G Hixon 848/1, GM Mitchell 850/1, VE Oates 851/1, Prof P Hancock 856/1, Mrs B Hancock 857/1, Mr & Mrs VJ Ayres 859/1, GW Palmer 860/1, LD Ellery 861/1, LJ Green 862/1, Beds Ladies County Golf Assn 865/1, Mrs J White 866/1, CW White 867/1, Beds County Golf Union 868/1, BG Sanders 869/1, Stockwood Park Golf Club 870/1, WB Sanders 871/1, T Hooley 872/1, Mrs YD Foulkes 874/1, FR Chandler 875/1, P Sampson 877/1, CW Sampson 878/1, Mrs B Payne 879/1, BN Margrave 881/1, K Vane Percy 883/1, M Palmer 884/1, R Palmer 885/1, A Palmer 886/1, R Foulkes 887/1, MP Foulkes 888/1, Mrs J Saundres 891/1, Mrs WM Hooley 893/1, I Tomlin 894/1, NW Houghton 895/1, Mrs D Chandler 900/1, Beadlow Manor Golf Club 902/1, Mrs DE Margrave 905/1, DB Olney 907/1, J Poole 908/1, Mrs J McNamara 909/1, JF McGrath 910/1, TJ Pasquire 914/1, J Grover 915/1, Mrs CG McDonald 916/1, B Sullivan 917/1, Mrs TIM Hillier 918/1, CAA Hillier 919/1, AT Thompson 920/1, Mrs NM Thompson 921/1, LV McDonald 922/1, AM Leonhardt 923/1, Dr CV Fraser 924/1, Mrs N Crawford 925/1, DS Crawford 926/1, Mrs P Jappy 927/1, L Jones 928/1, Miss JE Dudley 929/1, B Toyn 930/1, CR Porter 933/1, Mrs D Willis 934/1, SG Hamlet 938/1, NM Davies 942/1, J Spencer 945/1, S Newman 946/1, Mrs D Watson 947/1, KFR Savill 948/1, JM Jappy 949/1, Mrs M Jones 950/1, CD Carrington 954/1, Mrs J Savill 955/1, P Barrett 956/1, SA Guest 959/1, Mrs W Guest 960/1, HA Andrew 961/1, G Brown 962/1, BT Kearney 963/1, JA Dakin 964/1, Dr AH Clark 965/1, JE Ingram 967/1, DW Allen 968/1, JE Porter 970/1, HL Hatty 971/1, AE Muller 972/1, WJ Baxter 973/1, TB Woolliscroft 974/1, CJ Constable 977/1, Mr & Mrs DM George 978/1, JSH Aikman 983/1, Mrs E Kitchen 984/1, Mrs LJ Bradley 986/1, IG Bradley 987/1, Dr B Hamilton 988/1, JL Gallagher 989/1, EP Gallagher 990/1, Martin Cowan 996/1, Mr S King 997/1, David Wilson Homes 998/22, S Bibby 1004/1, MJ Bibby 1005/1, AAJ Willitt 1008/1, JD Hardwick 1009/1, GHE Baty 1012/1, A Chrystal 1014/1, Miss MJ Tattman 1018/1, Mrs M Maybank 1023/1, JT Kelly 1030/1, TA Nutt 1033/1, Prof DA Greenhalgh 1034/1, K Watson 1035/1, Mrs EM Twigden 1037/1, BG Jappy 1038/1, PA Kennedy 1039/1, AH Allott 1040/1, WJ Watkins 1047/1, CEG Kemp 1048/1, R Milne 1050/1, Mrs BM Davenport 1051/1, AJ Scarr 1052/1, JC Danes 1053/1, Mr & Mrs RJ Mash 1054/1, WR Harrison 1056/1, R Harman 1057/1, GC Howlett 1061/1, Mrs M Young 1062/1, Mrs ET Hawkins 1063/1, D Pittman 1064/1, JA Jappy 1065/1, Mrs S Jappy 1066/1, C Kidby 1067/1, Bedfordshire Golf Club 1085/1, PH Tyley 1087/1, I Ingram 1088/1, Twigden Homes, Eagle Homes & Connolly Homes 1090/13, CCL Vermeulen 1101/1, J Anderson 1102/1, WT Andrew 1103/1, DJP August 1115/1, J & SM George 1116/1, MK Greenley 1117/1, AWT Woodward 1120/1, Hon Judge & Mrs C Farmworth 1121/1, Mr & Mrs CW Harris 1126/1, LF Barbour 1133/1, DP Wright 1137/1, MT Wright 1138/1, RG Laughton 1141/1, Mrs B Laughton 1142/1, BG Woodrow 1143/1, P Carter 1150/1, Mr M Howarth 1154/1, Mr DJ Bertram 1164/1, SM Maxwell 1167/1, Mrs P

Pittman 1177/1, J Woodrow 1178/1, RI Gairdner 1179/1, Mrs S Porter 1182/1, RG Charlson 1183/1, Mrs SM Woodrow 1184/1, DR WT Little 1186/1, Assoc.of Golf Club Secretaries 1187/1, RB Saunders 1195/1, BJ Dorricott 1197/1, WA Lyon & Ptnrs 1200/5, The Bedford Charity 345/3

100 year old golf course and oldest county club should not be lost; no alternative course is offered; this is contra LR13, LR18, NE3, NE6, NE15, NE17, NE18, NE25 and views in para. 10.45, and Structure Plan policy 64; loss will weaken strength of county golf team; no provision for a new course made

explain "may" in last sentence of para. 5.25; the para. should mention the relief to be gained in Oakley and Bromham, as recognised in the 1994 preferred route announcement

change route of proposed road from Gold Lane Junction to a point near Clapham on Clapham bypass to prevent loss of golf club

anglers and walkers will be disadvantaged

follow an outer route to link A428 and A6

unacceptable loss of open land, wildlife and trees; make certain areas Important Open Spaces

too many houses proposed; need for them questioned

proposed road will generate a great traffic increase and become quickly overloaded; wrong concept to channel A6 users towards Bedford

principle of development not established and highway requirements in (ii) and (iii) will not assist deliverability; figure of 900 dwellings cannot be reached by 2006

identify the employment element more clearly

the figures set out in the policy do not seem to encourage BE policy aims of local distinctiveness

development here will lead to coalescence of settlements and adverse effects on the river Protection Area; designated area too small; include other land north of A428 at Biddenham which is RPA in 1993 Plan

allocate land east of Cut Throat Lane for employment, complementing Bromham Road allocation

mention inclusion of local shopping and a new lower school, amending SH17 to allow small foodstore

allow equestrian access for land north of Bromham Road

provide safe cycle crossing of new road and cycle routes within site

site should not have its former RPA status changed

the site could be enlarged to a net developable area of 53 ha

extend housing on the site westwards, deleting RPA and ASR designations from the new boundary



do not define route of new road or urban edge boundary until after a development brief

take 200 dwellings from the site total and add to policy H15 site instead

extend ASR east of Bromham further east to prevent coalescence

delete figure 11 as premature and misleading in view of changes to proposals

vary the Proposals Map to omit any notations south of the river; treat as white land pending development brief, with an adjusted northern perimeter road

route of safeguarded A6/A428 link incorrectly drawn

#### Council Reply

4.1.58 The Council's written response is contained in Documents BBCEV 18-20, 22-24, 27-28, 52-53, 55, 391, 426, 453, 580, 600, 727-729, 860, 884, 943-5, 989, 993, 1099 and 1191.

#### Appraisal

4.1.59 The Council put forward PICs 7, 175 and 176 in 1998, producing Counter Objections from Bedfordshire County Council 436/P93-/P94, Hallam Land Management 455/P26 & /P32, Martin Grant Homes (UK) Ltd 294/P30-/31, Environment Agency Central Area 319/P48, and Bromham Road Service Road Residents Group 1249/P1. By the end of the Inquiry these PIC's had been superseded by further Council revisions to the supporting text and the Policy itself (PIC's 456 and 457), while the final changes to the Proposals Map and illustrative Figure 11 were in PIC 508.

4.1.60 A large part of this open area was occupied at the time of my Inquiry by the Bedfordshire Golf Club, the remainder being arable land and allotments. However, the Club had already agreed to leave its land at the termination of its lease, and to relocate at Stagsden at its own expense. I acknowledge the deep sense of dissatisfaction of many members who objected to the Plan's Policy H8, and personal inconvenience and expense incurred by the move. However, I was told the land would be entirely vacated by the Club in 2000.

4.1.61 As the evidence of the Highways Agency makes clear, there is a preferred line safeguarded between the A428 and the A6. It has remained protected, though this element of the overall Bypass scheme was withdrawn from the national programme in 1996. The Highways Agency is willing to withdraw the existing protection line if the principles of a new line, agreed between the Council, Highways Agency and prospective developers, are confirmed in the Local Plan. The scheme depends on developer funding alone. There are Made Orders for the A6 Clapham Bypass scheme that is due to start on site in 2001-2. Though these cannot be varied, the Highways Agency stated an intention of writing the contract in a way that would allow a start to the A6-A428 link to be made while the Clapham Bypass is being built.

4.1.62 The County Council supports the strategic development principles in the Deposit Plan for both the outer Bypass link between the A428 and A6, and the inner distributor link road within the H8 housing site. In the light of the PIC's, it does not maintain an absolute opposition to details shown on the amended Proposals Map and revised textual figure 11. Its stance is that the important details of design and functioning to do with H8 must be dealt with in full, but that this can happen in preparing the Development Brief, in devising the Travel Assessment for the planning applications, and in planning obligations.

4.1.63 The area of open land afforded for housing between Bromham Road and a new northern perimeter road formed by the A6-A428 link allows construction of some 900

dwellings, with ancillary uses. Apart from objectors protesting about loss of the golf club land, all the objections to this policy appear to me to accept some housing development on H8; consequently, the arguments are about the scale of building and timing. The Council confirms that H8 does not form part of the "strategic location west of Bedford" referred to in Policy33 of the adopted Structure Plan: the strategic allocation consisting of sites H6, H7 and the existing commitments at Biddenham Loop and Deep Spinney.

4.1.64 I am satisfied that development of H8 is the only way to achieve an initial western bypass facility between the A421 in the south and the A6 in the north. As there is no large stock of urban brownfield land in Bedford, a major yield of dwellings from H8 – an urban extension - is the least unsustainable way to help meet the Structure Plan requirement. Major development need not seriously detract from the river valley landscape to the north, provided that adequate riverside land is left undeveloped, and structural landscaping is truly extensive; this last point is very important..

4.1.65 Amended proposals on the altered Proposals Map (PIC's 505 and 508) show that significant features, such as ecologically important sites and existing planting at The Baulk, can be protected by deliberate planning actions. The integrity of an attractive riverside park to the north seems assured, even with the altered road alignment introduced by PIC176 and carried on by PIC508. A suggested route running still further north, enabling more housing development on 5 extra hectares, would cut into this riverside area. This alignment from Hallam has no great purpose save extra dwellings, but it would be gained at the unacceptable expense of open land in the proposed Country Park, which has to have a certain depth from the river bank to make its proper effect.

4.1.66 I have given careful consideration to the argument that the removal of housing for 200 dwellings at the western end of the site would reduce the physical encroachment of Bedford town on Bromham, help keep the latter's existing identity and separateness, and diminish the prominence of the development seen from the village. It is inevitable that the Council's twin duties of allocating necessary urban extensions, and keeping the physical integrity of village-type settlements near Bedford, result in less than ideal solutions. The separating distance has often to be smaller than the ideal. The distances from western points on the H8 boundary to the east edges of Bromham village are about 900-1000 m, extending over the Ouse River valley. Taking account of the good quality new landscaping that can be expected around the western edge of H8, I see no overriding planning reason to move or reduce any development at the western end of H8.

4.1.67 I consider that the revised text in the PIC's allows for cycling interests to be properly furthered through the Development Brief, which should take account of relevant work done in the Local Transport Plan. The Council-owned employment site at Cut Throat Lane should be able to benefit from the proposal and provide enhanced opportunities for the nearby population. The Development Brief should also allow all the other concerns in objections about important details of the new development to be dealt with due attention, allowing for face to face consultation and discussion. This includes the provision of an appropriate smaller foodstore, and the PIC affecting policy SH17 is relevant to development here.

4.1.68 I see no harm in the Adopted Local Plan containing indicative layout illustrations of this and other major housing schemes, provided their status is made clear to the Plan user. I suggest the use of words for this and other figures on the lines of "indicative illustration of site layout, from the adopted Development Brief of 2001", to give the reader at any stage of the Plan's life the proper perspective.

4.1.69 As to the actual physical delivery of dwellings on this site in the Plan period, I am assuming the consideration of my report by the Council in the first half of 2001, and a detailed planning permission and executed planning obligation by the end of 2001. I am cautious about assuming more than a few completions in 2002, in view of comments made about by other objectors that the site could well be sold on after a planning permission. However, I see no reason why this site should not be developed at a rate of up to 150 dwellings per annum

thereafter. On that basis I expect no less than 450 dwellings to be completed in the plan period to 2006.

## Recommendation

4.1.70 I recommend that the Local Plan be modified to incorporate PIC's 456, 457, 505 and 508, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICIES H9 & E6 – LAND AT SHORTSTOWN

### Objections and Key Issues

#### 4.1.71 Re H9:

David Wilson Estates Ltd 144/45, Potton Developments Ltd 268/4 & /6, Bellway Homes Ltd 275/1, /13 & /21, British Horse Society 369/22 & /43, Old Road Securities plc 393/17, City and St James Property Ltd 456/17, /46 & /48-/49, Nettlecombe Ltd 487/2, Eastcotts PC 495/1, BRE 501/1, Cyclists' Touring Club 711/2, Twigden Homes, Eagle Homes & Connolly Homes 1090/24, Driving Standards Agency 1091/3

allocation of 455 dwellings opposed, as outside urban area, south of southern bypass, in an "A" village and not in the SW of Bedford Strategic Corridor

Extend ASR to the east across part of most northerly of the 3 Shortstown housing sites; reduce Scotts Avenue housing site,

not appropriate to site housing in isolated location so close to the airship hangars, with existing and proposed employment areas on north border; also may harm BRE's operations

enlarge housing allocation

decrease proposed employment

objection to form of development and listed key design principles

delete principle (i), access could come off A600 in the short term

make provision for bridleways – integrate with cycleways

no reference to cycleways in infrastructure list; extend the strategic cycle route

provision of affordable housing is opposed

provide a village hall and sports field on the existing sports field location

cannot build 455 dwellings in Plan period: reasons include ownership, drainage, archaeology, continuing MOD, operations, infrastructure requirements and lead time

consider Driving Standards Agency land for development; housing, employment or both

Re E6:

City and St James Property Ltd 456/83-/84, Potton Developments Ltd 268/5, Driving Standards Agency 1091/2

reduce the employment allocation and allow carrying of ASR, parallel with the bypass, across to disused railway and wildlife corridor; link the latter with requirement for footpaths and cycleways expressed in (iv)

expand the residential allocation

allocate Driving Standards Agency site for employment

#### Council Reply

4.1.72 The Council's written response is contained in Documents BBCEV 18, 27, 28, 31, 38, 94, 351, 420, 427, 486, 555, 731-736, 738-741, 885, 922 and 990.

#### Appraisal

4.1.73 The Council put forward pre-Inquiry Changes PIC11 excluding land east of the A600 from the Proposals Map, PIC178 redrafting paragraph 5.29, PIC179 redrafting paragraph 5.30 and PIC180 amending the policy wording. At the end of the Inquiry, minor amendment to the policy wording was put forward as PIC458, superseding PIC180. The PIC's were prompted by the Council's assumption in 1998 that the Shortstown Development Brief of 1996 needed significant alterations, making achievement of significant development east of the A600 unlikely within the Local Plan period. That land was therefore removed from the provisions of the Plan and deleted from the Proposals Map. PIC's 242 and 243 deleted policy E6 and amended the supporting text of paragraph 6.27 to explain why.

4.1.74 The Changes produced Counter Objections from Potton Developments Ltd 268/P11, P18, and P20-/P21, Bellway Homes Ltd 275/P27-/28 & /44-/45, Old Road Securities plc 393/P96, City and St James Property Ltd 456/P127-P130 and P135-P136, Nettlecombe Ltd 487/P9, Twigden Homes, Eagle Homes & Connolly Homes 1090/P39-/P40, Driving Standards Agency 1091/P4-P5, Davison & Pack 1253/P3, Defence Estate Organisation 1254/P1 & /P17-/P18 and Forthprice Ltd 1256/P3-/P4

4.1.75 After the pre-Inquiry Changes, and during my Inquiry, there was a succession of events and re-thinking about the future of land either side of the A600 in the Shortstown location. The two areas differ in function and type. West of the A600 is the settlement created largely by the old Short Brothers Airship Works and the later RAF Cardington Camp. The Council says that about half the dwellings are social rented stock, and it is clear that the decline of the original workplace has produced what is effectively a large housing estate, with few facilities and various social problems. On an open site rounding out the south-west corner of the estate, the Council agreed to grant planning permission for 170 new dwellings in April 1999, subject to a s.106 obligation that will also bring about a sports pavilion, village hall and playing fields. That act effectively resolves how land west of the A600 will be treated in the Plan period, and probably for some years beyond.

4.1.76 As to the land east of the A600, the position by the end of my Inquiry was that the following were joint promoters of a development: the MOD (Defence Estates Organisation), Messrs Forthprice/Potton Ltd and Bellway Homes. The latter had agreed terms for the purchase of the land occupied until March 2000 by the RAF's 217 Maintenance Unit. The purchase would be on 1 April 2000. An application for the comprehensive redevelopment of the land was to be made in April 2000. An application by Bellway Homes for mixed development on 28.2 ha of MOD owned land was made in April 1999.

4.1.77 The other major owner of land is the Driving Standards Agency, which also wishes to offer about 4.6 ha of its total holding land for development. Its formal position at the end of the Inquiry was that it had been informed by the Defence Estate Organisation that it could manage, sell or let its land as it required. Of all the sites available for development - amounting to some 89 ha - the housing potential is seen as being some 750 dwellings on about 38 ha. Realistic deliverability within the Plan period is assessed by all parties as 260, assuming a grant of full planning permission before the end of 2001. The amount of new employment land envisaged in the 1996 Brief can be obtained, but would be switched to some 19 ha nearer to the listed airship hangars, where the BRE's important activities can cause noise, smoke and fumes. This appears entirely sensible.

4.1.78 In paragraph 5.29 of the Deposit Plan, Shortstown "is considered to adjoin the urban area". It is a separate entity from Bedford town, but the Urban Area boundary that runs along the southern edge of the Southern Bypass leaves only a narrow open hinterland. For reasons more to do with classification than topography or visual character, Shortstown is also classified under Policy S7 as an "A" Village, with housing seen as contributing to the urban element of the housing requirement. The Council's evidence acknowledges the great majority of the objectors' land east of the A600 as "brownfield", with an element of doubt about the validity of that precise designation for some of the Potton/Forthprice land.

4.1.79 During the Inquiry, after the Council acknowledged a shortfall rather than a surplus of housing provision in the Plan period, it took up a revised position. This was that, if I found a need for additional allocations, land east of the A600 here should be the first choice, ahead of all other greenfield urban extension sites.

4.1.80 As this report does find a significant shortfall needing to be met, I consider that the land east of the A600, within the SPA boundary shown in the Deposit Plan Proposals Map, should be allocated for a mixture of uses. The pre-Inquiry Changes put forward by the Council are not justified. I have to deal with realities. The land is predominantly brownfield, and its owners fortunately seem intent on achieving an integrated development. If refused planning permission, they are almost certain to take the matter to appeal. It seems to me inconceivable that the result of any appeal would be to reject the principle of bringing forward unused brownfield land for housing and employment, where market demand can be shown. There are other strong factors favouring early development: firstly the opportunity to make a flawed and unbalanced settlement into something more vital and, secondly, the fact that a substantial development near the urban area and major employment sites would not greatly affect the achievement of the key allocations of H6, H7 and H8, which are some distance away.

4.1.81 I turn to the relief road concept for the enlarged settlement favoured by the Council. The Council envisages a new relief road skirting the proposed residential areas and taking the A600 traffic out of what would become the centre of the settlement as a key principle of development. I disagree. I find that the Council has paid too much heed to the road concept as the only or obvious way to achieve fully integrated and comprehensive development. As the objectors have said, the disadvantages of a development concept that is led by road infrastructure include its high cost. Also, the major engineering structure needed to connect to the appropriate roundabout on the Southern Bypass would need a viaduct, prominent and unsightly within the narrow breadth of the ASR. There is no technical evidence that a relief road is needed for reasons of traffic capacity on the A600. I prefer the objectors' concept of a more modest diversion of the A600 around a new central area, which could allow internal loop routes for buses through housing areas.

4.1.82 I was given examples of well-designed grade-separated pedestrian accesses at Milton Keynes, constructed under major roads. Having seen them I believe that this standard of facility could be provided to give easy and pleasing access between existing housing and community facilities and other areas of the new Shortstown. The key features would be very easy gradients, very wide pathways, good design and facing materials, with landscaping that is pleasant and easy to maintain. There should be no dark enclosed stretches, or changes of axis, under the road above to inhibit walkers, who should always be able to get some naturally-lit view through to development on the other side of the A600 during the transition.

This type of facility should be supplemented by crossing facilities at grade. The working out of development principles at Shortstown should of course include adequate facilities for pedestrians, cyclists and riders within the new settlement which link up to networks outside. There should be rigorous examination to make sure that shared use of a route does not disadvantage any one particular category of user.

4.1.83 I fully appreciate the fears of those living west of the A600 that they will somehow be perceived as confined to a less favoured part of the new Shortstown, if the integration is only cosmetic. This is a real fear, and whatever way Shortstown is redeveloped and expanded, that adverse social and economic perception will not go away in the short term. Nevertheless, I do not find any strong planning or transport reason to favour the development concept in the 1996 Shortstown Development Brief over the objectors' concept.

4.1.84 As to the actual physical delivery of dwellings on site in the Plan period, this is not a matter of contention between the Council and objectors. I am assuming the consideration of my report by the Council in the first half of 2001, and a detailed planning permission and executed planning obligation by the end of 2001. There should be initial completions on site by the Summer of 2002 at the latest. I consider that some 260 dwellings, based on about 80 completions per year, could be completed in the plan period to 2006.

#### Recommendation

4.1.85 I recommend that the Local Plan be modified to incorporate new supporting text, a redrawn Proposals Map Inset and a reworded Policy H9. Wording in the supporting text should refer to a future development brief rather than the 1996 document. The reworded part of the policy should read:

#### "Policy H9

The development of designated sites at Shortstown shall be undertaken in accordance with an agreed development brief, and as indicated on the inset to the Proposals Map. Each site will be expected to contribute towards highway, improvements and transport links, community and educational facilities, affordable housing, playing fields and sports pavilion and environmental improvements in Shortstown. The sites identified are:

Land east of A600 including former MoD land at RAF Cardington. Key principles include:-

- i) a comprehensive and integrated development form including housing, commercial and community areas;
- ii) structural landscaping of the eastern boundary of the site to strengthen the tree lined avenue."

The wording of the remainder of the policy in PIC 458 about land west of Scott Avenue seems not to need alteration. There will be a need for some redrafting in the Employment and Tourism chapter to reflect the altered situation.

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#### POLICIES S6, H1, H10, H11, H12 AND H25 – LAND SOUTH AND NORTH OF FIELDS ROAD, WOOTTON

#### Objections and Key Issues

4.1.86 In respect of S6, H1 and H25, Wootton PC 582/1, Old Road Securities plc 393/1, /4 & 7 and 1022/12

objection to the extent of the SPA around Wootton

want amendment of the SPA to permit 30 dwellings within a perimeter road, a school r/o Manor Road, Bott End, 1 ha for local employment, planting of land for community forest space, relocation of principal roundabout access, revised alignment for Fields Road link to the south of Fields Road, deletion of principal employment area, deletion of any housing proposals south of the perimeter road, community forest open space, and planting where no development for residential and employment use,

relocate Wootton Blue Cross Football Club, whose land should be a housing site, provide comprehensive footpath and cycleway links to Marsh Leys industrial allocation

the pond at Wootton does not really function as an IOS, as surrounded by a high dense hedge; also not safe so close to new housing

In respect of H10, Bellway Homes Ltd 1130/4

policy or supporting text should mention involvement of relevant landowners/developers

In respect of H11, Shanks & McEwan (Southern) Ltd 88/2, Old Road Securities plc 130/1 and 393/12, /41 and 1022/9-/10 & /13, Laing Homes Ltd 134/4 & /12, Martin Grant Homes (UK) Ltd 294/1, Phillips Planning Services 342/7, Cyclists' Touring Club 711/3, D Stewart 1076/6, City & County Developments 1077/8, and

in respect of H12, Old Road Securities plc 130/2 and 393/12 & /28 and 1022/14-/16, Martin Grant Homes (UK) Ltd 294/2, Phillips Planning Services 342/8, British Horse Society 369/19 & /41, Cyclists' Touring Club 711/4, D Stewart 1076/7, City & County Developments 1077/9 and Bellway Homes Ltd 1130/1 & /2

give considerations to smell from adjacent operational landfill site; down wind of brickworks; could be methane creep

alternative proposed to the unsafe roundabout proposed linking the two developments: further to the east on the bend of Fields Road

fourth arm of roundabout proposed at junction of Fields Road and A421 would need a major realignment of Fields Road

delete reference to need to contribute to dualling of A421, which is not formally programmed

identify Fields Road commitment from 1993 Plan on Inset Map 42

delete land at Fields Road altogether

amend capacity of H12 to 300 dwellings

reduce H11 allocation to 200 dwellings maximum

modify H12 to recognise the increased capacity of the site and its ability to contribute early to the land supply

re H12 reinstate the access road at the location shown in the Draft Plan

re H12 no indication made re possibility of securing separate and direct access to site from Fields Road on Inset Map 42

re H12 make development Brief recognises separate ownerships and avoid ransom strip problems

extend Wootton in Mount Pleasant/Keeley Farm area instead

new building develops in open countryside, poorly related to existing village, not sustainable and means more car journeys; diminishes gap to Marston Moretaine

opposed to housing south of Fields Road, particularly south of Cranfield Road/ Fields Road link

connect cycling provision to new Bedford /MK route; mention developer contributions to cycling aim

identify 1 ha for local employment north of Fields Road

no further residential and employment development south of proposed perimeter road

In respect of paragraph 5.32, the Council has put forward pre-Inquiry Change PIC183, producing Counter Objections from Potton Developments Ltd 268/P23, Marsh Leys Farms Ltd 272/P7, Martin Grant Homes (UK) Ltd 294/P24, Old Road Securities plc 393/P108 and 1022/P22

In respect of H11, the Council put forward pre-Inquiry Changes PIC184 and PIC186, amending the Policy and Proposals Map. This produced Counter Objections from Potton Developments Ltd 268/P22, Martin Grant Homes (UK) Ltd 294/P26 & /P28, Environment Agency Central Area 319/ P44 & /P46, Phillips Planning Services 342/P15 & P17, Administrators of FP Tinsley Dec'd 349/P15 & /P17, Old Road Securities plc 393/P111 and 1022/P23, Bedfordshire County Council 436/ P95, Beds and River Ivel IDB 562/P13, Wootton PC 582/P3, Mr & Mrs R McCartie 1070/P7, D Stewart 1076/P11 & /P13, City & County Developments 1077/P15 & /P17, Cllr M Smith 1240/P1, Mr AB Seymour 1241/P3, Mr & Mrs N Gordge 1243/P3, Miss S Gordge 1244/3, Mrs L Carling 1245/P1, Mrs J Newbury 1257/P1, Mr A Stringer 1258/P1, Mr & Mrs T Pendall 1259/P1. PIC's 459 and 457 are later Changes made in January 2000, which supersede PIC's 184 and 186.

In respect of H12, the Council has put forward pre-Inquiry Changes PIC185 and PIC187, producing Counter Objections from Marsh Leys Farms Ltd 272/P17, Martin Grant Homes (UK) Ltd 294/P25 & /P27, Environment Agency Central Area 319/ P45 & /P47, Phillips Planning Services 342/P16 & /P18, Administrators of FP Tinsley Dec'd 349/P16 & /P18, Old Road Securities plc 393/P110 & 1022/P33, Beds and River Ivel IDB 562/P14, Wootton PC 582/P2 & /P4, Mr & Mrs R McCartie 1070/P8, D Stewart 1076/P12 & /P14, City & County Developments 1077/P16 & /P18, Cllr M Smith 1240/P2, Mr AB Seymour 1241/P1, Mrs D Smith 1242/P1, Mr & Mrs N Gordge 1243/P1, Miss S Gordge 1244/P1, Mrs L Carling 1245/P2, Mr & Mrs J Harwood 1246/P1, Mrs J Newbury 1257/P2, Mr A Stringer 1258/P2, Mr & Mrs T Pendall 1259/P2. PIC 460 is a later Change made in January 2000, which supersedes PIC 185.

Counter Objections to PIC15 – the amendment of the SPA boundary on Inset 42 at Berry Farm are made by Phillips Planning Services 342/P13, Potton Developments Ltd 268/P12, Martin Grant Homes (UK) Ltd 294/P29, Administrators of FP Tinsley Dec'd 349/P13, Wootton PC 582/P5, Mr & Mrs R McCartie 1070/P5, D Stewart 1076/P9, City & County Developments 1077/P13, Mr AB Seymour 1241/P2, Mr & Mrs N Gordge 1243/P2 & Miss S Gordge 1244/P2.

Council Reply



4.1.87 The Council's written response is contained in Documents BBCEV 18, 25, 27, 28, 122, 400, 428-429, 457-458, 551, 738-743, 745-749, 752-757, 758, 760-763, 766-771, 773, 776-779, 781, 784-788, 882, 887-891, 938, 962 and 1227-1279.

#### Appraisal

4.1.88 Wootton is the largest village settlement in the Marston Vale Strategy Area, and lies within a Strategic Corridor designed to accommodate development that cannot be provided in urban areas. Therefore, unless the amount of new development proposed can reasonably be held to harm the intrinsic character or functioning of Wootton, or its immediate surroundings, there can be no valid objection to major development, provided this corrects major deficiencies and positively improves the village's overall functioning. Inevitably, it will become a different place, larger than the conventional view of a village, but with the consequent opportunities for better community facilities obtained through legitimate planning gain, as well as infrastructure improvements in the A421 corridor. The Council's approach to expansion at Wootton has the support of the Highways Agency and the County Council. As at H13, developers of H11 and H12 would contribute to widening of the A421.

4.1.89 Some rural views will necessarily be lost and open countryside will disappear. The strategic background has changed materially from that considered by the last Local Plan Inspector, when he recommended an allocation of 150 dwellings on the Berry Farm site within the Plan period up to 1996, with an ultimate goal of 250 dwellings. In considering the loss of open land, I recognise that the Marston Vale Community Forest designation on that land does not take development considerations into account. Non-compliance with that designation does not override strategic development considerations and requirements.

4.1.90 Wootton is not a settlement with an easily discernible or clear historic form, save in the small part around the parish church within the conservation area. The original constituent hamlets or ends have been joined up with a variety of 20th century housing areas. As now proposed by the Council's PIC's, H11 and H12 would provide some 904 dwellings - including land at Berry Farm, an employment/business area and community facilities. Together, they comprise one large swathe of development south and south-east of the existing village, served off both sides of the linking road to the A421. The Parish Council rightly points out how huge an increase this is in a village that has some 1500 dwellings today.

4.1.91 The Council adopted a Wootton Development Brief in July 1999. In the light of objections from the Parish Council, the Council and Village representatives had started to hold workshop sessions on educational and community facilities before the end of my Inquiry. These were to go on for some time. Nothing in the Brief suggests to me that particular community needs would be omitted when large-scale planned development was put in place. However, I think that the important ongoing consultations I mention may well result in layout changes to the Inset Proposals Map and master plan in the Development Brief. As beneficial revisions, I am thinking in particular of village-wide shopping and social facilities, as well as active recreational facilities within reasonable reach of all parts of Wootton.

4.1.92 If this process of "bottom-up" consultation continues while planning application proposals are being worked up, I can see no objection serious enough to rule out new housing, employment and community on the scale proposed by the Council. This would deliver some 480 dwellings in the Local Plan period, a figure I consider realistic. Detailed criticisms of particular deficiencies in the Policies have been addressed in the 1999 Development Brief. Objections to the principle, other than that of the Parish Council, do not appear to me sustainable in the light of clear structure plan guidance. Positive acceptability will be dependent on quality of design, landscaping and interconnection between old and new Wootton. The very large present-day village should become a larger settlement in the country, better planned as a whole, with positively enhanced facilities. I see no good visual or planning reason to remove the "landscaping/Open Space" designation from the large and attractive hedge-fringed pond to the rear of Fields Road, Wootton.

#### Recommendation

4.1.93 I recommend that the Local Plan be modified to incorporate PIC's 183, 459 and 460, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections. The proviso to this recommendation is that the wording of the Adopted Local Plan should reflect any tangible alteration to the Council's thinking produced by consultation between village representatives and the Council from December 1999 onwards.

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## POLICY H13 – LAND OFF ROUSEBY ROAD, STEWARTSBY

### Objections and Key Issues

4.1.94 David Wilson Estates Ltd 144/33, VE Parrott (Oakley) Ltd 273/7, Bellway Homes Ltd 275/2, Bedfordia Developments Ltd 293/19, Martin Grant Homes (UK) Ltd 294/3, Phillips Planning Services 342/1, Bedfordshire County Council 436/6, City and St James Property Ltd 456/18, 77- /78 & /98, Cyclists' Touring Club 711/5, David Wilson Homes 998/15 & /24, Old Road Securities plc 1022/1, D Stewart 1076/3, City & County Developments 1077/1

in para. 5.35 the approved Development Brief is now out of date and not suitable basis for policy

330 dwellings off Rousebury Road inappropriate: too large, poor environment, dust and smell problems, divorced from main highway network, unable to attract a local rail station, and will need to provide disproportionate package of village facilities to make up for existing poor provision; demand for housing is limited

develop more satisfactory cycle layout; integrate with major new route through the Marston Vale; mention developer contributions

policies do not adequately address the minerals and waste context

mention provision of adequate facilities at lower and middle school level

reword the policy to take account of the realities of Circular 1/97

Proposals Map Inset 36 is far too detailed; just show main uses/roads/footpaths

do not adopt Stewartby Development Brief

### Council Reply

4.1.95 The Council's written response is contained in Document BBCEV 18, 27, 28, 430, 458, 488-489, 501, 528, 823, 892-894, 946 and 1243-1244.

### Appraisal

4.1.96 Stewartby was built as a company village in the 1920's with a form and layout based on garden city principles. It can be affected by the smell of brick-firing from the large manufactory in the village, but there is no serious evidence that the smell or nature of the emissions from these operations have any materially adverse consequences for the health or wellbeing of the local population. The village lies within the adopted Structure Plan's defined South West of Bedford Strategic Corridor, a focus for housing and economic development.

4.1.97 Proposals for development were omitted from the adopted Local Plan of 1993, on the recommendation of the Local Plan Inspector, until the working out of a strategy and

programme to realise the long-term potential of the Marston Vale. The adopted Structure Plan, the Marston Vale Strategy and Community Forest Plan, the Minerals and Waste Local Plan, and the Deposit Plan together perform this function. The village has the planning advantages of a rail station on the Marston Vale line, and proximity to the A421 and B530 road corridors. The village, has many attractive features of design and layout, and it is difficult to see any other significantly different area for expansion than that shown on the Proposals Map. In the absence of convincing alternative proposals from City & St James, I see no reason to alter the form of designation on the Proposals Map Inset.

4.1.98 The reference to the 1992 Development Brief in paragraph 5.35 seems to me unhelpful as worded, nearly a decade after its preparation in a different planning context. It should be omitted, or qualified by reference to a successor Brief.

4.1.99 The Council has put forward PIC 461, revising and extending the criteria underlying the development of some 330 new dwellings . The Council has met the objection that it had not addressed the implications of the planning permission for clay extraction from Broadmead Pit, in a new criterion (xiii). There seems to me to be no real need for the policy to address school or cycling matters specifically, nor to set ambitious targets for developers in building significant parts of a Borough cycle network. The PIC responsibly phases development in step with proportionate road improvements in the immediate area of the A421 corridor.

4.1.100 I have no doubt that the Council's anticipated development of 330 dwellings here could eventually be achieved, even exceeded. At the end of my Inquiry the Council's position was that an application for development was close to resolution. However, it is obvious that the site will not be among the fastest in the Borough to progress, given its location, the local environment, and the linkage with roadwork contributions. I much prefer the objectors' assumptions of a development of about 50 dwellings per year, with first completions from summer/Autumn of 2002, to the Council's estimate of a rate of some 60 dwellings per year with first completions in early 2002.

#### Recommendation

4.1.101 I recommend that the Local Plan be modified to incorporate PIC 461, as set out in Core Documents 11, 11A and 11B, and that reference to the 1992 Development Brief in paragraph 5.35 be altered as suggested in my paragraph 4.1.98 above, but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICIES BE5 & H15 – LAND OFF NORTHAMPTON ROAD, BROMHAM

##### Objections and Key Issues

4.1.102 David Wilson Estates Ltd 144/39 & /73-/74, Martin Grant Homes (UK) Ltd 294/9, /13, /15-/16 & /20-/22, British Horse Society 369/21, Old Road Securities plc 393/15 & /61, Bromham PC 443/1, Cyclists' Touring Club 711/7, David Wilson Homes 998/18 & /30

objectionable extension into open countryside with no clear physical boundaries; sets a bad precedent for further development; delete in favour of land between Stagsden Road and the bypass

delete and substitute field east of the stream that runs N/S though this area

restore the number of houses in the Draft Plan on land west of Northampton Road; Given the delays at H6, H7 and H8, land on the western side of Bromham up to the A428 should be

within the SPA and allocated for 245 dwellings; this should be mentioned in Table H3; transfer 200 dwellings from H8 to prevent coalescence and improve village facilities; no relevant fundamental change in Structure Plan since Draft Plan published

land south of Bedford Road should not be in the ASR; in 2.50 it is not clear why Bromham is not described as within a preferred location

Delete triangular parcel of land defined by Bromham bypass, Stagsden Road and existing housing

an offsite bridge across the A428 should be mentioned in (iii); site needs special treatment and bridleways should not be subsumed

contribution to western bypass should be expected from developers of land off Northampton Road

should mention cycle provision; show Bromham Bridge for cyclists, buses and pedestrians only; show cycle route along Lower Farm Road as a strategic route; bridleway could be a means of foot/bike access to the site

#### Council Reply

4.1.103 The Council's written response is contained in Documents BBCEV 51, 52, 432, 450, 895-896 and 951-952.

#### Appraisal

4.1.104 There is strong support from the Parish Council for the extended allocation of site H15, as proposed by Martin Grant Homes, with a concomitant desire to have a wider gap between the village and the H8 allocation. The Parish Council, having initially opposed major development hereabouts, now views an extended H15 site as the last appropriate site for major development in the village, and one capable of delivering a number of planning gain elements to enhance or provide village facilities. I have the already considered the Parish Council's concerns about the extent of H8 in paragraph 4.1.66 above.

4.1.105 Until the adopted Structure Plan set out a new locational strategy, an enlarged H15 allocation such as Martin Grant Homes now seek was favoured by the Council and set out in the Draft Local Plan. Bromham is an "A" village in Deposit Plan terms, and has received a good amount of new housing in recent years. I agree with the Council that the adopted Structure Plan's preference for maximisation of the development potential of urban areas and the defined strategic corridors changed the planning assumptions for Bromham radically. Not fitting those criteria, a development of some 245 dwellings on the western edge of the village becomes a major anomaly, given the context of rural restraint policies. I sympathise with the views of the Parish Council in wanting a measure of certainty about future development and in welcoming the prospect of additions to community facilities. Of course, the objection site would cater mostly for non-local need, but it has to be borne in mind that the village is only 4 km from Bedford Town Centre: close to the town but not capable of definition as being on the urban edge in a way that would satisfy Policy 33 of the adopted Structure Plan..

4.1.106 Not surprisingly, having previously endorsed development on the Martin Grant objection site, the Council brings forward no specific visual or landscaping objections of any substance to oppose the loss of open land. This is agricultural land in active use, but there are no strong land quality arguments in front of me against development. The allocated site is part of a tract of open countryside stretching westwards from Northampton Road to the A428. I agree with some objectors that any further expansion west of Northampton Road opens up an attractive line of argument: that the only logical eventual stop to development is along the east side of the A428. Nevertheless, I consider that the allocation is defensible in this Plan period: it comprises a form of rounding-out of the village limits to correspond with the caravan

park immediately to the south, and is bounded by field hedges and Bromham Brook. The existing screening would be reinforced and the Northampton Road frontage would retain a strip of open land.

4.1.107 The objection site is close to the H6, H7 and H8 sites that would lie within the Bedford Western Bypass. I have read evidence about the differing socio-economic factors affecting the property market in the District. I would agree that the large villages outside Bedford town, though far from being compact or particularly picturesque, are perceived by many as more desirable places to live, and that this is broadly reflected in price levels. It may well be that sites H6, H7 and H8 are seen by most potential buyers as urban, in a way that land at Bromham is not. However, in this Plan period, I see it as plain common sense to avoid allocating more land than is strictly necessary for housing in locations close to, and offering potential alternatives to, the major housing and infrastructure sites at the core of the Local Plan strategy.

4.1.108 In arriving at my conclusion I acknowledge that Martin Grant Homes would be willing to make a number of tangible financial contributions to the completion of the A6-A428 link, to other road improvement works, to local bus services – including park and ride, and to cycle and pedestrian links. These are projects that, if implemented, could ensure that development of an enlarged H15 need not make the traffic situation worse. However, they do not outweigh the substantial reasons to oppose development at Bromham over and above the Deposit Plan allocation in this plan period. Though there is a significant housing shortfall in the Deposit Plan's provisions, arising from problems of deliverability, development here would deflect housing demand from key allocated sites where essential roads infrastructure, otherwise unobtainable from the public purse, can be provided.

4.1.109 None of the other objections is sufficiently weighty to justify alteration of the text in the Deposit Plan; this already has flexibly drafted key principles capable of satisfying elements of their objections. No objector sees problems in developing the allocated site for around 45 dwellings within the Plan period.

#### Recommendation

4.1.110 I recommend that no modification be made to the Local Plan in respect of these objections.

#### POLICY H16 – BROMHAM HOSPITAL SITE

##### Objection and Key Issue

4.1.111 Bromham PC 443/4

The revised area for the proposed development is not the existing footprint of buildings and should be revised as per the appeal decision of June 1995

##### Council Reply

4.1.112 The Council's written response is contained in Document BBCEV 52.

##### Appraisal

4.1.113 At the end of my Inquiry the Council stated that a s.106 obligation was close to completion on a planning application for 65 dwellings on this site, which had otherwise been given consent. In these circumstances I see no point in investigating an objection overtaken by events.

#### Recommendation

4.1.114 I recommend that no modification be made to the Local Plan in respect of this objection.

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#### POLICY H17 – CLAPHAM FOLLY, CLAPHAM

##### Objections and Key Issues

4.1.115 Environment Agency Central Area 319/21, Mr EDM Peacock 190/1, FRCA 320/3, Administrators of F P Tinsley dec'd 349/11, Oakley PC 423/3, Cyclists' Touring Club 711/8, National Grid Company 714/2, D Stewart 1076/8

first sentence of para. 5.42 not correct concerning foul water drainage

include additional land north of allocation, with buffer planting

delete as will cause loss of high grade agricultural land

provide a safe crossing for pedestrians and cyclists, and other amendments to Proposals Map Inset 9 concerning cycle routes

avoid the allocation; it tends to merge Clapham and Oakley

delete (ix) as BE47 is unacceptable and safety clearances are legislated for elsewhere

Clapham figure in Table H3 should be amended to read 250 dwellings

delete Clapham Folly site from Table H3 on grounds of sustainability, exacerbating traffic problems and inability to be integrated with rest of village

##### Council Reply

4.1.116 The Council's written response is contained in Documents BBCEV 6, 123, 433, 793, 794, 825, 826 and 969.

##### Appraisal

4.1.117 In September 1998, the Council put forward PIC193, rewording some of the key principles of development in the Policy. This produced Counter Objections from St Albans Diocesan BOF 292/P13 and Old Road Securities plc 393/P105. A planning consent, subject to a s.106 obligation, was issued by the Council on 23 September 1999, which should produce 170 dwellings in the plan period, and the Policy will be omitted from the adopted Local Plan. In so far as an objection refers to cycle routes on the Proposals Map inset, these are matters best dealt with in a review of the Council's Cycle Map, not the local plan process.

##### Recommendation

4.1.118 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### POLICY H18 – NEW ROAD, GREAT BARFORD

##### Objections and Key Issues

4.1.119 Mr P Southall 106/2, Laing Homes Ltd 134/3, B Bell & E Smith 137/1, Wimpey Homes Holdings 265/5, Mr & Mrs J Parrott 340/1, Davison & Sons 348/1, Mr I Geary 1112/4

delete; important visually as open area on village fringe; setting to the conservation area harmed; poor relation to settlement; loss of good farmland

fundamentally unsatisfactory: over-influenced by planning gain

realign SPA boundary with the existing High St built environment and consider alternative scheme on Roxton/Addington's Road

amend to encompass College Farm barns allow for extension to bowling green and safe positioning of access roads; there should not be social housing

#### Council Reply

4.1.120 The Council's written response is contained in Document BBCEV 36, 50, 58, 64, 70, 145, 490 and 953.

#### Appraisal

4.1.121 The position concerning this site at the end of my Inquiry was as follows. The Council granted outline planning permission on 14 April 1999 for the residential development of the site, with an extension to the existing bowling green, a car park for village use and public open space. Buildings at College Farm form part of the application, though excluded from the allocation site. MAFF/FRCA did not object or require a survey when consulted on the application. Wimpey Homes Holdings took legal action and the permission was rescinded on 14 July. However, it was re-determined on 22 September, and approval given, subject to the signing of a s.106 obligation.

4.1.122 On the information available, there seems a very strong prospect of the site being granted planning permission before the receipt of my report. Should that not be the case, I now consider whether there are matters of principle important enough to mark the site out as unsuitable for development.

4.1.123 The Council's justification is that the development of 25 dwellings here is modest in number and scale, and can be accommodated despite severe highway constraints in the village. I agree that the position of the site away from the A421 may allow traffic generated from it to be more evenly spread over the local highway network. There would be some added flow in the Conservation Area west and south of H18, but this would in itself be unlikely to detract from the preservation or enhancement of its character or appearance. There are bus stops serving Bedford close at hand, although the site is some hundreds of metres from the more frequent express bus route running along the A421. This is not a strong point for or against the allocation. Access to school, medical centre, general store and Post Office, all within about 750 m, seems not unreasonable in the context of a large village like this.

4.1.124 The site makes an incursion into open countryside under arable cultivation, and does not have a northern boundary based on a hedge or road. Both factors go into the planning balance on the negative side. More positively, the policy's sub-para.(iv) envisages extensive structural landscaping, which would serve as a clear planning argument against proposals for yet further incursions into the open countryside in the foreseeable future.

4.1.125 Visually, the site is outside the aegis of the River Protection Area, separated from the Ouse by a road and a wide area of land. There seems to me to be no matter of strong visual principle in developing north of the church and its graveyard. The built form of the village is quite wide in the vicinity of the church. There is recently built housing near the church, to the north-west; consequently, the church does not depend for its intrinsic interest or local importance in occupying an unchallenged position on the village edge. For my purposes, I do

not need to undertake detailed consideration of the merits of the elements of planning gain in the overall proposals. In any event, the visual acceptability of the whole package of proposals will depend on how well any detailed scheme is designed, set out and landscaped.

4.1.126 Overall, I find no adverse planning factor among the objections strong enough to overturn the principle of the allocation.

#### Recommendation

4.1.127 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### POLICY H19 – LAND AT YELNOW LANE, SHARNBROOK

##### Objections and Key Issues

4.1.128 The Phelps Family 218/5, Mr & Mrs PJ Garbett 240/1, P Davison 283/1-/2, CV Rolton 307/1, AD Ledger 327/1, BC Fletcher 330/1, G Harrison 341/2, Mr AC Thompson 446/1, Mr & Mrs DC Neal 450/1, D Andrews 465/2, Unilever Research 712/1-/2, GM Hogg 794/1, Mrs EO Thompson 828/1, Parkbury Investments Ltd 1078/1, BJ Sherwood 1104/1, Dr A Penman 1114/1, AA Marler & AG Thelwall 1152/2-/3, Mrs C Bavington 1206/1, N & J Wood 1208/1

delete; other land is available; harm to setting of village

woodland would be destroyed by access off Yelnow Lane; H19 is a Country Wildlife Site

unsustainable; would add to traffic journeys

should be only bungalows; too much affordable housing

added danger at junction Odell Road/Yelnow Lane

access and road layouts need detailed consideration; worry about detailed integration of new elements of development because of inadequate consultation

large area behind Woodlands could be future infill area

area H19 seems inaccurately shown on Proposals Map

modify to allow inclusion of land at Yelnow Farm

##### Council Reply

4.1.129 The Council's written response is contained in Document BBCEV 102, 115-116, 392, 394, 405, 409, 491-492, 827-831, 897-899 and 1000-1001.

##### Appraisal

4.1.130 Sharnbrook is a village away from the urban area, and not within a strategic corridor as defined in the Structure Plan. However, this "A" Village has above-average community facilities, and Unilever runs a very significant establishment on the village outskirts. Factors such as the large Conservation Area and the need to avoid encroachment into the sensitive River Protection Area restrict the choice for new housing sites. Given these constraints, and having looked and studied evidence for alternative sites put forward by objectors, I have come



to see H19 as one of the two "least bad" village housing sites, despite its undoubted nature interests.

4.1.131 The Council's evidence is that detailed discussions between interested parties have brought about a draft unilateral undertaking that would constrain any planning permission. The effect of this should be that development, incorporating most of the existing well planted boundary along Yelnow Lane and other peripheral screening, would be balanced by the preservation in perpetuity of adjoining open land, including the wooded area forming part of Castle Close. This is an environmental trade-off, but no worse than on any other site available in Sharnbrook. Part of the large area of valuable undeveloped land that penetrates and enhances the village would be lost. However, my many visits to Sharnbrook suggest to me that the loss of this particular area will probably impinge least on village residents and visitors; though well-integrated with the rest of Sharnbrook, it is reached off a cul-de-sac and relatively unvisited. There is no credible or detailed evidence that access or increased vehicular activity from a development of 25 dwellings would cause material problems, or that this amount of housing need look out of place, if well designed and set out sensitively on site.

#### Recommendation

4.1.132 I recommend that no modification be made to the Local Plan in respect of these objections.

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### POLICY H20 – LAND SOUTH-EAST OF SHARNBROOK UPPER SCHOOL

#### Objections and Key Issues

4.1.133 TJ Goldsmith 125/1, The Phelps Family 218/6, Mr & Mrs PJ Garbett 240/2, G Luddington 252/1, Bedfordia Developments Ltd 293/8, CV Rolton 307/2, G Harrison 341/1, Sharnbrook PC 372/1-/2, Mr & Mrs DC Neal 450/2, D Andrews 465/1, Unilever Research 712/3, GM Hogg 794/2, JA Hughes 1059/1, Mr & Mrs D Clayson 1108/2, Mrs C Bavington 1206/2, N & J Wood 1208/2

will increase traffic and danger in Odell Road and destroy village atmosphere and former conservation areas

intrusion into open countryside blighting adjoining property

need for a principle to reduce light pollution from this development at night

choose a safer site along the A6 instead

in the development criteria delete reference to "other highway improvements"; dedication of adjacent land for school purposes not necessary, nor off-site footpaths and cycleways; affordable housing should be linked to local needs

village already big enough; delete

disproportionate development in relation to entrance to village and existing housing in Odell Road

allocate half of site for school use next to school car park; would allow more school parking and a "loop road" system to replace two way flows; line of the SPA to be adjusted accordingly

the section of H20 land next to Sharnbrook Upper School car park – about half the field - should be excluded from the SPA for school use

added danger at junction Odell Road/Yelnow Lane

access and road layouts need detailed consideration; worry about detailed integration of new elements of development because of inadequate consultation

#### Council Reply

4.1.134 The Council's written response is contained in Documents BBCEV 108, 115, 397, 405-6, 409, 493, 795-7, 832-6 and 1002-1005.

#### Appraisal

4.1.135 The Council has put forward PIC's 13 and 195. These amended the boundary on Inset 32 to exclude the land allocated for school purposes, and included an area of land in the north-west corner of the site for school use (parking and circulation), reducing the capacity of the site to 41 units. The changes produced Counter Objections from Bedfordia Developments Ltd 293/P43-P44, Sharnbrook PC 372/5, N & J Wood 1208/P3 & /P5, Mr & Mrs G Assim 1238/P1 and Sharnbrook Tiny Tots 1247/1.

4.1.136 All the objections and counter-objections have been overtaken by events outside my Local Plan Inquiry. After a planning inquiry of November 1999 into appeals by the Ibbett Trust/Bedfordia Developments, outline planning permission was granted by Inspector Holland on appeal for two developments. One was the residential development of H20, without the provision of land in the north-west corner of the site for school parking and circulation. The Inspector considered the site might yield about 45 dwellings, and I accept that figure for my calculations. Ten were to be affordable housing units. A planning obligation would contribute to a footway/cycle link to the centre of the village. The other development allowed was the use of a long strip of agricultural land immediately south of the recent 6<sup>th</sup> form centre for parking, with ameliorating landscaping.

4.1.137 As a consequence PIC's 13 and 195 are invalidated. Through PIC 466 the Council wishes to ensure that Table H3 of the Housing Chapter would be amended to take account of the 45 dwellings stemming from this decision. The Council would also amend the wording of key principle (iv) of the Policy in the Deposit Plan to refer to a "contribution to" an improved footpath and cycle way to the centre of the village.

#### Recommendation

4.1.138 I recommend that the Local Plan be modified to incorporate Pre-Inquiry Change 466 and other rewording described in para. 4.1.137 above, but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICIES H21, BE38 & E17 – LAND BETWEEN A6 AND LUTON ROAD, WILSTEAD

#### Objection and Key Issues

4.1.139 Wilstead PC 44/1, David Wilson Estates Ltd 144/63-65, Martin Grant Homes (UK) Ltd 294/10, BE Crouch 331/1, Mr & Mrs JF Boston 457/1, Mr KG Cook 777/1, Westbury Homes (Holdings) Ltd 1032/2, Mr & Mrs R McCartie 1070/3, Mrs T Ward 1188/1

improvement to junction of Bedford Road/A6 and a cycle route needed; employment with the housing not needed: aesthetic objections, with noise and parking problems; already enough affordable housing

no need for MVCF designation washing over village; development site should not extend west of A6

the provision and amount of landscape and open space on H21 site is excessive

village development would be better on the retained open spaces

excessive development for this village; danger of sprawling ugly village

land north-east of H21 should be allocated

question need for employment allocation at Wilstead

#### Council Reply

4.1.140 The Council's written response is contained in Documents BBCEV 130, 324, 454, 459, 494, 495, 1006 and 1007.

#### Appraisal

4.1.141 A planning application for 86 dwellings on this site was approved by the Council in November 1999, subject to completion of a s.106 obligation. I know of no reason why the allocation should not be fully built within the plan period. The detailed application stage should allow most of the detailed objections to the scheme to be addressed. The 11 live/work units which form part of the scheme are approved at the edge of the development. Land west of the A6 is to be given over to community forest use, which appears to me an entirely positive feature. It should be entirely possible to avoid the creation of a hard edge to the southern end of the village. I find that none of the proposed additional, or alternative, sites put forward by objectors in this long linear village has any significant planning advantage over the allocated site.

#### Recommendation

4.1.142 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### POLICY H22 – LAND OFF THE MEADWAY, HARROLD

##### Objections and Key Issues

4.1.143 Environment Agency Central Area 319/27, Harrold Action Group 299/1, A Clamping 360/1, Old Road Securities plc 393/60

para. 5.46 should mention adjacent land prone to flooding

development is unsuitable for village as a whole; current road system unable to cope with additional traffic generated; certain aspects impractical

fears about effects on amenities of immediate surroundings: future of site's mature trees, extent of landscaping, measures to restrict access to Dove Lane; query about need for more housing in village with no extra employment

is site really available; has not come forward since 1993 Plan

### Council Reply

4.1.144 The Council's written response is contained in Documents BBCEV 838, 954 and 1008.

### Appraisal

4.1.145 The site was identified in the adopted Local Plan of 1993 for development. The information before me at the end of my Inquiry is that the Council has resolved to give planning permission for 40 dwellings on the site. However, it cannot conclude a s.106 obligation until the site is sold, as the Council itself is the landowner. Marketing was to take place after the close of my Inquiry. I see no intrinsic marketing or highway access problem that would prevent it being completed by the end of 2005. The Council has put forward PIC 196, so that flood risk precautions are now mentioned in paragraph 5.46.

### Recommendation

4.1.146 I recommend that the Local Plan be modified to incorporate PIC 196, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES

### Objections and Key Issues

4.1.147 Wimpey Homes Holdings 265/15, DH Barford & Co 269/9, Mrs M Wiltshire 422/1, WA Lyon & Ptnrs 1200/7, Twigden Homes, Eagle Homes & Connolly Homes 1090/16

elements of the policy not strong enough to prevent unwelcome developments around SPA's, viz. attempts to develop between 133-135 High St, Riseley

policy should presume against development, defining exceptional circumstances

excessive detail and prescription for sites for –10 or –0.4 ha; risks Plan being out of date before adoption and undermining "fall-in estimates

inappropriate to allocate small sites for housing development as here; should be considered as windfall sites through the normal development control process

insufficient residential development sites have been identified in villages

question sustainability of allocations in lower category rural settlements

there should be some development in Pavenham to sustain the village

### Council Reply

4.1.148 The Council's written response is contained in Documents BBCEV 55, 201, 203, 448 and 955.

### Appraisal

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4.1.149 My report earlier supports the specific categorisation in Policy S7 of smaller "B" Villages, which have a recognisable built-up character and basic facilities, albeit under the name of "Second Order Villages" (paragraphs 1.78-90 above). They will provide mostly sites with a very small housing total, but I can see no reason why they should not be specifically distinguished. The Local Plan's strict hierarchy of housing sites, with small rural villages at the bottom, distinguishes appropriate and proportionate development sites – as distinct from infill sites - in these smallest settlements. There is no problem in this Plan having such a policy alongside estimated figures for future windfall sites.

4.1.150 The Borough Council has consulted on possible village sites in some detail with individual Parish Councils in preparing the Local Plan, and even though it has sometimes not gone along with the latter's view, the democratic exercise is praiseworthy. The exercise will always appear arbitrary to some objectors. However, small increments of development in modest villages will not usually restore flagging or disappearing local services. The needs of local people for affordable housing can be met by an "exception" policy not reliant on a specific local plan allocation.

#### Recommendation

4.1.151 I recommend that no modification be made to the Local Plan in respect of these objections.

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### POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES

#### LAND SOUTH OF COPLE ROAD, CARDINGTON

##### Objections and Key Issues

4.1.152 SC Whitbread 375/3, CG Pooler 837/1, Bedfordshire County Council 985/1,

can accommodate 10 dwellings and go deeper than the road frontage; delete provision of car parking for the chapel, unrelated in Circ. 1/97 terms;

track shown in middle of proposed housing should stay as it is, as a right of way to the smallholding land

##### Council Reply

4.1.153 The Council's written response is contained in Documents BBCEV 256, 451 and 1009.

##### Appraisal

4.1.154 The Council has put forward PIC 197, adding new text about the need for an access to adjacent agricultural land. The allocation is at this stage for 5 dwellings only, because of the Council's perception of possible noise effects from a nearby grain-dryer. This may be over pessimistic in practice, but I find no need to alter the policy wording for such a small allocation, where detailed negotiations may lead to a higher number of dwellings on the site being acceptable.

#### Recommendation

4.1.155 I recommend that the Local Plan be modified to incorporate PIC 197, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES

### WILLINGTON ROAD, COPLE

#### Objections and Key Issues

4.1.156 DG Brooks 52/1, L Pompa 58/1, Mr & Mrs K Gower 153/1, Ms C Tombs 181/1, K Gower (Petition) 194/1, BJ Ebbs 244/1, Mr & Mrs Stephens 462/1, D Milligan 787/1, Mrs M Pegg 795/1, WC Baines 799/1, JM Smith 800/1, Mr & Mrs M Gallant 802/1, Mrs J Faulkner 810/1, P & A Cavener 811/1, Ms S Murdoch 812/1, SJ Bradbury 814/1, KJ Brooker 824/1, Mrs C Road 826/1, Mr & Mrs KJ Gale 827/1, Mr & Mrs RT Francis 829/1, R Parsonage 830/1, Mrs Scott 834/1, Mr & Mrs K Moore 835/1, Dr PR Bunkall 842/1, CJ Lightfoot 843/1, Mr & Mrs R Fitch 852/1, M Perman 854/1, Mr & Mrs PD Thorman 855/1, Mr & Mrs McEwan 873/1, Mr & Mrs M Skipsey 876/1, Mr & Mrs Mills 882/1, VM Janes 903/1, H Butterick 904/1, Mrs ME Cooke 906/1, Mr & Mrs S Pay 913/1, ARJ Fisher 931/1, Mr & Mrs A Metcalfe 932/1, Mr & Mrs AN Stephens 935/1, E Bevan 940/1, Mr & Mrs A Collis 941/1, JN Walker 1013/1, GW Blenkin 1028/1, Y Collins 1041/1, Mrs J Ebbs 1086/1, JM Watt 1100/1, Mr & Mrs NP Jenkins 1198/1

too near adjacent dense housing; visually prominent and valuable open space next to Cople Wildlife Open Woodland

grade A1 agricultural land

fear of larger development to come in the field; if developed, wants mixed cost housing with gardens of similar size to others in the road

village lacks facilities and cannot accommodate more housing; school will be over-crowded

adverse effect on character of village

no more than 8 houses

should not be housing association or rented property

#### Council Reply

4.1.157 The Council's written response is contained in Documents BBCEV 257-261 and 1010-1050.

#### Appraisal

4.1.158 The Council has properly put forward pre-Inquiry Change PIC198, deleting the plan text, and the notation and allocation on the Proposals Map, following the building of 6 permitted dwellings on the site.

Recommendation

4.1.159 I recommend that the Local Plan be modified to incorporate PIC198, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES

### LAND AT WEST END LANE, ELSTOW

#### Objections and Key Issues

4.1.160 Elstow PC 303/4, SC Whitbread 375/4

delete; suggest restoration/conversion of old farm buildings with farmland staying open

could be a small, sympathetic retail unit on the site on the site of the undistinguished barn

#### Council Reply

4.1.161 The Council's written response is contained in Documents BBCEV 288 and 497.

#### Appraisal

4.1.162 The Council has put forward PIC 199 to emphasise the sensitivity of this gateway site at the periphery of the Elstow Conservation Area. I agree with the Council that the site could be modestly developed, if this were done with the greatest sensitivity. Bearing in mind the very low visual quality of the new development a short distance east of the conservation area, I hope that the Council do insist on quality here. I see no reason to remove mention of the need to retain the pleasing barn/farm building from the Plan. Its retention, if at all possible, could only complement two or three new dwellings.

#### Recommendation

4.1.163 I recommend that the Local Plan be modified to incorporate PIC 199, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES

### LAND OFF PAVENHAM ROAD, OAKLEY

#### Objections and Key Issues

4.1.164 Mr & Mrs Childs 1153/1, The Smart Family 1157/1, J Sansom 1185/1

concern at erosion of green belt/area of landscape value, drainage/waterlogging problems, and access on busy road

unsuitable as near main rail line; undesirable and harmful village expansion; traffic increase on A6

### Council Reply

4.1.165 The Council's written response is contained in Documents BBCEV 202, 1052 and 1249.

### Appraisal

4.1.166 This would be the only allocation in a village with good local facilities, but one where any major expansion runs up against strong constraints. Perhaps the two most obvious are the proximity of the Ouse and land at the river edge north and south of the village, and the need to continue effective separation of Oakley from Clapham. Though open land, the site seems to me to occupy the last acceptable expansion site on Oakley's northern edge, before encroaching on land that is obviously within the riverine setting. It is opposite a line of existing dwellings and, if generously landscaped, could reinforce the perception that it is a final northern boundary point. The Council has put forward PIC 468, which mentions what might be real noise problems on site from the railway. It remains to be seen how difficult this problem might be, but I do not see it as a sufficient reason to remove the site from the Plan.

### Recommendation

4.1.167 I recommend that the Local Plan be modified to incorporate PIC 468, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## **POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES**

### LAND OFF SANDYE LANE, SWINESHEAD

#### Objection and Key Issue

4.1.168 Mr & Mrs TD Salter 1139/1

development objectionable

#### Council Reply

4.1.169 The Council's written response is contained in Document BBCEV 205.

#### Appraisal

4.1.170 This is a small entrance site on the north side of the village, within the conservation area and requiring sensitivity of design, layout and landscaping. It appears to me that it is only the indifferent execution of a scheme, rather than the principle, which could adversely affect the village. I find the wording of the key principles quite adequate.

#### Recommendation

4.1.171 I recommend that no modification be made to the Local Plan in respect of this objection.

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POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES

LAND OFF ROTTEN ROAD, AND OFF KEYSOE ROAD, RISELEY

Objections and Key Issues

4.1.172 Mr & Mrs DA Chapman 12/1, Riseley PC 243/1 VE Parrott (Oakley) Ltd 273/12

(vii) would extend development limits and invite further expansion between Keysoe Rd and Bowers Close as well as the other side; should not be permitted

say development of land to the rear will not be permitted

Rotten Row has inappropriate immediate setting; is distant from main services; has need for disproportionate off-site highway improvements

Council Reply

4.1.173 The Council's written response is contained in Documents BBCEV 204, 1053 and 1248.

Appraisal

4.1.174 The Council has put forward PIC's 200 and 201 in respect of these two sites. The first removes mention of the Rotten Row site following planning permission and completion of the 4 dwellings allowed. The second stiffens the key principle for the Keysoe Road site by saying that development behind the frontage will not be permitted. It is certainly true that the Keysoe Road allocation has brought in its wake other objections, seeking development in greater depth to the north-east of that allocation. However, if only four roadside dwellings are built and landscaped appropriately, that will be seen as no more than development of a linear nature, along the frontage of a road where two further large buildings already line the roadside to the south-east of the allocation.

Recommendation

4.1.175 I recommend that the Local Plan be modified to incorporate PIC's 200 and 201, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES

NEWTON ROAD, TURVEY

Objection and Key Issue

4.1.176 Mr & Mrs KP Short 1204/1

poor position and dubious sub-structure

Council Reply

4.1.177 The Council's written response is contained in Document BBCEV 1054.

#### Appraisal

4.1.178 Planning permission for 16 dwellings was given by the Council in March 1999, and the site is now under construction.

#### Recommendation

4.1.179 I recommend that no modification be made to the Local Plan in respect of this objection.

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### POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES

#### LAND R/O CHURCH ROAD, WILLINGTON

##### Objections and Key Issues

4.1.80 R Golder 6/1, Mr KB Walkden 20/1, RH Collier 33/1, IM Gibbs 35/1, SD & PJ Butcher 36/1, JC Hawkins 46/1, Mr & Mrs RJ Lee & Family 139/1, Mrs J Primiano 179/1, Willington PC 245/2, Beazer Homes (Bedford) Ltd (Mr M Lord MP & Mrs JM Lord 333/1 & /3, T Monaghan 338/1, Old Road Securities plc 393/11 and 1022/3, NP Gascoigne 477/1, Mrs J Gascoigne 481/1, Mrs EF Carter 784/1, Mr & Mrs BJMcG Butler 785/1, AJ Davis 792/1, RP Edwards 816/1, Mr & Mrs Hubbard 936/1, Mr & Mrs A Inge 966/1, A Butterwick 975/1, Mrs J Butterwick 976/1, WE Lowe 979/1, IL Parrott 980/1, RG Parrott 981/1, LF Steed 1006/1, D Bradley 1007/1, Mrs C Christopher 1097/1, Berwick Homes Ltd 1158/1, Mr & Mrs DJ Kerr 1163/1, Mr & Mrs AJ Plumbly 1166/1, G Ford 1173/1, Miss J England 1176/1, Mr & Mrs R Bollington 1180/1, AL Sharp 1181/1

adverse effects on birds and wildlife and loss of residential amenity; loss of wetland area

risk of flooding; increased traffic, safety risk and increased pollution; sub-standard access; too many houses; object to estate style housing; inadequate provision for pedestrians on Balls Lane; follow previous Inspector's decision

needs vital road improvements to accommodate traffic

no consideration made of Parish Council preferred sites

neither infilling nor small development; thus too large for the village

no evidence to support affordable housing on this modest site; already a significant benefit from enlarging the school site

new houses near old rail line would jeopardise chance of reviving services

land not derelict but abandoned by owners

offer of land for school is blackmail

gradual infill is preferable

need footpath along Balls Lane

houses backing on to cycle track could cause crime

delete maximum of 35 dwellings, as no technical factors limit site

#### Council Reply

4.1.181 The Council's written responses are contained in Documents BBCEV 118, 134-135, 407-408, 410, 496, 638-639, 839-842 and 1055-1076.

#### Appraisal

4.1.182 This allocation was the subject of PIC's 418-422, published in August 1999. These removed from the Local Plan all mention of this allocation. In brief, the site had generated considerable local opposition, a planning application had been refused and an appeal decision of December of 1998 dismissed a proposed development for some 35 dwellings, public open space, and land for a future extension of the Willington Lower School. The PIC's attracted Counter-Objections from Mr M Lord MP & Mrs JM Lord 333/P5-P9, owners of the site, taking on the objections made originally by Beazer Homes (Bedford) Ltd, whose option on the site had been allowed to lapse after the appeal decision. Willington PC 245/P10 objected to PIC 422 on the grounds that the Proposals Map should show the Important Open Space and County Wildlife Site locally. The Council rectified the CWS omission through a further PIC: 422. The British Horse Society 369/P77 was concerned that a footway/cycleway shown on the Proposals Map would be lost along with the development, but I accept the Council's statement that its use and designation is not dependent on whether the route is shown on the Proposals Map.

4.1.183 The appeal Inspector found the site to have a strong affinity with the countryside and some remoteness from the village. There is no present agricultural use of the site, which is attractively overgrown. It appears to have been partly used for gravel extraction and subsequently in-filled. He considered development would appear to encroach into the countryside. The potential benefits of an extension to the school grounds were found not to be directly related to the proposals. The site lies in what the Council calls "one of the lower category 'B' Villages", well outside the urban area and the strategic corridor as defined in the Structure Plan. Thus the Council felt able to delete the allocation without seeking a further allocation in Willington.

4.1.184 I agree with the Inspector's reasoning in his decision letter. There is no evidence that the future survival of the lower school was really dependent on the increased pupil numbers, or the virtual gift of land that could have accrued from a development on the allocation site. Even with high quality landscaping and boundary screening a developed site would still amount to an undesirable incursion in depth into open land. The Council appears to have accepted the Inspector's arguments against the proposal without reservations, and abandoned its aspiration to expand the site of the lower school. I agree with the PIC's that have been put forward, because policies of rural restraint are appropriate on the site. I do not consider that the objection land merits designation as Important Open Space. On the evidence available to me, I find nothing improper or seriously questionable in any of the actions taken by the Council on this allocation.

#### Recommendation

4.1.185 I recommend that the Local Plan be modified to incorporate PIC's 418-422 as set out in Core Document 11A.

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#### POLICY H23 – OBJECTIONS TO THE PLAN'S IDENTIFIED SMALL SITES IN THE VILLAGES

## CHURCH LANE, WYMINGTON

### Objections and Key Issues

4.1.186 Mr DW Smith 23/1, Mr & Mrs MJ Wade 141/1, D Stuart-Smith 196/1, Mr & Mrs PJ Tobutt 363/1

30 units is preferred; reference to off-site works is vague and must be made realistic

prime agricultural land site; will blight private house sales; spread increase in ones through other villages

better sites available such as existing South Grove site of Area D on Proposals Map

no demand for cheap starter homes; low density, good quality housing needed

### Council Reply

4.1.187 The Council's written response is contained in Document BBCEV 419, 1054 and 1078-1079.

### Appraisal

4.1.188 Planning permission has now been granted for the development of this allocated site and was well under construction at the end of my Inquiry.

### Recommendation

4.1.189 I recommend that no modification be made to the Local Plan in respect of these objections.

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## **CONCLUSIONS ON CHANGES NECESSARY TO POLICY H1, AND ITS ACCOMPANYING PARAGRAPHS 5.1-5.16**

### Base Data other than the allocated sites

4.1.190 I do not know what base date will be used for housing numbers in the adopted Local Plan, but at the end of my Inquiry the most up to date calculations of the Council and objectors used 31 December 1998. I also employ this date. All calculations are shown on the Table 1 on page 190 below. The entries in Table 1 are under five columns from A to E:

Column A shows Council figures for the full capacity of all sites under discussion;

Column B shows the Council estimate of the actual delivery possible from the sites in Column A;

Column C shows the figures favoured by the consultants Development Land and Planning, who acted on behalf of Objectors who include Bellway Homes, Bedfordia Developments, the Defence Estates Organisation, Potton Limited, Forthprice, David Wilson Homes and others;

Column D shows the figure favoured by two consultants: the DPDS Consulting Group and Mason Richards Planning, representing among others Old Road Securities, Connolly Homes, Eagle Homes, Twigden Homes and David Wilson Estates;

Column E contains my own estimates, made after careful consideration of all the representations.

4.1.191 Of the "Base Data" in Table 1, the total of 5004 completed dwellings is agreed by all parties at the base date. I do not consider that the Council decision to opt for an end date to the Local Plan of 2006, rather than the adopted Structure Plan date of 2011, is a matter for serious criticism. The 2006 date chosen has, as it has turned out, increased the rigour with which the issue of deliverability has been addressed by all the parties. The Council has been forced to admit that it was seriously over-optimistic about the number of dwellings that could be built in the period to 2006. The need for rapid progress on delivering sites H6, H7 and H8 has been highlighted. The complications of a change of end date are serious, and unnecessary for good land use planning in the Borough.

4.1.192 The references to "fall-in" have been revised by the Council, which has put forward PIC's 158-160. I have not disagreed with the Council identifying very modest sites in the smaller "B" villages under policy H23. There is no strong detailed evidence from objectors to convince me that an annual allowance for "fall-in" - of 75 additional dwellings gained by whatever means in each year from sites unidentified in the Local Plan - is unduly optimistic, given the past experience in Bedford noted in paragraph 3.5 of CD39D. The PIC's sensibly remove specific mention of a specific quantum from the identified Opportunity Sites in the urban area as a source of supply, which adds to the credibility of the Council's argument. However, although I agree with the Council's thinking on this matter, in view of PPG3's comments on windfall site criteria in its paragraphs 35-36, I recommend that the Council adopt the PPG's nomenclature, with suitable emendation to meet the situation in the Borough. This might profitably be done in consultation with other Councils in the county still at the plan-making stage.

4.1.193 The Council's "fall-in" calculation sits acceptably in Table 1 with the definitive total of outstanding planning permissions for 1890 dwellings at the base date, with no discrimination between smaller and larger sites. The Council has reasonably added 154 dwellings to the base data, from the Berry Farm, Wootton, and Meadway, Harrold sites allocated in the 1993 Local Plan, rather than showing the figures under the Deposit Plan allocations. It has also added "known sites" to the base data. These are 324 dwellings either given planning permission after the base date or awaiting it (i.e. Silver Jubilee School-78, Kingsway-44, Caves Yard at Kempston-30, Miller Road-c.112, Ford End Road-c.60). This is also reasonable.

4.1.194 I consider that there should be a deduction for the almost certain failure to get total implementation of all the outstanding and expected sites with planning permission. These amount to 2214 dwellings. I think a deduction of no more than 5% of this total should be made. My reasoning is that the much aired desire of housebuilders to develop scarce sites in the Borough must make them more pro-active in bringing sites to market than in some other locations. The second is that the thrust of national policy in PPG3 will tend to drive up the dwelling yield from allocated sites in a small yet appreciable way. This can already be seen in the detailed permissions given on sites such as H20 and H21, prior to the new PPG3. I see the tendency as inevitable, but still compatible with the thrust of policies BE35-BE40 in the Deposit Plan.

#### Additional housing land needed

4.1.195 I find much that is convincing in the Tym evidence given on behalf of the Council in the Deliverability Sessions, concerning past and likely trends for the immediate future. There is nothing to suggest a strong economic engine driving the Borough's economy to significant growth in the near future, above what has been experienced in the past few years. However, there may be impetus to come from outside sources – the Draft Revised Regional Planning

Guidance for the South East of December 2000 sees the Milton Keynes sub-region, which includes large parts of Bedfordshire, as a potential growth area for the foreseeable planning future.

4.1.196 Nothing diminishes the fact that the Borough is an area required by the adopted Structure Plan to take on a greater role as a provider of housing in Bedfordshire in the period up to 2011. I consider that the Local Plan must seek to allocate sufficient land to ensure the possibility of actually constructing about 11,700 dwellings in the 1991-2006 period to comply with the letter of Structure Plan policy. There must be sufficient sites to deliver completed dwellings ready for occupation, even if this means designating new sites to add to the Deposit Plan allocations. It may be that the approved Structure Plan has been over-sanguine about the prospects of achieving significant growth in the Borough population in the short term. However, I have no reason to question the longer term desirability, or feasibility, of moving the weight of new development from the Luton and South Bedfordshire area to the north of the County: a change first mooted in the Regional Planning Guidance for the South East of 1994.

4.1.197 In PPG3 of March 2000, paragraph 34 requires a local plan's proposals map to show sufficient sites to accommodate at least the first five years of housing development proposed. The longstanding absence of a 5-year housing land supply in the Borough inevitably led to planning by appeal. Continuance of this procedure is likely to produce results that go against sustainability goals and the reasoned structure Plan strategy for development of the Strategic corridor. It undermines the local planning process and local democracy. The Council's ideals of sustainability are translated into a hierarchy of desirable locations and expressed in paragraphs 2.20-21 of the Deposit Plan. In descending order they are: the Urban Area, The Urban Fringe, the adopted Structure Plan's Strategic Corridor, "A" Villages, "B" Villages, and lastly Other Settlements. These match up very well with the search sequence in paragraph 30 of PPG3.

4.1.198 One obvious reality in the Borough is the absence in the Bedford/Kempston urban area of significant brownfield land suitable for housing, other than the allocated Britannia Ironworks site (H2). The only major area of previously used land offered by objectors for housing is Shortstown, neither strictly urban fringe nor within the Strategic corridor. Thus I, like the Council, acknowledge green field sites as the major feasible source of land in Bedford Borough to meet required numbers. It is a fact that these are also generally of good or reasonable agricultural land quality: inevitable in a county well endowed with fine farmland.

4.1.199 A significant number of national housebuilders are demonstrating an apparently unfeigned interest in developing allocated and additional sites in the Borough up to or beyond the Structure Plan allocation. Though the Borough has had some low annual housing completions in the 1990's, in 1998, the last available year for which figures are available, there were 808 completions, nearly double the average figure for the three years 1995-1997. There is no definitive past trend.

4.1.200 The time has come to see if housebuilders can, without anyone to blame other than the economy, rise to the opportunity presented by genuinely available sites sufficient to achieve the structure plan target, which will require significant higher annual completions than hitherto up to the end of 2005. Should my recommendations to allocate land sufficient to complete the target still result in housing sites in the eventual adopted Local Plan not being built-out or largely developed, those same sites will be available for the next Local Plan, covering the last five years of the Structure Plan to 2011. I have found it necessary to recommend allocation of sites sufficient to build 721 dwellings in addition to those allocated by the Council. I have borne in mind the criterion that I must not choose additional sites that fly in the face of the Structure Plan strategy. Nor must I choose sites that would be too popular a counter-attraction to the early development of the key sites H6, H7 and H8. There must be no risk of delaying the speediest possible building of a new route with the capability to provide an effective western bypass for Bedford.

## **Section 4.2**

## **OBJECTIONS SEEKING NEW DEVELOPMENT LAND FOR, OR INCLUDING, HOUSING**

### Preamble

In examining the proposals below, all of which either explicitly seek or imply new housing sites, I seek to identify the least problematic sites capable of accommodating the 700+ dwellings needed to correct the deficiency in housing land supply in the Plan period to 2006. The objections about particular sites often include a number of policy headings from other chapters of the Deposit Plan. Wherever possible, I have considered them in the order they are set out in my Appendix C - Index of Representations in Plan Order - and by ascending Consultee Number, and in the following order:

- 1) within or immediately adjoining the Urban Area Boundary of Bedford Town, including those sites within Biddenham, Elstow and Renhold Parishes (up to paragraph 4.2.79 below)
- 2) then by Parish, alphabetically, from Bolnhurst to Wymington, from paragraph 4.2.80.

### NEW HOUSING PROPOSAL – BEDFORD/KEMPSTON: POLICIES S3, NE22 AND H1

#### Objections and Key Issues

##### 4.2.1 Bedfordia Developments Ltd 293/3, /27 & /42

change urban area boundary in the vicinity of North Brickhill/Freemans Common

allocate c.81 ha of land here for development: 400 dwellings, with 240 deliverable in the Plan period, in association with extensive landscaping and a 63 ha country park, and include in policy H1 and Table 3

The Council has put forward PIC 92, concerning the linear park to the north of Bedford. This has produced Counter-Objection P45 from the objector, who argues that this development is the only chance to bring about the park in this area of North Bedford.

#### Council Reply

4.2.2 The Council's written response is contained in Document BBCEV 29.

#### Appraisal

4.2.3 The concept here is of residential development surrounded by a country park area.

The objector claims that the latter would form an important part of the Council's desired linear park in this part of town, which would otherwise appear unachievable. The Council's stance is that the linear park concept is low key and its own emerging schemes for semi-formal recreational areas and access improvements in this vicinity are more to the point than the major facility offered. The objector's overall site includes some 30 ha of Council-owned land, in two parcels on the west and east flanks, but none of this is suggested for any other development than an access road.

4.2.4 In this part of north Bedford, the area of development is physically contained by rising land to the north, east and west. Existing built form follows the lower contours, with a relatively neat edge. The suggested building area would extend up to 300 m northwards from the existing urban boundary. It would all be contained below the 50 m contour, though an access road from Tyne Crescent to the west would have to run mostly above that level. The

site is surprisingly difficult to observe from surrounding roads, but can be seen from the footpath system to the north. It is not generally visible from the existing areas of Brickhill to the south. It is undoubtedly visually pleasing open land at present, largely within the valley floor of the Renhold Brook, though rising at its highest point to 68 m.

4.2.5 However, my own observations, from a number of vantage points, suggest that the topographical impact of this substantial development need not be really damaging, and that the small Cleat Hill settlement to the east would remain clearly separate from this extension to Bedford's northern fringe. There would be no visual effect on the two nearby rural settlements of Clapham and Renhold. From land to the north, the new housing would be seen against a backdrop of the developed northern areas of Bedford. The designated ASR, on and immediately around the objection site, does not, in reality, protect any entity other than Cleat Hill from the threat of coalescence. Generous landscaping around a development at the lower levels here, though no justification in itself for new development, would undoubtedly enhance its appearance, and act both as a pleasing transition and a long-term boundary to development of the urban area hereabouts.

4.2.6 The context here is a significant housing shortfall in the Deposit Plan's provisions, arising from problems of deliverability. I consider that development here would not deflect housing demand from the key allocated sites of H6, H7 and H8. In order of desirability, this sort of fringe development ranks just below behind brownfield land and urban renewal. However, the latter are both in very short supply in Bedford town. Of the 400 or so dwellings achievable here, I agree with the objectors that some 240 could be built in the Plan period. The underlying assumptions for this are that an application would follow the receipt of my report in early 2001, and that an agreement can ultimately be reached with the Council about the use of its land, despite its present opposition. There could then be development at a rate of 80 dwellings p.a., with first completions in Spring 2003.

4.2.7 The Council's contention is that this would be a "bolt-on" housing estate poorly related to public transport and other physical and social infrastructure. I agree with its contention that this is not a site that directly assists urban regeneration, but not that it threatens to encroach on the small distinct settlement of Cleat Hill, to the north-east. I concede that the actual distances to be travelled to get to jobs, education, health facilities, shopping and local services are not ideal. Unless there are revisions to bus services – which is quite possible – the furthest house on the site could be some 800 m from town centre bound bus stops. The nearest shopping centre and community facility is about 10-15 minutes walk from the centre of the site. Primary schools are beyond the 10 minute walk zone. However, given the need for more housing sites in the Borough, and the constraints of the real world, my overall conclusion is that these deficiencies are palpably outweighed by the overall planning merits of the site.

#### Recommendation

4.2.8 I recommend that the Local Plan be modified to incorporate new supporting text, a redrawn Proposals Map, and a new Policy allocating land north of Brickhill, at Freeman's Common, for the development of up to 400 dwellings, with 240 deliverable in the Plan period, in association with extensive landscaping and a 63 ha country park.

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#### NEW HOUSING PROPOSAL – BEDFORD/KEMPSTON: POLICIES NE17, H1 & H7

#### Objections and Key Issues

#### 4.2.9 Eaton Ltd 470/1-/3



The western part of the 4.7 ha Cutler Hammer Sports ground at High Street/Cemetery Road, Kempston, should be allocated for housing and not Urban Open Space, securing the future of the site for open sports and recreation

incorporate land into Land West of Kempston Development Brief

#### Council Reply

4.2.10 The Council's written response is contained in Document BBCEV 412.

#### Appraisal

4.2.11 The objector no longer seeks inclusion within the H7 policy area, due to the considerable advancement of the Development Brief. A scheme for c.35-40 dwellings on 1.74 ha of the site was dismissed on appeal in January 2000. The Council wishes to purchase the land from Eaton for public use, and sought to re-open negotiations after the appeal decision was issued.

4.2.12 The evidence is that the objector has been seeking a residential allocation of the land since 1987. It seeks to close the club operation as part of the Eaton Company's rationalisation and disengagement from the Bedford area. Closure is desired by the end of 2000. At the appeal Inquiry, the objector offered an undertaking to provide additional changing facilities on another public space at Hillsground. I also note that the reduced sports area put forward at the Inquiry could provide the same number of pitches as was previously set out on the larger site, though with smaller pitches and encroachment on a cricket outfield. The offers and revisions were sufficient to make Sport England withdraw its original objection to the appeal proposals. In these circumstances it is difficult to foresee real harm to local sports and recreational facilities if the reduced playing areas were genuinely available to the local population for the foreseeable future.

4.2.13 I have looked to see what harm might result to the physical make-up of this part of Kempston if an allocation were made as desired. I have no doubt that the sports ground is a visually important piece of open land on the urban edge of Kempston, visible from Church Walk, the High Street and Cemetery Road. – a transition between the open countryside and dwellings along High Street. The Land West of Kempston Draft Development Brief 1995(CD53) does not permit development immediately north of Cemetery Road apart from the Bypass itself. The site is also River Protection Area land under Policy NE15, where development will not be allowed to affect the landscape character adversely. Development on the west half of the site would amount to an unwelcome interpolation into a seamless flow of open land beyond the confines of urban Kempston. It is hard to see that significant development elsewhere on the sports ground would be much less damaging visually. I think it right that any further development proposals should be considered in the context of the land being subject to the Urban Open Space and RPA designations.

#### Recommendation

4.2.14 I recommend that no modification be made to the Local Plan in respect of these objections.

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NEW HOUSING/COMMERCIAL PROPOSAL – BEDFORD/KEMPSTON: POLICIES S6, H1, E12 & E13

#### Objections and Key Issues

4.2.15 UCC for Caldwell & Kingsbrook 230/5, Calendar Group 958/1-/2, County & Metropolitan Group 1010/1-3

keep the current status of the Meltis site

Add part of the Meltis Sportsfield, now under Policy NE17, to the schedule of 4 housing sites (H2-H5) within the urban area for a mixed development to include public open space

remove urban open space designation

Council Reply

4.2.16 The Council's written response is contained in Documents 814, 1126 and 958.1/H/H1.

Appraisal

4.2.17 In July 1999, the Council resolved to grant planning permission for proposals that would remove the cause of this objection. PIC 81 consequently deletes part of the Urban Open Space designation at Miller Road, Kempston.

Recommendation

4.2.18 I recommend that the Local Plan be modified to incorporate PIC 81, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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NEW HOUSING PROPOSAL – BEDFORD/KEMPSTON: PARA. 5.12

Objection and Key Issue

4.2.19 Wickes Properties Ltd 982/1

Table H3 should include land r/o London Road, Bedford, the former Builders Mate business, as a housing site; the recent grant of planning permission for a B8 use on the former Texas store should not preclude the remaining land becoming housing

Council Reply

4.2.20 The Council's written response is in Document BBCEV 1095.

Appraisal

4.2.21 The evidence is that land at London Road was included in the 1995 Consultation Draft Local Plan as site H6 for c.30 dwellings. The site was withdrawn as a proposal when new employment uses, together with parking land, were given planning permission on part of H6. I agree with the Council view that there is no longer a strong planning case for a specific allocation here.

Recommendation

4.2.22 I recommend that no modification be made to the Local Plan in respect of this objection.

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## NEW HOUSING & EMPLOYMENT PROPOSAL – BEDFORD/KEMPSTON: POLICIES NE15, H1 & T1

### Objection and Key Issue

#### 4.2.23 Lutea Trustees Ltd 1106/1-/5.

Table 3 of policy H1 should include 2 proposed housing sites north and south of the Great Ouse at Biddenham Loop, on land designated as Urban Open Space; the site is already blighted, much is part of the route corridor for the bypass road

site shown on plan DTZ3 should be an employment site

remove Lutea land west of Kempston from its designations as River Protection Area and Urban Open Space

policy T1 may adversely affect the Lutea site

### Council Reply

4.2.24 The Council's written response is contained in Documents BBCEV 863, 1122, 1128, 1167 and 1203.

### Appraisal

4.2.25 This land is subject to River Protection Area and Urban Open Space policies in the Deposit Plan. The latter policy only operates within the Urban Area Boundary. I see no reason to suppose that the proposed major housing areas of H6 and H7, to the north and south of the objection sites, will be underdeveloped with new housing. My strong conclusion is that all steps possible should be taken to set the intended housing areas on the two sites in a generous landscape context. The objector's land is in that most sensitive area of transition between H6 and H7: open land adjoining the River Great Ouse, with considerable wildlife and recreational value. The Council's Development Briefs for the two development areas (CD's 50 & 53) envisage a county park and retention of the open character of the objection land, and I can see no planning circumstance that would justify any significant building on it. The objector will have had the opportunity to submit objections to the County Council concerning the planning application for the Western Bypass

### Recommendation

4.2.26 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL – BEDFORD/KEMPSTON AT BIDDENHAM: POLICIES BE5, H1 & H6

### Objections and Key Issues

#### 4.2.27 Wimpey Homes Holdings 167/1-/2 & /4

allocate 18.61 ha of land at Gold Lane, Biddenham for some 350 new dwellings on 10 ha of net developable land with generous landscaping

immediate contribution to supply

delete land from the Area of Special Restraint

#### Council Reply

4.2.28 The Council's written response is contained in Document BBCEV 46.

#### Appraisal

4.2.29 The site lies within the Deposit Plan's urban area boundary. The site is defined to the north and east by roads, and to the south and west by field boundaries. I see no valid objection in principle to the existence of areas of open countryside within the urban boundary, if they have specific value and need protection from coalescence with other built up areas for good planning reasons. Thus, there is no automatic presumption in favour of development, merely by reason of location within the urban boundary. The settlement of Biddenham has a true village core. There has been recent enlargement by the Deep Spinney development on the west side of the settlement, and the emerging Biddenham Loop development nearby to the south has left planned - but only modest - areas of open green land in the intervening space. However, Biddenham is still a distinct entity, much valued by many of its inhabitants, and visibly and geographically more than just a suburb of Bedford.

4.2.30 The objection site, as refined after the making of the original objections, is at present used as three fields of arable farmland. A detailed visual inspection reveals that development of the scale proposed would seriously diminish the visual attractions of the village edge - especially at Church End, with its church and farm structures. By extending north-westwards, over what is now a now relatively wide rural landscape, it would much diminish the separation between this fringe area of Bedford and the nearby village of Bromham. Only the low-lying river corridor land, much less telling visually on the ground than on the map, would remain as an undeveloped entity. Any landscape or new open space benefits offered by the development - and I do not underestimate their scale or quality - would be significantly outweighed by the intrusion of housing close to the river corridor. My consideration of this matter assumes that road access to the A428 and other local roads need not be a major impediment to achieving this proposal on the ground.

4.2.31 Though there is a significant housing shortfall in the Deposit Plan's provisions, arising from problems of deliverability, development here would tend to deflect housing demand from the key allocated sites of H6, H7 and H8, where essential roads infrastructure, otherwise unobtainable from the public purse, can be provided.

#### Recommendation

4.2.32 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL – BEDFORD/KEMPSTON AT BIDDENHAM: POLICIES S3, S6, BE5, H1, H24 & H25

#### Objections and Key Issues

4.2.33 Richard Wingfield 415/7-/10, Mr J Watson 1201/2, Ian Laing 1074/1-/4,

5 sites north and south of main Road, Biddenham, could accommodate limited infilling without harm to character, loss of identity or risk of coalescence, and should be removed from the Area of Special Restraint

c.1 ha of garden land south of Main Road should be developed for 3-4 dwellings; amend the SPA boundary to follow the line of the Biddenham Loop Development Brief

2.72 ha of agricultural land south of Vicars Close, Biddenham should be in the Settlement Policy Area, removed from the Area of Special Restraint and identified for housing with associated landscaping

#### Council Reply

4.2.34 The Council's written responses are contained in Documents BBCEV 128, 136 and 475.

#### Appraisal

4.2.35 I have expressed general support for the Area of Special Restraint in considering objections to Policies S3 and BE5 above. The Local Plan and its predecessor are both concerned to achieve a considerable amount of new housing in the Biddenham Loop area without physically merging into, or extinguishing, the historic identity of Biddenham. This requires a considerable amount of artifice in separating the village visually from new development by relatively narrow distances of open land.

4.2.36 In hindsight, the northernmost housing areas at Biddenham Loop have clearly been sited uncomfortably close to village housing south of Church End. That is most regrettable, and the lesson I draw is not that that this over-proximity should be a new norm, but that the existing gaps south of Biddenham should be safeguarded more assiduously. This is best done by a SPA boundary drawn tightly round the village.

#### The Wingfield sites

4.2.37 Of the five sites, Nos. 1 and 2 are narrow gaps in the street frontage, designated as Important Open Spaces K and L. Both have footpaths along their western boundaries, and consist of attractive open avenues of grassland between adjoining properties. Both sites give on to paddocks, with longer views beyond to playing fields. In their context, the spaces themselves are visually special, and easily seen from the street over the existing field gates. I realise that the landowner could alter the appearance of the sites to make them less attractive than at present, but they are undoubtedly "important" as both spaces and views in their local context.

4.2.38 Wingfield site No. 3, I discuss under the Watson objections below. Site No. 4 is fronted by substantial hedging and the property of "Ramsmead", and is grassland. Seen through the boundary planting, there are pleasing views to be obtained to the south, designated as IOS's C and D. This is a substantial open site with positive visual virtues, due to the flow of open land into this point in Biddenham. Wingfield site No. 5 is the only one on the north side of Main Road: a small hedge-lined field which is part of a much larger area of open land. The suggested northern boundary is a path within a field, running east-west over the open land. Access to the site would be through Important Open Space J. As the frontage of Main Road is already lined with houses, save for the IOS, development on the site would be in depth, with the prospect that it could spread still further northwards over the larger field area at a later date. Any development on a site of this size would be inappropriate in a "B" Village, and the loss of a pleasing, valuable and vulnerable open vista would compound the harm.

#### The Laing site

4.2.39 The objection land has the obvious character of a rural field enclosed by trees and intermittent hedging. Development would bring new development nearly 80 m southwards into the narrow gap area. The land appears to be regularly cropped at present, but its financial viability is denied by the objector. It is distinct from the character and developed form of the

southern edge of Biddenham village. All its peripheral areas to the south, east and west are open land.

4.2.40 I regard it as a significant part of a structural open space, defined as such in the Biddenham Loop Development Brief. The fact that it is not part of the "active" open space area occupied by the recent golf course does not make it less important functionally. The objector has made an articulate argument for development to take the form of private sector sheltered housing, well designed and built at a low density. Despite the significant housing shortfall in the Borough, there are certain open areas that are too precious to lose. This is one of them.

#### The Watson site

4.2.41 The objection here is another example of the development pressure to extend Biddenham southwards, narrowing the important gap between the settlement and the golf club housing. The objection site consists of garden land, a paddock, and land behind 43 Main Road (where a bungalow was being built at the time of the Inquiry, the result of a successful appeal decided after the local plan objection was made). To reflect reality, the Council proposes to amend the SPA boundary and delete the ASR designation on the bungalow site through PIC's 513 and 515. Wingfield site No. 4 encompasses this site, with the addition of a tranche of open arable land running east-west from the south-easternmost corner of the Watson site.

4.2.42 Paragraph 4.6 of the adopted Biddenham Loop Development Brief states the intention that all the area between the village and the proposed development should remain essentially open in nature. The objector makes the point that the south and east sides of the objection site are bounded by hedging; also, that the site is the only area of land on this side of Biddenham that is neither within the area of land designated as a golf course/open space within the Development Brief, or the area of IOS to the east. That is so, but I find that detailed consideration of the SPA boundary for this Deposit Plan has clearly concluded that this sizeable parcel of land is not intimately connected with the main built framework of the village, though functionally within it. It is thus best considered as part of the buffer of open land to the south. It helps, as the Council aptly puts it, to create a soft rural edge to Biddenham. The additional Wingfield land is clearly open agricultural land, with a valuable function as part of the gap southwards.

#### Recommendation

4.2.43 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSALS – BEDFORD/KEMPSTON AT ELSTOW: PARAGRAPH 2.29, POLICIES S3, S5, S6, NE21, BE5, H1, H13, H25, T10 & PROPOSALS MAP

#### Objections and Key Issues

4.2.44 David Wilson Estates Ltd 144/3, /7, /18, /33, /48, /56, /58-/61 & /67-/70

c.40 ha of land east of the A6 north of the Southern Bypass and west of Wilstead Road should be identified on Proposals Map Inset 1 as a housing or mixed use development site to meet housing shortfall, with a potential of 475 dwellings, of which 260 could be built in the Local Plan period

recognise potential for houses within Southern Bypass line and west of Elstow

delete ASR notation spreading north of Bedford Southern Bypass and east of A6 at Elstow; blanket approach contra Structure Plan policy's acceptance of peripheral development, and a constraint to sustainable development

definition of the Inset 14 boundary wrong and should properly be shown on Inset 1

SPA boundary in the south should follow that of the conservation area

delete the H25 IOS designations on sites E,F,G,H,I and J

the boundary to the Marston Vale Community Forest should be withdrawn in the vicinity of Elstow; the Southern Bypass should be the boundary (a matter conditionally withdrawn during the Inquiry)

Elstow Parkway Station proposal in the adopted Local Plan should be reinstated

#### Trustees of Whitbread Harrowden Settlement 374/1-/3

amend SPA boundary at Elstow to include all the dwellings and buildings north of the Bypass into one SPA area

remove Area "F" as Important Open Space

the derelict farmyard within IOS areas "A" and "B" should be an additional village housing site under policy H23, which would help long term protection of Important Open Space

Lynn Farm buildings should be regarded as an integral part of the village and deleted from the ASR

#### Hallam Land Management 455/15

draw boundary more tightly around Elstow, rather than the Southern Bypass, to protect the historic village against pressure from south and west

#### Council Reply

4.2.55 The Council's written response is contained in Documents BBCEV 53, 289, 462, 923, 1113 and 1274.

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#### Appraisal

#### David Wilson

4.2.56 I consider these objections in the context of a housing shortfall of several hundred dwellings in the Deposit Plan's allocations. The objection site is clearly a strong candidate to fill part of the shortfall by virtue of its location within the designated Urban Area Boundary, albeit within land shown as an Area of Special Restraint. Also in its favour is a location sufficiently far removed from the key allocations of H6, H7 and H8 not to affect the marketing and delivery of desirable development there to underwrite delivery of the Western Bypass. I see no real problem in linking development here with the surrounding road network. Access to existing or projected local facilities – employment, public transport, schools and local

shopping - is not a major factor against the proposals. However, the location is not within a strategic corridor.

4.2.57 Elstow, like Biddenham, is a recognisable entity with the characteristics of a village within the Bedford/Kempston Urban Area Boundary – that is, it can be appreciated visually to be a distinct place. It is smaller than Biddenham, but equally vulnerable to the effects of nearby development diminishing its physical separation from the main urban built-up area. Elstow's historic and associative qualities are very important to the Borough as a whole. A rural connection is emphasised by the farmsteads and cottages still in the village.

4.2.58 I find that Elstow village has not yet been subsumed by the built up areas around it: the Hillesden and Wigram Estates to the north, and the Abbey Fields Estate to the east. To the south, the Elstow Storage Depot area is separated from Elstow Village by over 1 km of open land. There have been some meritorious recent efforts to protect the amenities and atmosphere of the village. Examples are the careful design and masking effects of the recent bridge across the Bypass, and the landscaping and construction in cutting of road access to Abbey Fields Estate, an allocation in the adopted Local Plan.

4.2.59 The Area of Special Restraint west of Elstow dates from the adopted Local Plan. I regard it as crucial to the identity of Elstow as a highly significant and valuable historic settlement. Some of the Council's past actions have not helped greatly in retaining the village's setting: the north end of the village has almost been absorbed into the Bedford urban area: there is some physical coalescence. The setting of the Conservation Area has been injured thereabouts. The gap to the east with the Abbey Fields Estate is quite meagre, and shows how invasive development close by on other quarters might be, and how injurious to the remaining rural character. However, I consider that the ASR designation west of the village still has a viable role in maintaining a clear identity between village and town fringe. It also complements the Conservation Area, while not performing the same function. The evidence on the ground is that Elstow better fits the description of a quasi-rural village, than an element of development on the town's southern fringe. Nevertheless, there is an anomaly between the designation of the Elstow SPA on the Proposals Map, and the policy and supporting text of S6. This needs to be addressed to cover the circumstances of Biddenham and Elstow, as villages that are not wholly surrounded by countryside. I have already flagged this matter in paragraphs 1.70-71 above.

4.2.60 The objection site is generally flat, comprising hedged fields used as arable and pastureland, nearly all within Grades 2 and 3A. Its development would leave open only the immediately adjoining fields and those along the Elstow Brook. The land west of the village extends the areas of open countryside leading up to Bedford northwards of the Bypass in cutting. It is more than just a rump of open land. These proposals would mean the loss of those important links to the countryside to the south, with the open hinterland shrinking to no more than a narrow green moat. Although the start-points of the Important Open Views shown in the Deposit Plan would be retained physically, the vistas they now command would be truncated and spoilt by intervening development. All these Views seem to me worthy of retention in the Adopted Local Plan

4.2.61 The important issue here is whether the integrity and quality of Elstow village merits leaving open what would be the only large site within the Southern Bypass possessing rural character. The objector's illustrative scheme seems to me to show a sensitive way of putting major housing development on the site. It displays both the merits and the limitations of keeping a strong landscaped boundary, creating open corridors of vision, and massing housing areas sensitively. I conclude that a high-quality housing scheme might ensue. However, the latter would finally and inevitably remove all real village character. In terms of protecting that character, the quasi-rural setting seems to me a factor of equivalent importance to the care and nurture of the designated Conservation Area and the various listed and scheduled structures. Paragraph 4.20 and Policy BE11 of the Deposit Plan stress the importance of retaining a Conservation Area's setting, even if that setting is not within the designated boundary.



### Whitbread Harrowden Settlement

4.2.62 The Council has permitted rural exception housing of the kind described in PPG3, Annex B on the Lynn Farm site, together with a barn conversion for employment use. This decision does not have any wider implication for the ASR land use designation around Elstow.

4.2.63 My findings above on the David Wilson proposals make clear my views on the importance of retaining the physical integrity and unique village character of Elstow. I have no doubt that the Deposit Plan's division of Elstow into two separate envelopes on Inset 14, defining the two primary built frameworks, is justified by the nature of the place. The central part of Elstow between the two envelopes comprises intermittent buildings along Wilstead Road. The IOS designations "A", "B" and "F" all appear to me justified on account of their special quality; they warrant long term protection as spaces which articulate and complement the built framework of Elstow.

### Recommendation

4.2.64 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL – BEDFORD/KEMPSTON AT ELSTOW: POLICIES S6, BE5 & H1

#### Objections and Key Issues

#### 4.2.65 Whitbread Property 1209/1-/3

Incorporate 0.51 ha of land r/o Red Lion PH in High Street within SPA and allocate for housing development of about 10 dwellings

remove the land from the Area of Special Restraint policy

#### Council Reply

4.2.66 The Council's written response is contained in Document BBCEV 61.

#### Appraisal

4.2.67 The land in question includes the surfaced car park behind the public house and an area of scrubland. Elstow is still recognisably a village, towards the southern end of Bedford's built-up area, but distinguished from the urban mass by having a separate SPA boundary. I discuss the merits of this designation in my consideration of the preceding objections. The Council has approved a mass of recent development close to the north-eastern part of Elstow village. The visibility of this development has undoubtedly had an adverse, but not fatal, effect on the setting of the Conservation Area.

4.2.68 Nevertheless, I still find good reason to differentiate the land within the Conservation Area physically from the new development by retaining the thin, vulnerable, but still just about defensible area of undeveloped land in between. This transitional land in the designated ASR has almost no intrinsic visual merit, but serves a valuable planning purpose just by being kept free of buildings. The setting and identity of part of the village are protected. Development of

the scale indicated on the objection site, even if generously landscaped, could not ensure effective separation and protection.

#### Recommendation

4.2.69 I recommend that the Plan should not be modified in response to these objections.

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#### NEW HOUSING PROPOSAL – BEDFORD/KEMPSTON AT RENHOLD: PARAS. 2.12,2.20,2.27,5.12 , POLICIES S3,NE22,BE5 & S3

#### Objections and Key Issues

4.2.70 Old Road Securities plc 393/5 & /9-/10, Twigden Homes, Eagle Homes & Connolly Homes 1090/1-/3, /6, /7, /9, /18 & /25

land north of Norse Road should be developed for about 200 dwellings and shown in Table H3 and on the Proposals Map, because of the sustainability case for more housing in and adjoining urban area

extend North Bedford Linear Park east of Salph End, in association with this new housing

delete the ASR designation north of Bedford and east of Salph End.

#### Council Reply

4.2.71 The Council's written response is contained in Documents BBCEV 351, 703 and 934. The Council has put forward PIC's 92,156, 178 and 180. These have produced Counter-Objections 393/P98, 1090/P28-P29 and P39-P40.

#### Appraisal

4.2.72 The site, some 23.45 ha, is now open agricultural land of good quality north of Norse Road; to the south lies a heavily built-up part of the urban area of east Bedford. In visual and common sense terms the site is clearly within the open countryside. The land is part of an Area of Special Restraint that serves the important purpose of preventing the coalescence of Bedford and the satellite villages of Renhold and Salph End.

4.2.73 Since the objections were made, a s.78 appeal for the residential development of land here has been decided by the Secretary of State in July 1999. He dismissed it. The decision letter found that the proposal was not in a location within the strategic corridors of Structure Plan policy 1, or locations identified in policy 33. Account was taken of the countryside and ASR factors.

4.2.74 However, it is very significant that the Inspector and the Secretary of State found no single overwhelming factor pointing to the intrinsic unacceptability of putting housing on this site. Removal of the site from the ASR designation was found only to lead to a modest degree of coalescence with Renhold and Salph End. The essential reason for dismissing the appeal was prematurity, prior to a thorough examination of the housing supply situation at my Inquiry.

4.2.75 In his decision letter on the appeal, the Secretary of State acknowledged that it might be necessary to develop some land in Grades 3A and above in the Borough. My conclusions on the acceptability of developing this site would be different if the Council had displayed a

clear intention to keep all the land north and east of Norse Road permanently open. It is obvious that Norse Road has a barrier function in the objection site area, though what one sees is a raw edge of town with little transitional planting. However, there are several other significant developments built or planned north and east of Norse Road: an MFI store and some 300 houses near the A421, and a recent Council crematorium near an older cemetery.

4.2.76 It is clear that the principle of development on a significant scale north of Norse Road has been considered and found acceptable by the Council in recent years. On balance, I find it reasonable to extend that acceptance to this site. I believe that the objection site could be given a planned boundary treatment through generous planting; that would enhance the local area, and safeguard an appropriate and effective separation of the town from Renhold and Salph End for the long term. There would be room within the site for good recreational facilities, including paths and cycleways.

4.2.77 The objectors now seek an allocation of some 200 dwellings on site, rather than the 250 sought at the s.78 Inquiry. This stems from a revision of the planned layout, to provide better views northwards from the Norse Road area to the vicinity of Renhold Church. I find that an upper limit of 200 dwellings should allow a sensitive and well-planted scheme to emerge in detailed development control negotiations. The site has positive locational merits. It is close to the Viking and Elms industrial estates, and to social, local retail and other urban community facilities in the Needwood Road/Church Lane area. There is no intrinsic problem getting to schools at lower, middle and upper levels. The bus service is not of the best, but the nearest terminus is some 200 m from the site at Needwood Road, with accessibility to the town centre and other employment areas. It seems reasonable to envisage enhancement of bus services in future. Cycleway facilities could be gained in and around the objection site.

4.2.78 In coming to my conclusions, I recognise that access would need to be gained to the site over the Council owned strip of land designated as Urban Open Space, and that a Council resolution was passed in December 1998 to the effect that the land should remain so designated. I am sure the site could be fully developed in the plan period.

#### Recommendation

4.2.79 I recommend that the Local Plan be modified to incorporate new supporting text, a redrawn Proposals Map, and a new Policy allocating land at Norse Road, for the development of c.200 dwellings, in association with an extension of North Bedford Linear Park.

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### NEW HOUSING PROPOSAL – BOLNHURST/KEYSOE: POLICY H1

#### Objection and Key Issue

4.2.80 Mr MW Ward 226/1

0.836 ha of agricultural land north-west of Keysoe Rd/Kimbolton Rd junction at Keysoe Row should be allocated for 7-8 dwellings including affordable housing, allowing parking and public open space benefits for the adjacent village hall

#### Council Reply

4.2.81 The Council's written response is contained in Document BBCEV 126.

#### Appraisal

4.2.82 The site lies in a modest linear settlement within the rural area, one of three entities in the dispersed Parish of Keysoe and Bolnhurst. It is regarded in terms of the Deposit Plan as

part of the open countryside, below the level of a "B" Village and without a defined SPA boundary. It lies well outside the urban area and the strategic corridor as defined in the Structure Plan. The presence of a lower school and village hall serving the whole parish cannot disguise the physical modesty of the place, and such facts as that there are only three buses a day to Bedford.

4.2.83 The main axis of development is East-West, and of single plot depth. The objector describes the site as being at the hub of the settlement, but it would tend to extend it northwards, consolidating scattered development on Kimbolton Road. It seems to me impossible to justify a local plan allocation for development here, even of affordable housing, because of the poor sustainability case. The pursuit of desirable enhancements to parish facilities around the village hall will have to be pursued by means of revised planning proposals argued on their own merits. I might add that my conclusions have not been based on the premise that road access to the objection site would be impossible.

#### Recommendation

4.2.83 I recommend that no modification be made to the Local Plan in respect of this objection.

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#### NEW HOUSING PROPOSAL - BROMHAM: POLICIES S6, BE5 & H1

##### Objections and Key Issues

4.2.84 David Wilson Estates Ltd 144/72 & /74-/75, David Wilson Homes 998/3, /29 & /30-/32

SPA boundary south of Stagsden Road and west of Northampton Road wrong and should follow A428 Bromham bypass

The field east of the stream running north/south through the triangular parcel of land defined by the Bromham bypass, Stagsden Rd and existing development should be allocated for 45-50 dwellings on 2.5 ha out of a total site of 4.1 ha, as a replacement for the policy H15 development

delete land within the Bromham Bypass from the ASR

##### Council Reply

4.2.85 The Council's written response is contained in Documents BBCEV 37, 921, 931 and 1265.

##### Appraisal

4.2.86 My conclusions on the H15 allocation (paragraphs 4.1.102-110 above) were that it should be supported, but not extended. Central to my thinking was that a larger amount of development at Bromham might well put at risk the successful construction and marketing of core allocations at the nearby sites H6, H7 and H8, where housing and essential roads infrastructure to construct the needed Western Bypass would go hand in hand. H15 as allocated would produce 45 dwellings in an "A" village where there has already been substantial new house building in recent years. The objectors are presenting this objection site as a direct substitution for the H15 allocation but - if I favour building on H15 and find a housing shortfall - as an addition.

4.2.87 The objection site is a field in agricultural use at the south-west corner of the village. It is part of a segment of open land running south to the bypass built in the mid-1980's,

bounded by Stagsden Road to the north. Housing development east of the site has halted at an old field boundary and separation is effected by a field hedge of varied height and thickness. The objectors have taken account of local topography, indicating a preference for setting new development down into the site, away from the elevated land close to the bypass. I acknowledge that in terms of placement, existing screening and new planting, the site could be developed in a fairly unobtrusive manner, though there would be visual augmentation of the existing mass of development on the village fringe within the Bypass, especially at upper and roof level. However, as I consider that developing more land than the H15 allocation would be undesirable in this Plan period, that is not a major consideration. Nor is the line of Bromham Brook on the west boundary of the objection site. Furthermore, the existence of the Bypass, undoubtedly a long term stop to development in the south of Bromham, is no automatic reason to justify the development of open agricultural land in this Plan period. I find that the extent of the existing built-up area of the village is already strongly and clearly defined by the dwellings on the north side of Bedford and Stagsden Roads, and those east of the objection site. I prefer the H15 allocated site to the site proposed by the objectors in that it is better sited in relation to the existing village.

4.2.88 There remains the question whether the land between the Bypass and Stagsden Road as far west as the A428/A422 roundabout should be designated as ASR. This is a new additional designation of ASR, not shown in the 1993 adopted Local Plan. The purpose of Policy BE5 is to prevent coalescence of the satellite villages with each other or with Bedford and Kempston, and to protect and reinforce their individual identity. The ASR designation here seems to me to have been misapplied. There are good policy reasons in this Plan period to prevent development encroaching on to this vulnerable area at the village's periphery. However, the land within the major dividing line of the Bypass is not at any risk of physical coalescence with the nearest settlements to it: Stagsden or Box End. Nor is the fact that the open land within the Bypass forms a prominent rural approach to the village relevant in this context. The designation should therefore be removed from land north of the Bypass in this south-west fringe of Bromham.

#### Recommendation

4.2.89 I recommend that no modification be made to the Local Plan in respect of the objections seeking to allocate a new housing site, but that it be modified to remove the Area of Special Restraint designation from the area north of the Bedford Road Bypass to the south-west of Bromham.

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#### NEW HOUSING PROPOSAL – BROMHAM: PARAS. 5.12 & 9.37

##### Objections and Key Issue

##### 4.2.90 Mr D Stewart 1076/2 & / 4

23 ha of Land at Lower Farm, Bromham, should be identified for mixed housing/commercial development with a new "Bedford North Parkway Rail Station" and associated park and ride of c.800 car spaces, removing the adverse comment in para 9.37 about non-implementation of the station

##### Council Reply

4.2.91 The Council's written response is in Document BBCEV 40.

##### Appraisal

4.2.92 The objector seeks identification of the site for one of two alternatives:

- 330 dwellings and a business park of 10,000 m<sup>2</sup>, providing 200 dwellings in the Plan period;  
or

- about 430 dwellings, providing 200 in the Plan period.

It is acknowledged that the proposals are entirely dependent on implementation of the Clapham Bypass, and I share the expectation of the parties that work should start in 2001-2002. I do not reject the possibility of connecting the site to the new bypass in a timescale that would allow development of 200 dwellings in the Plan period.

4.2.93 The Council has not ceased to support a rail station of this type in the Oakley Road area, but finds it to be unachievable in this period. No evidence has been produced by the objector to suggest that the commercial case for this station is strong, or that Railtrack, Thameslink and Midland Main Line would consider action until much further active study had been undertaken. For Thameslink to use a station north of Bedford, there would be a heavy electrification cost. I was given no information by the end of my Inquiry that the main parties had sat down to discuss meaningful action. The lack of real action so far convinces me that there is no prospect of physical implementation in the Plan period, or immediately beyond.

4.2.94 As to the location of the objector's suggested development, it does not lie within the urban area, or within a strategic corridor as defined in the Structure Plan; it would amount to a large isolated area of housing and employment, some distance from significant physical and social infrastructure. I consider it would inevitably encourage other proposals which, if permitted, would effectively join together north-west Bedford and Clapham. Another threat would be the reduction of the open land around the looping banks of the Ouse, protected by Policy NE15, to the serious detriment of one of the District's major visual, ecological and environmental assets. Though the site has been exploited for mineral and waste workings, it now mostly consists of restored farmland, with a completely rural and distinctly isolated character, despite not being far from the urban fringe. The building of the Clapham Bypass will decrease the sense of rural isolation, but will not remove it.

4.2.95 All these factors point to the lack of need for, indeed the positive undesirability of, major development in this particular location during the present plan period. Nothing should be planned to put at risk the integrated building of bypasses and associated housing at areas H6, H7 and H8. Further major increments of development nearby, outside the Deposit Plan's Urban Area Boundary, should only be contemplated when that very major addition to the fabric and functioning of Bedford is secured. Even then, such development should be integrally planned around a firmly agreed location for a realisable parkway station north of Bedford, without harming a great asset like the Ouse and its surroundings. The Area of Special Restraint and River Protection Area designations appear to me entirely appropriate for this site.

#### Recommendation

4.2.96 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - CARDINGTON: POLICIES S6 and/or H1

##### Objections and Key Issue

4.2.97 Mr S C Whitbread 375/1-3

Cardington SPA boundary should be extended to include Lakes Farm buildings

Site E Inset Plan 7 should not be Important Open Space , because it is contained by houses and used as a garden, with agricultural buildings to rear

Site I should also be deleted because it is narrow, confined, without particular character, and does not offer significant views

#### Council Reply

4.2.98 The Council's written response is contained in Documents BBCEV 287 and 1275.

#### Appraisal

4.2.99 Cardington is an attractive village with some fine buildings, but its loose knit character, lack of facilities and modest size is reflected in the "B" Village designation. As I have found nearby Shortstown to be an appropriate site for major housebuilding in this Plan period and beyond, restraint at nearby Cardington makes even greater planning sense. Under the process of defining a Settlement Policy Area described in Core Document 39A, the core village consists of the primary built framework. The objection site at Lakes Farm certainly lies off the same road frontage as most other village buildings, and comprises a concentrated mass of substantial and attractive older farm buildings. However, it is sited beyond a run of domestic structures set much closer to the street frontage. I see it as clearly outside the primary built framework, in its particular physical context. The allocated site for c.5 dwellings a short distance to the west is not really comparable, as it is closer to the village core, and would consolidate the existing street frontage.

4.2.100 As to the worth of the two IOS Sites, "E" is a wide and attractive area of land, east of Home Farmhouse and prominent in the vicinity of the main crossroads. Through the frontage of hedge and trees, there are glimpsed views to the garden and farmland to the rear. Like The Green, the site epitomises and enhances the loose-knit village character. It is a positive enhancement of the local scene. The existence of an outline planning permission for a an access road through the site does not really affect the issue; it could be well designed, and would seem likely to increase the visibility of the land behind, if anything.

4.2.101 IOS Site "I" is one of two identified IOS's, lying either side of a pair of semi-detached, post-war bungalows. The sites could each physically accommodate a single dwelling to make up gaps in a row of dwellings: they can be seen as infill sites. The immediately adjoining dwellings have no special architectural or townscape quality. However, the gaps themselves are of very high visual interest in the local scene. They comprise long views over pastureland, with distant prospects of higher land of pleasant pastoral quality – the Greensand Ridge. The designation is not in itself a total proscription of any development on the land, but it does signal that the view should not be obliterated

#### Recommendation

4.2.102 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL – CARLTON/CHELLINGTON: POLICY H23

#### Objection and Key Issue

4.2.103 Clerk to Carlton and Chellington PC 145/2

Two areas of up to 20 dwellings of a mixed nature, including a number of 2-bed flats affordable by young people are put forward

### Council Reply

4.2.104 The Council's written response is in Document BBCEV 402.

### Appraisal

4.2.105 Carlton is a "B" Village, outside the adopted Structure Plan's favoured locations: within the urban area, or within a defined strategic corridor. The village consequently has a low priority for any significant amounts of new housing. The Parish Council's ideas for two additional housing areas were submitted to the Council after a liaison meeting to do with the preparation of the local plan. The two sites, one in the northern part of the village - at Victoria Farm, The Moor - the other on the south-east edge, on allotment land off The Causeway, would both amount to what I regard as clear unwarranted intrusions into open countryside in pursuit of significant population expansion. If the Parish Council wishes to pursue a site or sites for local needs housing, it should discuss the matter further with the Council independent of the local plan process, to identify an exception site.

### Recommendation

4.2.106 I recommend that no modification be made to the Local Plan in respect of this objection.

## NEW HOUSING PROPOSAL – CARLTON/CHELLINGTON: POLICIES S6, H24 AND H25

### Objections and Key Issues

4.2.107 St Albans Diocesan BOF 223/2, /5 & /6

Include 1.68 ha of land off the Moor, Carlton, to allow typical small infill development for c.30 dwellings, with the remainder to stay as allotments

No detrimental effect on form, character or residential amenity

Remove Important Open Space designation "A"

### Council Reply

4.2.108 The Council's written response is contained in Document BBCEV 59.

### Appraisal

4.2.109 Carlton is a "B" village of modest size in the Deposit Plan outside the strategic growth corridor. The land, traversed by a footpath, is seen as a wide gap in the otherwise built-up frontage of The Moor, albeit a frontage with much generous garden planting. The view gained from The Moor, either through the field gate or over/through a dense boundary hedge, is of a well-hedged fieldscape, where actively cultivated statutory allotments mingle with pasture. The Space adds positively to the visual character of this northern boundary area, affording a pleasing if unspectacular view. Apart from the loss of land inside the site, development would undoubtedly result in some loss of attractive boundary hedge, at least around any new main site entrance.

4.2.110 The SPA has been drawn tightly and consistently round existing development in Carlton, excluding other land in gaps along village roads, and its boundary seems to me well



judged. The Board's undoubted ability to offer alternative allotment land seems to me not to alter the position.

#### Recommendation

4.2.111 I recommend that the Plan should not be modified in response to this objection.

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#### NEW HOUSING PROPOSAL - CLAPHAM: POLICY S6 & BE5

##### Objections and Key Issues

4.2.112 Mr EDM Peacock 190/2-/5

Land between Clapham Folly site and line of A6 Bypass should be in SPA and not covered by the ASR

Land south of Oakley Road, Clapham and east of the line of the A6 Bypass should be in SPA and not covered by the ASR

##### Council Reply

4.2.113 The Council's written response is contained in Documents BBCEV 152, 164, 191 and 812.

##### Appraisal

##### Land between Clapham Folly site and line of A6 Bypass

4.2.114 I agree with the objector to the extent that the proposed bypass will conclusively mark the ultimate western edge of Clapham village. By the same token, it seems plain to me that the Clapham Folly housing site will be the westernmost extent of building in this part of Clapham. That scheme for 170 dwellings had been given consent, but awaited the signing of a s.106 obligation at the end of my Inquiry. The significant area of landscaping between the western boundary of the scheme and the bypass is necessary to mitigate the visual impact and proximity of the bypass, and has to endure for the foreseeable future. The physical extent and depth of the landscaping is large, and I have no doubts that the built framework of this area of Clapham is best defined by the Council's SPA line in the Deposit Plan. I also see no strong planning argument to justify northerly extension of an already large housing site over open rising land in this Plan period. The ASR designation is well justified on this site, because of the need to avoid all unnecessary erosion of the narrow gap of open land between Clapham and Oakley.

##### Land south of Oakley Road

4.2.115 Development of this wedge-shaped piece of open land east of the proposed bypass would transform a fringe area of Clapham, now seen as no more than open land behind a line of ribbon housing along Oakley Road, into a concentrated development very close to the new road. There would be considerable noise problems to overcome. It is hard to see how development on such a site could provide visual or planning benefit, whatever land use was proposed on the land. Even after the bypass was completed, the site could reasonably be considered part of the narrow open gap between Clapham and Oakley. It also plays a modest part in maintaining openness to the south-east and south - in the direction of Bromham and the proposed H8 housing site, beyond the visually important riverside open land alongside the Great Ouse. The Deposit Plan's ASR boundary in this part of Clapham appears to me to be well drawn.

## Recommendation

4.2.116 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSALS - CLAPHAM: POLICIES S6, BE5, H1 & H25

### Objections and Key Issues

4.2.117 Administrators of FP Tinsley deceased 349/1 & /4-/8, City & County Developments 1077/2-/5, & /11, Mr & Mrs G Pugh 896/2-/3

SPA boundary should encompass land at Church Farm, Clapham, which should be identified for housing purposes with associated open space, and removed from the Area of Special Restraint, with the Important Open Space designation also removed from the part of the site to be developed

3.6 ha of land at Clapham Park Farm should be identified for housing, including some conversion, demolish the buildings at the disused camp at the Baulk, and restore and to agriculture and redevelop part of the site for the relocated riding school

SPA boundary should not encompass site of Clapham Folly, which should be deleted from the Plan

land at Green Lane/Bedford Rd should be identified in Table H3 for mixed residential and commercial development including the provision of a Green Lane bypass

because the plan understates the importance of views into and across Church Farm. designate as Important Open Spaces the following views: a) from the north end of The Warren; b) from the west end of The Slade; c) from the footpath between Highbury Grove and Green Lane which traverses the ASR

### Council Reply

4.2.118 The Council's written response is contained in Documents BBCEV123 and 132.

### Appraisal

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### Church Farm

4.2.119 The objection site at Church Farm is seen as suitable for up to 100 dwellings altogether, with access taken off the Slade, and conversion of the farm barns on site to housing. The land is now used for pasture. The objectors see Church Farm as a logical site to round off development at the eastern end of Clapham village, the nearest category "A" village to Bedford.

4.2.120 The concept put forward at my Inquiry differs from an appeal scheme put to a section 78 Inquiry and dismissed by the Secretary of State in December 1997. Fifty fewer dwellings are sought, and no road access is proposed from the semi-rural Church Lane. The merits and deficiencies of gaining access from the Slade, a minor residential road west of the objection site have been argued in the representations. I consider that a scheme could be devised whereby 100 dwellings were serviced from this area in a way that need not cause major problems of safety or loss of amenity.

4.2.121 The site is near village facilities in Clapham, and public transport to and from Bedford is good. The central question is whether this would be an acceptable site in policy terms for 100 dwellings, which could be of service in meeting a housing shortfall in the Plan period. The site is not within a strategic corridor, nor on the urban edge of Bedford. It is clearly open countryside, separating the small entity of Clapham Green from Clapham village. I find the objection site is appropriately designated as an Area of Special Restraint to achieve that end, and that the Important Open Space designation in the south-east corner of the site helps show the historic visual link between Clapham church, immediately south of the site, and its agricultural setting.

4.2.122 The objector's development concept is to leave the central part of the site undeveloped. Thus a view northwards from the church to open countryside would be retained, while the western part of the site was developed, achieving some landscaped softening of the raw edge of development on the east side of Highbury Grove. The idea would have some merit were development on the objection site imperative, but this is not the case. The result would be a token but shrunken piece of open land, even if retained in agricultural use. Future coalescence between Clapham and Clapham Green would be facilitated if the site were developed, even in the manner proposed. The setting of the grade 1 Listed church would also be diminished.

4.2.123 Though there is a significant housing shortfall in the Deposit Plan's provisions, arising from problems of deliverability, development here would deflect housing demand from key allocated sites where essential roads infrastructure, otherwise unobtainable from the public purse, can be provided. The Council has put forward PIC 206, which would enlarge Important Open Space "D" in the Deposit Plan to include the land of Church Farm. The PIC produced Counter Objections from Phillips Planning Services 342/P12, Administrators of FP Tinsley Dec'd 349/ P12, Mr & Mrs PG Pugh 896/P4, and City & County Developments 1077/P12. However, the PIC appears to me well merited, and the actual area of enlargement well judged.

#### Park Farm

4.2.124 This is said by the objectors to be a redundant farm site, comprising a variety of residential and agricultural buildings, including a listed farmhouse. Park Farm is an entity of around 100 ha, some 90% of it arable. Riding stables operates from the farm but it is intended to relocate to the Baulk. The very small settlement of Clapham Green – essentially a scatter of structures - is found around the junction where Green Lane meets The Baulk and Carriage Drive. The objectors accept that, in policy terms, Clapham Green, including this site, is located in the countryside, but hold that the farm site is brownfield land and might best be shown as an inset to Clapham on the Proposals Map. Up to around 30 dwellings are envisaged on the farmyard site, including a maximum of 20 new dwellings.

4.2.125 It is a fact that the site has been the subject of various planning applications and permissions, not all carried out. The latest permission, affecting the barns, was given in December 1999. Nothing in the objectors' evidence strongly suggests that the Park Farm or Baulk sites cannot properly be treated through development control procedures, in the context of proposed countryside policies in the Local Plan. The planning merits of a development of the size envisaged at Park Farm appear flimsy in such a context.

#### Recommendation

4.2.126 I recommend that the Local Plan be modified to incorporate PIC 206, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSALS - CLAPHAM: POLICY H1

### Objections and Key Issues

4.2.127 Bedford Pilgrims Housing Assn 379/11, Anglian Water Services 1045/11

Land next to Princess St flats, Clapham, should be identified as a housing site, allowing development of an under-used open space close to amenities

the Clapham Road reservoir will be surplus soon and could meet housing needs

### Council Reply

4.2.128 The Council's written response is contained in Documents BBCEV 864 and 1094.

### Appraisal

4.2.129 The land at Princess Street flats is part of a very large area of allotment gardens, designated as Important Open Space "A" in Clapham. I have no detailed or convincing evidence from the objector that the land is unimportant visually, or not wanted for a social and recreational purpose. My own view is that it has visual attractions in the midst of built development, and does serve an important purpose for residents of the village.

4.2.130 The Clapham Road reservoir is previously developed land but, both technically and in appearance, it is part of the narrow area of open countryside between Bedford town and Clapham village. That area has rightly been designated as an Area of Special Restraint to reinforce the necessity of maintaining separation.

### Recommendation

4.2.131 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSALS AT COPLE – GENERAL OBSERVATIONS

4.2.132 Cople remains a linear village where only C20th estates at the north and south ends have altered a development pattern of single-depth structures lining the roads. I have found no convincing planning case to challenge the status of Cople as a designated "B" village - one where there is limited capacity to accommodate development on infill or small sites within the Settlement Policy Area. The village does not lie within the urban area or within a strategic corridor as defined in the Structure Plan, so it cannot be a priority area for new development, or a realistic candidate for material expansion of SPA boundaries. The identification of a 1.33 ha site for housing in the Draft Local Plan, has been changed in the Deposit Plan because of the new strategic thinking in the Structure Plan, and the reduced site in the later Plan has been built out. Consequently, I consider there can be no sensible planning case to justify arguments by individual objectors that their sites help to achieve that scale of housebuilding.

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## NEW HOUSING PROPOSAL - COPLE: POLICY H1

### Objection and Key Issue

#### 4.2.133 Mr J Cambers 31/1

Identify 0.27 ha of open agricultural land at Northill Road, south-east of Cople to be within the SPA and allocated for 4-5 dwellings

### Council Reply

4.2.134 The Council's written response is contained in Document BBCEV 379.

### Appraisal

4.2.135 The objection site is at the southern end of the village, beyond the last of a run of dwellings on the east side of Northill Road. The fact that housing stretches further southwards on the opposite side of the road, and has been developed in depth, is no good planning reason to replicate or respond to that form of development on the objection site. Neither is the presence of an existing house and farm buildings away from the road on the east side of the objection site. I find that the site relates far more to the open countryside than the existing fabric of the village.

### Recommendation

4.2.136 I recommend that no modification be made to the Local Plan in respect of this objection.

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## NEW HOUSING PROPOSAL - COPLE: POLICY S6

### Objection and Key Issue

#### 4.2.137 SC Whitbread Farms 376/1

SPA boundary for Cople is too restrictive; an area of agricultural land west of Northill Road and south of the village playing field should be included

### Council Reply

4.2.138 The Council's written response is contained in Document BBCEV 286.

### Appraisal

4.2.139 In this linear village, the development of a large, open area projecting westwards behind a line of existing frontage buildings would be arbitrary, and visually alien to the historic form of Cople. Furthermore, if allocated, it could be used as a precedent for other applications to develop agricultural land behind frontage housing. I can find no positive planning merits in this proposal.

### Recommendation

4.2.140 I recommend that no modification be made to the Local Plan in respect of this objection.

#### NEW HOUSING PROPOSAL - COPLE: POLICIES S6, NE21 & H1

##### Objections and Key Issues

4.2.141 Messrs Cortese Franklin & Phipps 1094/1- /3

Identify the 2 acre site r/o 10 Willington Road - now wasteland, garden land, and farmland - for development of housing, as a sensible rounding off within a built-up frontage; remove the site from the Marston Vale Community Forest

SPA boundary should be extended; should include existing built up land and gardens

Should be an area capable of accommodating future development required by the village and the rural economy, to avoid decline

##### Council Reply

4.2.142 The Council's written response is contained in Documents BBCEV 153, 165 and 817.

##### Appraisal

4.2.143 The boundaries of the Marston Vale Community Forest are set out in the Forest Plan (CD108) which is a non-statutory document with no direct statutory implications for the planning process. The boundaries must be shown on the Proposals Map, reflecting the designation, and the local plan process cannot directly change them.

4.2.144 The site lies behind frontage development on the eastern side of Willington Road. Although there is a development of dwellings in depth just to the south of the site, at Burrsholt, that is the exception to the general linear pattern of housing plots lining the road. As the objectors say, there would be no practical difficulty in servicing backland development here, but the concept would lead to another atypical incursion on to open land away from the road, reinforcing the not very pleasing visual precedent of Burrsholt. That is unnecessary in a "B" village having no priority for other than modest growth in this plan period.

##### Recommendation

4.2.145 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL – COPLE: POLICY S6

##### Objection and Key Issue

4.2.146 Mr BL Saunders 1095/2

Include in SPA a pair of semi's at the western end of Grange Lane, Cople and Grange Farmhouse; help in avoiding decline of rural economy

##### Council Reply

4.2.147 The Council's written response is contained in Document BBCEV 105.

#### Appraisal

4.2.148 The key question here is whether the buildings can reasonably be construed to lie within the primary built framework of the modest linear village of Cople. They are clearly part of the entity of the village, but that is not the same thing. I have walked and driven along this road a number of times. My conclusion is that the frontage development here is intimately linked with the groups of cottages to the east. I consider that the SPA boundary should be extended westwards to encompass the frontage development, but should not extend back further north than the northern curtilages of these frontage cottages. Grange Farm and the remainder of the farmyard buildings are set well back from the road frontage. I find they are not laid out tightly enough on the ground to lie credibly within Cople's primary built framework. Any development and demolition here would lead to new housing extending back deeply from the road, in conflict with the existing pattern of only frontage housing to the east of the objection site.

#### Recommendation

4.2.149 I recommend that the Local Plan be modified to show the frontage cottages in the Grange farm complex within the SPA, but that no other modification be made to the Local Plan in respect of this objection.

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#### NEW HOUSING PROPOSAL COPLE: POLICIES S6, H1 & INSET 11

#### Objections and Key Issue

4.2.150 Mr & Mrs B Saunders & TH Saunders & Sons 1131/2-/4

Extend and round-off the SPA at the rear of the site of H23 to allow 8 quality houses on large plots, and link Willington Road through the development

#### Council Reply

4.2.151 The Council's written response is contained in Document BBCEV 154/160 (formerly 98).

#### Appraisal

4.2.152 The more modest housing allocation in the Deposit Plan has now been built out. Having seen the site, I agree with the Council that it "provides a contained parcel of land within the SPA boundary neatly distinguishing between the built up and rural areas". Given my earlier comments about the appropriateness of the "B" Village designation, and the changed priorities between the Draft and Deposit Plans, it would be most inappropriate to extend the new site in any way in this plan period.

#### Recommendation

4.2.153 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - COPLE: POLICIES S6, H1 & H24

## Objections and Key Issues

### 4.2.154 Mr BL Saunders 1095/2-/3, Mrs B Beazley 1191/1-/3

Delete Site B at Home Farm as an Important Open Space and include the land within SPA as suitable for low density housing to meet the needs of the upper salariat

Delete Important Open Spaces C1-C4 between cottages on Grange Lane, as they

amount to an unnecessary protection within an otherwise built up frontage

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## Council Reply

4.2.155 The Council's written response is contained in Documents BBCEV 88 and 213.

## Appraisal

4.2.156 Cople remains a linear village where only C20th estates at the north and south ends have altered a pattern of single structures lining the roads. I have found the principle of defining Important Open Spaces to be acceptable, provided the exercise is carried out with rigour. The objectors do not directly challenge the status of Cople as a designated "B" village.

## IOS "B"

4.2.157 IOS "B" is a large area of land east of Willington Road, which the objector chooses to consider as two entities: a smaller southern area "B(i)", and the remaining bulk of the land "B(ii)" to the east and north of the Home Farm complex. The case made is that IOS designations are not required in the countryside, because of other policy protection afforded, but no reason is put to justify removing B(ii) from the IOS (about 0.45 ha, seen as suitable for about 4 or 5 dwellings). However, all of IOS "B", like other IOS designations in the Borough, follows the rule of lying within or at the fringe of a settlement.

4.2.158 I find that the IOS gains in value from being part of a surviving farm, which occupies a prominent position on the main village road. It is well within the northern edge of Cople, and visible to those on foot, though perhaps not so obviously to passing motorists, because of low boundary hedging. The open land is an apposite and visually attractive frame to the central farm buildings. The northern and southern parts of the IOS both reveal impressively long open views over farmland to the east. In a village context the whole IOS is a very pleasing visual incident, adding to the attractions of the settlement. The presence of three derelict glasshouses some distance from the road frontage in sub-area B(ii) does not significantly detract from the merits of the open space or seriously inhibit views eastwards. I consider that the whole objection site is properly excluded from the main built framework of Cople, within the line of the SPA.

## IOS C1-C4

4.2.159 These four spaces are planned gaps, set between small groups of visually similar Victorian estate cottages on the north side of Grange Lane, designed for the Bedford Estate. Unlike IOS "B", these were not designated in the adopted Local Plan. Some cottages have undergone unsympathetic alterations, and the gaps are not particularly well tended. However, especially to the attentive passer-by, the whole group retains overall an attractive architectural character, which enhances the village street scene. The IOS's point up this fact, act as a reminder of village history, afford views to the open backland, and serve to inhibit unsuitable extensions in between the cottages. I feel that a good case could be made for a small conservation area designation in this part of Cople, including the cottages and the church.



## Recommendation

4.2.160 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSALS AT COTTON END, EASTCOTTS – GENERAL OBSERVATIONS

4.2.161 Cotton End is a small settlement designated as a "B" Village, without a specific housing allocation in the Deposit Plan. It has the usual basic facilities of a "B" Village, save that the local shop has recently closed. I have no firm evidence that a replacement shop will open, despite the efforts of local people. The settlement does not lie within the urban area or within a strategic corridor as defined in the Structure Plan, but it is near enough (less than 2 km away) to compete for buyers' attention with Shortstown, an area that I do favour for major development. Consequently, I support the designation of Cotton End as a "B" Village.

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## NEW HOUSING PROPOSAL – COTTON END, EASTCOTTS: POLICIES S6 & H1

### Objections and Key Issues

4.2.162 Wimpey Homes Holdings 265/8 & /10

Extend SPA boundary for Eastcotts, Cotton End, to provide a housing site for c.40 dwellings at Manor Way, on 1.4 ha of Grade 3B agricultural land

Cotton End deserves a higher place in the settlement hierarchy

### Council Reply

4.2.163 The Council's written response is contained in Document BBCEV 448.

### Appraisal

4.2.164 I acknowledge that there has been extensive post-war development at Cotton End, including the recent Hermitage Gardens estate of 28 dwellings, apparently built on former nursery land containing glasshouses. I also take the point that, if one were "rounding out" the SPA envelope, this site is part of an area of land on the north-east

of the settlement lending itself to that purpose. However, that is not a relevant exercise and, for the reasons given in my general observations above, I do not see a good planning case for significant expansion of Cotton End in this plan period.

## Recommendation

4.2.165 I recommend that no modification be made to the Local Plan in respect of these objections.

## NEW HOUSING PROPOSAL – COTTON END, EASTCOTTS: POLICY H1

### Objection and Key Issue

#### 4.2.166 Bedfordshire County Council (as landowner) 295/6

c.10 ha of agricultural land at Rookery Farm, Cotton End, should be allocated for housing, in view of the large housing shortfall in the plan period

#### Council Reply

4.2.167 The Council's written response is contained in Document BBCEV 481.

#### Appraisal

4.2.168 It is the case that I have found a large housing shortfall in the plan period, and this may be, as the objector says, "featureless arable farmland", but it has very little to recommend it, apart from a willing vendor. Bearing in mind my general observations above on the village in paragraph 4.2.161, the site is clearly a very large extension. Lying on the other side of the A600 to the existing settlement, in a totally rural environment, the objection site could attract yet further additions in time, given its lack of strong natural boundaries. There are many preferable types of location for a major housing development, as national policy, the adopted Structure Plan and the Deposit Plan all clearly indicate

#### Recommendation

4.2.169 I recommend that no modification be made to the Local Plan in respect of this objection.

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#### NEW HOUSING PROPOSAL – COTTON END, EASTCOTTS: POLICIES H1, H23, H24 & H25

#### Objections and Key Issues

#### 4.2.170 Resource Maintenance Ltd 1081/1-/5, D Mackay 1089/1-/5

Site of 0.99 ha, partly on Important Open Space C at Cotton End, should be allocated for housing – a suggested 30 dwellings

Delete Important Open Space C and replace with housing development notation

Para. iv of H24 is not supported insofar as it relates to the site at High Road, Cotton End

#### Council Reply

4.2.171 The Council's written response is contained in Document BBCEV 71.

#### Appraisal

4.2.172 The designation of Important Open Space "C" goes back to the adopted Local Plan, where a very similar site is described as "an area of gardens/paddocks providing a gap in development between High Road, Hall Way and Meeting Close". The site is made up of pieces of land in different ownerships: parts of extended domestic gardens, areas of pasture with stables, some uncultivated land, and open land within a garage site and a public house. It is landlocked, but adjoins a site with outline planning permission for 10 dwellings that would gain access from Hall Way. The evidence does not suggest that gaining safe and neighbourly access to the A600 would be difficult in principle.

4.2.173 I have stated my support for the IOS concept, while finding fault with some particular designations in the Plan. I find this designation at site "C" entirely misconceived. The land is open, and it may afford some visual pleasure to those living nearby. However, no part of it serves to provide particularly special or valuable views to or from the open countryside. To the passer-by it is barely appreciable as a large area of open land. The built fabric around the IOS is visually unremarkable and not of historic interest. It is not analagous to a village green, or public play area. No existing dwelling would lose its primary garden.

4.2.174 Removal of the IOS designation leaves no strong planning reason against a development on the land of similar or slightly higher density than surrounding housing. Thirty dwellings on the site sounds reasonable in principle, but detailed investigation may mean that a slightly smaller number is necessary in order to provide adequate gardens and landscaping, and avoid overlooking.

#### Recommendation

4.2.175 I recommend that the Local Plan be modified to add the objection site to the list of village housing sites in Policy H23 of the Deposit Plan for up to 30 dwellings.

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#### NEW HOUSING PROPOSALS – FELMERSHAM/RADWELL: POLICIES S6, NE14, H1 & H23

##### Objections and Key Issues

4.2.176 Mr D Richardson 114/1-/5, Phillips Planning Services 342/6, Messrs P & D Cook & Mrs J Liller 350/1-/4, Mr A Perkins 1175/1-/2, Clients of Savage & Ptnrs 1172/1

Amend SPA boundary to include 2.4 ha of land at High Road, Felmersham, for up to 35 dwellings, including c.7 affordable dwellings

remove from the AGLV

delete former horse paddock from IOS "A" designation; part develop in sustainable manner for housing and village green, and include in the SPA, along with development between Stonehaven and the Memorial Lane/High St Junction

Include 0.17 ha in Town Lot Lane, Felmersham within SPA, as it is not open space nor undeveloped, but part of built-up frontage

##### Council Reply

4.2.177 The Council's written response is contained in Documents BBCEV 78, 932, 933, 959, 960, 1051, 1081, 1104 and 1272.

##### Appraisal

4.2.178 Richardson site Development of this prominent piece of land, which has been in informal use as a cricket field, would amount to a considerable augmentation of Felmersham's built form at its southern end. New housing behind the existing ribbon of dwellings along the eastern side of Pavenham Road could not remotely be described as infill or small scale development of the kind considered appropriate to "B" Villages in the Deposit Plan. The site does not lie within the urban area or within a strategic corridor as defined in the Structure Plan. Thus, in a village with few social facilities and no marked public transport advantages, it is a poor candidate to help fill the housing land shortfall for the Plan period.

The AGLV designation washes over the whole village, and is of such a scale and breadth of purpose that a specific exclusion here would serve no purpose, whatever my findings.

4.2.179 Phillips/Cook and Liller site The objection here gives no real clue to the form or amount of development that is envisaged on IOS "A", described in the 1993 Adopted Local Plan as "pasture and other farming use, essential to the rural character of Memorial Lane". I have no doubt about the continuing validity of this description, and the characteristics of the village that I have described above point up the undesirability of the proposal, which would encroach into a rural site. The development between Stonehaven and the Memorial Lane/High St Junction seems to me to lie entirely outside the primary built framework of Felmersham.

4.2.180 Perkins site This site was included within the SPA in the 1995 Draft Plan, but excluded in the Deposit Plan, presumably as a result of a dismissed appeal for residential and employment use here. I am not told by the Council what originally led it to include the land. My own visits lead me to the view that, in this modest settlement where there is no active Council search for new housing sites, the excluded area can legitimately be regarded as a peripheral collection of agricultural structures, which does not amount to an integral part of the primary built framework of Felmersham.

#### Recommendation

4.2.181 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSALS AT GREAT BARFORD – GENERAL OBSERVATIONS

4.2.182 Despite the significant housing shortfall in the Deposit Plan's provisions, arising from problems of deliverability, development in Great Barford, outside the urban area and the Strategic Corridor, would deflect housing demand from key allocated sites where essential roads infrastructure, otherwise unobtainable from the public purse, can be provided. I have supported the Council's H18 allocation at New Road for 25 dwellings. There would need to be very strong planning reasons for me to recommend any further traffic-generating development in the village in this Plan period, however small the impact.

4.2.183 The inhibiting factor is the absence of the projected village bypass for the A421, much needed since the opening of the Bedford Southern Bypass. The evidence convinces me that construction will not begin before the latter end of the Plan period, and will not be complete before its end.

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#### NEW HOUSING PROPOSALS – GREAT BARFORD: POLICIES S6, H1 & H25

##### Objections and Key Issues

4.2.184 Laing Homes Ltd 134/1-/2 & /14-/15, Mr P Southall 106/1 & /3, Mr I Geary 1112/1-/3

Table H3 should include land at two sites north of the A428 at Home Farm, Great Barford, as a housing allocation for some 72 dwellings; too much emphasis on large sites in and adjoining Bedford

The northern 30% of Important Open Space "A" at High St, Great Barford should be a housing allocation for 9-12 dwellings on 0.60 ha; delete Important Open Space notation and amend SPA on Inset 16 to include it

#### Council Reply

4.2.185 The Council's written response is contained in Documents BBCEV 50, 70 and 144-145.

#### Appraisal

##### Home Farm Site

4.2.186 The objectors accept that further land would need to be acquired to gain satisfactory vehicular access. It is put that the site could be developed in phases. If the smaller site of 1.06 ha were allocated, the rear field – bringing the total site up to 2.97 ha - would be developed in a second phase. The option of putting an element of public open space on part of the Farm is mentioned, but not clearly developed as a concept.

4.2.187 I find the objections very tentative in nature. An additional adverse factor is that development here would extend the built up area into open countryside, removing land and farm buildings that are not clearly demonstrated to be redundant, despite the smallness of Home Farm. The village edge hereabouts is visually abrupt and not attractive. However, even if the pre-bypass traffic problem did not exist, I do not regard Home Farm as an obvious first choice for new development in the village. The Council's basis for defining SPA's and the criteria in CD39A, both of which I find plausible and worthy of support, do not seek to "round-off" settlements for the sake of it.

##### High Street Site

4.2.188 This objection site was identified in the adopted Local Plan as the northern part of IOS"A". The Council document that accompanied the designation of the village's south-eastern Conservation Area talks of the positive virtues of a significant open area, specifically mentioning the short to medium views obtainable to the west. It is stated that the development of any part of the area would have an injurious effect on the conservation area, as the open effect helps integrate country and buildings "and is a reminder that Great Barford is a village rather than an urban enclave".

4.2.189 I have walked through this area of the village and taken the footpath route mentioned above. The words and sentiments of the conservation area document remain true in my view, despite the recent development of new housing on the site of former dilapidated farm structures. Their presence, some distance back from the High Street, does not appear to me to have removed the visual integrity of any part of the IOS, or to have detracted from the character or appearance of the conservation area. Though until recently actively used for market gardening, the objection site is now grassed over and used for occasional grazing. A small brick building along the northern boundary has been used for storage and a farm shop. The latter does not really impinge on the site's openness, the value of which is compounded by the presence of the larger part of the IOS to the south, into which it blends seamlessly when viewed either from the High Street or the tree-planted footpath.

4.2.190 I do not doubt that the site could be developed with attractive and well laid out new houses, behind a generous frontage of open ground on to the High Street. However, the totality of the designated IOS has an integrity and visual quality that outweighs any case for housebuilding, however distinguished in design and layout. This would be the case, with or without a bypass.

#### Recommendation

4.2.191 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL – GREAT BARFORD: POLICIES S6, S7, H1 & H18

### Objections and Key Issues

4.2.192 Wimpey Homes Holdings 265/3-/7, Mr & Mrs J Parrott 340/2, Mr I Geary 1112/1-/2

Instead of the proposal at New Rd, Great Barford, there should be an alternative site at Addington Rd, to be included in the SPA

Revise Great Barford SPA boundary between New Road and School Lane to follow Conservation Area boundary

extend SPA to enclose 4.25 ha for c.100 dwellings between Roxton Road and Addington Road

### Council Reply

4.2.193 The Council's written response is contained in Document BBCEV 36, 64 and 145.

### Appraisal

4.2.194 The proposed new housing site is allied to objections against the H18 allocation at New Road, Great Barford, but is sought for allocation on its merits. I have not supported these or other objections against H18 ( paragraphs 4.1.119-127 above). From the words used in paragraph 2.52 of the Deposit Plan, the Council implies that the size of and facilities at Great Barford might justify more than the 25 dwellings produced by developing H18. The Highways Agency would oppose development on this scale. Even the development at New Road would have some minor effect in exacerbating the present traffic problems, if occupied before completion of the Bypass.

4.2.195 Despite the significant housing shortfall in the Deposit Plan's provisions, arising from problems of deliverability, development here would deflect housing demand from key allocated sites - within the South West Bedford Strategic Corridor and the Bedford Western Bypass - where essential roads infrastructure, otherwise unobtainable from the public purse, can be provided. Consequently, there would need to be very strong reasons for me to recommend any further traffic generating, pre-bypass development in the village, however small the impact. The major other consideration here is whether the proposed site fits well with the village form and the definition of the SPA shown in the Deposit Plan.

4.2.196 My visits convince me that the development along the Brook Lane and Roxton Road form the limit of the main built area of the village. That said, the site is well placed in relation to local services. If development were being sought on any scale at Great Barford, then the filling in of the triangle of land bounded by Roxton Road, Addington's Road and Brook Lane would be a very strong candidate. Though it would mean an extension of village form towards the north-east, and would be clearly visible from surrounding open land, there is already a scatter of dwellings at the north-east tip of the triangle. The land is not intrinsically attractive, and it would be possible to set significant development within a good landscaped framework.

4.2.197 However, the Highways Agency's stance is that it would oppose access to the trunk road, either by a roundabout giving directly on to Roxton Road, or via other exits using

Addington's Road or Brook Lane. The road is undoubtedly well trafficked with c.13,000 vehicle movements per day around this point - and there are heavy delays in the AM peak which can lead to queues extending outside the village speed limit areas. Even if phased, with an initial development of 60 dwellings, as the objector suggests, there would be adverse effects on traffic. I do not suggest these effects would be dramatic in themselves, but they would aggravate a very unsatisfactory local situation. Only when a bypass is built, giving the anticipated 75% reduction in through traffic, would it be prudent to occupy such a large increment of new housing

#### Recommendation

4.2.198 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL – GREAT BARFORD: POLICIES H1 & H23, & TABLE H3

#### Objections and Key Issue

##### 4.2.199 Prowting Projects Ltd 1049/1-/3

Allocate 2.03 ha of land at Beresford Close, Great Barford, for c. 50 dwellings; it could contribute immediately to the deficient housing land supply

#### Council Reply

4.2. The Council's written response is contained in Document BBCEV 34.

#### Appraisal

4.2. An appeal for housing here was dismissed in 1990. The site does not adjoin the urban area, nor is it in a strategic corridor, though Great Barford is an "A" village. Even the "A" village categorisation has to be qualified because of the impending bypass for the A421 – much needed since the opening of the Bedford Southern Bypass. I am assuming that the H18 allocation at New Road, Great Barford, which the Council decided to approve subject to a s.106 obligation, will be implemented before 2006. Development at New Road will have some minor effect in exacerbating the present traffic problems if occupied before completion of the Bypass.

4.2.200 Despite the significant housing shortfall in the Deposit Plan's provisions, arising from problems of deliverability, development here would deflect housing demand from key allocated sites where essential roads infrastructure, otherwise unobtainable from the public purse, can be provided. Consequently, there would need to be very strong reasons for me to recommend any further traffic generating, pre-bypass development in the village, however small the impact. The major other consideration here is whether the proposed site fits well with the village form and the definition of the SPA shown on the Deposit Plan.

4.2.201 The objector does not consider that the site clearly lies outside the built up area or forms part of the village's open rural surroundings, which were the conclusions of the Inspector in the 1990 appeal. I have looked carefully at the site from close at hand and from longer views. It is a rectangular field. To the south lie school playing fields and then open rural land. To the north the site adjoins the discrete main developed mass of the village. It is unquestionably an open space of some significance in its local context. Neither the existence of prominent school buildings on its south-east side, nor the line of detached dwellings across Bedford Road detract from the open quality of this particular land, and of the neighbouring playing fields. Whether or not the site is conspicuous as an entity seems to me to have no

bearing on the case for keeping it free from development. I find no convincing planning case that the SPA boundary has been wrongly drawn in this part of the village.

4.2.202 While a development of the kind sought could have generous screening to form a clear boundary between countryside and village, that is no justification for an otherwise unnecessary breaching of the boundary into open countryside. I have seen other examples of playing fields cited by the objector as having been accorded different classification: at Thurleigh, Wootton, Milton Ernest, Carlton and Bromham; they do not alter my conclusions on the particular merits of the present objections.

#### Recommendation

4.2.203 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL – GREAT BARFORD: POLICY S6

#### Objection and Key Issue

4.2.204 PC Bath Ltd 1068/1

Extend SPA boundary to include frontage land between main part of village and Rogers Engineering Depot, Great Barford

#### Council Reply

4.2.205 The Council's written response is contained in Document BBCEV 72.

#### Appraisal

4.2.206 The objection is postulated on the basis of the Bypass scheme being constructed in 2000, whereas the evidence from my Inquiry convinces me that construction will not begin before the latter end of the Plan period, and will not be complete before its end. It seems almost certain that access would need to be taken from the affected A421. At present the SPA boundary extends north of Roxton Road only to encompass visually cohesive blocks of existing development, which occupy small areas of the road frontage. Building over the objection site would mean the filling of a very long frontage now occupied by open countryside. Even without the roads constraint, this site would have a low ranking in any list of significant candidate areas for new housing that could integrate well into the overall village framework.

#### Recommendation

4.2.207 I recommend that no modification be made to the Local Plan in respect of this objection.

### NEW HOUSING PROPOSAL - HARROLD: POLICIES S6, NE14, H1, H23, H24 & H25

#### Objections and Key Issues

4.2.208 Mrs S Willars & Mr R Willars 951/1-/4, EC Clayson 1170/1-/3

SPA should include land to rear of Mansion Lane and land fronting Orchard Lane, Harrold



Land at Mansion Lane, Harrold, should be in SPA for up to 16 dwellings that could be built immediately on 0.525 ha

sites should be deleted from the AGLV as they relate to the built up area, and S6 should not omit existing built-up and garden areas

unnecessary to retain full width of Important Open Space "F" to develop at Orchard Lane

S6 should not omit existing and built up garden areas and should look to accommodate future development appropriate to the locality

#### Council Reply

4.2.209 The Council's written response is contained in Documents BBCEV54 and 147.

#### Appraisal

4.2.210 The relevant context for both objection sites is as follows. There are no objections to the "B" village status of Harrold, or to the allocated site at the Meadway, which I find likely to produce some 40 dwellings in the Plan period. There will probably be more residential development in the village in the near future – at least 15 dwellings - because of the closure of the Bridgman's factory on its two sites in the middle of Harrold. This major employer has thus disappeared, while a significant number of new dwellings are in prospect. The AGLV designation washes over the whole village, and is of such a scale and breadth of purpose that a specific exclusion here would serve no purpose, whatever my findings.

#### Mansion Lane

4.2.211 The Mansion Lane objection site defined by Mr Clayson is essentially the same as in the Willars' objections. The evidence is that detailed boundaries might change in a detailed planning application. I saw that this site mostly has the appearance of a spinney, with part of a field in agricultural use. I have no conclusive evidence that this was a domestic garden in the past, but my conclusions take into account that it might have been. The objectors envisage keeping existing peripheral planting. Effectively, the cul de sac of Mansion Lane would be extended, and the prospect is held out that the site could provide a turning space and some street parking for existing residents.

4.2.212 My visits reveal that the site is definitely outside the built-up limit of the village, and would be perceived as such in any reasonable planning assessment. There need not be harm to the nearby conservation area, if a scheme design were sensitive. Nevertheless, any development of between 10 and 16 dwellings would be partly visible from the village outskirts, however good the boundary landscaping, although the site is not particularly prominent. The parking and turning improvements held out could outweigh an addition of traffic using the narrow Mansion Lane, but any benefits are not so significant as to discount other planning drawbacks.

#### Orchard Lane

4.2.213 The eastern boundary of this open site occupies a considerable length on the west side of Orchard Lane. Not only is it a major break in the built fabric, but to the west it adjoins land which is entirely open save for the listed "Mansion" building, set within formal grounds. It would be fallacious to claim the land as an infill site. Areas of land along the north and west boundaries of the site are designated as Important Open Space "F", to reflect indubitably fine views of The Mansion and its grounds. The definition of the SPA in this part of Harrold accurately reflects the primary built framework of the village – The Mansion being set apart from the village proper. Any significant development would diminish the important views, as well as intruding into what I have no difficulty in describing as open countryside.

## Recommendation

4.2.214 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL - HARROLD: POLICIES S6, H1 & H25

### Objections and Key Issue

4.2.215 Messrs RJ & CT Goodes 1190/1-/3

Include site "A" at Harrold within SPA boundary as sensible rounding off of village to allow one detached dwelling on the eastern side

### Council Reply

4.2.216 The Council's written response is contained in Documents BBCEV 156, 166 and 167.

### Appraisal

4.2.217 The 1993 Adopted Local Plan succinctly describes this Important Open Space, set within the River Protection Area, as "a meadow between a public footpath and the river, providing a rare open view from the village of the river and valley beyond". I find that it plainly lies outside the main built framework of this part of the village. Any building on this handsome meadowland, which offers a long attractive vista, appears to me likely to harm the visual characteristics of the Space, without making any real contribution to the housing land shortfall.

## Recommendation

4.2.218 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL - HARROLD: POLICIES S6, H1, H23

### Objections and Key Issues

4.2.219 WA Lyon & Partners 1200/1-/2 & /7

insufficient sites are allocated within villages

4.05 ha of open land off Wood Lane, Harrold, should be within SPA and allocated for 45 dwellings

SPA boundaries are anyway objectionable in not allowing for sufficient development, in the context of a housing shortfall

### Council Reply

4.2.220 The Council's written response is contained in Document BBCEV 55.

#### Appraisal

4.2.221 No objection is made to the "B" village status of Harrold, or to the allocated site at the Meadway, which I find likely to produce some 40 dwellings in the Plan period. There seems likely to be more residential development in the village in the near future – at least 15 dwellings and probably more - because of the closure of the Bridgman's factory on its two sites in the middle of Harrold. This is a relatively large number of dwellings, producing a consequent significant addition of affordable housing if implemented.

4.2.222 The objection site consists of two fields in the north-west part of Harrold, and all the boundaries save that to the west adjoin open countryside. Even the housing to the west is little more than visually undistinguished ribbon development, leading out of the village. The site is visibly and obviously not within the primary built framework of the village. Development of this scale and on this site would amount to uncontrolled expansion into the countryside at a wastefully low density. I find no fault with the designation of the SPA boundary in this area of Harrold, as it follows the line of significant development.

#### Recommendation

4.2.223 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL – KEMPSTON RURAL: POLICIES S6, BE5 & NE21

#### Objection and Key Issue

4.2.224 Mr Frossell & Mrs R Hall 1189/1-/3

Gibraltar Corner and Wood End, Kempston, are established small communities capable of extension without harm, and should be within SPA

adjust the Marston Vale Community Forest boundaries

Area of Special Restraint designation in this location is too close to the built-up area; there could be development without detrimental effect

#### Council Reply

4.2.225 The Council's written response is contained in Document BBCEV 74.

#### Appraisal

4.2.226 The boundaries of the Marston Vale Community Forest are set out in the Forest Plan (CD108), a non-statutory document with no direct statutory implications for the planning process. The boundaries have to be shown on the Proposals Map, reflecting the designation, and the local plan process cannot directly change them.

4.2.227 Gibraltar appears to be an isolated pre-war speculative building development, amounting to no more than a small mass of houses without supporting facilities. Wood End is essentially a small linear development. They lie in open countryside; their closeness to an area of Bedford and Kempston that is due for major but controlled expansion is another prime

reason not to expand the two, as they could in a minor way detract from the prospects of the H7 allocation.

4.2.228 Even in the context of Wood End and Gibraltar, the four proposed sites have no planning virtues. The proposed site at the eastern end of Wood End would merely extend the ribbon of roadside development into a pleasant open gap. The three sites west and north of Gibraltar, amounting to some 8 ha, are strips of open land utterly unconnected to the existing built form, though of about the same size in total. They encroach on to open land, and their development would merely invite more proposals for building outside the settlement in due course.

#### Recommendation

4.2.229 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL – LITTLE STAUGHTON: POLICIES S6 and H24

#### Objections and Key Issue

##### 4.2.230 St Albans Diocesan BOF 223/1 & /3

Include 1.15 ha of Board's land on which buildings once stood within SPA, and round off village

#### Council Reply

4.2.231 The Council's written response is contained in Document BBCEV 59.

#### Appraisal

4.2.232 Little Staughton is a linear village with very little depth of development and few facilities, categorised as a "B" Village in the Deposit Plan and outside the strategic growth corridor. Admittedly, the site lies south of an untypical 20<sup>th</sup> century cul de sac development, but the latter is not an ensemble of any visual merit. I take account of the fact that the site would be unostentatious seen from the High Street, as it lies at the end of a trackway. The SPA has been drawn tightly around existing buildings in this modest settlement, in my view with good reason, so there is very little room to accommodate any new dwellings.

4.2.233 There undoubtedly once was a substantial building on the objection site, as old OS maps show. However, it has been gone for some time and I have no evidence of what it was. This fact adds no real grounds to justify new building of different scale and character on a site now in agricultural use.

#### Recommendation

4.2.234 I recommend that the Plan should not be modified in response to this objection.

### NEW HOUSING PROPOSAL – LITTLE STAUGHTON: POLICY S6

#### Objection and Key Issue

4.2.235 CJ Jordan 957/1

Include land behind Roebuck and Holly Cottages in Little Staughton in the Settlement Policy Area

Council Reply

4.2.236 The Council's written response is contained in Document BBCEV 1105.

Appraisal

4.2.237 The objector talks of a possible future need or desire to upgrade or enlarge existing refrigeration facilities on the land behind the cottages, or to enlarge or replace the cottages. The SPA line at Little Staughton has been drawn in a consistent manner to enclose existing curtilages in this long, linear "B" Village tightly. Any adjustment here in the manner desired would alter this consistent principle to no good planning effect. I agree with the Council that the best way forward for this objector would be to seek to achieve desired changes through planning applications specific to a particular project.

Recommendation

4.2.238 I recommend that no modification be made to the Local Plan in respect of this objection.

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NEW HOUSING PROPOSAL – LITTLE STAUGHTON: POLICY S6

Objections and Key Issue

4.2.239 B Hopperton Esq 1148/1, CG Hopperton Esq 1149/1

Include land within Little Staughton SPA

Council Reply

4.2.240 The Council's written response is contained in Documents BBCEV 1228 and 1229.

Appraisal

4.2.241 The objectors are presenting adjoining sites on the east side of the long main street in this linear village. Both amount to significant and deep incursions into open countryside, far to the rear of the curtilages of existing properties. The sites do not lie within the urban area or within a strategic corridor as defined in the Structure Plan, but are outside the boundary of a modest "B" Village. Development would bring about a significant change in the overall form of Little Staughton, and if sanctioned, would no doubt be followed by further applications to develop in depth. This would be most undesirable in an isolated rural settlement of modest size, which cannot expect significant growth within the criteria of current local and national planning policy.

Recommendation

4.2.242 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL – MELCHBOURNE/YELDEN: POLICY S6

### Objection and Key Issue

#### 4.2.243 Mr NA Briggs 1156/1

Land r/o Leacroft, High Street, Yelden, should be within SPA, able to accommodate a single storey dwelling; a Planning Inspector recently considered it to be in the village

### Council Reply

4.2.244 The Council's written response is contained in Document BBCEV 411.

### Appraisal

4.2.245 The objection site is now occupied by a large existing building of agricultural origins, later used as a private squash court. It is set well to the rear of Leacroft off the High Street, and is of no visual attraction. The site is obviously at Yelden village, but the SPA defines what is included in the primary built framework of a settlement. Yelden is a modest "B" Village, far from the urban area, and not within a strategic corridor as defined in the Structure Plan. The SPA boundary has been tightly but equitably drawn round the existing core of building curtilages. The objection site does not fit within this tight curtilage, and I see it as an outlying, ancillary structure best described as part of the countryside surroundings of the village.

### Recommendation

4.2.246 I recommend that no modification be made to the Local Plan in respect of this objection.

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## NEW HOUSING PROPOSALS – MILTON ERNEST: POLICY S7, H1 & H23

### Objections and Key Issues

#### 4.2.247 Bedfordia Developments Ltd 66/1, Alfred McAlpine Developments Ltd 1082/1-/3

Allocate land on 2.8 ha of agricultural land of Grades 2 and 3A at Marsh Lane, Milton Ernest, for 70-80 dwellings of varied size and tenure - a 14 ha site altogether with capacity for 200 dwellings

3.6 ha of grazing land at Home Farm, Milton Ernest, should be allocated for about 35 dwellings in a reclassified "A" Village

### Council Reply

4.2.248 The Council's written response is contained in Documents BBCEV 56 and 479.

### Appraisal

4.2.249 The objections are made in the context of a significant housing land shortage in the plan period to 2006. The sites lie neither within the urban area, or a strategic corridor as defined in the Structure Plan. Milton Ernest has been designated a "B" Village, and it has very limited facilities for its population, which has been recently augmented by a 43 dwelling development east of the large commercial Garden Centre. It is, however, true that post war development has changed the form of what must earlier have been a linear settlement along

its constituent roads. The AGLV designation washes over the whole village, and is of such a scale and breadth of purpose that a specific exclusion here would serve no purpose, whatever my findings on the two objection sites.

4.2.250 In the context of the AGLV, the Bedfordia site, which lies in a shallow bowl with ground rising to the north and east, is undoubtedly prominent when seen from the adjacent A6. Its physical presence would be noticeable, however well the scheme was landscaped. The original objection put forward a larger 14 ha site, and it is relevant that, if this objection were sustained, the larger site might be resurrected by the objectors in a later plan period.

4.2.251 The McAlpine site lies in both the AGLV and the River Protection Area. It is a sensitive site; new houses would fill some of the attractive open land north of the Great Ouse, and impinge adversely on the setting of Butterfield's distinguished High Victorian Milton Ernest Hall complex. The objector says that the area of development would relate well to the existing pattern of development and round-off the edge of the built up area. The present developed edge of this part of Milton Ernest appears to me well enough defined already by River Lane and the back boundaries of properties to the north.

4.2.252 Overall, there seems to me no justification for major expansion of Milton Ernest in this Plan period, in view of the priorities around Bedford and in the Strategic Corridor.

#### Recommendation

4.2.253 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSALS - OAKLEY: POLICIES S6 & H1

#### Objections and Key Issues

##### 4.2.254 Bedfordia Developments Ltd 66/2, Parrotts (Oakley) Ltd 1169/1-/2

Include Parrott land at Lovell Road, Oakley (commercial land r/o Nos. 22 and 24 Lovell Road with part rear garden land of No. 20) for c.16 dwellings, or mixed residential/commercial development, additional to the allocated site

Allocate Bedfordia land at Station Rd, Oakley, for about 106 dwellings arranged in 2 parcels on 15.62 ha

AGLV and ASR notations are accordingly inappropriate, as the land relates to the built-up area.

#### Council Reply

4.2.255 The Council's written responses are contained in Documents BBCEV 82 and 104.

#### Appraisal

4.2.256 These two objection sites adjoin physically, and though greatly differing in size, both lie within the triangle formed by Lovell Road, Station Road and the embanked Midland main

railway line. The issue of residential development is coloured by land nearest the railway having been assessed by the Council as falling within Noise Exposure Category "C" – where housing is not proscribed, but is not normally granted planning permission. The Council assesses all the Parrott land in this category, as well as a strip of the Bedfordia land nearly 100 m wide on the railway frontage. The remainder of the Bedfordia land falls within Category "B", where noise should be taken into account, and appropriate environmental steps carried out.

4.2.257 Both sites are within a designated ASR. Its purpose is clear. Oakley and Clapham are separate communities, clearly divided by an area of open agricultural land. The width of that separating land will shortly be much diminished by the construction of the Clapham Bypass, and the development of the Clapham Folly site immediately east of the new road. The presence of scattered groups of dwellings along Oakley/Lovell Road does not diminish the reality of the separation. My site visits convince me that the presence of the railway line does not bring either objection site into the ambit of Oakley village. Station Road is a strong eastern boundary to the main built form of the village. The Bedfordia land especially is authentic open countryside in planning terms, the playing fields at its southern end as much as the agricultural land. The Parrott site, though seen as backland, either open or behind buildings used for storage, is also distinct and clearly not part of the village proper. Development of the sites would more or less halve the gap between Oakley's edge and the new western boundary of Clapham formed by the Bypass and Clapham Folly development.

4.2.258 Oakley is designated a "B" Village in the Deposit Plan, but it has many of the village facilities associated with "A" villages. Of course, the sites do not lie within the urban area or within a strategic corridor as defined in the Structure Plan; also, the Structure Plan gives no policy support for village development on the scale proposed by Bedfordia. My conclusions on Oakley's status are set out above in paragraphs 1.76-91 above. The Clapham Folly site is a fait accompli, and has been treated by the Council as an exception to general policy, justified by particular circumstances.

4.2.259 However, I consider that the factor militating most against development on this side of the village, now or in the future, is the small size and vulnerability of the gap towards Clapham. The Parrott site is quite small, and landscaping could probably screen most of it from view to passers-by. However, it would still amount to undesirable small-scale development in open countryside of the kind PPG7 says should be strictly controlled. The Bedfordia site makes a particular contribution to the rural character and context of Oakley. The AGLV designation, though very broad-scale, is another reason to look with disfavour on any development of open land within it that is not absolutely necessary. The arguments against building on the Bedfordia site are not seriously diminished by the proposed relocation of the Middle School's playing fields, with other access and parking benefits for the Middle and Lower Schools.

4.2.260 The modest, problem-free employment use on the Parrott site would be lost to a greater amount of development: a poor exchange in any terms. Even if the present business of builders' offices and storage were to close, I would not consider a specific local plan allocation for housing appropriate here. An application to expand the existing commercial use could be judged in terms of the Deposit Plan's policies E19 and E20.

#### Recommendation

4.2.261 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - OAKLEY: POLICIES H1 & H25

#### Objections and Key Issues



4.2.262 Bedfordshire County Council 295/2, /7 & /11, Mr JH Felce 236/1, Mr & Mrs Felce 1160/1

Allocate 0.91 ha of agricultural land for housing at Pavenham Rd, Oakley, immediately north of the Council's allocated site

remove the inaccessible area of established woodland north of Lovell Road from its Important Open Space "F" designation; only visual contribution is as backdrop to residential properties fronting Lovell Rd, Church Rd, Ruffs Furze and Parsonage Close; could develop 1-2 dwellings without harm to surroundings or woodland backdrop; the trees would be better protected by other legislation

#### Council Reply

4.2.263 The Council's written response is contained in Documents BBCEV 255, 262, 263, 265 and 482.

#### Appraisal

4.2.264 The Council's allocated site at Pavenham Road is already at the very northern end of the village, and can be held to complement a line of single roadside dwellings on the west side of the road opposite. Although the County Council land is of similar visual character to the allocated site, its development would extend the village's expansion further northwards into open countryside along a narrow axis. The housing gain would be modest, but the advance of development towards the Great Ouse, encroaching into designated River Protection Area land, would be a positive planning demerit.

4.2.265 The proposed Important Open Space "F" is private land, seen by the public only as a dense and impressive tree screen behind housing. It has merits in this respect, but I consider that the Council's perceived tongue of open land between Lovell Road, the school grounds, and the playing fields east of Station Road, is a tenuous concept, not really appreciated by pedestrians or other passers-by. The proposed IOS is already proposed for diminution following a planning appeal decision by PIC207. If the Council thinks the main body of trees worthy of preservation, it is open to it to make a Tree Preservation Order.

#### Recommendation

4.2.266 I recommend that the Local Plan be modified to omit the proposed Important Open Space "F" at Oakley, but that no modification be made to the Local Plan in respect of the objection concerning land at Pavenham Road,

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#### POTENTIAL NEW HOUSING PROPOSAL - OAKLEY: POLICY S6

#### Objection and Key Issue

4.2.267 Old Road Securities plc 393/62

Oakley SPA should include the Recreation Ground depicted as a IOS, Dial House, Parklands north of the Drive, the walled garden north east of Oakley House, and the Gables off Westfield Road

#### Council Reply

4.2.268 The Council's written response is contained in Document BBCEV 84.

## Appraisal

4.2.269 The developed argument of the objector includes the submission that Oakley should be an "A" Village. My conclusions on Oakley's status are set out above in paragraphs 1.76-91 above. The development potential of Oakley in this plan period is very limited, the allocated site off Pavenham Road accommodating only about 14 dwellings.

4.2.270 Despite the large amount of post-war development in the village, I find that the form of the main settlement is quite easy to distinguish on the ground. It follows that the definition of boundaries where the village proper – the primary built framework - meets the inevitable straggle of dwellings on roads out of the settlement is not difficult. In this south-west corner of Oakley, the Council's SPA line follows the boundaries of closely spaced houses where Church Lane runs westwards into Westfield Road. It stops at the western curtilage of "Tamarisk", where a narrow roadway marks a transition to single houses set built within much larger frontages on the south side of the road.

4.2.271 Behind the houses that front the south side of Church Lane and Westfield Road stands the generous village recreation ground, amounting to 2.4 ha. It is around the periphery of that large public open space that one finds the dwellings the objector wishes to include within the SPA. By no reasonable estimate can the recreation ground, which has a substantial clubhouse and changing rooms, or any of these houses, be described as lying within Oakley's primary built framework. The fact that one or two other villages have had recreation grounds included within their SPA's is not to the point. If such designations attract objections I consider them on their merits.

4.2.272 The large walled garden south of the recreation ground, an adjunct of the listed Oakley House, received planning permission for a significant new house on appeal in 1990. However, if it were built it would amount to no more than another peripheral dwelling on the Oakley fringe, well separated from neighbouring houses. None of the planning history submitted by the objector alters my conclusions on the matter.

## Recommendation

4.2.273 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL - ODELL: POLICY S6

### Objection and Key Issue

4.2.274 Bedfordshire County Council 295/3

Include Rectory Farm, Odell in the SPA

### Council Reply

4.2.275 The Council's written response is contained in Document BBCEV 1270.

## Appraisal

4.2.276 Rectory Farm lies at the eastern end of the High Street at Odell. The village can easily be seen as divided into two parts. The western end is densely developed, but this depth of development stops with the group of dwellings at 82-88 High Street, and at Odell Mill in Mill Lane. East of that point, individual structures and small groups of buildings are the norm. The Rectory Farm buildings are no more than the last cluster of development at the

eastern end of the High Street. I find that the current low-density redevelopment of another large but distinct developed area north of Rectory Farm for housing - the leather works – does not give the eastern end of the village a critical mass of development sufficient to justify a second SPA area matching that at the western end. Nor does it justify a very large eastward expansion of the Deposit Plan's defined SPA.

#### Recommendation

4.2.277 I recommend that no modification be made to the Local Plan in respect of this objection.

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### NEW HOUSING PROPOSAL – ODELL: POLICY S6

#### Objection and Key Issue

4.2.278 Odell Estate Trustees 1083/1

amend SPA boundary to include land at Horsefair Lane

#### Council Reply

4.2.279 The Council's written response is contained in Document BBCEV 73.

#### Appraisal

4.2.280 The objection site was included within the Settlement Policy Area boundary in the 1995 Draft Plan, but omitted after the matter was reconsidered. My visit convinces me that the Council's change of mind between the Draft and Deposit Plans was correct, and neither intrinsically unfair nor unjustifiable. The objection site does differ appreciably in character from the more developed plots to the north of it in Horsefair Lane. Essentially it has the character of a field, and the presence of the wooden building close to the lane frontage does not make the overall site other than predominantly open. The existence of dwellings across the lane is no strong planning argument for "balancing" development opposite in this modest "B" Village.

#### Recommendation

4.2.281 I recommend that no modification be made to the Local Plan in respect of this objection.

### NEW HOUSING PROPOSAL – PAVENHAM: POLICIES S6, NE14, H1, H24 AND H26

#### Objections and Key Issues

4.2.282 Mr GCW Beazley 1027/9, /11, /16 & /23-/24, J Tandy Esq 1069/1-/2

The Pavenham SPA should be enlarged to provide for a sustainable village community; including:

the existing pony paddock between Pavenham Bury estate and Pavenham Golf Club – one house or two starter homes; and

the whole of the gardens forming the eastern boundary of the Pavenham Bury Estate at Church Spinney – preferably a single house of quality with access to Church Lane at Crowlands; and

3.24 ha of land known as the Harris field should be included within the SPA, for hobby farming or smallholding with 1-2 units, each with one dwelling

rough grazing land in Church Lane, corresponding with the development at Model Farm, should be within the SPA

#### Council Reply

4.2.283 The Council's written response is contained in Documents BBCEV 87 and 100.

#### Appraisal

4.2.284 In discussing objections to Policy H26, at paragraphs 4.4.21-26 below, I find against Mr Beazley's concerns for the Plan to endorse the principle of large houses of fine quality in the open countryside, and a special dispensation for hobby farmers to build there more freely. The Deposit Plan's defined Settlement Policy Area for this village is wrapped tightly around existing development, though excluding peripheral farm buildings. The definition seems to me logical in the light of criteria in CD39A, not requiring especially tortuous subjective judgements.

#### Paddock land between Pavenham Bury estate and Pavenham Golf Club

4.2.285 This land has twice been the subject of a planning appeal, dismissed on both occasions. Though it adjoins the post-war estate development of the Bury, the site is entirely in keeping with the open landscaped character of the land east of the estate, and is attractive to the eye throughout the year. It is by no stretch of the imagination "a rural brownfield site" as is claimed in the objector's evidence, and any building on it would amount to backland development, which could be problematic. There is simply no strong planning argument to justify absorption of the site within the village confines.

#### Church Spinney

4.2.286 This is a woodland area running east of the Church Lane exit from the village, with open golf club land on its eastern fringe. I saw on site the general area within it that the objector considers appropriate for one or two large buildings. I do not doubt that such a project might produce a handsome architectural result, if put in the hands of a gifted designer. However, the site is well to the north of the village and there could be no logical planning reason for extending the SPA to enclose the envisaged housing and generous grounds. Any proposal would have to be argued on its merits in the context of a countryside location.

#### The Harris Field

4.2.287 This rectangular field lies well to the east of the main village, and its setting is unquestionably rural in character, despite the surroundings of a caravan park to the west and housing at Close Road to the east. Both of the latter have their origins in uncontrolled pre-war development in the countryside. I see no logical grounds for putting a SPA boundary around the field and its surroundings as some sort of detached outlier of Pavenham, or otherwise amend the Plan specifically. A desire to use the land as small-holdings with integral dwellings would be best dealt with by a reasoned planning application, which could be treated on its merits.

#### Church Lane

4.2.288 The proposal would simply push out the SPA boundary from its existing precise alignment around the curtilages of buildings on the west side of Church Lane, and extend it northwards, into the open countryside up to a field boundary line. It is described as a logical rounding off, but it serves no planning purpose in the Deposit Plan's context of restraint, which is appropriate for this modestly sized village.

#### Recommendation

4.2.289 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - PODINGTON: POLICY S6

#### Objection and Key Issue

#### 4.2.290 Podington Garden Centre 993/2

Podington SPA should be amended on its south eastern side to include a narrow strip of land, coinciding with the boundary as given in the Centre's planning permission

#### Council Reply

4.2.291 The Council's written response is contained in Document BBCEV 158.

#### Appraisal

4.2.292 The estimation of the appropriate SPA for a settlement does not necessarily have to reflect an ownership boundary. In the case of the nursery, the line is drawn to capture significant structures at the Garden Centre within the boundary. It thus defines the primary built framework of Podington with precision, and I find the Council's judgement here to be preferable.

#### Recommendation

4.2.293 I recommend that no modification be made to the Local Plan in respect of this objection.

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### NEW HOUSING PROPOSAL - RAVENSDEN: POLICIES S6 & H1

#### Objections and Key Issue

#### 4.2.294 Greene King plc 346/1 & /5

2.5 ha of agricultural land at Ravensden crossroads should be identified for residential and open space, and there should be a settlement boundary, enclosing a "B" Village

#### Council Reply

4.2.295 The Council's written response is contained in Document BBCEV 85.

#### Appraisal

4.2.296 The Council rightly says in evidence that SPA's should not be defined for settlements without a recognisable built-up character. Here there is a characterless cluster of service buildings around a rural crossroads. The public house and Post Office/Store face each other across that junction, and no more than a modest scatter of dwellings, plus the garage, complete the picture. The relative disproportion of service buildings to dwellings, which makes the location a destination for users of those services, does not thereby make the location a significant settlement. The hinterland in all directions away from the crossroads is plainly open countryside. I find that the south-east quadrant of the cross-roads is justifiably designated as the northern tip of a larger Area of Special Restraint, designated to counter-act any attempt to develop land between Bedford and the surrounding small settlements. It is into that area that the objector seeks to build between 8 and 16 dwellings. The illustrative sketch – admittedly only one way of developing the site - would leave potentially developable "community open space" at the end of a new service road between the new construction and what is now an isolated caravan site to the south.

4.2.297 A development here could expand the number of dwellings in this tiny settlement by up to one quarter, while conspicuously consolidating the Bedford Road and Oldways Road frontages near the crossroads, and encroaching into open countryside. This is clearly quite unreasonable and disproportionate. The site has no special visual attraction; it is just plain agricultural land. For reasons of sustainability and countryside conservation, the objection site is one of the last locations one would choose to meet a housing land shortfall in the Borough.

#### Recommendation

4.2.298 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - RAVENSDEN: POLICIES S3, S6, BE5, H1 & H24

##### Objections and Key Issues

4.2.299 Mr R Mingalone 1021/1, /2 & /4, Trustees of Northfield Estate 1093/1-/4, R Westley 1162/1-/2

there should be a redrawn SPA, and land for housing identified at Northfields, Church End

Cleat Hill should have a SPA boundary, preferably within the Urban Area Boundary, and be outside the Area of Special Restraint

remove Important Open Space "A" at Church End, and part of "E" at Cleat Hill

Delete farm buildings west of the farmhouse at Ravensden from the ASR

##### Council Reply

4.2.300 The Council's written responses are contained in Documents BBCEV 77, 107, 1096 & 1106.

##### Appraisal

4.2.301 The objection site at Church End comprises Northfield and other structures at the north-east periphery of Church End, a modest "B" Village. Neither site lies within the urban area or a strategic corridor as defined in the Structure Plan. At Church End, my visits confirm the Council's view that the primary built framework of the village at the northern end is defined by the close-knit roadside housing running south-westwards from Corner Cottage and

Moulterbeck. Northfields and its attendant open land – which includes the well-treed IOS "A" – are clearly "at" Church End, but peripheral to the denser form of development to the south-west. In reaching this view, I take account of the prior existence of dwellings on IOS "A", but the present day scene there – densely planted land - is highly attractive and sited at a prominent point of approach into Church End.

4.2.302 I see the entity of Cleat Hill as essentially a collection of low density roadside development along the B660, on the fringe of the defined urban area but appreciably outside the densely developed urban edge. It entirely lacks the close-knit urban character of the nearby housing within the defined Urban Area Boundary. The Council sees Cleat Hill, logically in my view, as not having the recognisable mass to warrant the drawing of an SPA boundary. Any expansion of development at Cleat Hill would be visually prominent, on high ground, and would extend the urban form of Bedford Town north-eastwards, in a thin ribbon of building stretching into open countryside. I support the concept of the Area of Special Restraint, and see it as a suitable and sensible planning designation to wash over Cleat Hill, as well as adjoining areas of open countryside in the vicinity. All of the designated IOS "E" has visual value: the open eastern part with its long views, and the garden-like western part.

4.2.303 The objectors put forward an argument that development is needed to sustain small settlements and their services. However, I find in favour of the Council's arguments, underpinned by national planning policies, that small settlements like Cleat Hill and Church End have the lowest of priorities for expansion in this Plan period. In any event, development on the small scale put forward would encroach on open land but not lead to the retention or expansion of local facilities.

#### Recommendation

4.2.304 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - RENHOLD: POLICIES S6, NE23, BE5 & H1

##### Objections and Key Issues

4.2.305 JH Joyce & Sons 168/1-/2, Markham Family 221/1-/2, Mr AN Polhill 222/1-/3

The developed land at Church End (for infill) and Top End, Renhold (open frontages along southern side including Important Open Space "L"), should be within SPA and receive new housing

The area of special restraint should be removed

0.51 ha site at the end of Woodfield Lane should be allocated for housing

##### Council Reply

4.2.306 The Council's written response is contained in Documents BBCEV 33, 83, 159 & 168.

##### Appraisal

4.2.307 The collection of "Ends" in Renhold Parish is a quintessential illustration of this local form of detached hamlet. In journeying through the Renhold area, one is conscious of passing through a very loose, linear form of settlement. Workhouse End and Salph End both possess a concentrated density of built form that greatly exceeds in impact the loose linear string of buildings along the road at Church End and Top End. To draw a SPA boundary to enclose all

the Church End and Top End buildings would serve no purpose save to bring forward many open rural areas along the connecting road for development. Such an action would suburbanise a semi-rural location, outside the urban area and not within any strategic corridor as defined in the Structure Plan. In saying this, I am not of course denying the undoubted sense of place and community felt by those who live in or near Renhold, or the presence of communal buildings like the parish church, public house and village hall. It is simply not an appropriate place for significant expansion, given the priorities at County and Borough level, and the national policy of safeguarding the countryside for its own sake. The Area of Special Restraint policy, extending over open land from the urban area northwards up to the line of the road linking the Ends, is an appropriate policy mechanism to safeguard open countryside from unnecessary development. Insofar as it may need to be adjusted, I have found that adjustment is better done around the Urban Area boundary of Bedford Town than in the surrounding ends and parishes.

4.2.308 The proposed Joyce site at Workhouse End amounts to no more than a proposed incursion into open countryside, to the rear of a significant amount of uninterrupted roadside housing. The Markham site at Church End is not in any realistic sense an infill site in a developed frontage. The Polhill suggestions for further definition of roadside areas to be enclosed by a SPA boundary between Church End and Workhouse End, along with IOS "L", would almost certainly lead directly to proposals to further consolidate existing linear development. If these were successful, the result would be suburbanisation of the roadside area, cutting off valued rural or semi-rural views.

#### Recommendation

4.2.309 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - RENHOLD: POLICIES S6, H1 & LR1

#### Objections and Key Issue

4.2.310 Greene King 346/2-/4

1.39 ha site adjacent to the Polhill Arms should be included within the SPA of Renhold, and allocated for between 20-36 new dwellings and a new village hall

#### Council Reply

4.2.311 The Council's written response is contained in Document BBCEV 86.

#### Appraisal

4.2.312 The objector now accepts that the site is no longer needed for a village hall. This is an undeveloped site beyond the north-east boundary of Salph End, a "B" category settlement very close to, but rightly distinguished from, the Urban Area Boundary of Bedford Town. Between this part of Salph End and the town, the separating area of vulnerable open land has been designated as an Area of Special Restraint – again rightly, in my opinion. The objection site stretches deep into the open countryside south of Wilden Road. It has no visual or organic link with the built-up core of land in Salph End.

4.2.313 Though not itself used as agricultural land, the site is bordered by land of that character to the south, east and west, and I find that it reads visually as countryside. It is set on rising land, and sufficiently far from Bedford not to be visible when one looks northwards from the town's designated boundary along Norse Road, some 500+ m away. My findings



about these objections take account of, but are not invalidated by, my conclusions at paragraphs 4.2.70-79 above about the Norse Road objection site.

4.2.314 Though the stretch of Wilden Road north of the objection site contains houses, these comprise a modest line of frontage dwellings outside the consolidated mass of development at Salph End. The site does not therefore gain any real measure of integration with the settlement on account of that fact.

#### Recommendation

4.2.315 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - RISELEY: POLICIES S6 & H1

#### Objections and Key Issue

4.2.316 VE Parrott (Oakley) Ltd 273/2 & /17, Mr D Howard 1109/1 & /3

1.78 ha, comprising separate parcels of agricultural/market gardening, paddock and vacant land at the rear of the High Street, Riseley, should be within the SPA as a housing allocation, and its boundary should run along the line of the Riseley Brook

#### Council Reply

4.2.317 The Council's written response is contained in Documents BBCEV 112 and 416.

#### Appraisal

4.2.318 The objections are made with others that Riseley should be re-classified as an "A" Village, which I have found against when considering Policy S7 at paragraphs 1.76-91 above. As a "B" Village, Riseley would be more suited to accommodate development in the form of infill and small sites, and this objection site falls into neither category. The site, which is in a number of ownerships, is all open land set to the north of frontage development along the High Street. The objectors have not yet defined a definitive vehicle access point to the High Street, but I do not doubt that this could be accomplished in due course.

4.2.319 Not only would the inevitable development in depth change the built character of this central part of the village, which is mostly narrow and linear; the new buildings would be very visible from the footpath, which leads down from the village church on higher ground to the High Street, and also from another footpath along the north side of the Brook which traverses the north-east part of the site.

4.2.320 The old village settlement pattern would be further suburbanised, in a Plan period when there is no planning policy priority to expand even "A" Villages significantly. The affected land is at the village edge. This highly visible, undeveloped zone of transition has positive visual merit, both in the area of intensive cultivation, and in the tree-screened areas of paddock and rough grass occupying the north-east area of the site. Most of it serves as a highly appropriate boundary to a part of the Riseley Conservation Area immediately to its south, at the village's core, which has retained its old linear form. I consider the SPA boundary hereabouts to be a strong and defensible line, which has no need to be extended to the Brook to gain credibility.

## Recommendation

4.2.321 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL - RISELEY: POLICIES H1 & H25

### Objection and Key Issues

#### 4.2.322 Charles Wells Ltd 289/4-/5

Include in the SPA 1.81 ha of open agricultural land next to the Old White Horse public house, Riseley, for about 28 dwellings, including up to 8 affordable homes

Delete the land from the Important Open Space designation

### Council Reply

4.2.323 The Council's written response is contained in Document BBCEV 90.

### Appraisal

4.2.324 The objections relate to land north-west and south-east of a tree-lined brook, but only the latter is proposed for housing, behind a landscaped strip to the High Street frontage. The land north-west of the brook would be dedicated as public open space, and some houses would be offered as affordable homes. The objections are made with another, that Riseley should be re-classified as an "A" Village, which I have found against, in considering Policy S7 at paragraphs 1.76-91 above. That finding leads to the concomitant conclusion that there is no need to search for land for significant housing development in Riseley. The site does not lie within the urban area, or within a strategic corridor as defined in the Structure Plan. The Council, vigilant in such matters, says that there is no strong need for affordable housing in Riseley at present.

4.2.325 It is agreed that the village has an historic linear nature. This is still the dominant impression of the village's character, though the part of Riseley north of the High Street and north-west of the objection site is the major exception to this general rule, containing undistinguished post-war housing of different form. At present those entering the village from the south-west pass this 80 m long frontage after encountering only a handful of dwellings that lie outside the main village framework. In its local context, the frontage is a significant visual incident in a stretch of road marked by buildings at either end.

4.2.326 However, although the land is pleasant and rural, it is little more than that. The location is semi-rural, not a green vista set in the midst of the village. The effective depth of view into the site extends little further than the screen of trees along the brook, although this is less true when this screening vegetation is leafless. I agree with the objector's contention that it neither alters nor affects the overall character or pattern of the settlement. I consider that it does not deserve special status as an Important Open Space, in terms of the qualifying attributes set out in paragraphs 5.48-5.52 of the Deposit Plan.

4.2.327 Nevertheless, I see no strong physical planning or townscape reason why the SPA boundary should be extended to enclose the objection site, leaving aside the lack of obvious need for a significant housing allocation in a "B" Village. Nor do I find any need for development to overcome shortcomings in the transition between village and open countryside perceived by the objector.

## Recommendation

4.2.328 I recommend that the Important Open Space "A" designation be removed from the south-east part of the objection site, but that no other modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL - RISELEY: POLICIES S6, H1 & H23

### Objection and Key Issue

4.2.329 Mr & Mrs CD Clayton 13/1-/3, Hazelwood plc 635/1-/4

Clayton land forming an extension to the housing allocation at Hill View Farm, Riseley, should be included within the SPA, designated for up to 6 dwellings + two pairs of retirement bungalows, and the village reclassified as "A", with a boundary including the farmyard and an extended Paulson's Close

In view of the deficiencies in the Council's housing land allocations, land at Keysoe Road, Riseley, should be within the SPA and allocated for a low density development of c.26 dwellings capable of immediate implementation

### Council Reply

4.2.330 The Council's written response is contained in Document BBCEV 89 and 476.

### Appraisal

4.2.331 The Clayton site is a sub-area within the larger Hazelwood objection land. These objection sites within a "B" Village do not lie within the urban area, or a strategic corridor as defined in the Structure Plan. It is argued that this village fringe site - farm buildings together with grazing land - is clearly divorced from the open countryside. Functionally, the land is a part of a working farm, and the evidence is that all the pasture is grazed at some time each year. Neither the "B" Village status of Riseley, nor the Council's methodology for defining a Settlement Policy Area boundary, is directly challenged by Hazelwood, although it is by Mr & Mrs Clayton. I have found against any change of status for Riseley, in considering Policy S7 at paragraphs 1.76-91 above.

4.2.332 Riseley is essentially a linear village, though the original pattern has been altered by some post-war developments in parts – none of great visual quality. The Council has defined the SPA boundary in the vicinity of the objection site to include nearby properties in High Street and Paulson's Close, but only a short length of land and buildings on the north side of Keysoe Road. The Deposit Plan's allocated site fills in the frontage of Keysoe Road on either side of an existing dwelling, between existing housing and two employment units.

4.2.333 The agenda underlying this route for the line of the SPA has to do with the Council's desire to accommodate a housing allocation in the immediate area when it began preparation of the Local Plan. A scheme for a larger housing site behind the Keysoe Road frontage was abandoned. Relevant factors were the adoption of the new Structure Plan, with its altered locational strategy and changed local factors – principally a lack of need for social housing on this site, after another was found and built on. The end result in the Deposit Plan was an allocation for frontage development only. The objection sites are larger than the Consultation Draft allocation. The objectors are not specifically objecting to the development of the Deposit Plan allocation, but Hazelwood makes the point that its limited scale creates problems for the present agricultural operations, and would not generate sufficient profit to pay for a desirable highway improvement at the High Street junction.

4.2.334 Having visited the sites and surrounding areas, I am clear that the Council was correct in excluding from the settlement the two isolated employment premises just to the south-east of the objection sites. The majority of the latter is pasture. The Deposit Plan housing allocation avoids development in depth, a decision I see as something of a virtue, despite the presence of such development directly across Keysoe Road.

4.2.335 Acceding to these objections would mean that the necessary access road created could be extended to the north-east, opening up the prospect of yet more development in depth behind the High Street. The site occupies ground that rises from this valley bottom settlement; even with boundary planting I consider it would be very difficult to prevent any scheme that properly exploited the site having an adverse impact when seen in long views from the footpath near the Parish Church. The Conservation Area boundary abuts part of the objection site, but its presence is not in itself a reason for my rejecting the proposed allocation.

4.2.336 Recent development in this part of the village has not been of great visual quality, and has not paid great attention to enhancing the physical form or townscape qualities of Riseley. Nevertheless, development in this location and of the scale proposed would certainly not enhance a village where there is no need to allocate more housing in this Plan period.

#### Recommendation

4.2.337 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - RISELEY: POLICY S6

##### Objections and Key Issues

4.2.338 BG plc 780/1, Eastwood Riseley Farms Ltd 1111/3

0.27 ha of land at south-east end of Lowsdown Lane, Top End, Riseley, should be within the SPA, appropriate for 3-4 dwellings

0.85 ha of farmstead site at Town Farm, Lowsdown Lane, Riseley, where there is planning permission for frontage development, should be within SPA

##### Council Reply

4.2.339 The Council's written response is contained in Documents BBCEV 414-415.

##### Appraisal

4.2.340 The BG land has been used for some time as commercial storage, with access gained to Lowsdown Lane through the depot to the north of the site. The site adjoins domestic garden land on most of its western frontage, with open land on other frontages.

4.2.341 The Eastwood Riseley Farms site is a group of agricultural buildings of no visual merit on the opposite northern side of Lowsdown Lane, lying close to and south-east of the older part of Town Farm. This objector's submission is made with another, that Riseley should be re-classified as an "A" Village, which I have found against, in considering Policy S7 at paragraphs 1.76-91 above. On the western fringe of this objection site the Council has put forward PIC12, reflecting a recent planning permission.

4.2.342 Riseley remains a long linear village, with mainly frontage development apart from the College Drive/Gold Lane area. As a "B" Village, the Council has taken what I believe to be a properly conservative attitude to the definition of the SPA boundary. Lowsdown Lane, Bowers Lane and Keysoe Road are thoroughfares leading south-eastwards off the High Street. The Council appears to me to have defined the SPA boundary along them only as far as a continuous and close-set line of buildings exists. Peripheral non-domestic buildings and their curtilages have been excluded as not lying within the primary built framework. The objection sites appear to have been judged as being within the latter category of loosely knit village outliers: in essence, part of the open countryside. My visits to the village confirm the merits of the Council's judgement about the objection sites.

#### Recommendation

4.2.343 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - RISELEY: POLICIES S6, H23 & H25

#### Objections and Key Issue

4.2.344 PS Doble 898/1-/3

Area "E" east of High St should not be included as Important Open Space; it should be within SPA, for a small-scale residential development

#### Council Reply

4.2.345 The Council's written response is contained in Documents BBCEV 161-163.

#### Appraisal

4.2.346 IOS "E" is one of two such designations south of the High Street at Riseley. It is a wide gap of open pastureland, traversed by a public footpath. It is set behind a high roadside hedge but fully visible through a field gate, between 34 High Street and the Five Bells public house. I find that it gives pleasant views south-eastwards and enhances the setting of nearby old buildings within the village conservation area. It thus has a positive planning and conservation function in Riseley and should be retained.

#### Recommendation

4.2.347 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING/DEVELOPMENT PROPOSAL - ROXTON: POLICY S6

#### Objections and Key Issue

4.2.348 Ms J Must 257/1 & /2

Two pieces of land, north of proposed housing allocation and between the Parish Church and Hills Close, should be within the Settlement Policy Area

#### Council Reply

4.2.349 The Council's written response is contained in Documents BBCEV 1267-1268.

#### Appraisal

4.2.350 The objector clearly believes that the village needs considerably more development, to revive it and make up for past restrictions, than does the Council. The land suggested to the south of the church is not clearly put forward for any use save one: an extension of the parish burial ground. It seems to me that such a use has no need for inclusion within the SPA policy line, and given its open nature, would not be judged to lie within the primary built framework of Roxton. If this land were needed as a burial ground, the matter would best be resolved by a planning application. I find no strong argument for any other allocation on a visually sensitive site immediately south of the church.

4.2.351 An area about double the size of the Deposit Plan's 5-dwelling allocation is proposed, on a site immediately to its north. The village is small, not near the urban area of Bedford, or within a strategic corridor as defined in the Structure Plan. In view of the planning priorities of the Deposit Plan and the adopted Structure Plan, I see no good planning case to add more development land within the SPA in this plan period, on a rural site clearly lying within open countryside.

#### Recommendation

4.2.352 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - ROXTON: POLICIES S6, S7, H25 & PROPOSALS MAP INSET 31C

#### Objections and Key Issues

4.2.353 David Bates 1080/2, /4, /5 & /10, Mr N Manley 270/1-/2

Land off Nags Head Lane should be shown within, and as part of, a defined SPA for Wyboston

the classification of Wyboston is too limiting, preventing provision of leisure facilities and cultural activities; land south of The Lane should be considered individually

Important Open Space "C" is unjustified

#### Council Reply

4.2.354 The Council's written response is contained in Documents BBCEV 169, 170, 961, 1236 and 1237.

#### Appraisal

4.2.355 I find that Wyboston can realistically be considered as a place rather than just an area within the Borough. However, seen as an entity alongside both the A1 trunk road and The Lane, it is a loose knit and strung-out settlement. As the Borough says in its evidence, it is "characterised by small groups of buildings separated by open spaces that afford views to open countryside beyond the road frontage". I do not see this place as a conventional village

of the kind suitable to receive a Settlement Policy Area boundary. The definition set out on paper by the objector would merely encourage the creation of continuous ribbon development without a real core of habitation. Mr Manley speaks of the existence of a "recognisable hub of properties that have a distinct built character lying adjacent to the A1". I am not persuaded of the force of that view from my visits to the area.

4.2.356 The Council has put forward PIC 18 deleting the reference to Wyboston altogether in paragraph 2.57. This appears to me a correct planning judgement. There are consequences stemming from the PIC. Important Open Space "C" is one of a number of large open areas in the vicinity. They are supposed to have a positive role as key features in the sporadic nature of development in Wyboston. However, they have no intrinsic aesthetic qualities over and above neighbouring open land, and could be removed without detriment to the Plan's intentions in an area without a Settlement Policy Area boundary.

#### Recommendation

4.2.357 I recommend that the Local Plan be modified to incorporate PIC 18, as set out in Core Documents 11, 11A and 11B, and remove the Important Open Spaces in Proposals Map Inset 31c, but that no other modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - ROXTON: POLICIES H1, H23 & APPENDIX D

##### Objections and Key Issue

4.2.358 Kier Ventures Ltd 953/1-4

Allocate the 2.8 ha Wyseplant site at Chawston Lane for c. 60 dwellings, with possible mixed use,

designate it a Rural Opportunity Site to make an immediate contribution, because the Deposit Plan fails to make adequate housing provision to 2001

##### Council Reply

4.2.359 The Council's written response is in Documents BBCEV 197-200.

##### Appraisal

4.2.360 This is a site bounded to the south by Chawston Lane, with open countryside on other frontages. The site does not lie within the urban area or a strategic corridor as defined in the Structure Plan. The area around the objection site is a part of a loose knit and strung-out settlement, not a conventional village of the kind suitable to receive a Settlement Policy Area boundary. The site already has considerable value as an employment area in the countryside, and the Deposit Plan's positive views about support and encouragement of this sort of use are made clear in paragraphs 6.51-55, echoing national policy. Its loss would be resisted in principle. Though there is a significant housing shortfall in the Deposit Plan's provisions, arising from problems of deliverability, development here would deflect housing demand from key allocated sites where essential roads infrastructure, otherwise unobtainable from the public purse, can be provided.

4.2.361 The Deposit Plan's concept of Opportunity Sites is aimed at the urban area of Bedford. I see no good planning reasons to extend the concept to other areas of the District, and certainly not here.

#### Recommendation

4.2.362 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSALS - SHARNBROOK: POLICIES S6, NE4, NE14, H1, H19, H24 & H25

#### Objections and Key Issues

4.2.363 The Phelps Family 218/1-/4, Mr P Davison 283/1, Trustees of the Rollbridge Pension Fund 805/1, Parkbury Investments Ltd 1078/2-/5, Mr NJ Gant 1161/1-/2, AA Marler & AG Thelwall 1152/2

Redraw SPA to include land for residential development:

- r/o Sharnbrook Court/Normans Road (Phelps)
- east of the Moat House, High Street, removing Important Open Space "G" as the area is fronted by very high hedge, trees and shrubs to the highway (Phelps)
- on 0.5 ha at the former railway station at Coffle End (Rollbridge)
- at Lodge Road/Odell Road, deleting the Important Open Space and Country Wildlife Site designations (Parkbury)
- 0.4 ha adjoining "Woodlands" off Odell Road, excluding it from the identified adjacent area of Important Open Space, possibly in conjunction with adjoining site (Gant)
- c.2 ha of open land to the rear of "Woodlands", Odell Road (Davison)
- on 2.4 ha at Yelnow Farm, in its own right or in substitute for the whole or part of H19 (Marler/Thelwall)

Redraw the AGLV to accommodate a level of future development within the village

#### Council Reply

4.2.364 The Council's written response is contained in Documents BBCEV 109, 110, 114, 116, 392 and 409.

#### Appraisal

4.2.365 Though the objection sites do not lie within the urban area, or a strategic corridor as defined in the Structure Plan, Sharnbrook is an "A" Village, relatively well endowed with facilities, having two substantial allocated housing sites in the Deposit Plan. On one of these, H20, planning permission was given on appeal in January 2000 for a development expected to produce 45 dwellings. I support allocation of the second site, H19, for 25 dwellings. Consequently, I can see no valid argument that this village is being starved of growth opportunities in a Plan period when the priorities for significant development lie elsewhere in



the Borough. I examine below whether the objection sites have strong claims to lie within what the Council's evidence says it aspires to: a defensible and enduring boundary to the primary built framework of the village.

#### Land to the rear of Sharnbrook Court/Normans Road

4.2.366 The land lies within the River Protection Area, a policy category not challenged here in principle by any objection. It is all rural open land, and though the north-east part of the site is narrower and set between gardens, it does not have the properties of an infill site, i.e. a narrow gap between developed frontages. The County-level AGLV designation covering this area is for the Upper Ouse Valley. To retain and protect this modest site between the village and the Ouse from unnecessary development seems to me entirely in accordance with the aim of protecting landscape character.

#### Land east of the Moat House, High Street

4.2.367 This large area of land north at Kennel Hill has, at its east end, a loose group of dwellings on generous open plots and, at the west end, gardens behind a low wall and privet hedge designated as Important Open Space "G". Judged by the criteria of Core Document 39A, it is clearly loosely knit development separate from the unified mass of eastern Sharnbrook. To the east of the scatter of dwellings, and north of Station Road, is agricultural land as far as the Midland Mainline Railway.

4.2.368 However, land west of the rail line and south of Station Road constitutes the last visually significant area of built up land on the east side of Sharnbrook. Within it is the Objection site on the former railway station at Coffle End. The rail station appears to have been the original built element at Coffle End, and the location has been significantly enlarged by a recent housing development. Apart from some commercial use of the former station yard, Coffle End is a small, locationally distinct residential entity, very close to the main village and functioning socially as a part of it. In policy terms, this sort of minor settlement, fully developed and compact, would not be suitable for expansion, although appropriate redevelopment of existing developed land should not be unreasonably withheld. There are also rural employment policies enabling augmentation and some expansion of employment sites such as the former station land here. Thus I see no credible planning case for extending the Sharnbrook SPA to include Coffle End. By the same token, because of its modest importance I see no case for a secondary but separate SPA around Coffle End.

#### Land at Lodge Road/Odell Road

4.2.369 The Parkbury land is seen as two sites, each just below or around 1 ha in extent, for modest developments of 3 and 4 new houses in areas of woodland, both taking access off Lodge Road. I accept the likelihood that neither falls technically into the category of "Ancient Woodland". Trees on both sites included in the Sharnbrook TPO of 1965 have largely disappeared, and that TPO appears something of an historic curiosity, greatly in need of revision. After detailed survey work, the objector has shown that construction would be possible without the destruction of high quality tree species within the woodland.

4.2.370 The above site and the Land adjoining and to the rear of "Woodlands", off Odell Road, both lie within a large open area in the south-east of Sharnbrook. That large area has been excluded from the SPA, though it amounts to a significant element of land physically wrapped around by development that has been designated as within the SPA. Like the Parkbury sites, the Gant site is within IOS area "A", designated for its size and predominantly wooded character; the Gant site is not within a County Wildlife Site (CWS), like the Parkbury sites. The CWS is a County made definition, and apart from suggesting that the detailed Parkbury criticisms of the basis of the designation are submitted to the County Council for consideration, I make no further comment.

4.2.371 I can see no valid objection in principle against an SPA designation which excludes an area of open land penetrating some way into the general outline of a settlement. All the land within IOS "A" has a rural, unmanicured and attractive appearance; this is the case even when the open land is bare of trees, but serves as an attractive open foreground to a wooded backdrop, as with the Gant land. I find an appreciable difference in character when I consider the formal playing field land on the other side of Lodge Road; that is more integrally part of the overall settlement. All the defined area of IOS "A" in the Deposit Plan appears to me to have appreciable merit and local significance, enhancing its surroundings. Apart from its visual merits, I find that the SPA line chosen by the Council legitimately excludes the Gant site, assessing its open surroundings as a more significant factor than its position at the end of a row of houses - the Gant land now appears more like a paddock than the extended garden it may once have been.

4.2.372 Much of the wooded area lacks the benefit of active conservation management when looked at closely. That does not mean its importance is greatly diminished, though it may become a more important factor if not addressed in the foreseeable future. Opening up sites within the woodland for even small housing clusters would mean significant and undesirable loss of trees and scrub, taking account of access, gardens and the need to avoid significant loss of daylight to habitable rooms. The access drives off Lodge Road alone would materially diminish the existing wooded character, however well designed.

4.2.373 The Davison site has no special nature protection, but is visually part of the larger, uncultivated open area that extends to Odell Road, Lodge Road, the Upper School, and the H19 site. Like them it has the appearance of land clearly outside the primary built framework of the village, while adding positively to its character. This last factor has been recognised by its inclusion, together with the Parkbury and Gant land, within the Sharnbrook Conservation Area boundary.

4.2.374 The Yelow Farm site is very obviously part of the open countryside. The owners now have the opportunity to construct a single dwelling on the site of dilapidated farm buildings near the Yellow Lane frontage, following the issue of a Certificate of Lawful Use in October 1999. The likely prospect is that the H19 site will be developed soon, with a strong screen of planting remaining round the site boundaries. The resulting development would give a strong, logical and defensible long-term boundary to this north-west edge of the village. Larger scale development on the objection site would push an appreciable amount of housing up to 200 m further along a quiet cul-de-sac, away from village shops and services.

4.2.375 Development of Yellow Farm could result in up to 50 new dwellings on the land, even if a substantial amount of ground was dedicated to the upper School in perpetuity, as is mooted. It might be done well and appear relatively inconspicuous from further afield, especially if a high standard of boundary landscaping were insisted on. However, it would inevitably increase the suburbanisation of the large school complex to the south, which can otherwise credibly be held to stand outside the main village framework. Yellow Farm is simply not needed as a site in this Plan period, and its merits are not obvious to me in the longer term.

#### Recommendation

4.2.376 I recommend that no modification be made to the Local Plan in respect of these objections.

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NEW HOUSING PROPOSAL – SOULDROP: POLICIES S6, NE14a& H1

Objections and Key Issues

4.2.377 Bedfordia Developments Ltd 66/3, VE Parrott (Oakley) Ltd 273/16, Mr JI Roberts 1147/2, J Roberts Esq 1107/1-3, Warmingtons 1145/2

0.45 ha of land at Town Farm, Souldrop, should be within SPA for about 6 dwellings

0.62 ha of land in the Cross Weir Farm farmyard at Souldrop, now containing redundant buildings, should be within SPA to round off the built-up area

AGLV should be redrawn to accommodate a level of future development in Souldrop

#### Council Reply

4.2.378 The Council's written response is contained in Documents BBCEV13, 91, 92, and 102.

#### Appraisal

4.2.379 Souldrop is a small, remote village with no school and no shop other than a part-time Post Office. Bus services are very modest. It does not lie within a strategic corridor as defined in the Structure Plan. Sharnbrook, about 2 km south-east of Souldrop, is the nearest settlement: an "A" Village with two allocated sites for 60+ dwellings. Souldrop seems to me to be a very unlikely candidate for significant expansion in the future, judged by even the most flexible sustainability criteria. Nevertheless, I have decided these objections on their physical merits alone.

#### Town Farm

4.2.380 The objection seeks an extension of the SPA in the south-east extremity of the village, covering an area south of Stocking Lane. The site is just one isolated part of Bedfordia's large agricultural holdings, and contains a currently used dutch barn, areas of hard standing without any remaining agricultural buildings, and a modest area of open land. North of the objection site, the former farmhouse at the junction of Sharnbrook Road and Stocking Lane is now divorced from the agricultural holding, and is about 50 m away from the barn. The barn does not closely adjoin any village building along Sharnbrook Road.

4.2.381 On inspection of the site, the isolated position of the barn in relation to existing dwellings to the north-west confirms to me that it has rightly been excluded from the main framework of the village shown within the SPA boundary. It is not land forming part of the recognisable mass of the settlement.

#### Cross Weir Farm

4.2.382 The 4.8 ha of Cross Weir Farm lies at the northern developed edge of Souldrop, and the objectors want to see residential development of an area of the farmyard. The underlying logic of including the site within the SPA seems to me inevitably to lead to pursuit of larger-scale housing development there in the future.

4.2.383 The farmyard is effectively an area of transition between settlement and countryside, and in a village as small and compact as Souldrop, building on it would represent a substantial extension of the whole. The area is very close to other village buildings, and the farmyard buildings, though set back from public roads and screened, are large and of notably rural character. However, I do not see them as visually akin, or similar in type, to the linear layout of dwellings in the immediate vicinity, which include a former chapel. This observation is made notwithstanding the established non-agricultural storage within the buildings on the objection site. They appear, at best, loosely knit and ancillary to the village proper, resembling a conventional farmyard layout, not an industrial site. The storage use that goes on is low key in nature. Future viability of the legitimate use would be assisted by use of the provisions of

Policies E18 and E20. In terms of the criteria for determining SPA boundaries, set out in CD39A, I find them properly and logically defined in this northern part of Souldrop. The AGLV objection is not really relevant, the designation being broad-brush and consistent with the Structure Plan, and washing over settlements such as Souldrop.

#### Recommendation

4.2.384 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - STAGSDEN: POLICIES S6, H1 & LR3

#### Objections and Key Issue

4.2.385 Mr P & Mrs D Newman 219/2-/3, Mr G Newman 1110/1-/2

Extend SPA boundary to include 7.47 ha of land between existing built-up area and Stagsden Bypass, to accommodate 13+ dwellings

Land east of Stagsden, Brookmeads Farmhouse, and possibly land west of Spring Lane should be included in the SPA

#### Council Reply

4.2.386 The Council's written response is contained in Documents BBCEV 65 and 79.

#### Appraisal

4.2.387 At present, Stagsden is a small and compact linear village (only 153 dwellings in the 1991 census), separated from the bypass A422 road to the south by open land – where the objectors would like to see new housing. The SPA boundary line is drawn tightly round existing properties lining the road through the village. The Deposit Plan designation is a "B" Village, which seems to me the only possible classification in the range set out there. The sites do not lie near the adopted Structure Plan's favoured locations of the urban area, or within a defined strategic corridor.

4.2.388 In the context of national or county level planning policy, the opening of the replacement Golf Club just east of the A422 in 2000 is no sort of appropriate economic motor to justify significant expansion of the village, with consequent loss of land properly classifiable as open countryside. The proposals would be greatly disproportionate to the size of the existing village, and the Deposit Plan's modest 6 dwelling allocation at Spring Lane is hugely preferable to the objector's proposals. There is no kind of realistic guarantee that development of the size proposed would rescue the fortunes of the village public house, which the objectors see as threatened

#### Recommendation

4.2.389 I recommend that no modification be made to the Local Plan in respect of these objections.

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NEW HOUSING PROPOSAL – STAPLOE AND DULOE PARISH AT DULOE: POLICIES S6, S7, H23 & H25

Objections and Key Issue

4.2.390 Banks Family Settlements 471/1-/4

Duloe should be the subject of a SPA as a type "B" Village, not open countryside

an infill plot of open land between No. 32 and No. 42 Duloe should be allocated for development, and two Important Open Spaces designated in the new settlement.

Council Reply

4.2.391 The Council's written response is contained in Document BBCEV 404.

Appraisal

4.2.392 This is a tiny settlement some 2 km west of St Neots on a modest country road. The A1 trunk road between Duloe and St Neots acts a strict physical policy barrier to new development on the west side of the town, which reinforces Duloe's rural character. Duloe does not lie near the adopted Structure Plan's favoured locations of the urban area of Bedford, or within a defined strategic corridor. There is no indication whatever that Huntingdonshire District Council requires a development of this kind near St Neots. Nor is the fact that St Neots can provide a wide range of services any real planning justification to expand a nearby hamlet without any. In these circumstances, I see no planning reason for a settlement boundary or the specific designation of any IOS.

Recommendation

4.2.393 I recommend that no modification be made to the Local Plan in respect of these objections.

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NEW HOUSING PROPOSAL - STEVINGTON: POLICY S6

Objections and Key Issues

4.2.394 Bedfordshire County Council (as landowner) 295/4, CJ Homer 937/1

Site at Langcroft Farm, Stevington, should be within SPA

Extend SPA adjacent to 19 Church Road, Stevington

Council Reply

4.2.395 The Council's written response is contained in Documents BBCEV 175 and 1271.

Appraisal

4.2.396 This is a modest "B" Village, based around a central crossroads. Its four "arms" are linear roads leading away from the centre, with the SPA boundary drawn tightly around the lengths of continuous roadside building up to the point where they peter out; thereafter open countryside lines the roadside.

4.2.397 The County Council objection site comprises Langcroft Farm which is at the end of a line of development, and north of the road stretching north-west out of the village, and a large open established playing field south of that road. My visits convince me that the loose cluster of buildings at the farm is well separated from the tight line of dwellings to its south-east. Neither it nor the large playing field can reasonably be seen as part of the primary built framework of Stevington. They belong incontrovertibly to the open countryside.

4.2.398 The Homer site lies off the west side of the road up to Church End, but on open land to the rear of frontage development owned by Mr Homer. There are nearby precedents for development in depth behind Church Road. However, this is a small village not near the adopted Structure Plan's favoured locations of the urban area, or within a defined strategic corridor. In a Plan period where SPA's are being defined for the first time, I see no good planning reason here to extend the SPA boundary beyond the primary built framework into open countryside. If Mr Homer has special needs in garaging his car because of a disability, he should contact the Council to discuss other possible planning stratagems.

#### Recommendation

4.2.399 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - SWINESHEAD: POLICY S6 & PROPOSALS MAP INSET 26a

#### Objections and Key Issue

4.2.400 Mr JE Williams 267/1-/2

Swineshead SPA should include a group of c.15 detached and semi-detached properties around Green Lane, part of the built framework.

#### Council Reply

4.2.401 The Council's written response is contained in Document BBCEV 176.

#### Appraisal

4.2.402 The objection contains a number of comments about the alleged deficiencies of the Council in defining a SPA, which I have considered in discussing policy S6. In Swineshead, the small run of dwellings in question amounts to a detached group west of Swineshead proper, which I consider lie in open countryside rather within the primary built framework of this very modest village. By this, I do not mean to say that the group of dwellings would be thought of as being in a place other than Swineshead; but that in defining the village in an equitable but conservative manner, the group is an outlier of the main village structure.

#### Recommendation

4.2.403 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - THURLEIGH: POLICIES S6, H1, H23 & E1

#### Objections and Key Issues

4.2.404 City and County Developments Ltd 65/1-/4, St Modwen Developments Ltd 1020/1-/3

1.04 ha of land south of the High Street, Thurleigh, should be within the SPA and allocated for 24 dwellings and public open space, capable of immediate implementation to make up a deficient supply

The 1.82 ha site of the former Officers' Mess at Keysoe Road, Thurleigh, should be within the SPA to help meet the housing requirement, as it is well related to the village, and a brownfield site; it should also be specifically included in the Plan as an employment land allocation

Council Reply

4.2.405 The Council's written responses are contained in Document BBCEV 103, 904, 935 and 974.

Appraisal

High Street Site

4.2.406 The site lies in what the Council calls "one of the lower category "B" Villages, well outside the urban area and the strategic corridor as defined in the Structure Plan. Despite the presence of a lower school, store and post office, it is a relatively isolated settlement of modest size, with only a modest bus service. In the absence of clearly demonstrated need, I do not consider the closeness to an important nearby employment facility at Thurleigh Airfield a critical factor to justify what would be a substantial addition to village housing.

4.2.407 The original linear form of the south side of the village High Street has been altered in places by development in depth, notably at Vicarage Close; however, in the area around the objection site the old form prevails. The scale of development proposed on the objection site is that of a small estate, and necessitates demolition of a large detached frontage house of no visual merit. The depth of development suggested would indicate that the recent Vicarage Close development has been taken as a new pattern for other sites nearby, rather than being viewed as an exception to the hitherto linear pattern. I think it quite possible that the development put forward could be relatively inconspicuous and visually pleasing; the extended public open space at the east end of the site is also a positive attraction. However, it represents a significant incursion into the countryside, contrary to a policy framework for this Plan period that I wholly endorse.

Former Officers' Mess Site

4.2.408 The SPA boundary of Thurleigh has been drawn to include the thin ribbon of housing running north out of the village along Keysoe Road. This line is itself at best an appendage to the main built framework of Thurleigh. The objection site is north of this ribbon and separated from the SPA boundary by some 200 m of rural land. There is no credible planning case for including the site within the designated village boundary. As a site with brownfield characteristics, the appropriate way forward would be for the objector to submit a planning application for housing or employment use that did not materially extend the existing built footprint.

Recommendation

4.2.409 I recommend that no modification be made to the Local Plan in respect of these objections.

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## Objections and Key Issues

### 4.2.410 Lady Hanbury's Settlement 526/1-/3, Mr & Mrs KP Short 1204/1-/2

part cultivated allotment land east of Newton Road, Turvey, should be within SPA for mixed housing and employment development, helping to retain the existing facilities within the village

The Newton Road site should be deleted as poorly positioned and with dubious sub-structure; insert in its place Meadow House, Norfolk Road

## Council Reply

4.2.411 The Council's written response is contained in Documents BBCEV 93, 865 and 1054.

## Appraisal

4.2.412 The Deposit Plan allocation for housing, south of the Hanbury site and on the west side of Newton Road, was given planning permission for 16 dwellings in 1999. Although it extended the southern tip of Turvey into open countryside, the Plan's intention was to give it extensive peripheral planting. I support the Plan's "B" Village status for Turvey, and find no need automatically to create another development site in the period up to 2006 merely because the allocation has been taken up.

4.2.413 Hanbury site The claim is made that the objection site is the more natural place to extend the Village southwards. However, the objection site projects outwards starkly at a right angle from Newton Road, with open land to the north, east and south, whereas the allocated site is more obviously an extension southwards of a development of some depth at Tandys Close. Nothing in the evidence suggests that development of the objection site would really make a difference in sustaining local services and amenities in the near future.

4.2.414 Short site At present, most of the built-up eastern boundary of Turvey north of High Street runs clearly along a north-south line of domestic garden boundaries. Open countryside extends uninterruptedly east of this Settlement Policy Area boundary. The objection site encompasses several fields around Meadow House, which would make a major incursion into open countryside. The objector refers to the mitigating effects of new shrub and tree belts around any development here. However, the size of the site is disproportionately large in relation to the defined area of the village, and has no planning merit given the existing policy background in this Plan period.

## Recommendation

4.2.415 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL - TURVEY: POLICIES S6, NE1, NE14, H1, H23 & H26

## Objections and Key Issues

### 4.2.416 Mr Hanbury-Higgins 527/1-/6

Include the 40 dwelling settlement around the former Turvey Station within the SPA as a "B" Village; allocate agricultural land west of Priory Close there for housing



development would be sustainable, as rural population accommodated and local facilities strengthened

policies – including the AGLV designation - are overly restrictive of development in open countryside

#### Council Reply

4.2.417 The Council's written response is contained in Document BBCEV 92.

#### Appraisal

4.2.418 I saw that this small settlement c.1.6 km east of Turvey village contains a nursery school and grain store. The settlement does not lie near the adopted Structure Plan's favoured locations of the urban area, or within a defined strategic corridor. It is very small; the fact that it survives at this level is no reason to overturn national and local policies that protect the countryside and only allow additional development where there is a good planning reason.

4.2.419 There is no evidence that what the objector suggests could make the settlement sustainable. It does not have the size, mass or cohesion of constituent elements to justify designation of a SPA boundary; nor does it have the historic continuity or village form found at such small "B" Villages as Bletsoe and Souldrop. It is best treated as a small "end", and part of the overall countryside. The proposed development site would not even consolidate the existing settlement, but merely intrude further into countryside.

#### Recommendation

4.2.420 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - WILDEN: POLICIES S6, H1 & H25

#### Objections and Key Issue

4.2.421 Mr R Pell 184/1-/3

Redefine SPA boundary to include land at Manor Farm, Wilden; the farm buildings should be allocated for residential development of about 9 dwellings, with restoration of the listed Manor Farmhouse and land to the east

Important Open Space E should be should be reduced slightly to allow this

#### Council Reply

4.2.422 The Council's written response is contained in Document BBCEV 80.

#### Appraisal

4.2.423 The small settlement of Wilden is classed as a "B" Village in the Deposit Plan. It is a linear settlement, and I find no fault with the way the Settlement Policy Area boundary line has been drawn to include the frontage buildings and attendant open land. The six separate Important Open Spaces identified all appear to me to add positively to the setting and context of Wilden's built form. The village does not lie near the adopted Structure Plan's favoured

locations of the urban area, or within a defined strategic corridor, and there is no strong planning case for any housing allocation at Wilden, despite the identified housing shortfall.

4.2.424 The Manor Farm complex stands well back from the High Street frontage, and I find that it is not part of the primary built framework of Wilden, as this has been narrowly but properly defined. There is an argument put forward that development should be allowed to fund removal of the run-down farmyard, and enable the decayed listed Manor House to be restored. The Council's opinion is that the listed building is beyond repair, but there is no evidence before me that can resolve that matter. If there is a credible case for restoration and rationalisation of the farm complex, the Council would need to see detailed survey and cost evidence before the prospect of enabling development sufficient to bring the desired result could be entertained. I see no convincing case to enlarge the SPA and lose part of the IOS before such a detailed submission is made to the Council.

#### Recommendation

4.2.425 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSALS AT WILLINGTON – GENERAL OBSERVATIONS

4.2.426 Willington is a "B" Village beyond the urban area, and outside the strategic corridor as defined in the Structure Plan. Other than the lower school and one shop on the south side of Bedford Road, the village has few facilities. In such a place, the Council's abandonment of support for the allocated site at Church Road does not automatically demand substitution by another allocation of similar size, if this entails an unwarranted loss of open land beyond the SPA boundary.

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#### NEW HOUSING PROPOSALS - WILLINGTON: POLICIES S6 & H24

##### Objections and Key Issue

4.2.427 Mr L White 208/1-/2, The Hon. R Godber 351/1

Amend SPA to include 63 Church Road, Willington, and its associated plot

Include in the SPA the church of St Laurence and the Manor to the west of the village, and a substantial developed area south of Bedford Road

##### Council Reply

4.2.428 The Council's written response is contained in Documents BBCEV 42 and 1273.

##### Appraisal

4.2.429 White site The objection site is a bungalow in large grounds south of St Laurence's church. The bungalow stands west of a close knit run of detached dwellings extending eastwards to Balls Lane. A path separates it from its neighbours, and emphasises the change in character of the objection site from land to the east. Like the nearby church across the track, it stands outside the primary built framework of roadside houses at the Church Road

end of the village. Though it may seem a paradox for a settlement boundary to exclude such a significant structure as the church, the SPA boundary is a policy line: the objection site, the church and the historic buildings north of the latter are, in this context, looser knit development.

4.2.430 Godber sites The objector wishes to see the Manor Farm area added within the SPA boundary. This comprises a very attractive farm and house group, but though it has the clearest historic and associative links with the area designated by the Council within Willington's Settlement Policy Area, it is again loosely knit with the latter. Its inclusion would add a good deal of unneeded potential development land, now attractive and open, to the defined settlement. Of course this open land might be shown as Important Open Space, but I find it is properly defined as open countryside, within which lies a cluster of development.

4.2.431 The proposed extension of the SPA area in the south-east part of Willington would add various low-density nursery/garden centre uses to the close-knit development along Bedford Road, Barford Road, Sandy Road and Wood Lane. My inspection of the area convinces me that all the land in question is outside the village's primary built framework.

#### Recommendation

4.2.432 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSALS - WILLINGTON: POLICY S6, NE23, H1, H23 & PROPOSALS MAP

##### Objections and Key Issues

4.2.433 Old Road Securities plc 393/6 & /11 and 1022/6, The Stokes Family 166/1-/3, Berwick Homes Ltd 1158/4

About 1 ha of land r/o 47 Station Road, Willington, should be allocated for the development of 25 dwellings in place of the allocated site, and the SPA amended accordingly

Redraw SPA to include farmland east of Station Road, Willington; a logical rounding-off of the village which could be enclosed by a landscaping buffer

remove the land from the proposed Bedford River Valley Park; not an important wildlife or recreational resource, nor a wetland habitat

##### Council Reply

4.2.434 The Council's written response is in Documents BBCEV 118, 383, 937 and 957.

##### Appraisal

4.2.435 The Old Road/Berwick objection site is a former area of farmland that has been effectively incorporated as a large domestic garden for 47 Station Road since 1987 at least. The SPA boundary has been drawn to exclude the larger area, but including a core garden area behind No. 47. The demolition of No. 47 would be necessary to access the backland.

4.2.436 I find that the grassed and tree-planted objection site still retains much of its former countryside character, though without great ecological interest. Though it is adjoined on three sides by housing one plot deep, its very size prevents it being reasonably characterised as an infill site. There are examples throughout the village of clusters of development set out in the form of closes, some near this site. However, in a "B" Village mostly made up of frontage development, there is no occasion to add to these examples, where no obvious visual or townscape reason exists.

4.2.437 From what I have seen on site, development of the Stokes land – immediately north-east of the OldRoad/Berwick site - would clearly constitute a significant expansion into open countryside rather than any kind of natural rounding off of the settlement form. The inclusion of this site would also lead to inevitable pressure to extend this objector's desired eastern SPA boundary line yet further south to Barford Road. I have already expressed my support for the principle of the Bedford River Valley Park, which is a project for the longer term. There is no good planning reason to remove this small part of the designation from the whole.

#### Recommendation

4.2.438 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - WILLINGTON: POLICIES S6, H1 & H23

#### Objections and Key Issue

4.2.439 Connolly Homes plc 952/1-/4

in the light of an inadequate housing land supply, include land in the rear garden of 30 Church Road, Willington, within the SPA, for no more than 6 dwellings, with access off Church Road and good landscaping and insert in Table 3

#### Council Reply

4.2.440 The Council's written response is contained in Document BBCEV 121.

#### Appraisal

4.2.441 On this north side of Church Road, west of the lower school, the predominant pattern of development is detached houses along the street frontage set in generous grounds. The exception is Churchill Place immediately west of the objection site, a local needs housing scheme developed in greater depth from the road frontage. I accept the Council's argument that, as this scheme is an exception, it should not be taken as a strong precedent for other general housing proposals in the vicinity. The removal of the allocated site nearby, to the rear of the lower school, removes another potential precedent for development in depth. The SPA boundary is drawn through the objection site - between the narrow front portion of the site and a much larger rear area of domesticated garden. The distinction the Council has made seems to me understandable and justifiable in a "B" Village, where it is not actively seeking housing sites. Development here would be significantly beyond Willington's primary built framework, and there is no planning need to make a significant extension to accommodate housing in the village.

#### Recommendation

4.2.442 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL - WILLINGTON: POLICY H1

### Objection and Key Issue

#### 4.2.443 Francis Coales Charitable Foundation and Mr & Mrs Mackay 994/1

Allocate all or part of 12 ha of agricultural land for <100 dwellings with public open space at Bedford Road/Balls Road, Willington, to make an immediate contribution to the inadequate housing supply; site meets all other policies in the Deposit Plan

### Council Reply

4.2.444 The Council's written response is in Document BBCEV 386.

### Appraisal

4.2.445 This would be a very large allocation in a "B" Village, and the objector does not challenge the categorisation in the Deposit Plan. I cannot agree with the objectors that the site is "well contained within the existing built envelope of the village". Not only is it a large open area in agricultural use, but it adjoins further open land stretching well to the west. Until and unless planning priorities for new housing locations are changed in future local plans, the site should remain undeveloped.

### Recommendation

4.2.446 I recommend that no modification be made to the Local Plan in respect of this objection.

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## NEW HOUSING PROPOSAL - WILLINGTON: POLICY S6 & PROPOSALS MAP INSET 40

### Objection and Key Issue

#### 4.2.447 Mr T McQueenie 1207/1-2

Include land amounting to 0.287 ha south of Bedford Road, Willington, within the SPA, to allow 5 detached dwellings on a site including the former petrol filling station

### Council Reply

4.2.448 The Council's written response is contained in Document BBCEV 117.

### Appraisal

4.2.449 The Council put forward PIC14 to extend the Willington Settlement Policy Area to include certain properties on the south side of Bedford Road. Counter Objection 1207/P3 was made by the objector because the PIC fails to include the objection land behind the bungalow and former petrol filling station at 73 Station Road. The Council has generally drawn the revised southern boundary along the real and notional lines of back gardens of conventional length, but not on the objection land. This objection land falls into two areas of different character. The western part is land with associated buildings previously occupied by a roofing contractor. The eastern part is open land formerly attached to the existing bungalow, with planning permission for a replacement bungalow. This permission is dependent on demolition

of the existing bungalow, but execution of the permission is made problematic, as that bungalow is now in separate ownership. There has been a technical start to building the replacement bungalow, but this amounts to no more than excavation of a foundation trench.

4.2.450 I agree with the Council's contention that there is no imperative to include every structure or building within a SPA. The predominant pattern along the south side of Bedford Road is linear development of single plot depth. However, there are mitigating circumstances here. The Council did specifically allow the incursion of a builders' yard and a bungalow into the open land behind the garage operation on the street frontage as recently as 1990. There is a possibility that the "replacement bungalow" might still get planning permission if it were applied for anew, in changed circumstances. Also, the garage and builder's yards are now unsightly relics of former uses, and at least a part of the builder's yard behind the frontage appears to me to have brownfield characteristics. In these exceptional circumstances I consider that the objection sites should be included within the revised SPA boundary set down in PIC14, enabling 5 bungalows to be built.

#### Recommendation

4.2.451 I recommend that the Local Plan be modified to incorporate PIC14, further amended to include the objection site discussed in paragraphs 4.2.449-450 above.

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#### NEW HOUSING PROPOSALS AT WILSTEAD – GENERAL OBSERVATIONS

4.2.452 Wilstead has attracted a number of objections seeking substantial housing developments. The village is well away from the urban area. Unlike Wootton and Stewartby, the village is not within the South-West Bedford Strategic Corridor area of search, as shown on the Key Diagram in the adopted Structure Plan and developed in detail on an O.S. base in the Deposit Plan. It does lie only a very short distance south-east of the boundary of the vital new settlement based on Elstow Storage Depot, as physically defined in the adopted Planning and Development Brief of September 1999 (CD54H). Consequently, Wilstead is clearly not an appropriate focus for major new housebuilding; poorly justified major housebuilding on the periphery of the defined Settlement Policy Area boundary could seriously inhibit the commercial take-off of the first vital phases of development at the new settlement. The fact that the 1995 Draft Local Plan put up Wilstead as a preferred location for major development is no longer a significant factor. Nor is the existence of a reasonable range of local facilities within this "A" Village. The situation was changed utterly by the need to recast the Local Plan in the light of the adopted Structure Plan of March 1997.

4.2.453 In the text that follows, I look at all the Wilstead objection sites in the above context. I am assuming problem-free development of the single, significant, allocated H21 site between the A6 and Luton Road for 86 dwellings. This was approved in November 1999, subject to signing of a planning obligation.

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#### NEW HOUSING PROPOSAL - WILSTEAD: POLICIES S6, H1 & H23

##### Objections and Key Issue

##### 4.2.454 Cowlgrove Ltd 68/1-/4

1.57 ha of land at Luton Road, Wilstead, should be included in the SPA for up to 40 dwellings, as an immediate contribution to the inadequate housing supply

#### Council Reply

4.2.455 The Council's written response is contained in Document BBCEV 111.

#### Appraisal

4.2.456 This site – open land with significant use as paddocks - is visually contained and has development on three sides. However it is significant that the development to the south and west is a very large mobile home park, unattractive and of a kind unlikely to be approved as an entity nowadays. It is a narrow site, reached only after traversing an existing recent housing site through an extended cul-de-sac. Its development would only consolidate an unpleasing spur of development south-eastwards into open countryside. It does not fit well with the aspiration in paragraph 70 of PPG3 of March 2000, that development should be laid out in keeping with the character of a village.

4.2.457 The objector makes the point that the objection should be viewed more favourably because it is within an "A" Village, on a transport corridor and on the strategic road network. These are not adequate factors to justify the proposal.

#### Recommendation

4.2.458 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - WILSTEAD: PARAS. 2.55, 5.12 & 5.45 AND PROPOSALS MAP

#### Objections and Key Issues

4.2.459 Martin Grant Homes (UK) Ltd 294/10, /14, /17-/18

Include the whole or part of 9.1 ha of land at Duck End, Wilstead, as a site for development within the SPA, with the capacity to accommodate at least 110 dwellings; alternatively, reduced site of 3.09 ha could accommodate c.58 dwellings with balance available for community forest planting

para. 2.55 wrong in saying limited capacity for development at Wilstead

#### Council Reply

4.2.460 The Council's written response is in Document BBCEV 130.

#### Appraisal

4.2.461 The site does not lie within the urban area or a strategic corridor as defined in the adopted Structure Plan. The planning context has greatly changed since the Draft Local Plan showed this area as a housing site. The Council's sole favoured site in Wilstead - H21 - had been approved for 86 new dwellings subject to the signing of a s.106 obligation, when my

Inquiry closed. This objector has not opposed that designation. Despite its "A" village status, I see no strong planning case for another significant housing site in this large and diffuse village.

4.2.462 This site is clearly part of the open countryside between the main framework of the settlement and the scatter of buildings at Duck End. The exclusion of Duck End from Wilstead when drawing the SPA boundary was a matter of plain common sense. The fact that the village edge hereabouts is visually rather abrupt and not particularly pleasing to the eye is not a good reason to extend the village further and provide an improved landscaped setting.

4.2.463 Crucially, the site is very close to the boundary defined by the adopted Planning and Development Brief for Elstow New Settlement, which is advocated by policy 33 of the Structure Plan. Visually, the physical extension of Wilstead into the already narrow gap with Elstow is something to be avoided; the two locations are separate entities with different functions.

4.2.464 Though there is a significant housing shortfall in the Deposit Plan's provisions, arising from problems of deliverability, development here would deflect housing demand from key allocated sites. Specifically, further major housebuilding at Wilstead can do nothing but detract from the marketing and success of crucial early development at Elstow. I acknowledge that the objector has made a major effort by producing a reduced layout scheme, much more in keeping with the physical form of the periphery of the village. This would include an opportunity to contribute significantly to the Marston Community Forest; however, it remains open to the same fundamental objections I have outlined.

#### Recommendation

4.2.465 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### NEW HOUSING PROPOSAL - WILSTEAD: POLICIES S4, S6, NE21, H1 & H25

##### Objections and Key Issues

4.2.466 Mr V J Wisson 21/1, Jellis Trustees 286/1-/2 & /5-/7, Wisson & Couch 287/1-/2, /5, /8 & 1215/1-/4, Old Road Securities 393/3, /24-/25, 42-/43 & /45

delete Spaces "B" and "C" in Wilstead as there are sufficient open spaces in Cotton End Road already

(Jellis)

Land off Luton Road and Whitworth Way should be allocated for 150 dwellings

Land east of Luton Road, Wilstead, should be allocated for development of 100-150 dwellings

Public Open Space B performs no realistic open view function, having a hedge along its frontage

(Wisson & Crouch)



Land off Whitworth Way, Wilstead, should be identified and allocated for c.40-50 dwellings, and land off Luton Road and Whitworth Way for 150 dwellings

The SPA should be extended to include land off Whitworth Way and north of Cotton End Road, to form a logical rounding off of the village

the land should be removed from the Community Forest

Important Open Space "C" is unnecessary, particularly since IOS "D" forms a green lung nearby already

(Old Road)

Wilstead should be in the Strategic Corridor and land r/o Whitworth Way/Luton Road, Wilstead, should be allocated for 200 houses

Land off Luton Road, Wilstead, should be allocated for c.150 dwellings, with the Proposals Map and Table H3 amended accordingly

Land r/o Whitworth Way should be allocated for c.50 dwellings ditto

Delete Important Open Space "B" designation as no more than a hedge between built development; this and other IOS designations should be examined to see if fulfilling valid planning function, rather than just being an undeveloped area that has to be preserved in its own right

#### Council Reply

4.2.467 The Council's written response is in Documents BBCEV 359-360, 477 and 1083.

#### Appraisal

4.2.468 These objectors have a legal obligation to promote their land separately in objections, but I have considered the objection land as a whole, as have the objectors, while taking account of individual holdings. The overall area consists of a number of worked fields divided by hedges. The prominent gap in development along Luton Road - IOS "B" – affords partial views into the site and draws attention to the way agricultural land penetrates into the heart of an otherwise sprawling and unremarkable settlement. It is a locally valuable designation, and there would need to be a strong planning reason to justify its diminution or obliteration, as here. By the time of the Inquiry, the proposals for the whole site of 21.5 ha envisaged about 175 dwellings on 5.8 ha of net developable land (developed at 30 dwgs per ha), with 0.4 ha for B1 employment use, a doctor's surgery on 0.2 ha, a village hall site of 0.4 ha, and generous open spaces. Land south of the housing area would be dedicated to a suitable wildlife organisation or the Marston Vale Community Forest.

4.2.469 Wilstead can still be said to have a linear character, though post-war developments of indifferent quality, behind certain areas of frontage, have penetrated deeply into open countryside. If all this objection land were built over, the southern part of the village would be greatly increased in mass, stretching westwards from the Whitworth Way Estate as far as the A6. In considering objections to the definition of the South West Bedford Strategic Corridor under Policy S4, I found no reason to include Wilstead within the corridor. Not only did the County Council and Borough Council never have this intention, but the major expansion of Wilstead in this Plan period would be likely to mar the successful launch of the new settlement planned around the Elstow Storage Depot. It is the case that this "A" Village has reasonable facilities and community provision – hence the allocation that will produce 86 new dwellings in the plan period. However, further development on the scale proposed here is totally inappropriate in this plan period, given the priorities and policies of the adopted

Structure Plan. I have given thought to whether there is a reasonable case for release of the 1.7 ha of Wisson and Crouch land, as a separate entity, but conclude that there is not. Any significant addition to the number of new dwellings produced by the allocated site H21 could detract from the success of early development at the Elstow settlement.

4.1.470 The positive visual merits of IOS "C" also appear to me to be strong enough for the designation to be retained; the open orchard and garden land gives a view of farm buildings that have a significant visual and social link with the village and its development over time.

#### Recommendation

4.2.471 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - WILSTEAD: POLICIES S6, H1 & H21

#### Objections and Key Issue

4.2.472 Mr & Mrs R McCartie 1070/1-/4

5.96 ha of land at Little Church Farm, Wilstead and its curtilage – south of Vicarage Lane and north-west of allocated site H21 - should be within SPA to help meet the housing shortfall

#### Council Reply

4.2.473 The Council's written response is contained in Document BBCEV 459.

#### Appraisal

4.2.474 This is self-evidently a site in the open countryside, directly adjoining the already generous allocated site H21. The objectors describe it as "formerly in agricultural use...and part...currently used for paddock". It is not integrated with the existing form of the village. The allocated site can be said to continue the existing thrust of development southwards along the axis of Luton Road. Building on the objection site would create an extraneous lump of development amounting to sprawl, only constrained by the boundary of the A6. The contextual factors I have set down in paragraphs 4.2.452-453 above are all highly relevant to this site.

#### Recommendation

4.2.475 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - WILSTEAD: POLICY S6

#### Objection and Key Issue

4.2.476 Mr RP Ryall 1096/1

Land r/o 115-121 Cotton End Road, Wilstead, should be within SPA, suitable for up to 4 dwellings, or 2 with larger gardens

#### Council Reply

4.2.477 The Council's written response is contained in Document BBCEV 354.

#### Appraisal

4.2.478 The open garden land to the rear of Nos. 115-117A is already included in the Settlement Policy Area, and is the subject of planning permissions for housing. Realising those permissions would produce a continuation of housing along the already developed, eastern side of Church Lane. Developing the open, grassed objection land behind Nos. 119A-121 would constitute a different form of expansion of the village limits: it would incorporate a considerable depth of open land behind dwellings on the Cotton End Road frontage. There is no precedent in the Proposals Map Inset for this type of open land being included within the SPA east or west of the objection site along Cotton End Road. The objection land, though not divided by a strong physical boundary from No. 119A, is undoubtedly outside the primary built framework of the village, and in an area where restrictive open countryside policies are appropriate.

4.2.479 The objector refers to alleged inconsistencies in the drawing of the SPA on the southern side of Cotton End Road opposite, behind No. 58. However, I see the inclusion of the whole garden there as apt, because that land is integral to the property, though larger than the average garden size of nearby dwellings.

#### Recommendation

4.2.480 I recommend that no modification be made to the Local Plan in respect of this objection.

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#### NEW HOUSING PROPOSAL - WILSTEAD: POLICY S6

#### Objection and Key Issue

4.2.481 Mr & Mrs P Lowe 1136/1

Dwellings east of Chapel End, Wilstead, should be within SPA

#### Council Reply

4.2.482 The Council's written response is contained in Document BBCEV 180.

#### Appraisal

4.2.483 The proposal envisages the incorporation of the sites of some 16 dwellings east of the Settlement Policy Area boundary along Cotton End Road, but with the small green fields between forming a natural buffer. It is not clear from the representation if the green fields are proposed as a formal IOS under Policy H25. However, there seems to me no doubt that a disinterested observer would see the objection area as a loose knit collection of buildings well beyond the tight-knit, primary built framework of the village to the west. The likely consequence of acceding to this objection would be planning applications for a significant amount of new housing in a peripheral area of Wilstead. That would be undesirable and unnecessary, given the virtual certainty of major development on the H21 site.

#### Recommendation

4.2.484 I recommend that no modification be made to the Local Plan in respect of this objection.

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## NEW HOUSING PROPOSAL - WILSTEAD: POLICIES H1 & H21

### Objections and Key Issue

4.2.485 Mrs T Ward 1188/1-/2

Land at Whitworth Way would be preferable as a development site compared with the sprawl and environmental disadvantages of the allocated site at Luton Road

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### Council Reply

4.2.486 The Council's written response is in Document BBCEV 867 and 1007.

### Appraisal

4.2.487 The allocated site H21 has now been effectively approved for development of 86 dwellings, and the need for an alternative as suggested therefore has no effective basis. Better sites to meet the housing shortfall in the Borough exist on the edge of Bedford town.

### Recommendation

4.2.488 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSALS AT WOOTTON – GENERAL OBSERVATIONS

4.2.489 I have previously found (paras. 4.1.86-93 above) in favour of the Council's case for adding extra housebuilding land to what were already large allocations – H11 and H12 - at Wootton. The sites preferred by the Council appear to me to be acceptably located, and capable of full integration with the existing settlement of Wootton, if the detailed planning and layout is handled flexibly, with full local participation. The Council-suggested sites at Wootton are of the size needed to fund necessary capacity improvements to the A421, and they have other merits that I have pointed out above. Any other objection sites of significant size would need to have exceptional merits either to supplant or augment Sites H11 and H12. However, as there is a deficiency in the housing land supply, they deserve careful consideration.

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## NEW HOUSING PROPOSAL - WOOTTON: POLICIES H1 & H11

### Objections and Key Issue

4.2.490 Laing Homes Ltd 134/4-/5

3.2 ha of land south of Keeley Lane, Wootton with a capacity for c.80 dwellings should be allocated, because H11 and H12 will only contribute 300 dwellings in the period

The larger adjacent 6.8 ha field to the south, also used for rough grazing, is seen as second phase development for c.170 further dwellings

#### Council Reply

4.2.491 The Council's written response is in Document BBCEV 457.

#### Appraisal

4.2.492 The Council's view, which I share, is that sites H11 and H12 can deliver 480 dwellings within the local plan period, not the 300 claimed by the objector and seen as a desirable maximum. That figure is a very large addition to the existing village, as the Parish Council has argued very eloquently. The assimilation of new development will need to be very carefully planned, and well integrated with the existing houses and village facilities.

4.2.493 The objector holds that at least one further distinct housing location should be available. It is argued that this site at the northern end of the village is more accessible to Bedford and Kempston, and to existing bus routes. However, as the objection site(s) would be additional to Fields Road and not a replacement, these are not strong points. Bus services will adapt to serve significant new residential areas in the village. The dualled A421, which will be in place when the new housing is built, should improve journeys into Bedford, and runs more directly to large new planned employment sites nearby, on the southern edge of town. There are no other very strong locational advantages of the objection land over H11 and H12. The scheme promises no more in benefits to its neighbourhood than what is described as a "small community facility".

#### Recommendation

4.2.494 I recommend that no modification be made to the Local Plan in respect of these objections.

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### NEW HOUSING PROPOSAL - WOOTTON: POLICIES S6, BE5, H11 & H12

#### Objection and Key Issue

4.2.495 Martin Grant Homes (UK) Ltd 294/1-/2, /6 & /11-12

3.07 ha of land at Mount Pleasant/Keeley Farm, and on 9.1 ha off Mephram Road, Wootton should be within SPA, to provide c.300 dwellings, split 200:100 respectively between the sites

ASR should not extend into the Mount Pleasant/Keeley Farm area, when it was excluded in the 1993 Plan.

#### Council Reply

4.2.496 The Council's specific written response is contained in Document BBCEV 25.

#### Appraisal

4.2.497 The objector wants the sites considered as substitutes for the H11 and H12 in the Deposit Plan; alternatively they should be added to those sites instead of the Council's new

allocations in pre-Inquiry Changes. The objector's stance is that neither of his suggested sites require the dualling of the A421 to have been completed, though he is willing to contribute to off-site highway and and/or public transport.

4.2.498 I did not find that the gap between the proposed E7 allocation, and the eastern edge of Wootton after the proposed expansion, would be so diminished that an impartial viewer would consider them virtually joined up. For all the reasons I have set down earlier, H11 and H12 as modified by the pre-Inquiry Changes are beneficial allocations with few material drawbacks. They cannot seriously be replaced by these two suggested allocations. The reasons for this are the latter's modest size, and the fact that they are not considered by the objectors as needing to contribute to the necessary costs of improving the A421.

4.2.499 However, there is a deficiency in the housing land supply, and I now assess their suitability as supplementary sites.

#### Keeley Farm

4.2.500 The situation since the adopted Local Plan has changed significantly. Though the 1993 Plan showed the Biddenham Loop development, it did not show other features on the Deposit Plan: the H7 housing extending closer to the village, and a more westerly alignment of the bypass. I find it quite realistic in principle to adjust the 1993 boundary of the ASR, to fit an altered urban boundary at Kempston in the current Plan. Indeed, that kind of thinking is stated in para. 9.30a of the 1993 Plan.

4.2.501 Nevertheless, I find that there are good reasons to keep the remaining gap between the northern edge of Wootton and Kempston as wide and open as possible. There is already a continuous ribbon of building, one house deep, from the village tip up to Gibraltar, the anomalous block of inter-war development that occupies ground on both sides of Ridge Road; the straightline distance of the gap here is only c.500 m. Also there is only about 150 m of open land between Gibraltar's eastern edge and the projected bypass line. The objector's willingness to avoid development on the frontage that would augment existing ribbon development is no real mitigation of this harm. It is important to appreciate that the ASR policy is there to strengthen the case against development in narrow gap areas, as here, and is not a landscape or visually based policy.

4.2.502 The Keeley Farm land is best described as genuine farmland beyond the developed village edge, close to development, but not overwhelmed by it. It is a rural transition between the village edge, sensibly defined by the SPA line in the Deposit Plan, and the ribbon development which is effectively no more than an unsightly incident in the countryside. I accept that there would be no direct inter-visibility between the proposed enlargement of the Kempston area and the Keeley Farm site, and that there could be a distance of some 850 m between buildings in the two areas. Nevertheless, there are sensible measures that can be taken to prevent undue expansion, and these may be needed even more where, as here, strategic growth corridor policies exist. At Keeley Farm I find both the ASR and SPA boundaries have been drawn sensibly.

#### Land off Mephram Road

2.503 Development here would affect what I find to be a more attractive area of open land than at the allocated sites. The village boundary on the west side of the village has been drawn tightly, though visually it has raw edges and lacks landscaping that might serve to announce a long term barrier to further development. I accept that the development of this land could be achieved with a good landscaping scheme, and result in little or no material visual damage. However, the amount of new development that I find acceptable and necessary elsewhere at Wootton is considerable: c.900 new dwellings. Development of this site would be excessive; it would set a precedent for development on the village's western side at a time when it is neither needed nor desirable. This concern is exacerbated when one takes account of the arbitrary nature of the objector's defined western boundary.

## Recommendation

4.2.504 I recommend that no modification be made to the Local Plan in respect of these objections.

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## NEW HOUSING PROPOSAL - WOOTTON: POLICY S6

### Objection and Key Issue

4.2.505 Mrs S Evans, Mrs BD Parks and Executors of Mrs MI Frossell 1092/1

extend and round off the SPA by inclusion of pasture land north of Wootton Upper School for residential development

### Council Reply

4.2.506 The Council's written response is contained in Document BBCEV 99.

### Appraisal

4.2.507 Though no area is given, this is a very large area of open land, comparable in size with the Laing and Martin Grant sites put forward elsewhere on the periphery of Wootton. No mention is made of any contribution its development would make to infrastructure or village amenities/facilities. Though some such contribution would certainly be forthcoming if the site were developed, I see nothing to compare with the benefits afforded by developing sites H11 and H12.

4.2.508 Building on the site would in no way "round off" the settlement, as is suggested. The result would be a marked incursion into open countryside, absorbing the small and pleasant entity of Hall End into the village for no good planning purpose. The land is shown as being within the Marston Vale Community Forest area. As is said for the objectors, NE21, which expresses support for the project, is a broad brush policy. There are no clear, worked out physical implications for the objection land at present. However, no strong argument is made to remove the designation from the land in this plan period

## Recommendation

4.2.509 I recommend that no modification be made to the Local Plan in respect of this objection.

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## NEW HOUSING PROPOSALS - WYMINGTON: POLICIES S6, NE14, H1 & H25

### Objections and Key Issues

4.2.510 Mr DW Smith 23/2-/4 & 189/1-/3, St Albans Diocesan BOF 223/7-/10

include 1.35 ha of land off Rushden Road, Wymington, for a housing site for c.24 dwellings, and include it in Table H3, with the land then subject to policy H24

remove the Important Open Space "A" and AGLV designations off Rushden Road

include land at three areas B, C , D (not the IOS's of the same name) and domestic buildings around Poplars Farmhouse, within the SPA of Rushden

allow residential development of c.1200 dwellings on c. 77 ha on the eastern edge of the village, which could be released in phases

remove the land from the AGLV

#### Council Reply

4.2.511 The Council's written response is contained in Documents BBCEV 60, 106 and 419.

#### Appraisal

4.2.512 Wymington is designated a "B" Village in the Deposit Plan, outside the strategic growth corridor. The Council has designated a proposed housing site within the settlement, which would result in a net gain of 6 dwellings.

4.2.513 The land designated as Important Open Space "A" has a single visual character: that of open countryside bounded by a high hedge. Through the field gate and parts of the hedge line, long and pleasing views are obtained of uninterrupted countryside, falling away somewhat from the road. The views are made the more pleasant by contrast with the visually unremarkable housing on the east side of Rushden Road. Although the broad-brush AGLV designation in this part of the Borough does not exclude development in principle, I consider that its partial removal would affect the character and value of this part of the designation, and so would fail the test of policy NE14

4.2.514 Mr Smiths site "B", which is part of IOS "D", is described by the objector as waste ground on a slope and without distant views. I find that it is an integral part of the designation. The whole of IOS "D" is a tree-fronted open area, affording long views westward. Together, the three IOS's "A", "B" and "D" have a secondary purpose additional to their intrinsic visual merits: to minimise the visual harm done to the settlement by the ribbon development to their east.

4.2.515 Mr Smith's site "C" is towards the north of the settlement, a strip directly behind the rear gardens of some of the inter-war houses lining the east side of Rushden Road. Two or three new houses here would merely widen the ribbon and make a further incursion into the open countryside, without any landscape or architectural benefit to the vicinity.

4.2.516 His site "D" is described as old and sparse copse land, adjoining a landscaped garden. It is in the south-east corner of the village. I cannot disagree with the Council's contention that it is open land next to a very clearly defined built edge to the settlement. It would not "round off" Chestnut Close in any sense of that term that I recognise.

#### Land on the eastern edge

4.2.517 The objection land is all in agricultural production, predominantly within Grades 2 and 3A. Not only is the land poorly related to the developed form of the small town of Rushden to the north, it is greatly out of proportion with the modest settlement of Wymington to its west. Wymington, immediately south of Rushden, is distinct enough in character and disposition from the former to be treated as a separate entity, though the two places are in adjoining Districts.

4.2.518 Visually, the land rises quite steeply north-westwards through the site up to the bridle path running parallel with Rushden Road. There is no doubt that large-scale housing



development would be visible from long distance, however well laid out and screened by planting. A site as large and open as this forms an intrinsic part of the broad AGLV designation in this part of the Borough. It should not be extinguished as an open site in the absence of overwhelming housing need. The East Northamptonshire Council has specifically stated that it does not support the allocation of this land for housing, and that there is no demand for housing of this scale in the District, given existing allocations and commitments. There is no convincing evidence to support the objector's claim that the closeness of the site to the planned A6 Rushden and Higham Ferrers Bypass gives the location planning significance as a potential development site. Given the policy thrust of the adopted Bedfordshire Structure Plan about appropriate locations for significant housing development, this site is a non-starter.

4.2.519 The residential and agricultural buildings at Poplars Farm are held by the Council to be outside the primary built framework of Wymington. I have looked at the south-east part of the village, and I find that this farmyard complex is more loosely knit than its neighbours to the west; it is also more obviously an extension of isolated development into open countryside. I agree with the Council's judgement on this matter.

#### Recommendation

4.2.520 I recommend that no modification be made to the Local Plan in respect of these objections.

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### **Section 4.3**

#### **CONCLUSIONS ON THE SITES ALLOCATED IN THE DEPOSIT PLAN AND THOSE PUT FORWARD BY OBJECTORS**

4.3.1 Of the objection sites reported on in Section 4.2, I recommend the following to make up the 700+ deficit in the period to the end of 2005 identified in my paragraph 4.1.200 above (see also Table 1 at page 236 below):

##### Urban Extensions of Bedford/Kempston

North Brickhill/Freemans Common 240 dwellings

Norse Road 200 dwellings

##### Previously Developed Land at an Existing Settlement Close to the Urban Area

Land East of the A600 at Shortstown 260 dwellings

##### Land within a proposed "B" Village Settlement Policy Area boundary

Land proposed as Important Open Space "C"

at Cotton End, Eastcotts 25 dwellings

Land outside a proposed "B" Village Settlement Policy Area boundary

Land at the rear of 73 Bedford Road, Willington 5 dwellings.

4.3.2 The evidence about delivery of the three larger sites has been thoroughly explored and debated during my Inquiry. My conclusions on the deliverability of allocated and suggested sites has tended to support the most conservative estimates of delivery, not deliberately, but from my estimation of the weight of the arguments in each case. Consequently, I see no strong reason to subject any figures in the paragraph above to a further percentage reduction for non-delivery.

4.3.3 One of the disappointments of the Inquiry period was the failure of parties to set before me, prior to its closure, any document with an agreed and convincing mechanism for the delivery of the western bypass tied to housing development on sites H6 and H7. I see this as a tactical delay, to assure landowners/developers of an optimum financial return, rather than a fundamental problem. However, I cannot be as certain as I would wish that the "real-world" questions of private sector commitment have been fully answered. The deliverability of a substantial element of housing on these two sites within the Plan period is not beyond doubt.

4.3.4 I think the Council should be ready to conduct a review and updating of the housing sites it eventually allocates at an appropriate date, at least a couple of years before the end date of this Local Plan. If the H6, H7 or H8 allocations lag behind my estimations, it will be necessary to resist any temptation to allocate other sites physically close to the western bypass route, that might diminish the market attractions of H6, H7 and H8. I think particularly of the otherwise attractive option of expanding the H15 allocation at Bromham in the manner favoured by the Parish Council and objectors. If any further urban extension site is sought around Bedford, the least harmful addition appears to me to be a possible extension eastwards of the Norse Road objection site, where the precedent for development on the north side has been well and truly set. I would regard any development on the objection site at Elstow, advocated by David Wilson Estates and the Trustees of the Whitbread Harrowden Settlement, as a huge detriment to the setting and identity of that beleaguered but still highly significant and valuable historic settlement.

4.3.5 I hope that opportunities to build new housing within the Bedford Urban Area Boundary would be advanced by the period of any mid- or late-term review. I think particularly of Opportunity Site 12 in terms of significance and potential yield.

4.3.6 Given the priorities of the Deposit Plan, I have not looked with favour on objections seeking significant extension of any village's Settlement Policy Area boundary in this Plan period. I find nothing in PPG3 of March 2000 to indicate that any village in Bedford Borough has a strong planning need to grow or receive new housing beyond the limits advocated by the Council in the Deposit Plan and its subsequent PIC's.

TABLE 1: RESPECTIVE POSITIONS ON HOUSEBUILDING UP TO 2006									
	A	B	C	D	E				
	FULL LP	BBC	DLP	DPDS/MRP	INSPECTOR				

<b>Base Date</b>	31/12/98	31/12/98	31/12/98	31/12/98	<b>31/12/98</b>
Completions	5004	5004	5004	5004	<b>5004</b>
Fall in	525	525	525	525	<b>525</b>
Non implementation	0	0	-80	-617	<b>-111</b>
Outstanding pps.	1890	1890	1594	1599	<b>1890</b>
*Adopted LP allocations	154	154	0	0	<b>154</b>
Known Sites	324	324	240	324	<b>324</b>
<b>Supply Total</b>	<b>7897</b>	<b>7897</b>	<b>7283</b>	<b>6835</b>	<b>7786</b>
<b>Local Plan Requirement</b>	<b>3803</b>	<b>3803</b>	<b>4417</b>	<b>4865</b>	<b>3914</b>
<b>Location</b>	<b>Policy</b>				
Britannia Iron Works	H2	180	180	0	<b>180</b>
Austin	H3	25	25	25	<b>25</b>
*Ford	H4	0	0	0	<b>0</b>
College St	H5	20	30	30	<b>30</b>
Biddenham Loop	H6	1450	850	500	<b>520</b>
L W of Kempston	H7	730	275	500	<b>390</b>
L N of Bromham	H8	900	560	390	<b>450</b>
Shortstown	H9	170	170	170	<b>170</b>
Fields Rd N	H11	450	240	250	<b>240</b>
* Berry Farm	H12	340	126	254	<b>126</b>
Stewartby	H13	330	240	162	<b>162</b>
Elstow Storage	H14	375	375	375	<b>375</b>
Northampton Rd Bromham	H15	45	45	45	<b>45</b>
Bromham Hosp	H16	65	65	65	<b>65</b>
Clapham Folly	H17	170	170	170	<b>170</b>
New Road Gt Barford	H18	25	25	25	<b>25</b>
Yelnow Lane	H19	25	25	25	<b>25</b>
Clay Piece	H20	41	41	41	<b>45</b>
Luton Road Wilstead	H21	50	86	86	<b>86</b>
*Harrold Meadway	H22	0	0	40	<b>0</b>
*Village sites	H23	90	55	67	<b>55</b>
*Canons Close	H23	9	9	9	<b>9</b>
Units to be delivered by 2006		5490	3592	3229	<b>3139</b>

<b>Total (A)</b>	<b>13387</b>	<b>11489</b>	<b>10512</b>	<b>9974</b>	<b>**10979</b>
Structure Plan requirement	11700	11700	11700	11700	<b>11700</b>
<b>Difference</b>	<b>1687</b>	<b>-211</b>	<b>-1188</b>	<b>-1726</b>	<b>-721</b>
<b>objection sites</b>					
r/o 73 Bedford Rd, Willington					<b>5</b>
Land at Cotton End					<b>25</b>
Shortstown (east of A600)	700	260	260	260	<b>260</b>
Freemans Common	400	0	240	240	<b>240</b>
Norse Road	200	0	200	200	<b>200</b>
west of Wilstead Road Elstow	475	260	260	260	<b>0</b>
<b>Total (B)</b>	<b>1775</b>	<b>520</b>	<b>960</b>	<b>960</b>	<b>730</b>
<b>Local Plan and objection sites total A+B</b>	<b>15162</b>	<b>12009</b>	<b>11472</b>	<b>10934</b>	<b>11709</b>
Structure plan requirement	11700	11700	11700	11700	<b>11700</b>
<b>Difference</b>	<b>3462</b>	<b>309</b>	<b>-228</b>	<b>-766</b>	<b>9</b>

\* units which in BBC calculations are included in the supply side data. \*\*supply total + units to be delivered

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#### **Section 4.4**

### **OBJECTIONS TO POLICIES H24 TO H39**

#### **POLICY H24 – CRITERIA FOR DEVELOPMENT WITHIN SETTLEMENT POLICY AREAS**

##### **Objections and Key Issues**

##### **4.4.1 BT plc 170/1, British Horse Society 369/15**

add "or public rights of way" to criterion (iv)

(vii) would prevent loss of employment land for residential development; better to read as "benefits would be achieved or there is excess supply over demand based on historic take up rates"

#### Council Reply

4.4.2 The Council's written response is contained in Document BBCEV 1080.

#### Appraisal

4.4.3 The Council has put forward PIC 204, specifically adding the need to safeguard existing public rights of way to the criteria in the policy. The BT objection is linked to its desire to alter the thrust of Policy E12, allowing change of use in employment areas in periods when the supply of such land exceeds the demand, with reference to historic take-up rates. I have not acceded to that objection, and thus see no reason to alter H24 in like manner.

#### Recommendation

4.4.4 I recommend that the Local Plan be modified to incorporate PIC 204, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICY H25 – DEVELOPMENT ON LAND DESIGNATED AS IMPORTANT OPEN SPACE

##### Objections and Key Issues

4.4.5 Mr & Mrs V Head 776/1, Friends of Biddenham Village Pond 1098/1, Bromham PC 443/5, Carlton & Chellington PC 145/3, Mr GCW Beazley 1027/ 8, The Bromborough Estate Co Ltd 911/1, EA & MS Westley 1073/1, DH Barford & Co 269/17

there should not be a presumption against development on these Spaces

together with NE17 and NE18, this policy gives rise to a two tier approach to safeguarding important open spaces and gaps; all the open sites considered to merit protection should be so identified on the Proposals Map

Reword the policy allowing development limited to low density to ensure balanced space and the provision of public, private and recreational space within an SPA

Site 1 on Proposal Map Biddenham Inset is objected to insofar as it affects the private garden of 34 Bromham Rd, and the whole policy is questioned

Insert an additional Open Space/View on Biddenham Inset looking westwards across the pond towards St James Church

8 additional spaces in Bromham proposed; alter boundaries of Spaces "M" and "H"

add 2 fields in The Marsh, Carlton, as IOS's

Land at Vicarage Lane, Podington, does not have enough quality for designation

#### Council Reply

4.4.6 The Council's written response is contained in Documents BBCEV 45, 81, 188, 206, 403, 452 and 1082.

#### Appraisal

4.4.7 The Important Open Space policy was considered by the Inspector who held the 1992 Local Plan Inquiry. The policy applies to settlements other than the Bedford/Kempston Urban Area. Inevitably, it involves subjective visual judgements on the importance of a particular piece of land to the form and character of a settlement. In the Deposit Plan such settlements are villages, including the semi-urban villages of Biddenham and Elstow, as well as settlements so humble as not to merit a formal settlement boundary in the Deposit Plan. Important Open Spaces are said to have been specifically identified from the generality of open space. The Deposit Plan quotes as examples the following: village greens, play areas, gaps in a frontage providing a break in the built form, and the foreground (at least) of areas giving views to the open countryside which contribute to the character and setting of a village.

4.4.8 I agree with the Council's stance that the policy is not essentially at variance with national advice in PPG7, paragraph 4.16 on the subject of local countryside designations. However, I do so only provided that the policy is confined to spaces within the Settlement Policy Area boundary, whether or not looking to the open countryside beyond. I question the utility of IOS designations in settlements so modest that the Plan gives them no SPA boundary; such a settlement is only seen in terms of policy as a set of buildings in open countryside. I suggest the Council look again at this last matter, even where no objections exist.

4.4.9 My predecessor found against a number of individual IOS designations, and so have I. I am not satisfied that the process has been conducted with a unified or Borough-wide vision or rigorous standards. I say this, having listened to Council witnesses at my Inquiry, and having read written evidence. Therefore, though I address specific objections, there can be no certainty that I would always have found in favour of the Council had further objections to other IOS's been made.

4.4.10 The best way for the Council to deal with the matter is to have a swift but rigorous review of all the designations in the Deposit Plan. The adopted version of the present Plan should have a clearer and more focussed text explaining the criteria than what is written in paragraphs 5.49-5.54. The meaning of the differentiation made between Important Open Space and Important Open Views in the keys to the Proposals Map Insets must be made clear. Both here and in the lower case text to NE17 and NE18, any qualitative as well as locational difference between Important Open Spaces and Urban Open Spaces must be set out.

4.4.11 Text in the last two sentences paragraph 3.42 of the Deposit Plan is confusing and needs alteration. It is said that in Important Open Spaces and Urban Open Spaces there are undoubtedly important spaces such as churchyards that have been omitted because the Council thinks they are "unlikely to be under pressure". This needs revision for two reasons. If a space is important it should always be recorded as such. Also, there is no guarantee that the Council has correctly assessed that development pressure is unlikely.

4.4.12 There must be a verbal description of the essential elements of each IOS designation somewhere in the adopted Local Plan document. This could either on the Proposals Map Insets, as in the 1993 Plan, or bound separately in the text. It should give the plan user specific enlightenment on what the Council finds important. The Council should word the descriptions knowing that the brief summary may be rigorously questioned in the making of planning applications and appeals.

#### Biddenham

4.4.13 IOS "I" As regards the objection to land comprising the garden of 34 Bromham Road (776.1), this is a pleasant, well planted and relatively generous domestic garden, within the Plan's designated Settlement Policy Area boundary for Biddenham. The area to the north, at present flat and featureless arable farmland, will be developed as part of the H8 housing allocation. There will be a need to produce careful detailed designs in order to retain a neighbourly relationship with the No. 34 and other dwellings on Bromham Road. However, I cannot see the garden land as meriting IOS status: there will be no view through to open

countryside from Bromham Road when H8 is developed, and the garden is visually pleasant rather than "Important". The objection also questions whether the remainder of IOS "I" merits designation. It comprises an area of open field and a coppice. This land is pleasant but nothing more, and cannot be said to contribute greatly to the visual form or character of its surroundings - either as they are now or will be when H8 is developed. I suggest that what is important to the local scene is the tree lined approach to Bedford along Bromham Road, and the general siting of buildings of domestic scale away from the road edge in a landscaped setting.

4.1.14 Biddenham Village Pond This site lies beyond the Biddenham Settlement Policy Area boundary on Proposals Map Inset 3. It is one visual incident in an area of open countryside, inside the Bedford Urban Area Boundary, designated as an Area of Special Restriction. I see no reason to designate it as an IOS. The view from the pond to the church, which the objector quotes, is no different in kind or importance from any other view of the church from the open land near the pond.

#### Bromham

4.4.15 The Parish Council has proposed 8 areas of open land within the village as IOS's. The Council has put forward PIC 205, in which it agrees that 5 of the 8 proposed should have IOS status:

Swan Green;

Land adjacent to Bromham Brook, Village Road;

Land next to the Bypass, and r/o Brett Drive, Cartwright Close and Symonds Close;

Land off Dynevor Close (south and north sites);

Land at Kings Close, Village Road.

4.4.16 Three other sites are not seen as worthy of IOS designation:

Land next the Bypass and r/o gardens in Quenby Way;

Land at Trevor Drive;

Highway verges at the entrance to Quenby Way.

Having seen all 8 sites I concur with the Council's appraisal and conclusions. The PIC also adjusts IOS "H" to take account of a recent planning permission.

#### Carlton

4.4.17 The Parish Council has proposed two fields in The Marsh at the western end of Carlton, beyond the Settlement Policy Area boundary, to be an IOS. I see them as neither more nor less than open fields in the countryside, not eligible for, or worthy of, IOS status.

#### Podington

4.4.18 The paddock land on the south-west side of a bend at Vicarage Lane, which is part of IOS "B", is said by the Council to help create a pleasant approach to the village along Vicarage Lane. I do not disagree, but I fail to find very special visual merits in the site. Nor does it have a significant historic character, or provide a truly important gap or view. It does not merit IOS status in my view, despite gaining classification in the 1993 adopted Local Plan.

## Ravensden (Cleat Hill)

4.4.19 In policy terms, Cleat Hill is regarded as one of the "other settlements in the countryside" ... "forming part of the open countryside where there is a presumption against development" (Deposit Plan, paragraph 2.58). IOS "E" was identified in the 1993 adopted Local Plan where, on the settlement maps, it is described as " part garden and field access. A good group of trees on prominent corner site". The Council now adds in evidence that, despite the tree cover, the eastern side of the site provides open views. This is the case, but neither the area of the IOS nor the views are by any means visually exceptional, in the context of the surrounding area. As the area of Cleat Hill is already treated as open countryside, to be protected for its own sake, I consider the designation is unjustified.

### Recommendation

4.4.20 I recommend that the Local Plan be modified to incorporate revisions and additions to the supporting text to Policy H25 as recommended in paragraphs 4.4.7-19 above; also the incorporation of PIC 205, as set out in Core Documents 11, 11A and 11B. I also recommend the deletion of the following:

IOS "I" on Proposals Map Inset 3; IOS "E" on Proposals Map Inset 28a;

The paddock land on the south-west side of a bend at Vicarage Lane, which is part of IOS "B" on Proposals Map Inset 27.

No other modification should be made to the Local Plan in respect of these objections.

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## POLICY H26 – HOUSING IN THE OPEN COUNTRYSIDE

### Objection and Key Issue

4.4.21 DH Barford & Co 269/10, Mr GCW Beazley 1027/7 & /25, BT plc 170/26-/27, Bedfordia Developments Ltd 293/34, Mr RW Fettes 1159/2, Warmingtons 188/1

need for a new policy to recognise that there are opportunities for small scale infilling within well defined groups and clusters outside SPA, with H26 varied to incorporate the new policy as a further exception where countryside housing may be acceptable

a policy needed to promote special needs housing for upper salariat in best English country house tradition

fails to refer to a policy dealing with conversion of rural buildings (including ex-telephone exchanges) as an acceptable type of new countryside housing

policy should incorporate an allowance for hobby smallholdings

express support for rural housing next to areas of employment to aid sustainability

allow for situations like development of redundant farmyards and analogous sites for development with particular community or environmental benefit, including being of innovative nature, and very good design outweighing the "presumption against"

include a more flexible housing policy with regard to the extension of rural villages to prevent them becoming mere residential dormitories without local facilities



H26 fails to refer to a policy dealing with the conversion of rural buildings as one of the types of development where new housing in the countryside may be acceptable

#### Council Reply

4.4.22 The Council's written response is contained in Documents BBCEV 62, 67, 87, 92, 207, 212, 1084 and 1093.

#### Appraisal

4.4.23 I support the restrictive attitude of this Local Plan to new housing outside settlements which are so small or unfocused that they do not merit definition by a Settlement Policy Area boundary. This appears to me entirely in line with local and national planning policy. It would be perverse for the Local Plan to spell out possible exceptions to this policy stance, even on the very smallest scale of infilling. The viability of settlements, the priority growth areas in this plan period, and the case for limited expansion are considered quite adequately in the Strategy chapter of the Plan, specifically in the policy wording and supporting text of S6 and S7. Where I disagree with a particular SPA boundary definition that has been objected to, I say so elsewhere in this report.

4.4.24 I see no reason for this or other policies to address the specific issue of conversion of rural buildings to residential use. This course of action is not specifically favoured by local or national planning policy, and the matter is referred to adequately in lower case text in paragraph 4.50 of the Deposit Plan. Policy E18 deals with reuse of existing buildings for commercial, industrial, tourism or recreational uses. The objection seeking favourable mention of "individual" development with particular community or environmental benefit, innovative nature, very good design etc., is best judged in this policy context. I can see no good planning reason to devise a policy specifically favouring residential development of redundant farmyards and other formerly developed rural sites, even for very special projects.

4.4.25 The Council sensibly expresses opposition to any mention in a policy or supporting text of an isolated new dwelling in the countryside being justified by its very high architectural quality or harmony with the landscape. Any such policy would be taken as justification of large new dwellings of disputable aesthetic merits by their proponents, including professional advisers. Cases like these should be dealt with on their merits by the Council. It seems inevitable that matters of dispute will end up as planning appeals. That is the nature of such proposals in a small and highly populated country, where rural seclusion is almost impossible to find.

#### Recommendation

4.4.26 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### POLICY H27 – AGRICULTURAL WORKERS' DWELLINGS

##### Objections and Key Issues

4.4.27 Mr GCW Beazley 1027/5, NFU 321/15, FRCA 320/6

workers concerned should not be condemned to caravan living against their wishes: an abuse of planning powers

either say 5 years or until viability is shown, or modify to comply with PPG7's 3 year guidance

#### Council Reply

4.4.28 The Council's written response is contained in Documents BBCEV 264, 1085 and 1086.

#### Appraisal

4.4.29 The Council has put forward PIC 208, accepting the PPG7 advice in Annex I, paragraph 14 that 3 rather than 5 years should be the right period for temporary accommodation. I see no sound reason to relax this policy further, as it could lead to more opportunistic attempts to make a capital gain from housebuilding, rather than the less rewarding path of purely agricultural enterprise.

#### Recommendation

4.2.30 I recommend that the Local Plan be modified to incorporate PIC 208, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY H30 – LOCAL NEEDS HOUSING IN THE RURAL AREA

#### Objections and Key Issues

4.4.31 Oakley PC 423/4, Mrs M Wiltshire 422/2

concern that housing would be allowed where it would have been denied in the past: e.g. at the rear of houses in Oakley High Street

to give Pavenham new blood there is a need for provision of affordable housing

#### Council Reply

4.4.32 The Council's written response is contained in Documents BBCEV 208 and 209.

#### Appraisal

4.4.33 The two objections made to this policy merely show the innate problems and deficiencies of any device aiming to meet the aspirations of rural residents who cannot afford to buy in the open market. This exception policy and the lower case criteria in paragraphs 5.65-5.67 fully meet the criteria set down in paragraph 18 of PPG3 of March 2000.

#### Recommendation

4.4.34 I recommend that no modification be made to the Local Plan in respect of these objections.

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### POLICY H31 – AFFORDABLE HOUSING

#### Objections and Key Issues

4.4.35 David Wilson Estates Ltd 144/42, BT plc 170/25, J & J Design 263/10, VE Parrott (Oakley) Ltd 273/8, Bellway Homes Ltd 275/23, Jellis Trustees 286/3, Messrs Wisson &

Crouch 287/3, Beazer Homes (Bedford) Ltd 333/2, CPRE 388/54, City and St James Property Ltd 456/22 & /32-/35, DH Barford & Co 269/11, Bedfordia Developments Ltd 293/15, Old Road Securities plc 393/46 and 1022/7, House Builders Federation 454/1, Hallam Land Management 455/9, Nettlecombe Ltd 487/1, David Wilson Homes 998/21, Wilstead PC 44/2, Twigden Homes, Eagle Homes & Connolly Homes 1090/17, Westbury Homes (Holdings) Ltd 1151/6, Berwick Homes Ltd 1158/2

re para. 5.68, projections from the 1993-94 position are suspect and no guarantee of future trend; delete

re paras. 5.69-70, text confused; distinguish need for affordable housing and requirement of those with special needs

re para. 5.71, appears to ignore "right to acquire" legislation; occupancy conditions as indicated likely to restrict funding

include proviso that all affordable housing will depend on proven local need

reword the policy to say Council will negotiate for an appropriate amount of affordable housing, in accordance with the Circular's advice, and pay regard to the housing needs of the particular locality, to be affordable for both initial and subsequent occupiers

the test in para. 5.72 purporting to have regard to the ability to make such provision on small sites is not a material consideration and thus inappropriate; 5.72 is contra Circular 13/96

say affordable housing is to include low cost market housing for sale

change the 25% target

total requirement figure is questioned; should be expressed as an actual figure, not a percentage

list the sites where affordable housing - by reference to a local needs survey - will be sought; do not include Shortstown

too inflexible and does not allow for imbalances in range of housing to be taken into account

lack of clarity as to how the target will be reached

refer to site and market conditions

include wording to ensure that larger sites are not presented for consent in smaller parcels just falling under the limits stated to avoid providing affordable housing

#### Council Reply

4.4.36 The Council's written response is contained in Documents BBCEV 1, 138-141, 410, 498, 802-805, 807-809, 843, 963-966 and 1088-1089.

#### Appraisal

4.4.37 The Council put forward pre-Inquiry Changes PIC209-PIC217, producing Counter Objections from St Albans Diocesan BOF 292/P12, DH Barford & Co 269/P23-/P24, Marsh Leys Farms Ltd 272/P6, Bellway Homes Ltd 275/P31-P32, Bedfordia Developments Ltd 293/P50-P51, Old Road Securities plc 393/P85-/P87 and 1022/P21, Hallam Land Management 455/P33-/P34, City and St James Property Ltd 456/P132-/P133, Nettlecombe

Ltd 487/P7 Twigden Homes, Eagle Homes & Connolly Homes 1090/P41-/P43, McCann Homes 1252/P5, Defence Estate Organisation 1254/P4-/P5. Subsequently, the Council replaced PIC217 with a new wording of the policy, incorporating some of the criticisms made (PIC469).

4.4.38 The Council has almost totally redrafted its Deposit Plan wording for the policy and supporting text. It now mentions the latest national advice about affordable housing in Circular 6/98, and the update in April 1998 of its own consultants' advice. I find the supporting text to be properly informative about the local context. The wording of the policy in PIC469 appears to me to strike a judicious balance; it has a firm quantitative aim in mind, but the figure of 30% of dwellings on sites above the national threshold which it would like to see as affordable housing is set out as a reasonable starting point for negotiation, rather than an ultimatum. In the context of assessed housing need, I see no prospect of the policy wording producing anything close to an excess of affordable housing over demand in this Plan period. The actual local need at the time, and the practicality and usefulness of provision on a particular site, can be investigated and cited by a developer or the Council during negotiations.

#### Recommendation

4.4.39 I recommend that the Local Plan be modified to incorporate PIC's 209-216 inclusive, PIC220 and PIC469, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY H32 – MIX AND RANGE OF HOUSING TYPES AND SIZES

#### Objections and Key Issues

4.4.40 House Builders Federation 454/4, CPRE 388/53, David Wilson Estates Ltd 144/41, J & J Design 263/1, VE Parrott (Oakley) Ltd 273/14, Bellway Homes Ltd 275/16, Bedfordia Developments Ltd 293/28, David Wilson Homes 998/19

no justification for requiring smaller dwellings

way policy is worded makes it very difficult to enforce; leads to continuation of current preponderance of 4-5 bed dwellings, particularly in rural areas: unsustainable and leads to out-commuting

delete – mix of house types and sizes on a site a matter for developer and clientele

suggest threshold at 10 dwellings and flexible approach to reflect site and market conditions

acknowledge that current affordability of housing means more people can afford to occupy housing larger than they can require

acknowledge that single person households arising from divorce and longevity often take into account the desirability of accommodating visitors and require housing greater than apparently required

#### Council Reply

4.4.41 The Council's written response is contained in Documents BBCEV 210, 469, 499, 967-968 and 1090.

#### Appraisal

4.4.42 The thrust of this policy appears to me fully in line with the sentiments expressed in PPG3 of March 2000 in paragraphs 9-11. It alerts a developer to the Council's assessment of needs and deficiencies, without being too didactic. However, some of the objections make a good point about single person households often needing the physical capacity to accommodate more than one person. I consider that the supporting text should take account of this consideration.

#### Recommendation

4.4.43 I recommend that the supporting text should touch on the need of many single person households for physical capacity to accommodate more than one person, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICIES H33 AND H34 – ACCESSIBLE HOUSING

#### Objections and Key Issues

4.4.44 David Wilson Estates Ltd 144/40 & /55, J & J Design 263/2-/3 House Builders Federation 454/12-/13, Hallam Land Management 455/21-/24

re paras. 5.74-5.75, visitability and mobility housing must be related to specific quantified needs rather than generalised unspecific quotas

re para. 5.75, the guideline for 10% of new housing to be of mobility standard is too high

both policies and the supporting text unreasonable and contrary to national policy advice

unrealistic to expect all housing on a development to be constructed to "visitability" standards; H34 provides an adequate requirement in this respect and as such H33 should be deleted

unreasonable to apply H33 provisions to all developments irrespective of size and location, contrary to national policy, which seeks to deal with such matters by way of building regulations and contra the advice of Circular 1/97. Same goes for H34 and it is unreasonable to apply this to small developments

#### Council Reply

4.4.45 The Council's written response is contained in Documents BBCEV 143, 500, 844, 1091-1092 and 1097-1098.

#### Appraisal

4.4.46 The Council considers that revised Part "M" of the Building Regulations adequately cover visitability standards, and has put forward PIC's 470, 471 and 472 to remove policy H33 and all supporting text references to this matter. I see no fundamental objection to the wording of H34, which stresses negotiation on each particular site to find a suitable mobility housing figure. However, I consider that the supporting text in paragraph 5.75 would read better as follows:

"The Borough Council has prepared standards for mobility housing which will be adopted as supplementary planning guidance. The Borough Council will seek a percentage of new housing to meet the standards, which will be assessed by reference to up to date survey information. At the date of adoption of this Plan the general guideline figure is assessed as 10%. Sites on which mobility housing is provided should be well located in respect of shops, services and public transport."

## Recommendation

4.4.47 I recommend that the Local Plan be modified to incorporate PIC's 470 and 472 , as set out in Core Documents 11, 11A and 11B, and the revised wording for paragraph 5.75 in my paragraph 4.4.46 above, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY H38 – EXISTING RESIDENTIAL BUILDINGS AND CURTILAGES

### Objection and Key Issue

#### 4.4.48 GOER 516/4

to avoid doubt about the status and weight to be accorded to criteria and to strengthen policy, criteria should be revised and properly included in bold case policy text

### Council Reply

4.4.49 The Council's written response is contained in Document BBCEV 211.

### Appraisal

4.4.50 I agree with this objection, which would strengthen the intentions of the policy. The words of the policy should be revised to incorporate at least the gist of the criteria within it. The criteria can be expanded as required in the supporting text.

## Recommendation

4.4.51 I recommend that the Local Plan be modified to in accordance with my conclusions in paragraph 4.4.50 above.

## CHAPTER 5

### OBJECTIONS TO THE CHAPTER ON EMPLOYMENT AND TOURISM

#### Preamble

(I) In this chapter I first consider objections to the proposed individual employment sites E2-E11. I then look at objections to the overall employment land supply in policy E1 and the tables showing the details of supply and the totality of employment sites. Other policies, from E12 onward, are dealt with in chapter order. Among the specific employment allocations I find strong reasons to support E2-E5, all within the Urban Area Boundary and on the town side of the Southern Bypass, which is Bedford's major interface with the regional and national road system. All four seem to me natural sites to attract non-local and local market interest in the next few years (significantly, they do not include the open agricultural land which plays such an important part in retaining the vitally important semi-rural setting for the picturesque Elstow Village).

(II) The four sites are close to major areas of population in the southern part of the town, to the H7 site, and to the Shortstown/Cardington area that will be regenerated throughout the next two Plan periods at least. Though attractive to road users the sites can and should be integrally linked by diverted and new public transport routes. I see no reason why this matter cannot be successfully explored in the Local Transport Plan. It is argued that they are vulnerable to attempts to build housing on them instead of employment. However, the strong policy argument to retain these well-sited locations for employment will be even more defensible so long as the Council can argue that it has done its utmost to ensure an adequate supply of housing land, capable of development to meet whatever is the current structure plan target.

#### POLICY E2 – LAND SOUTH OF CAMBRIDGE ROAD

##### Objections and Key Issues

5.1 CPRE 388/51, Cyclists' Touring Club 711/12, BT Ross1174/1, GN Defew 1196/1

like E3, should include requirement for provision of Cardington Park and Ride facility

do not use the term footpath/cycleway; refer to provision for crossing the A603

adverse effects of noise, increased traffic, loss of pleasant outlook, drop in property value

could be better road layout

because of heavy traffic, either CPO Cambridge Road houses or make houses into a cul-de-sac

##### Council Reply

5.2 The Council's written response is contained in Documents BBCEV 367, 434, 669, 1169 and 1170.

##### Appraisal

5.3 The Inspector at the last Local Plan Inquiry favoured the release of this site if it were needed. The Council says the site, within the Urban Area Boundary, has the benefit of a

planning permission, subject to completion of a s.106 obligation. It has taken note of well reasoned objections from local residents and changed the policy text to lay down more civilised principles for access and movement. I see no reason why the policy should make any reference to an enhanced crossing of the A603, some distance away.

5.4 The Council's alterations to the text of the supporting text and policy in pre-Inquiry Change PIC230 and PIC231, produced Counter Objections from Twigden Homes, Eagle Homes & Connolly Homes 1090/P44, and Bedfordshire County Council 436/P96. I see no point at this late stage in mentioning that the land has a high agricultural quality rating. The Council has confirmed that it will revise the Proposals Map to reflect in full the intent of the PIC's in the adopted Local Plan.

#### Recommendation

5.5 I recommend that the Local Plan be modified to incorporate PIC's 230-231, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY E3 – LAND WEST OF ELSTOW BYPASS

#### Objection and Key Issue

5.6 CPRE 388/50, Trustees of the Whitbread Harrowden Settlement 418/3

fears for nature conservation area at north end of site from new development; better to double its size to provide viability and better landscaping barrier

amend such elements as off-site works, Park and Ride and Marston Vale and Community Forest

design must ensure buses can exit to head of the queue for Cow Bridge roundabout or West End Lane by access under A6

#### Council Reply

5.7 The Council's written response is contained in Documents BBCEV 214 and 372.

#### Appraisal

5.8 This site, surrounded by road and rail links to Bedford, appears to me to have been well analysed by the Council in terms of the key natural features that can be retained or enhanced. I see no very strong reason to require a further increment of open land on the site. The Council has re-worded principles of development (ii), (iii) and (v) in pre-Inquiry Changes PIC233, PIC234 and PIC235, producing a Counter Objection to the last from Trustees of the Whitbread Harrowden Settlement 418/P11. The Trustees' remaining objection is that the words "where appropriate should be added to (v). I think that this sentiment is implicit in the amended policy wording.

#### Recommendation

5.9 I recommend that the Local Plan be modified to incorporate PIC's 233-235, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.



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## POLICY E4 – LAND WEST OF B530

### Objections and Key Issues

#### 5.10 CPRE 388/49, Trustees of the Whitbread Harrowden Settlement 418/4

(iv) and (v) need further definition to ensure safe and convenient access to Kempston Road and Ampthill Road residential areas; ensure public footpath at western end of E5 is respected

integrated scheme with E3 and E5 needed to improve cycle and pedestrian facilities

amend such elements as off-site works and Marston Vale and Community Forest

### Council Reply

5.11 The Council's written response is contained in Document BBCEV 373.

### Appraisal

5.12 The Council has put forward pre-Inquiry Changes to the policy wording in PIC236, PIC237 and PIC238, elaborating on the provision of footpaths and cycleways, and on contributions to public transport. This produced Counter Objections from Trustees of the Whitbread Harrowden Settlement 418/P13-P14. The Council's wording is less anodyne than that favoured by the Trustees and I prefer it; the Changes spell out the broad measures undoubtedly needed from any developer, including helping to link the site, through a variety of modes, with nearby residential and employment areas, and other parts of the town.

### Recommendation

5.13 I recommend that the Local Plan be modified to incorporate PIC's 236-238, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY E5 – LAND EAST OF B530

### Objections and Key Issues

#### 5.14 CPRE 388/48, Trustees of the Whitbread Harrowden Settlement 418/5

(iv) and (v) need further definition to ensure safe and convenient access to Kempston Road and Ampthill Road residential areas; ensure public footpath at western end of E5 is respected

integrated scheme with E3 and E4 needed to improve cycle and pedestrian facilities

amendments needed in respect of the unlikely "tidy tip", cycleway/footway provision, and Marston Vale and Community Forest provision

### Council Reply

5.15 The Council's written response is contained in Document BBCEV 374.

## Appraisal

5.16 The Council has put forward pre-Inquiry Changes PIC239, PIC240 and PIC241, expanding the key principles of development. They produced Counter Objections from Trustees of the Whitbread Harrowden Settlement 418/P16-P17. Subsequent PIC's 474 and 475 do no more than correct errors of misnumbering in the earlier PIC's.

5.17 However unlikely the real prospect of the "tidy tip" on the site, it would be unwise to remove mention of it before expiry of the extant planning permission or replacement of the Minerals and Waste Local Plan. As in the case of E4 above, the other Changes spell out the broad measures undoubtedly needed from any developer, including helping to link the site, through a variety of modes, with nearby residential and employment areas, and other parts of the town.

## Recommendation

5.18 I recommend that the Local Plan be modified to incorporate PIC's 239-241 and 474-475, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICIES S3 & E7 – LAND AT MARSH LEYS FARM

### Objections and Key Issues

5.19 Old Road Securities plc 393/73 & 1135/10-/12, Bedfordia Developments & Bedfordshire County Council 136/4, J & J Design 263/14, CPRE 388/46, City and St James Property Ltd 456/10 & /30

clarify wording of para. 6.30

fails to provide for developers contributing to proposed A421/A428 distributor road junction; ensure access is as shown on illustrative plan for H7

allocation is inconsistent with policies S3, BE5 and U2, would reduce activity at sites E9 and E10 and likely to result in coalescence of settlements (Kempston & Wootton)

excessive, breaches the bypass, and a precedent for further sprawl into the countryside

(vi) needs to say that financial contributions should only be fairly and reasonably related

extend Urban Area boundary to include Marsh Leys Farm

delete reference to employment site south of southern bypass in para. 2.35

### Council Reply

5.20 The Council's written response is contained in Documents BBCEV 9, 35, 342, 435, 565-567, 678-679 and 976-977.

## Appraisal

5.21 As a planned location for growth, Site E7 causes me more disquiet than other employment allocations in the Deposit Plan. It is on the rural side of the Southern Bypass and makes a deep penetration into undeveloped countryside not far from the large outlier village of Wootton, itself due to be much enlarged. However, the matter has been preempted by the Council's decision to assent to development for B1, B2 and B8 on the site just before the start of my Inquiry in January 1999, albeit in outline and subject to a s.106 obligation and schedule of conditions. The Council's pre-Inquiry Change PIC 247 produced Counter Objections from Old Road Securities plc 393/P109 & 1135/P15. All the objections and counter-objections bearing on the key principles of development in the policy will doubtless have been overtaken by the issue of a detailed consent, probably before the submission of my report, and almost certainly by the time the Plan is adopted. I therefore do not comment on them.

5.22 The great majority of this rectangular site juts out, in an isolated manner, on the rural side of the line of the Southern and Western Bypasses, which are major physical barriers and natural boundary markers. It lies within the Marston Vale Community Forest Area, and is envisaged by the Council as being developed within a highly landscaped setting. These commonsense physical factors lead me to see it as a peripheral development, not one integral to the perceived urban form of Bedford/Kempston. As an employment site well connected to the strategic road network it has some merits. However, I have no doubt that its inclusion within the Urban Area Boundary would open up the tempting prospect of planning applications sooner or later for major housing development on the site, stretching deep into open countryside. That kind of deep ribbon development, inimical to national planning guidance, would virtually bring about coalesce with the expanded Wootton.

#### Recommendation

5.23 I recommend that the Local Plan be modified to incorporate PIC's 246-250, as set out in Core Documents 11, 11A and 11B (unless these need to be modified in the light of a detailed planning permission on the site), but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICIES E9 & E10 – CORONATION AND ELSTOW BRICKWORKS

##### Objections and Key Issues

5.24 Re E9: City and St James Property Ltd 456/8, /26 & /90, Bedfordshire County Council 436/52, Cyclists' Touring Club 711/18

re 6.33, permanent uses should be put forward in an inset map as part of the Plan

rewording needed; better to refer to Minerals Planning Authority in supporting text, and in the policy to require preparation of a development brief

do not inhibit this site being developed before the Elstow depot site

policy should make provision for access by cycleway to Stewartby, new rail station and Elstow Depot

investigate further amount of land available for employment at former Coronation brickworks

Re E10: Bedfordshire County Council 436/7, City and St James Property Ltd 456/8 & 89, Cyclists' Touring Club 711/20

does not adequately address minerals and waste context

better to refer to Minerals Planning Authority in supporting text and the policy to require preparation of a development brief

Plan should refer to "land within the Elstow Storage Depot, and a large new site of c.30 ha encompassing former Elstow brickworks should be included

make provision for access by cycleway

#### Council Reply

5.25 The Council's written response is contained in Document BBCEV 343-344, 355, 436-437, 979-980 and 984.

#### Appraisal

5.26 These are the only matters connected with the area of Elstow New Settlement Area in Bedford Borough that are not dealt with in the Joint report of February 2001, already sent to the two Councils. The Council agrees that there will be an Inset map for the whole Area in the adopted Local Plan. The future of the two former Brickwork areas has to be considered in the context of the whole re-planned area, but I see no implication that these sites would hang fire unduly; indeed, the Council acknowledges that the Elstow Brickworks could theoretically come forward now. The adopted Brief makes it clear that new developments will require good interconnection, including cycle use. The Council has put forward PIC's 252-254, removing the unneeded reference to the Minerals Planning Authority in both policies.

5.27 The City and St James objection that a larger site than Elstow Brickworks should be specifically identified for employment development is not really feasible. This does not mean that a worked up and practical scheme for such development might not prove acceptable in practice. Nevertheless, it is a serious inhibiting factor that part of the larger area that the objector seeks to have recognised is allocated in the adopted the Minerals and Waste Local Plan (for compensating water features after infill).

#### Recommendation

5.28 I recommend that the Local Plan be modified to incorporate PIC's 252-254, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICY E11 – THURLEIGH AIRFIELD

##### Objections and Key Issues

5.29 DETR Airports Policy Division 148/1-/2, Bedfordshire County Council 436/2, /28 & /36, London Luton Airport 76/1, Bolnhurst and Keysoe PC 91/3, B Janson Smith (deceased) 133/2, Luton BC 172/2, Oakley Residents Planning and Traffic Action Group 237/17, Environment At Risk 524/1, St Modwen Developments Ltd (Redman Heeman) 889/2-/6, J Palmer 897/2-/3

re 6.36 consider a noise budget permitting movements up to the noise equivalent of 22,000 military aircraft movements

insufficient justification for this amount of employment at Thurleigh

should restrict air activity of all kinds in perpetuity; better definition of movements and night flying

oppose night flying in principle

change wording of (vi) and (vii)

oppose all flying in principle

in (vi) change "passenger services" to "scheduled and inclusive tour services"

small scale business and recreational flying should be the limit of air activity

get back to the pre-war bridleways that crossed the area

the Local Plan Inquiry should consider the CPRE comments on the Thurleigh Brief

policy should take adequate account of need to protect the strategic interest in Luton Airport and Structure Plan policy on smaller airfields

(i) should be as in Draft Plan; remove (v); clarify "authorised vehicles" in (vii)

do not restrict uses to B1, B2 and B8 only

remove words "appropriate to the airfield's location in a rural area" from (ii)

(iv) and last sentence of (vii) are unnecessary

Figure 17 is out of date and flawed

(vi) does not accurately reflect the policy guidelines in the approved Brief: replace a full community evaluation" with "an economic evaluation"

(vii) is too restrictive, going beyond the approved Brief

#### Council Reply

5.30 The Council's written response is contained in Documents BBCEV 124, 125, 127, 129, 219, 345-347, 847-849 and 1171.

#### Appraisal

5.31 The Council has put forward PIC's 256-260 and 478, altering the wording of the policy and supporting text, in response to detailed textual objections from the airfield's owners and the DETR Airports Policy Division, and PIC 255 as a clarification of the text of the preceding paragraph 2.35. The Changes in response to objections either improve accuracy or reflect the text of the adopted Development Brief (CD 49) more precisely.

5.32 The County Council is not pressing hard with an objection to employment at the Airfield site, but remains uneasy about a potential oversupply of Borough allocations if employment there were to surge towards the 2,000 peak figure in the Brief. However, there is no evidence that this is likely in this Plan period. I agree with the Borough Council that it is apt and proper that the site should be removed from the Table E2 list, given the substantial permissions already granted, and the kind of low employment uses currently attracted to the site. The reference to keeping open the aviation option until 2015 is plainly in a policy context of any use being small-scale and not geared to passenger travel, on a site with many existing and potential non-aviation uses. However, the fact that the site possesses a runway of exceptional length and width makes it very reasonable to retain the possibility of some continued use, especially in the absence of an up to date national statement on airport policy. I see no

explicit, implicit or improper threat in the sentiments or wording of the Deposit Plan that could possibly affect the interests of Luton Airport.

5.33 The revised policy wording is supported by DETR's Airports Policy Division, but I agree with that objector's suggestion that explicit mention should be made in paragraph 6.36 of the Council's wish to have a noise budget, or analogous exercise, produced with any planning application. The improved policy and supporting text appears to me compatible with policy 49 of the adopted Structure Plan. It is inconceivable that a significant aviation proposal would not be fully scrutinised at a Public Inquiry, and I find that the amended policy and supporting text could not reasonably be interpreted as favouring a significant change of role for the airfield. I appreciate the legitimate concerns of nearby residents, fearful of backdoor or incremental endeavours to increase aircraft movements significantly, but I consider the revised wording adequate to defend their interests when new planning proposals are brought forward.

#### Recommendation

5.34 I recommend that the Local Plan be modified to incorporate PIC's 256-260 and 478, as set out in Core Documents 11, 11A and 11B, together with the change to paragraph 6.36 that I commend in my paragraph 5.33 above, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY E1 & TABLES E1& E2 – THE BOROUGH'S EMPLOYMENT LAND SUPPLY

#### Objections and Key Issues

5.35 Bedfordia Developments Ltd and Bedfordshire County Council 136/3, City and St James Property Ltd 456/8, /23 & /36-/42, Bedfordshire County Council 436/27 & /29-/35, Old Road Securities plc 393/36, /75-/77 and 1135/14, GOER 516/5, Bucks County Council 86/1, Milton Keynes Borough Council 381/1, CPRE 388/52, Northants County Council 389/3, SC Whitbread 417/2, Trustees of the Whitbread Harrowden Settlement 418/ 2, Trustees of the Elstow Allotment Settlement 944/2

put greater emphasis on more sustainable pattern of use through mixed development

insufficient justification for scale of employment land proposed, including the Thurleigh airfield development, in the light of Structure Plan policy

Southern bypass allocations are to the detriment of employment areas in town

big single zonings are out of date; go for mixed use

green field sites could go to housing if no employment interest from the market

increased employment allocations may have unsustainable consequence of more commuting between Bedford and Northants

mention archaeological constraints

say "to foster local economic growth and provide for a range and variety of sites for economic development"

Council cannot "ensure" that land is brought actively to market; make partial deletion

delete Marsh Leys Farm

figure should be 109.5 ha, not 109 ha, as Marsh Leys goes from 22 ha to 33 ha

8.5 ha of land south of Fields Road, Wootton, and 2 ha West of Kempston should go

include 2 ha of land west of Broadmead Road, Stewartby

#### Council Reply

5.36 The Council's written response is contained in Documents BBCEV 7, 124, 131, 266, 339-341, 369-371, 380, 558-568, 661-662, 664-668, 678, 974, 977 and 1250.

#### Appraisal

5.37 The Council has put forward pre-Inquiry Changes PIC224 concerning Table E1, and PIC225 concerning the policy, producing Counter Objections from Old Road Securities plc 393/P80-/81 and 1135/P16, and City and St James Property Ltd 456/P134. Its pre-Inquiry Changes PIC226-PIC228 produced Counter Objections from Old Road Securities plc 393/P82-P84 and 1135/P17, Hallam Land Management 455/P35, Potton Developments Ltd 268/P19, and Westbury Homes (Holdings) Ltd 1032/P12.

5.38 The Council has worked to produce a Borough-wide employment audit, as commended in paragraph 17.10 of the adopted Structure Plan, in the wake of the County Council's objections. There is no specific numerical target in the Structure Plan, which contains the conclusion that there is already a sufficient provision of employment land across the County to facilitate economic growth and meet Bedfordshire's needs to 2001. However, the Borough has made the most out of the County Council's acknowledgement that this may not be the case for an individual District. The latter's evidence does not oppose any specific local plan allocation, indeed it states that they can be theoretically justified. However, there is a strong suspicion expressed that not all the allocations will be taken up, and that some might fall to housing development, as recently happened at Norse Road. This is an important point, also stressed by CPRE. The County Council favours a phased release of land, based on regular updating of the employment land audit.

5.39 The Borough Council has included modest but probably realistic areas of potential employment land to be developed in tandem with its significant housing allocations. The 2 ha allocated with site H7 appears to me a welcome and sustainable concept, in scale with the amount of new housing land. The larger amount of land at Wootton sensibly reflects the major increase in the village population, the location within a Strategic Corridor and the major advantages of a site close to the A421, with its ease of communication to the motorway network. The Stewartby land is now properly included. For better or worse, the future of the Marsh Leys site is now a fait accompli. In the light of the conclusions in my Chapter 4 on land at Shortstown, there will need to be a further adjustment to Table E2.

5.40 I have read carefully the objections of neighbouring counties and Milton Keynes District, but find no strong argument to make me think that the scale of allocations at Bedford is perverse and would result in greatly increased travel to work distances of an unsustainable kind. I find nothing of substance to object to in the aspirational tone of the policy's final phrase. The aim is laudable and the sentiment not merely rhetorical. The Council agrees with the additional wording suggested by GOER.

5.41 To sum up, the Council is making the most of the important role it has been assigned : helping move the weight of new development to the north of the county. The older types of manual employment are in serious decline. It has maximised the opportunity to create new employment in prominent new sites on the town side of the Southern Bypass. Its laudable intention is to introduce appropriate increments of new employment alongside substantial new housing areas. I endorse the essentials of this higher profile route to obtain jobs, even though the inevitable result is the presentation of more sites to the market than can be developed in this Plan period. I consider that the Plan's level of provision is justified on qualitative as well

as quantitative grounds. Because not all the sites will be developed in the near future, I suggest that the text of the adopted Local Plan should state more prominently its intention, and the stratagems it will employ, to prevent designated new employment sites falling to more commercially attractive uses, notably housing.

#### Recommendation

5.42 I recommend that the Local Plan be modified to incorporate the gist of PIC's 224-227 and 472A, as set out in Core Documents 11, 11A and 11B, subject to the specific alterations I suggest in my paragraphs 5.39 and 5.41 above, but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICY E1 AND PARAS. 6.18, 6.35 AND 6.53 – WYBOSTON LAKES

##### Objection and Key Issue

5.43 Potton Developments Ltd 268/7-/9, 706 Union Avenue 416/1-/4

allocate land at Wyboston Lakes complex as an employment centre with an increase of 14.5 ha in policy E1

specifically mention in Table E2 and paras 6.35 and 6.53, with appropriate allocation in Insets 31b and c

##### Council Reply

5.44 The Council's written response is contained in Documents BBCEV 11 and 75.

##### Appraisal

5.45 The Council wishes to insert into the Chapter text agreed with Potton Developments after publication of the Pre-Inquiry Changes. This would read:

"The role of the Wyboston Lakes complex as a regional centre for training and leisure based activities in a parkland setting adjacent to the A1 trunk road is recognised. The Borough Council will continue to provide support to this development consistent with the criteria for the impact of development in Policy BE30".

5.46 The Structure Plan context for this site is one of rural restraint, and I have found above in paragraphs 5.35-42 that the overall employment allocation for the Borough is adequate. Nevertheless, it is a fact that this site lies at the northern extremity of Bedford Borough, just south of the built-up area of St Neots in Cambridgeshire. The Cambridgeshire Structure Plan identifies St Neots for Cambridge-related growth. Some of this kind of growth is undoubtedly spreading on to land at Wyboston, which is owned in separate parcels by the two objectors. A research and technology innovation centre is now being sought on the 706 Union Avenue/Potton land. There are extensive existing training and leisure facilities on the two objectors' land, and the latest, which has the input of Robinson College, Cambridge, was under construction during my Inquiry.

5.47 The overall development of the present significant collection of leisure and training/knowledge based enterprises arose through opportunities for after-uses on sand and gravel workings, starting as long ago as the 1960's. There also exist uses of a much less impressive kind, such as an area of car storage on 706 Union Avenue's land. It is quite feasible that the Wyboston Lakes land may appear as or more attractive to prospective users and developers than some land in St Neots and nearby Cambridgeshire.



5.48 The present Bedfordshire Structure Plan does not specifically recognise the potential advocated by the objectors, the Key Plan diagram including the sites within an agricultural priority area. Nor do I have any indication that emerging Structure Plan policy in Bedfordshire will admit a need or desire to be part of the Cambridge-related growth pressure hereabouts. I therefore see no reason to support 706 Union Avenue's desire for new text on these lines. It seems to me unlikely that the impetus for well-designed and landscaped augmentation of current uses, or variants of it, can be easily halted on the two objector's lands as a whole. However, that does not mean that any proposal is acceptable anywhere at Wyboston Lakes. The form of words put forward by the Council appears adequate and sensible, recognising the facts as they exist. The words are an appropriate planning context for consideration of the merits of any proposal for a research and technology innovation centre sought by 706 Union Avenue.

#### Recommendation

5.49 I recommend that the Plan be modified to include the words set out in para. 5.45 above, but that it should not be otherwise modified in response to these objections.

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#### NEW EMPLOYMENT PROPOSAL – BEDFORD/KEMPSTON: POLICIES E1, NE15, NE17 & NE23

##### Objections and Key Issues

5.50 E Wootton & Sons1192/1-4

allocate 1.79 ha land at Goldington Road as a gateway site accommodating prestige employment

remove the land from the River Protection Area

remove the designation as Urban Open Space

remove the site from the Bedford River Valley Park

##### Council Reply

5.51 The Council's written response is contained in Document BBC EV63.

##### Appraisal

5.52 The developed arguments of the objector concern an open area of grassland with a 270 m frontage to Goldington Road, set behind a mature field hedge. The duly made objection is to only 0.9 ha with a road frontage of about 140 m. My argument in this case encompasses both sites. The hedge allows limited views of the land to the south through gaps, though more so in Winter. The land was allocated as River Protection Area in the adopted Local Plan. The objections to all three Natural Environment policies are site specific rather than general, and I have found none of the three objectionable in principle. The evidence suggests that road access, and public transport considerations, would not be major factors telling against an allocation here.

5.53 I have also found above that the overall supply of employment land allocated in the Deposit Plan is reasonable and adequate. B1 uses are not given special allocations in the Plan, but the objector's evidence does not convince me that the newly allocated employment sites and existing areas or premises in town could not provide land for such demand as is

likely to arise in the Plan period. Over-allocation, even to attract high quality offices, could lead to land not taken up subsequently going for housing, as at Norse Road.

5.54 The objector criticises the way that the existing commercial development of retail warehousing sheds west of the site since the late 1980's has been carried out, without regard for an important location at the town's edge. This was done through the Goldington Development Brief. It is the case that the retail warehousing area was originally identified as a business park; this did not come about, and the sites are now developed. Though not of any great visual merit, the transition from open countryside to urban area on the south side of Goldington Road seems to me to have been achieved neatly enough not to call for any more formal entry buildings.

5.55 Given the very modest amount of developable brownfield land within the built-up area, the Council has been forced to look at urban fringe sites for major housing and employment allocations. This makes it necessary to look very critically at all objections entailing the loss of yet more green field land. The Council sees the site as an important structural element in the Borough's open space network. Thus, I have looked at the site and its surroundings from close by, and in longer views from the south.

5.56 As a consequence I find that the objection site and other land in the open river valley to the east and south are, as paragraph 2.9 of the Deposit Plan says, "crucial in defining the character of the town". The sinuous course of the Ouse as it winds through the urban area, together with the open land along its banks, are probably Bedford's greatest visual attractions. Open land south of Goldington Road is spacious, attractive grassland, well punctuated with hedges and trees. Though the developed area would be on the northern boundary, and there is an employment area across the wide Goldington Road, there would still be a loss of a prominent length of open land, visible to all users of the A428. New building would have an additional impact viewed from the south, since the site is on ground rising somewhat above the lower flood plan land. It is visible to those on the Southern Bypass, or on the publicly accessible land north of it. This attractive land is clearly part of the river landscape, and therefore properly placed within the RPA and designated as Urban Open Space. As for its inclusion in the River Valley Park, though development is not inherently objectionable under the designation, offices unrelated to the Park are not a favoured use.

5.57 I have no doubt that an employment allocation on this site would prompt further pressure for development of all the open land on the south side of Goldington road as far eastwards as the Norse Road roundabout.

#### Recommendation

5.58 I recommend that no modification be made to the Local Plan in respect of these objections.

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#### PARA. 6.19 – NET DEVELOPABLE AREA OF EMPLOYMENT SITES

##### Objection and Key Issue

5.59 City and St James Property Ltd 456/9

the concept is not applicable to employment sites; should say develop as intensely as possible consonant with good design, landscaping and internal space

##### Council Reply

5.60 The Council's written response is contained in Documents BBCEV 568.

## Appraisal

5.61 There are no hard and fast rules on this matter, but I find the Council's approach acceptable in principle. Any successful modern employment site must strive to be physically attractive and consciously designed as a whole in relation to its surroundings. With these general principles accepted, more precise details can be argued in detail at the planning application stage.

## Recommendation

5.62 I recommend that no modification be made to the Local Plan in respect of this objection.

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## POLICY E12 – EXISTING EMPLOYMENT AREAS

### Objections and Key Issues

5.63 Anglian Water Services 1045/8, BT plc 170/28-/29, Safeway Stores plc 171/5,

more flexibility for retail/service uses, as PPG1 says, for example at Anglian Water HQ and Depot, Cambridge Road, Harrowden when it is surplus

policy hinders BT's disposal of property in St John's St, Bedford; cross refer to H24, E19, SH5 and SH12, which refer to loss of employment

delete" exceptional circumstances" and "significant"; reword as suggested, referring to community and environmental benefit

### Council Reply

5.64 The Council's written response is contained in Documents BBCEV 76, 851, 1173 and 1177.

## Appraisal

5.65 In response to the BT objection, the Council has put forward PIC's 261 and 479, inserting an additional sentence into paragraph 6.39. The argument by objectors that there should be greater flexibility seems to me little more than wanting the ability to change use without a demonstrably rigorous attempt to retain the presence of at least some future employment on the vacated employment site. The aim of keeping a pool of employment land for a broad range of employment uses – even when land supply exceeds demand – seems to me reasonable, at least for this structure plan period, because the adopted Structure Plan assigns Bedford Borough the role of accepting significant new development from the south of Bedfordshire. The allocation of new sites close to the Southern Bypass, to attract particular future investment requirements, is not itself a reason to release older urban sites with different characteristics and other kinds of locational advantage. The policy's supporting text sets out the context for arguing change clearly and reasonably.

5.66 The policy wording does seem to me to indicate that some loss of existing employment land can be tolerated by the Plan without undermining its objectives. I see no reason to skew the intention of the policy to give advantage to retail development by deleting " exceptional circumstances" from the policy wording. "Exceptional" means no more than that a convincing reasoned case has to be put forward why the policy should not apply in a particular location in particular circumstances. However, I do think that the word "specific" would be more appropriate and less contentious than "significant", as an adjective qualifying "benefit".

## Recommendation

5.67 I recommend that the Local Plan be modified to incorporate PIC's 261 and 479, as set out in Core Documents 11, 11A and 11B, and the altered wording I suggest in my paragraph 5.66 above, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICIES E14 - WORKING FROM HOME AND E15 – BUSINESS/EMPLOYMENT USES IN RESIDENTIAL AREAS

### Objections and Key Issues

5.68 Woods Hardwick Ltd 29/5, GOER 516/6

E14 is too prescriptive in PPG1 terms; delete

extend E15 or draft new policy to encourage or allow generally for employment development within urban areas, as opposed to just within residential areas

### Council Reply

5.69 The Council's written response is contained in Documents BBCEV 215 and 216.

### Appraisal

5.70 E14 may contain an aspiration that future market demand in the Borough will show to be unrealistic, and some housebuilders may be agnostic about the matter. Nevertheless, I think the policy is in line with identified working trends, is appropriate to a land use plan and is not unduly coercive. As to E15, I agree with the Council's response that the encouragement of employment development in the urban area is adequately achieved by other policies in this Plan Chapter, BE1 and E8.

## Recommendation

5.71 I recommend that no modification be made to the Local Plan in respect of these objections.

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## POLICY E16 – PROVISION OF AFFORDABLE FLOORSPACE

### Objections and Key Issues

5.72 DH Barford & Co 269/12, Old Road Securities plc 393/37, 1022/8 & 1135/9, Trustees of the Whitbread Harrowden Settlement 418/6, BT plc 170/8, J & J Design 263/15, Bedfordia Developments Ltd 293/30, SC Whitbread 417/3, Trustees of the Elstow Allotment Settlement 944/3,

a virtual tax on developers not justified by national or structure plan policies

contra 1/97 and ultra vires

will benefits other areas with no such policy

#### Council Reply

5.73 The Council's written response is contained in Documents BBCEV 348-349, 357-358, 361-363 and 1174-1175.

#### Appraisal

5.74 The Council has put forward pre-Inquiry Change PIC266 and PIC267, rewording the policy and revising supporting text to give hoped-for added flexibility. This produced Counter Objections from SC Whitbread 417/P7-P8, Trustees of the Whitbread Harrowden Settlement 418/P18-P19, and Trustees of the Elstow Allotment Settlement 944/P10-P11.

5.75 I agree with objectors that if there is no market demand for small units, private investment will not respond. If the concept is not favoured by a developer, but the Council detects a suppressed or emerging demand, the latter will need to argue a strong and hard-headed case if it is to obtain such provision, when planning applications are being formulated for allocated employment sites. However, I do not consider that the dialogue should not be attempted, nor that the matter of affordability should be ignored.

5.76 I conclude that the new paragraph proposed by PIC 266, and the wording of the policy, should be replaced by the following wording, which lacks the dogmatism of some of the Council's phrasing and does not give a precise size threshold for a small unit:

"A range of employment provision is necessary to meet the needs of the local economy. The provision of premises suitable for small-scale business will be encouraged, as these can form the seedbed of a buoyant economy. Where it considers affordability to be a material planning concern, the Council may seek the ability of initial occupants of such accommodation to pass on any negotiated low cost provision to subsequent occupiers by means of planning conditions or planning obligations.

"Policy E16: The Borough Council will encourage and, where it considers appropriate, negotiate for the provision of premises suitable to accommodate small businesses as part of the development of sites allocated for employment use"

#### Recommendation

5.77 I recommend that the Local Plan be modified to incorporate PIC's 264-265, as set out in Core Documents 11, 11A and 11B, and the altered wording I suggest in my paragraph 5.76 above, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY E17 – BUSINESS USES WITHIN SETTLEMENT POLICY AREAS

#### Objections and Key Issues

5.78 Mrs P Binns 1129/1, J & J Design 263/16, British Horse Society 369/23, Podington Garden Centre 993/4

site off Broadmead Road, Stewartby, would be damaging to residential amenity, out of scale and not safe re access

(iv) unnecessary due to definition of business uses in Use Classes Order

mention extra traffic impact on rights of way and horse riders

use term "employment generating uses" throughout

#### Council Reply

5.79 The Council's written response is contained in Documents BBCEV 267, 366 and 1176.

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#### Appraisal

5.80 The Council has put forward PIC 269 changing the policy wording from "business" to "business/employment", to accord with that in policy E15, based on classes B1, B2 and B8 of the Use Classes Order. I see no good reason to use a more embracing term, as the Council has the ability to consider other proposals on their planning merits. I find that the policy's criteria, and other plan policies such as LR10 and T20, adequately safeguard the interests of riders and other non-motorists.

5.81 The site-specific objection against the proposed site off Broadmead Road in Stewartby is principally concerned with the feared effects on Rose Cottage, although it is also claimed that the allocation does not relate in scale to the present village. From my observations, taking the view of Stewartby as one enters from the north-west, the site could be developed as a subordinate foreground element of the larger brickworks complex behind. If the road access and landscaping of the site and its boundaries are designed with care, the physical impact on its immediate neighbours, like Rose Cottage, should be more than merely tolerable. Of course, development here would bring about unwelcome change for nearby residents, but I see no case to abandon the scheme, which should increase and vary the range of local employment in sequence with the ambitious planned expansion in dwellings.

#### Recommendation

5.82 I recommend that the Local Plan be modified to incorporate PIC 269, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY E18 – RE-USE OF RURAL BUILDINGS

#### Objections and Key Issue

5.83 J & J Design 263/17

(iii) as worded, likely to fetter Council's discretion; add "significant"

#### Council Reply

5.84 The Council's written response is contained in Document BBCEV 364.

#### Appraisal

5.85 I take the word "adverse" to mean "hurtful" or "injurious" (Concise Oxford Dictionary). Accordingly, I do not believe that the test in (iii) is intrinsically onerous or in need of change, given that a particular proposal should be examined with some rigour and on its merits before a decision is reached.

## Recommendation

5.86 I recommend that no modification be made to the Local Plan in respect of this objection.

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## POLICY E20 – ADDITIONAL EMPLOYMENT

### Objection and Key Issue

5.87 Podington Garden Centre 993/3

reword and clarify in a manner more positive to expansion

### Council Reply

5.88 The Council's written response is contained in Document BBCEV 268.

### Appraisal

5.89 The Council has put forward PIC 270, which clarifies that the policy refers to the countryside and rural settlements. However, it does not accede to the objector's wish to mention favourably the physical extension of existing employment generating uses. Such extension into open countryside may on occasions be an accepted element in a scheme gaining planning permission, but I see no reason to encourage it overtly through a plan policy.

## Recommendation

5.90 I recommend that the Local Plan be modified to incorporate PIC 270, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of this objection.

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## POLICY E21 – FARM DIVERSIFICATION

### Objections and Key Issues

5.91 J & J Design 263/18, NFU 321/16, British Horse Society 369/32

unreasonable to require primary land use to remain agricultural

modify to "the primary use of the farmholding is and remains agricultural"

traffic generation should be a criterion

### Council Reply

5.92 The Council's written response is contained in Documents BBCEV 375 and 1178.

### Appraisal

5.93 The Council has put forward PIC 271-273, for clarification and in response to the NFU and BHS objections. The other objector quotes examples of rural diversification on land where the primary farm use has effectively ceased, and where there is an unviable holding.

However, it seems to me that such cases can be appropriately dealt with under the provisions of policies E17-E19, if E21 could not reasonably be applied. This particular policy, as altered by the PIC's, is in line with thinking in the main text and Annexes of PPG7. It may be that national policy will evolve further in the lifetime of this Local Plan on the encouragement of rural enterprise and diversification, but it has not yet happened. If it does, the Council can take appropriate steps to adapt its plan policy.

#### Recommendation

5.94 I recommend that the Local Plan be modified to incorporate PIC's 271-273, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY E22 – HORSE RELATED DEVELOPMENT

#### Objection and Key Issue

5.95 CPRE 388/41

make statement of intent about conditions being imposed to stop degradation of pasture, unsightly structures and damage to trees

#### Council Reply

5.96 The Council's written response is contained in Document BBCEV 269.

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#### Appraisal

5.97 The Council has put forward PIC 274, so that the supporting text now says that a high standard of maintenance is "essential" when horse activities occupy land. The policy itself contains five criteria governing new development of this kind, and it is implicit that the Council would apply necessary and appropriate conditions to any planning permission to prevent the kind of consequences feared by the objector. No additional wording is really necessary.

#### Recommendation

5.98 I recommend that no modification be made to the Local Plan in respect of this objection.

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### POLICY E24 – PROVISION OF SIGNPOSTING

#### Objection and Key Issue

5.99 CPRE 388/30

reword to avoid roadside clutter from all but very necessary tourist signs

#### Council Reply

5.100 The Council's written response is contained in Document BBCEV 217.



### Appraisal

5.101 I do not think it possible for a policy to be worded precisely to bring about what the objector seems to want. Circumstances alter cases. The supporting text already mentions good design and avoidance of visual clutter, and the Council will simply need to live up to the good intentions announced in this well crafted policy.

### Recommendation

5.102 I recommend that no modification be made to the Local Plan in respect of this objection.

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## POLICY E26 – TOURING CARAVAN SITES

### Objections and Key Issues

5.103 GOER 516/7, CPRE 388/29

replace "normally" with "only"

requires inclusion of a statement of intent to apply planning conditions precluding the storage of unoccupied caravans on touring sites

### Council Reply

5.104 The Council's written response is contained in Document BBCEV 1251.

### Appraisal

5.105 The Council has put forward PIC's 275-276 to meet both these objections. I agree that both changes would strengthen the application of the policy.

### Recommendation

5.106 I recommend that the Local Plan be modified to incorporate PIC's 275-276, as set out in Core Documents 11, 11A and 11B.

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## SUGGESTED NEW POLICY

### Objection and Key Issue

5.107 The Bedford Charity 345/1

should be a strategy to protect and enhance education facilities in District, as this is a very significant part of Bedford's economy, affecting all sectors of the community

### Council Reply

5.108 The Council's written response is contained in Document BBCEV 218.

### Appraisal

5.109 Although I am sure that the Council shares the sentiments of the objector about education facilities in the Borough, I do not believe that this sort of sentiment easily translates into a specific land-use planning policy. It may well be effectively stated elsewhere in other official Council plans, policies or statement, but I have no information about that.

#### Recommendation

5.110 I recommend that no modification be made to the Local Plan in respect of this objection.

## CHAPTER 6

### OBJECTIONS TO THE CHAPTER ON SHOPPING

#### POLICY SH2 – TOWN CENTRE SHOPPING DEVELOPMENT

##### Objection and Key Issue

##### 6.1 Safeway Stores plc 171/1

Clarify (ii) as it implies that new good quality retail development within the town centre will be resisted if enlarging the primary shopping area

##### Council Reply

6.2 The Council's written response is contained in Core Document 10.

##### Appraisal

6.3 The supporting text prior to this policy states that " the first preference will be for new retail development to be located within the primary shopping area of Bedford...as defined in the Plan, followed by edge of centre sites where suitable town centre sites are not available" (paragraph.7.8). Paragraph 7.23 makes it clear that there are significant opportunities to redevelop poor quality premises or sites within the town centre. Neither of the above statements suggests to me a real need to enlarge the boundaries of the primary shopping area shown on the Proposals Map Inset 2. However, the area shown therein may need detailed revision to include the recently redeveloped Lidl site in St Peter's Street (Opportunity Site 2).

##### Recommendation

6.4 I recommend that no modification be made to the Local Plan in respect of this objection, but that inclusion of Opportunity Site 2 in the primary shopping area be considered.

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#### POLICY SH3 – PRIMARY SHOPPING FRONTAGE

##### Objections and Key Issues

##### 6.5 BT plc 170/14, City Centre Restaurants 227/1 & /3, Boots Properties plc 371/4

Para. 7.26 could be construed as A3, as well as A2, uses pushing out A1 uses; dated thinking, as A2 uses tend to rationalise their representation

Policy seems to bar A2 and A3 uses totally from the primary shopping frontage, not differentiating between these and non-retail uses

Primary shopping area should include telephone exchange at Harpur Road, and the Charter Market

##### Council Reply

6.6 The Council's written response is contained in Documents BBCEV 585, 1179-1180 and 1195.

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### Appraisal

6.7 Within the primary shopping area, the primary shopping frontage shown on the Proposals Map represents the realities of the present, and the policy seeks to defend its integrity and retail vitality and viability. The open market site, though a potent attraction to shoppers on market days, does not equate with perennial prime retail frontage, and it is conceivable that it could operate equally successfully on another site. The telephone exchange may come up for redevelopment in the Plan period, but the Council sees no reason now to assign the site a favoured future use in its Plan, and I can find no good reason to oppose its judgement.

6.8 The defence and enhancement of the core retailing function make a great deal of sense, given Bedford's comparative deficiencies when compared with Milton Keynes, Cambridge and Northampton. The Council rightly opposes the dilution of the elements in the A1 Class Use by non-retail proposals. In principle a good restaurant use can undoubtedly enhance any shopping street. However, the defined primary shopping frontage in Bedford is modest in amount; there is plentiful secondary shop frontage close by in which existing and future A2 and A3 uses can thrive. The defence of core retailing is best done by a strong policy and I see no strong planning reason to alter the supporting text or policy wording.

### Recommendation

6.9 I recommend that no modification be made to the Local Plan in respect of these objections.

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## POLICY SH4 – PILGRIM SQUARE

### Objections and Key Issues

6.10 City Centre Restaurants 227/10, Cyclists' Touring Club 711/21

Development here could harm recovery of the High Street; need car park signage to east of High St locations

Makes no provision for cycling from Hassett St to Allhallows, a vital link in a cross-centre cycle route

### Council Reply

6.11 The Council's written response is contained in Documents BBCEV 439 and 1181.

### Appraisal

6.12 The Council has put forward PIC 290, introducing a new policy criterion (v) to meet the cycling objection. The other objection does not have any real criticism of the planning merits of redeveloping Pilgrim Square. The decline of the more traditional and modestly sized retail premises in the High Street is merely a measure of the diminished retail vitality of Bedford town centre as a whole. Paragraph 7.25 of the Deposit Plan shows that the Council has a conception of how to improve the condition of the High Street, and it will doubtless consider the merits of the objector's positive suggestions for better signing.

### Recommendation

6.13 I recommend that the Local Plan be modified to incorporate PIC 290, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY SH5 – THE DISTRICT CENTRE

### Objections and Key Issues

6.14 BT plc 170/30, Safeway Stores plc 171/2

Cross-refer to policy E12 re loss of employment floorspace

(ii) unnecessary as any proposal coming forward within the district centre will underpin it

(v) is unnecessary in prohibiting any loss of employment or residential use, urban open space or recreation space/playing field

### Council Reply

6.15 The Council's written response is contained in Documents BBCEV 623, 853 and 1182.

### Appraisal

6.16 The Council put forward pre-Inquiry Change PIC 292, addressing the Safeway objections, but this produced a Counter Objection from Bedfordshire County Council 436/P97. I agree that criterion (ii) of the Deposit Plan policy is unnecessary, but (v) seems to me appropriate, as the Council can always take into account exceptional circumstances to justify the loss of otherwise valuable employment land (as policy E12 says). The Council says that it agrees with the County Council that original criterion (vi) should be re-instated; I too endorse this step. The Council should note that its intentions in the responses do not seem to match the details of PIC wordings in the Core Documents.

### Recommendation

6.17 I recommend that the Local Plan be modified to incorporate the Council's stated intentions through changed text, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY SH6 – LOCAL CENTRES

### Objection and Key Issue

6.18 Cyclists' Touring Club 711/22

shopping developers should make contributions or provide for cycle provision in shopping development

### Council Reply

6.19 The Council's written response is contained in Document BBCEV 440.

### Appraisal

6.20 The Council has accepted the merits of this reasonable objection and put forward PIC 297, amending criterion (iv).

#### Recommendation

6.21 I recommend that the Local Plan be modified to incorporate PIC 297, as set out in Core Documents 11, 11A and 11B.

### POLICY SH11 – FARM SHOPS

#### Objection and Key Issue

6.22 NFU 321/18

should be amended to avoid conflict with PPG7

#### Council Reply

6.23 The Council's written response is contained in Document BBCEV 1183.

#### Appraisal

6.24 The Council's policy demonstrates that it is prepared to give planning permission for farm shops not merely selling their own or local farm produce. However, I consider the criteria set down could be improved in two respects. I see no reason why criterion (ii) uses a circuitous wording rather than a criterion based on harm, such as: "the scale and scope of retailing will not harm the viability of retail facilities in any nearby settlement". A better wording for (iv), also based on harm, might read: "the road access and exit at the site will be safe, and the local road network can safely handle the extra traffic generated". If this were done, (iii) could omit the words "..as a local convenience facility..".

#### Recommendation

6.25 I recommend that the Local Plan be modified to incorporate altered criteria, as set out in my paragraph 6.24 above.

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### POLICY SH12 – COMPARISON RETAIL DEVELOPMENT OUTSIDE PRIMARY AND DISTRICT CENTRE AREAS

#### Objections and Key Issues

6.26 Boots Properties plc 371/7, Cyclists' Touring Club 711/23, BT plc 170/9, Do It All Ltd 1019/1,

delete "compelling" in (i)

in (ii) developers must show that town centre options have been thoroughly assessed

(vii) superfluous; all development should be of high standard

"enduring, sustainable landscape" needs definition

change "such as" to "including" in (iv)

make cross-reference to E12 re loss of employment floorspace

add "or open countryside" to (viii)

#### Council Reply

6.27 The Council's written response is contained in Documents BBCEV 441, 1184 and 1185.

#### Appraisal

6.28 The Council has put forward PIC's 301-302. These acknowledge that the word "compelling" in criterion (i), and the whole of criteria (vii) and (viii), are unnecessary for the satisfactory functioning of the policy. The gist of the cycling objection is satisfied by the change to criterion (iv), which would ensure adequate parking as well as access.

#### Recommendation

6.29 I recommend that the Local Plan be modified to incorporate PIC's 301-302, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICY SH13 – OTHER USES ON RETAIL WAREHOUSE SITES AND POLICY SH14 – RETAIL WAREHOUSES

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#### Objections and Key Issues

6.30 Re SH13: Boots Properties plc 371/6, Do It All Ltd 1019/2

delete: SH12 gives the control that SH13 seeks

other retail uses are acceptable if sites are so located as to be able to accommodate other uses

Re SH14: Boots Properties plc 371/1, Terleys 1214/1, St Johns Centre (Bedford) Ltd 863/1, AXA Sun Life Properties Ltd 864/1, Do It All Ltd 1019/3

delete: issues raised are dealt with in SH12

range of goods is too prescriptive

understates positive contribution of retail warehouses to a town's offer; the town centre's vitality and viability is not endangered

phrase the policy approach in negative terms

#### Council Reply

6.31 The Council's written response is contained in Documents BBCEV 30, 624-625, 985 and 1186-1189.

#### Appraisal

6.32 The Council put forward PIC's 306, which deleted Deposit Plan policy SH13 and replaced it with a reworded policy, and 308, which deleted SH14. The former produced Counter Objections from St Johns Centre (Bedford) Ltd 863/P2, AXA Sun Life Properties Ltd 864/P2, Terleys 1214/P2 and B&Q plc 1248/P1. The Council then had third thoughts on the matter and came up with a fresh replacement policy – set out in PIC 485 - concentrating on the ability to control a proposed sub-division, or a change in the type of goods being sold on a particular premises.

6.33 The Council's reason for deleting SH14 was that it was unnecessary, given the existing provisions of the catch-all policy SH12. I agree with that conclusion. I also agree that the new policy introduced by PIC 485 would help ensure that the vitality and viability of the town centre was not affected by particular changes to retail warehouse units. The combination of the new clarificatory paragraph introduced in PIC 305 and the new policy adequately reflect current national policy in PPG 6 and the subsequent additional statement about "need", given by Planning Minister Richard Caborn in answer to a Parliamentary Question on 11 February 1999.

#### Recommendation

6.34 I recommend that the Local Plan be modified to incorporate PIC's 305, 308, 483 and 485, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICY SH16 – CONVENIENCE RETAILING

##### Objections and Key Issues

6.35 Safeway Stores plc 171/3, Wyncote Developments 995/1, Boots Properties plc 371/2, Cyclists' Touring Club 711/24, BT plc 170/10

negatively worded; does not fully address sequential approach; define role of out of centre sites, where no sequentially better sites are available

(vii) is vague and lacks guidance

(viii) is too restrictive and disregards individual merits of an application for alternative use

no sites allocated for discount food stores, despite findings of Hillier Parker Retail Study

amend introductory para to reflect 3.13 of PPG6; now precludes locations other than the central area

delete "compelling" need

reword "such as" to "including" in (iv)

deal with effects on public rights of way, including bridleways

add "or open countryside" to (viii)

##### Council Reply

6.36 The Council's written response is contained in Documents BBCEV 221, 284, 442 and 1190.



### Appraisal

6.37 The Council has put forward PIC's 310-312 in response to objections concerning: cycle access and parking, the use of the word "compelling, and the overly restrictive nature of criteria (vii) and (viii). Given the circumstances in this Borough, with one primary shopping area and one district centre, both needing to be kept vital and flourishing, I see the negative wording of the first paragraph of the policy as realistic. There is no undue bias against a lower location in the Borough's declared shopping hierarchy, if it can be clearly demonstrated why the proposal cannot fit in a location further up that hierarchy. I see no good planning reasons to include specific mention of discount food retailing in this policy.

### Recommendation

6.38 I recommend that the Local Plan be modified to incorporate PIC's 310-312, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY SH17 – SMALLER FOODSTORES

### Objections and Key Issues

6.39 Wyncote Developments 995/3, Safeway Stores plc 171/4,

as no sites are allocated, though only to be permitted where allocated, policy is unnecessary and should be deleted

as no guarantee that Plan's allocations will be realised, policy should allow for exceptions to criterion (i); reword

### Council Reply

6.40 The Council's written response is contained in Documents BBCEV 285 and 626.

### Appraisal

6.41 The Council has put forward pre-Inquiry Change PIC313. This deleted the Deposit Plan policy, and its requirement for smaller foodstores only to go on sites allocated in the Plan, and replaced it with new wording. It produced a Counter Objection from Marks & Spencer plc 1250/P1, subsequently withdrawn in the light of the additional statement about "need", given by Planning Minister Richard Caborn in answer to a Parliamentary Question on 11 February 1999. I find the PIC makes the policy both workable and acceptable.

### Recommendation

6.42 I recommend that the Local Plan be modified to incorporate PIC 313, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY SH18 – DISCOUNT FOODSTORES

### Objections and Key Issues

6.43 Boots Properties plc 371/5 & /8, Wyncote Developments 995/2, BT plc 170/11, Bedfordia Developments Ltd 293/29, Cyclists' Touring Club 711/38

delete 7.51 as no evidence that new car trips generated or stores unlikely to reduce travel by car

can cater for customers on foot or using public transport

policy contra advice in 3.1 of PPG6, and no PPG6 support for stance effectively precluding discount food retail uses

just one type of convenience retailing, which is subject to SH16; delete as not needed

SH12 more than adequate to deal with such proposals

Clearer emphasis needed in Plan on opportunities for discount food outlets, particularly at edge of centre locations to serve a neighbourhood; can be regenerative

In (ii) change "such as" to "including"

### Council Reply

6.44 The Council's written response is contained in Documents BBCEV 222, 590, 986, 1192-1193 and 1196.

### Appraisal

6.45 The Council has put forward PIC 315, meeting the cycling objection, and has responded to other objections through PIC 314, by removing its adverse remarks about the type of shoppers using discount foodstores, and their travel characteristics. The Council evidently views this type of shopping with some trepidation, because of feared adverse effects. However, I consider that any feared effects can be adequately dealt with under policy SH16 and its criteria. The gist of amended paragraph 7.51 could be added to SH16's existing supporting text, with a further addition, to the effect that evidence will be required from a prospective developer of any disproportionate impact which such an outlet might have on weaker centres.

### Recommendation

6.46 I recommend that the Local Plan be modified to delete policy SH18, but with the suggested textual addition I outline in paragraph 6.45 above.

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## POLICY SH19 – RESTAURANTS AND TAKE-AWAYS

### Objections and Key Issues

6.47 City Centre Restaurants 227/2 & /4

"unneighbourly facilities" objected to in 7.52

(iii) of policy wrong to totally exclude restaurants and takeaways from ground floor premises in the primary shopping area; contra PPG6 and Circ. 13/87 re diversity

### Council Reply

6.48 The Council's written response is contained in Documents BBCEV 1194 and 1197.

### Appraisal

6.49 I explain why I support the Council's opposition to new restaurants and take-aways in the primary shopping frontage in my paragraph 6.8 above. The text of Plan paragraph 7.52 would be improved if the word "potentially" were added in front of "..unneighbourly facilities..." in the first line.

### Recommendation

6.50 I recommend that the Local Plan be modified to reword paragraph 7.52, as suggested in my paragraph 6.49 above, but that no other modification be made to the Local Plan in respect of these objections.

## CHAPTER 7

### OBJECTIONS TO THE CHAPTER ON BEDFORD TOWN CENTRE

#### POLICY TC1 – PROTECTING THE ARCHITECTURAL AND HISTORIC FEATURES

##### Objection and Key Issues

##### 7.1 English Heritage 1/4

amend (ii) to "the Bedford Conservation Area and its setting" and (i) to "listed buildings and their setting"

##### Council Reply

7.2 The Council's written response is contained in Document BBCEV 1198.

##### Appraisal

7.3 The Council has put forward PIC's 316 and 317 in response to objections by the County Council, now formally withdrawn. These concern the lack of mention in para. 8.11 of the Castle, a Scheduled Ancient Monument; also a request that historic property boundaries should be added to (iii) of the policy. However, it does not wish to accede to the English Heritage objection. This is not an open and shut matter. However, in the light of comments in paragraphs 2.16 and 4.14 of PPG 15, I think on balance that acceding to this objection would actually help the Council in attaining its policy aim through the development control process.

##### Recommendation

7.4 I recommend that the Local Plan be modified to incorporate amend criterion (ii) of policy TC1 to "the Bedford Conservation Area and its setting" and criterion (i) to "listed buildings and their setting".

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#### POLICIES TC3, T14 AND PARA. 8.53 – ENVIRONMENTAL IMPROVEMENTS

##### Objections and Key Issues

7.5 Bedfordshire County Council 436/11, /24-/26, /49, /66-/74, City Centre Restaurants 227/5-/7, Cyclists' Touring Club 711/37

help cyclists to cross the town centre: via 2 east-west routes and the riverside, and 2-way cycle use of Harpur St between St Loyes and St Paul's Square

elements of the proposed cycle network need amendment: routes and design

there is no High Street pedestrian policy linked to 8.21-8.23, and nothing about consulting freeholders and leaseholders on a policy that could be damaging to trade

##### Council Reply

7.6 The Council's written response is contained in Documents BBCEV 438, 569-576, 594 and 1200-1202.

## Appraisal

7.7 As the supporting text to this policy, between paragraphs 8.15 and 8.26, is effectively a record of intentions and achievements concerning environmental improvements, it will be revised to reflect the situation at the time of adopting this Plan. In the matter of the cycle network through the town centre, the evidence before me at the end of my Inquiry is that negotiation is still needed to reach final agreement about cycle movement through pedestrian areas. I can understand that, though the principle is laudable, the details must be worked out to see if this could be done without danger and inconvenience to pedestrians, and avoiding visual degradation. Other change will have to be introduced at the modification stage. As to the objection about High Street pedestrian policy, this part of what is a rather long and discursive supporting text is only "trailing" potential improvements there. There is no firm proposal meriting a policy yet, and full formal consultation would be required before such a proposal was formalised.

## Recommendation

7.8 I recommend that no modification be made to the Local Plan in respect of these objections.

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## POLICY TC6 – SECONDARY SHOPPING FRONTAGES

### Objection and Key Issue

#### 7.9 City Centre Restaurants 227/8

the term "dead frontages" not in national advice

define "avoiding the concentration of similar uses"

tone down hostility to A3 uses

### Council Reply

7.10 The Council's written response is contained in Document BBCEV 1199.

## Appraisal

7.11 I have looked at this policy and its supporting text to see if it appears unduly biased against A3 uses. The Council has put forward PIC 319, which makes clear that the main criterion of a "dead frontage" is that lacks a window display. I find that the phrase is not mere jargon, and is well enough explained to a normally attentive reader. It has to be a vital consideration in a town centre needing to attract the maximum of visitors and compete with larger rivals within the range of Bedford Borough residents. It would not apply to the vast majority of restaurants, or to any take-away chain that I have seen. The Council has clearly set out in paragraph 8.34 the three factors that it would examine to see if an over-concentration of such uses was threatened by a new planning application. I find no undue bias as alleged.

## Recommendation

7.12 I recommend that the Local Plan be modified to incorporate PIC 319, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of this objection.

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## POLICY TC10 – TOWN CENTRE AMENITY

### Objection and Key Issue

#### 7.13 GOER 516/8

amend policy to relate it more closely to land use matters and emphasise link between nuisance and contributions towards the CCTV system

### Council Reply

7.14 The Council's written response is contained in Document BBCEV 270.

### Appraisal

7.15 The Council has accepted the objection and put forward PIC 320, rewording the policy to reflect the criticism made in a way that I find fully acceptable.

### Recommendation

7.16 I recommend that the Local Plan be modified to incorporate PIC 320, as set out in Core Documents 11, 11A and 11B.

## CHAPTER 8

### OBJECTIONS TO THE CHAPTER ON TRANSPORT

#### PARAGRAPH 9.6 AND POLICIES T1 & T21 – HORSE INTERESTS

##### Objections and Key Issue

8.1 British Horse Society 369/29, /40 & /46

ridden and driven horses a special category like pedestrians and cyclists

policy has no mention of equestrian facilities: underpasses, bridges or horse tracks

include ridden and driven horses in policy T21

##### Council Reply

8.2 The Council's written response is contained in Document BBCEV 643.

##### Appraisal

8.3 The Council has put forward pre-Inquiry Changes PIC 325 and 326 which satisfy the objector, as they extend the scope of paragraph 9.8 to cover the interest of riders explicitly. PIC 325 produced a Counter Objection from Bedfordshire County Council 436/ P99, to the effect that those words belong under text dealing with road safety rather than the road network, but I consider they address an accessibility issue and I support the Council's Change.

##### Recommendation

8.4 I recommend that the Local Plan be modified to incorporate PIC's 325-26, as set out in Core Documents 11, 11A and 11B.

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#### POLICY T1 – STRATEGIC ROAD NETWORK AND INTEGRATED TRANSPORT STRATEGY

##### Objections and Key Issues

8.5 GOER 516/9, 14-/18, The Bedford Charity 345/5-/6, Oakley PC 423/6, City and St James Property Ltd 456/11

roads programme explanatory text inadequate and needs updating

Clapham Bypass route wrong; eastern option should be chosen

link policy to planning obligations

reference to the BTDP in 9.13 and 9.15 should include A6/A428 link

##### Council Reply

8.6 The Council's written response is contained in Documents BBCEV 16, 274-278, 398, 591, 640-641, 643-646, 854 and 856-857.

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#### Appraisal

8.7 The introductory text, as well as the supporting text on the road network preceding policy T1, will need revision to take account of the latest change to organisational structures and national policy advice before this Plan is adopted, whether or not formal objections have been made to a particular passage. The reference to the TPP process in paragraph 9.3 is an example. The Council has put forward several pre-Inquiry Changes. In response to Government Office objections, these are: PIC's 487, 327 (amended by PIC489 after the County Council's Counter-Objection 436/P100), 328 and 510, 329 and 330, but of course there may yet be need for further alteration.

8.8 The Bedford Charity's objection is not justified, because the A6/A428 link is adequately and appropriately referred to in the text of PIC 328. The Oakley PC objection about the Clapham Bypass has been overtaken by events, as the scheme has been approved by the Highways Agency. PIC 331 produced Counter Objections from Bedfordshire County Council 436/ P101, also from City and St James Property Ltd 456/P137. I find the fear of the County Council that the PIC will affect implementation adversely to be without substance. I also find that the Council's wording meets the gist of the City and St James objection, and treats the matter of s.106 obligations even-handedly.

8.9 PIC 323 produced Counter Objections from Old Road Securities plc 393/P79, Bedfordshire County Council 436/ P98 and Twigden Homes, Eagle Homes & Connolly Homes 1090/P45 for two reasons: a drafting error, and because the text did not reflect the Structure Plan policy for new development "within and adjoining the existing urban area". The Council rightly acceded to these factual objections.

#### Recommendation

8.10 I recommend that the Local Plan be modified to incorporate PIC's 323 (as amended by PIC 486), 326-331, 487 and 510, as set out in Core Documents 11, 11A and 11B, but that no other modification - save the need to update the text to meet changed circumstances - be made to the Local Plan in respect of these objections.

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### POLICY T2 – HIGHWAY DEVELOPMENT PLAN AND OTHER LOCAL ROADS

#### Objections and Key Issues

8.11 The Post Office 1046/1-/2, Bedfordia Developments Ltd 293/32

objection to safeguarded road line encroaching on to Post Office site

Prebend Street Area Relief Scheme impinges on Bedfordia Group site

#### Council Reply

8.12 The Council's written response is contained in Documents BBCEV 113, 592 and 647-648.

#### Appraisal



8.13 The Council has put forward pre-Inquiry Changes PIC's 333-337, updating the policy wording and supporting text. PIC's 334 and PIC336 produced Counter Objections from Bedfordshire County Council 436/P102 and P103, and The Post Office 1046/P3. The Changes reflect alterations in national transport policy, and the withdrawal of bids to fund the St John's Area and Prebend Street Relief Schemes. Thus the Bedford Transport Development Plan will not be implemented as set out in the Deposit Plan; nor is it likely to remain as firm policy when the Local Plan is adopted. The Changes would keep the County Council's latest safeguarded lines intact in the Local Plan, pending completion of a new transport strategy, which was in progress during my Inquiry. The strategy would allow consideration of other action than new construction on safeguarded land, such as public transport priority. The extent of the safeguarding corridor on the Proposals Map is revised through PIC 511, reflecting planning decisions made in the last 5 years.

8.14 The amended safeguarded corridor line would still encroach on the Post Office site, despite an amendment in that site's southern part. This objector is particularly concerned about the effect on operational movements of vehicles on a reduced site, and loss of allocated parking areas for staff who work unsocial hours when public transport does not run. However, the situation at my Inquiry was that the County Council had properly appointed consultants who were investigating all feasible options. I cannot predict the outcome of their deliberations nor legally amend the safeguarding proposals. This is not a very satisfactory position, but I see no alternative to retaining the revised safeguarding line at present. Significant new road building seems totally unrealistic and unlikely in the foreseeable future. However, Plan users would be ill served if the line were removed before the threat of physical change had actually passed. I might be more disturbed if I thought there was any real likelihood of substantial harm to the Post Office's efficient operations in Bedford, but the evidence before me suggests this is a very remote possibility.

#### Recommendation

8.15 I recommend that the Local Plan be modified to incorporate PIC's 333-337 and 511, as set out in Core Documents 11, 11A and 11B (unless County Council decision-making has moved on before the time of adoption), but that no other modification be made to the Local Plan in respect of these objections.

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#### PROPOSED EXPANSION OF THE PLAN'S POLICY T2

##### Objection and Key Issues

##### 8.16 Bedfordshire Railway & Transport Association 969/1

Bedford Traffic Development Plan is inimical to rail interests in particular respects regarding the St John's Area and Prebend Street Relief Schemes

negative effect on Bedford to Bletchley railway; rail cheaper and uses less land

Bedford-Sandy rail and Sharnbrook Station would help park and ride and relieve road pressures

##### Council Reply

8.17 The Council's written response is contained in Documents BBCEV8 and EV12.

##### Appraisal

8.18 As it has been developed in detailed evidence, the objection from the BRTA amounts to an understandable and in many ways laudable cry for the major expansion and increased use of rail transport, rather than just a single policy objection. The Changes to policy T2 and its supporting text, dealt with above, effectively bring nearer the objector's wishes concerning the St John's Area and Prebend Street Relief Schemes.

8.19 BRTA's evidence is also full of dispraise for purported Council sins of omission or commission to do with the Association's favoured schemes. However, it has been established that the Association would like the Plan to have policy content indicating use or safeguarding of the disused rail trackbed/corridor through the urban area – from the present operational railway at Bedford St John's eastwards to the Borough boundary. It is urged that this section of the East West Rail Link project – EWRL - (to run between Oxford, Bedford, Cambridge and East Anglia) should be marked on the Proposals Map as "safeguarded for sustainable forms of transport" or "for future public transport use".

8.20 The Borough Council has only a limited advocacy role in the allocation of rail investment funds. The content of local plans should be to do with feasible and realistic proposals for land use, not rhetoric. The Council's stance is that Borough support for a project could not be forthcoming in a Local Plan without Government and Railtrack support, and clear signs of multi-modal benefit to optimise the integration of transport as a whole. I find such a stance prudent and reasonable for a District Council. At the time of writing this report I am unaware whether the EWRL scheme has made any effective progress. However, the evolution in transport plan-making may mean that a shared and supportive Borough/County Council view on EWRL, with agreement on a safeguarding line, can come about in time for its mention in the Local Plan. Whether that is merely a positive mention in supporting text or goes as far as a policy with safeguarding implications is a matter for the Borough Council. I have not the weight of information to assess the pros or cons of such a scheme properly, and offer no view.

## Recommendation

8.21 I recommend that the Plan be modified to accommodate comments or policy on the EWRL project only in the circumstances I set out in paragraph 8.20 above.

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## POLICY T5 – MOTORISTS' FACILITIES

### Objections and Key Issues

8.22 Trustees of the Elstow Allotment Settlement 944/4, Mrs JM Nelson 1055/1

there is a better site in the eastern quadrant of the bypass/A603 junction

amend the policy to allocate a site for major services on west side of the A1, on 6.2 ha of agricultural land at Wyboston, where the A428 crosses the A1

### Council Reply

8.23 The Council's written response is contained in Documents BBCEV 10 and 385.

### Appraisal

### Objection by Trustees of the Elstow Allotment Settlement

8.24 The projected motorists' facilities, in physical association with a park and ride scheme, are at present no more than a concept. The objector's evidence lacks the substance to convince me that there is insufficient potential land to achieve both facilities within the line of the Urban Area Boundary, which runs here along the outer edge of the Southern Bypass. The Council's concept seems likely to be able to serve both local and trunk road users. By contrast the objector's land has the grave disadvantage of lying in open countryside outside that boundary. Unlike the Council's concept it could not perform a prestige gateway function right at the urban edge. It is also unnecessary. Also, it would be most undesirable if the objector's concept were cited as a precedent by others seeking to build outside the UAB.

#### The Nelson objection

8.25 This proposed major site for road services is opposed by the Council, as the latter considers there is adequate provision within the Borough. The need has to be assessed in terms of existing and preferred services. The objector seeks a 24 hour service, catering for heavy goods vehicles and cars locally. She cites the existing relevant facilities as the Brampton Hut, Huntingdon, 16 km away; the South Mimms facility (A1/M25), 70 km away; and the proposed facilities at Radwell, Herts, 25 km away. The absence of services on the Bedford-Cambridge stretch of the A428 is mentioned. I have no evidence that the concept here could not be physically implemented, and the Highways Agency find the development and access proposal acceptable in principle. However, access to the proposals would be somewhat circuitous for southbound drivers on the A1.

8.26 The relevant national recommendation for facilities on the "all-purpose network" is half an hour's driving time or 25 miles, and no closer than 15 miles apart. I have no reason to believe that the proposed major facilities at Radwell will not come forward. The distance between Radwell and Brampton would then be just under the 25 mile figure in Circular 4/88. I need also to take into account the existing and proposed facilities in the Borough closer at hand. These are:

around the Black Cat roundabout 2 miles to the south, a Little Chef, travel lodge and refuelling facilities on the north-bound carriageway, plus a Macdonalds and refuelling southbound;

a valid planning permission for lorry park and facilities just north of the Black Cat roundabout;

a new travel lodge east of the A1/A421 junction at Wyboston.

8.27 There are two other facilities with planning permission within 13 miles of the Black Cat roundabout. Taken individually, the above services (other than Brampton Hut and Radwell) fall below the standard of major 24 hour facilities with equally easy access for north- and south-bound drivers. Nevertheless, they undoubtedly add up to a generous and extensive provision, and one reasonably likely to be available for road users before the end of this Plan period. Hence, I find no strong need for the proposed services sufficient to merit a specific Local Plan allocation.

#### Recommendation

8.28 I recommend that the Plan should not be modified in response to these objections.

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#### POLICY T6 – PUBLIC TRANSPORT INFRASTRUCTURE

#### Objections and Key Issues

#### 8.29 Northants County Council 389/1

add such words as "from a very early stage of development" re public transport facilities and new development

#### Council Reply

8.30 The Council's written response is contained in Core Document 10.

#### Appraisal

8.31 The Council accepts that the proposed wording would make the policy more effective and implements this through PIC 345.

#### Recommendation

8.32 I recommend that the Local Plan be modified to incorporate PIC 345, as set out in Core Documents 11, 11A and 11B.

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### POLICY T7 – DEVELOPER CONTRIBUTIONS TO PUBLIC TRANSPORT MEASURES

#### Objections and Key Issues

8.33 DH Barford & Co 269/13, Northants County Council 389/4, City and St James Property Ltd 456/12

ambiguous; more guidance and clarification needed

include reference to seeking contributions to revenue costs of running services

link to planning obligations and Circular 1/97

#### Council Reply

8.34 The Council's written response is contained in Documents BBCEV 223, 399, 649-650, 652-656 and 1252.

#### Appraisal

8.35 The Council has put forward pre-Inquiry Changes PIC 347, adding text as suggested by the Northamptonshire County Council, and PIC 348. The latter, which refines and expands the content of the policy in line with the altered supporting text, produced Counter Objections from Marsh Leys Farms Ltd 272/P2, St Albans Diocesan Board of Finance 292/P9, Old Road Securities plc 393/P78 and 1022/P17, City and St James Property Ltd 456/P138, Twigden Homes, Eagle Homes & Connolly Homes 1090/P46, Bedfordia Developments Ltd 293/P46 and Forthprice Ltd 1256/P5.

8.36 I find that the altered policy wording sets down the matters that will attract requests for planning obligations and financial contributions clearly, and without undue detail and prescription. However, the supporting text seems to me the best place to spell out the necessary limitations on contributions, particularly contentious on-going matters such as revenue support. I suggest a new final sentence after PIC 347, to read: "All contributions sought will reflect current national advice on planning obligations which, at the time of

adoption of this Plan, include the limitation of contributions to revenue support to the short term, and with a maximum cost."

#### Recommendation

8.37 I recommend that the Local Plan be modified to incorporate the gist of PIC's 347-348, as set out in Core Documents 11, 11A and 11B, subject to the altered wording I suggest in my paragraph 8.36 above; no other modification should be made to the Local Plan in respect of these objections.

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### POLICY T8 – PROMOTION OF THE RAIL NETWORK

#### Objection and Key Issue

8.38 CPRE 388/94

add encouraging improvement of existing cross country services and new links, especially east of Bedford

#### Council Reply

8.39 The Council's written response is contained in Document BBCEV 1204.

#### Appraisal

8.40 The Council has put forward PIC 349, altering criterion (iii) to satisfy the textual objections of CPRE.

#### Recommendation

8.41 I recommend that the Local Plan be modified to incorporate PIC 349, as set out in Core Documents 11, 11A and 11B.

### POLICY T9 – IMPROVED RAIL SERVICES TO AND FROM BEDFORD

#### Objections and Key Issues

8.42 City and St James Property Ltd 456/93, Mr GCW Beazley 1027/2

no good grounds to electrify rail north of Bedford; could re-open freight only line Bicester Town-Bletchley, and encourage Chiltern Line extension Aylesbury-Calvert-Bletchley-MK-Bedford linking to Oxford and the west

more definitive Plan statement is needed to get the east-west rail route started in the Plan period

#### Council Reply

8.43 The Council's written response is contained in Documents BBCEV 582, 657-658 and 1204.

#### Appraisal

8.44 The Council has put forward PIC 350, satisfying the textual objection of the County Council (its objection now withdrawn). That PIC does not satisfy City and St James Property Ltd 456/P139, but it is not possible for the Plan to mention a factual future connection of the Marston Vale Line to the East Coast Main Line, or to be more specific about the projected east-west route. The Council's pre-Inquiry Change PIC P351, amending the supporting text, produced a Counter Objection from Bedfordshire County Council 436/P104, but this only mentions what seems already in the Borough Council's mind: to update the narrative if possible when the Plan is adopted.

8.45 Mr Beazley's views may turn out to be hard-headed realism or undue pessimism – only time will tell - but I see no reason to amend the text because of them. Nor should the text be further altered to mention his more favoured Bicester-Bletchley rail project, which lies outside the Borough boundaries.

#### Recommendation

8.46 I recommend that the Local Plan be modified to incorporate PIC's 350-351, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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#### POLICY T10 – IMPROVED ACCESS TO RAIL SERVICES

##### Objections and Key Issues

8.47 David Wilson Estates Ltd 144/60, Oakley Residents Planning & Traffic Action Group 237/15, Oakley PC 423/5

should not delete Elstow parkway station shown in 1993 Plan and Draft Plan

change last sentence of 9.37 with its support for a station north of Bedford in the longer term

##### Council Reply

8.48 The Council's written response is contained in Documents BBCEV 53, 224, 659 and 1205.

##### Appraisal

8.49 The Council has put forward pre-Inquiry Change PIC 355, producing a Counter Objection from Bedfordshire County Council 436/ P105. Whatever argument there is seems to be no more than very minor. It is clear that the Borough Council would do its part in implementing the Bedford Integrated Transport Strategy. As to the David Wilson objection, there is no evidence of any substance that a second new rail station south of Bedford is realistic in the next few years, given the primacy of the Elstow Storage Depot proposals, which envisage an integrated rail station alongside the planned settlement.

8.50 As for the Council's expression of long term support for a future parkway station to the north of Bedford, the Deposit Plan text does not mention a specific location, at Oakley or anywhere else, unlike the 1993 Local Plan in its policy T9. I consider the Deposit Plan's positive statement is appropriate in a land use plan. It may lead to some beneficial inaugural work on an important project whose benefits will not be realised for a number of years. My conclusions on an objection seeking development at Lower Farm, Bromham, allied to a new parkway station (paragraphs 4.2.90-96 above), suggest that finding an acceptable site in open countryside may not be at all easy.

## Recommendation

8.51 I recommend that the Local Plan be modified to incorporate PIC 355, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY T12 – RIVER BUS

### Objection and Key Issue

8.52 Mr GCW Beazley 1027/ 6

totally impractical; delete

### Council Reply

8.53 The Council's written response is contained in Document BBCEV 1206.

### Appraisal

8.54 On reflection, the Council has prudently removed the specific references to "commuting services" from the policy wording and supporting text through PIC's 356 and 357. Support now extends to river boat services (unspecified) as a supplement to road provision. While this sentiment has a virtuous air about it, it is bland and unspecific. I invite the Council to consider carefully whether it merits a specific policy in a land use plan.

## Recommendation

8.55 I recommend that the Council consider again whether this reworded policy merits a place in the adopted Local Plan.

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## POLICY T13 – PEDESTRIAN ROUTES AND FACILITIES

### Objections and Key Issues

8.56 Northants County Council 389/6-/10, British Horse Society 369/65, Cyclists' Touring Club 711/26,

mention need for open, well-lit pedestrian ways designed to limit crime

ramped bridge, not footbridge needed at Clapham Ford

bring in bridges to accommodate cyclists

### Council Reply

8.57 The Council's written response is contained in Documents BBCEV 443 and 449.

### Appraisal

8.58 The Council has put forward PIC 358, acceding to the Northants CC objection. The Council makes what I see as a fair and balanced response to the BHS objection about the form of the proposed bridge at Clapham Ford: any improvement to the route will be consistent with its bridleway designation, but the Local Plan and its policies are not the place for details about its form. I consider that the supporting text to this policy covers the interests of cyclists adequately. The policy wording, amended by PIC 360, concerns primarily pedestrian routes. I agree there may well be locations where physical constraints mean that joint pedestrian and cycle use would be unduly prejudicial to the convenience or safety of pedestrians.

#### Recommendation

8.59 I recommend that the Local Plan be modified to incorporate PIC 358 and 360, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY T14 – CYCLE ROUTES AND FACILITIES

#### Objections and Key Issues

8.60 Bedfordshire County Council 436/75, British Horse Society 369/30, Cyclists' Touring Club 711/25 & /39

elements of the proposed network need change

make cycle tracks available to horses where appropriate

too many routes follow main roads; follow parallel routes or through open space

show cycle links in the town are linked to the wider area in Figure 20

#### Council Reply

8.61 The Council's written response is contained in Documents BBCEV 444-445, 447 and 583.

#### Appraisal

8.62 The disadvantage of including illustrative material like Figure 20 is that the information shown can become outdated quite soon. The Council's response says that revision is likely. The Borough and County Councils still have to take on the concept and formally agree further developments. The Figure would be much improved if updated to reflect the position at the adoption of the Plan, with the year date shown, and with a better representation of the network outside the urban area of Bedford/Kempston.

8.63 As to the BHS objection, the Council's evidence is that the cycling network would not be a uniform type of designation, but would use such provision as "white line areas on main roads, bridleways and shared use of pedestrian routes". The Council has said that it has no intention of hard surfacing bridleways where they are part of the Cycle Network shown in Figure 20. I appreciate the BHS fear that, if horse interests are not specifically mentioned in certain Transport policies, they may be disadvantaged. However, the references to promoting horse-related interests in the overall text of the Deposit Plan and subsequent PIC's suggests otherwise to me. There is no need to address horse interests specifically in the context of this policy.

#### Recommendation



8.64 I recommend that the Local Plan be modified to incorporate the type of altered Figure 20 I suggest in my paragraph 8.62 above, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY T15 – CAR PARKING STANDARDS

### Objections and Key Issues

8.65 GOER 516/10-/11, Cyclists' Touring Club 711/28, Podington Garden Centre 993/5

restore SPG on parking standards and traffic calming as appendices, as in Draft Plan

move to strategy of maximum standards, but seeking operational minimum amounts of parking possible in line with PPG's 6 & 13

developer contributions should be about more than commuted parking payments

reduce garden centre parking standard to 1 space per 35sq m of relevant area

### Council Reply

8.66 The Council's written response is contained in Documents BBCEV 225 and 271.

### Appraisal

8.67 The Council has put forward PIC 364, to take account of the Government Office points, other than the inclusion of supplementary planning guidance bound into the Plan. On this last point, I agree that there are good practical reasons – unwieldiness and ease of updating – for keeping to separate documents, provided that Plan users are informed clearly in the adopted Local Plan document where to find and obtain copies of particular supplementary planning guidance. The CTC is satisfied with the PIC. The objection about garden centre standards is a matter which it would be reasonable to re-examine when County Council standards are next up for revision, and the objector might be advised to approach the County Council about it directly to that effect.

### Recommendation

8.68 I recommend that the Local Plan be modified to incorporate PIC 364, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICIES T16 AND T17 – SHORT STAY PARKING/PARK AND RIDE

### Objection and Key Issue

8.69 GOER 516/12

stronger measures necessary to ensure park and ride scheme's success

### Council Reply

8.70 The Council's written response is contained in Documents BBCEV 272 and 660.

### Appraisal

8.71 The Council has put forward PIC's 366-368 and 490, in an attempt to update the text. PIC 367 produced a Counter Objection from Bedfordshire County Council 436/P106 to the effect that further detail is needed about the meaning of "associated commercial activities" in the PIC. The Council gives no detailed or convincing answer to the question, and the new text amounts to little more than a snapshot of the situation up to the end of 1999.

8.72 I see much sense in the Government Office's objection. T16 and T17 could profitably be combined, since they concern conjoined links in an integrated strategy. The relationship of a redrafted policy and supporting text to new PPG13 could be set down, and the supporting text adjusted, to show how details of policy are evolving at the time of adoption, and the way it will affect land use and new development for the life of the Plan.

### Recommendation

8.73 I recommend that the Local Plan be modified as indicated in paragraph 8.72 above.

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## POLICY T18 – COMMERCIAL VEHICLE PARK

### Objection and Key Issue

8.74 David Wilson Estates Ltd 144/71

Inset 1 does not provide a notation for this facility on the Southern Bypass junction with the A6 and A603

### Council Reply

8.75 The Council's written response is contained in Document BBCEV 595.

### Appraisal

8.76 The Council has put forward PIC 369, which amends the key to Inset 1 to include this information.

### Recommendation

8.77 I recommend that the Local Plan be modified to incorporate PIC 369, as set out in Core Documents 11, 11A and 11B.

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## POLICY T20 – SAFETY AND TRAFFIC CALMING

### Objections and Key Issues

8.78 NFU 321/19

state in supporting text that agricultural interests will be consulted re proposals

#### Council Reply

8.79 The Council's written response is contained in Document BBCEV 1208.

#### Appraisal

8.80 There is no need to enlarge the supporting text as suggested. Agricultural interests, like other individuals and bodies, can and should respond actively to the opportunities for dialogue and response that will be afforded at the formal consultation stage over any proposals.

#### Recommendation

8.81 I recommend that no modification be made to the Local Plan in respect of this objection.

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### POLICY T21 – ACCESS AND MOBILITY

#### Objections and Key Issues

8.82 Woods Hardwick 29/3, BT plc 170/24

redraft to be consistent with Circular 1/97: permissive rather than mandatory

say "where appropriate" in policy's line 1

#### Council Reply

8.83 The Council's written response is contained in Document BBCEV 273.

#### Appraisal

8.84 The Council has put forward PIC 370, which appropriately amends the policy as desired by the objectors.

#### Recommendation

8.85 I recommend that the Local Plan be modified to incorporate PIC 370, as set out in Core Documents 11, 11A and 11B.

## CHAPTER 9

### OBJECTIONS TO THE CHAPTER ON LEISURE AND RECREATION

#### POLICY LR1 – FORMAL LEISURE PROVISION

##### Objections and Key Issues

9.1 Administrators of FP Tinsley Dec'd 349/2, Davison & Co (Barford) Ltd 284/2, Cyclists' Touring Club 711/29

Park Farm, Clapham, should be identified for golf club

Land at Great Barford could be valuable recreational resource and attraction for the Borough; refer to the development of recreational/sports facilities of a higher order

Delete "wherever possible" from (ii) of policy

##### Council Reply

9.2 The Council's written response is contained in Documents BBCEV 378 and 987.

##### Appraisal

9.3 The Council has put forward PIC 373, in response to the CTC objection, sensibly removing the unnecessarily conciliatory words "wherever possible" from the policy's criterion (ii).

9.4 Park Lane Clapham This rural agricultural land lies east of an existing golf course. The objector does not dispute that the guideline for championship courses has been met in the Borough, as has the former ESCR's minimum requirement for course provision. In the absence of any well-developed argument submitted with the objection, I see no good planning reason for a specific designation.

9.5 Land at Great Barford The objection to this policy, as to NE15, is prompted by the objector's wish to develop a complex with hotel, conference centre, marina, swimming pool, courts, driving range and golf course on an agricultural riverside site in its ownership. The objector wants to change the thrust of the policy towards tourism and leisure. The Plan treats tourism in the Employment chapter, and sees the urban area as the place for tourist accommodation, with significant rural tourism sited within village SPA's. Outside villages, the only real basis for development would be adaptation of existing buildings. Nothing on the subject in the Deposit Plan contradicts any policy of the adopted Structure Plan.

9.6 In the provision of leisure facilities, the Council's Plan concept is that the urban area is the place for all but lower level provision without significant buildings. The objector's suggested rewording of LR1 alters several of the criteria, but without great purpose, save to make some of them rather more vague and less focussed. I cannot see what end the suggested criterion (i) achieves, as it does not gainsay tourism policies in the Employment chapter.

9.7 I see no reason why the Plan should give any policy support to a concept like this: an inevitably large building complex on a prominent undeveloped site comprising good agricultural land at the river edge. The objector has shown that the Council has not been very successful at getting new hotels on to sites within settlements in the Borough, but that does not seem to me a good reason to alter this policy or NE15. If a planning application were made hereabouts, it would need to be supported by strong evidence explaining its merits as a justified exception to policy.

## Recommendation

9.8 I recommend that the Local Plan be modified to incorporate PIC 373, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY LR2 – LEISURE AND THE EVENING ECONOMY

### Objection and Key Issue

9.9 CPRE 388/17,

Add "or the tranquility of the countryside" in (i)

### Council Reply

9.10 The Council's written response is contained in Core Document 10.

### Appraisal

9.11 Rightly in my view, the Council has declined to alter the wording as requested. If a proposal is put forward affecting the open countryside, the specific wording of criterion (i) and the general wording of the policy should suffice to maintain an appropriate local noise environment.

## Recommendation

9.12 I recommend that no modification be made to the Local Plan in respect of this objection.

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## POLICY LR3 - GOLF

### Objections and Key Issues

9.13 English Sports Council-East 297/3 & /5, FRCA 320/10, Mr GCW Beazley 1027/4, Mr P and Mrs D Newman 219/1, CPRE 388/10

10.27 factually inaccurate and new wording suggested for policy

policy should deal with course development and agricultural land

extend existing courses before making new ones

identify replacement for Bedfordshire Golf Club at Brookmead Farm, Stagsden

say "...will only be granted where..."

### Council Reply

9.14 The Council's written response is contained in Documents BBCEV 79, 227-229, 281 and 1209.

#### Appraisal

9.15 The Newman objection has already been satisfied by a grant of planning permission for a new golf club, which will presumably be mentioned in new supporting text before adoption of the Local Plan. The Council has put forward PIC's 374-375 to satisfy the English Sports Council, but I agree with the Council that criterion (vi) should be unaltered, for reasons of consistency with other references to rural restraint in the Plan. FRCA's objection is effectively met by the Plan's policy NE26, which sets down a rigorous approach to the loss of good agricultural land. In my view, what is suggested in the CPRE objection would make no real difference to the rigour with which this policy was applied. Mr Beazley may be right about the desirability of extending certain courses, but he does not provide evidence to convince me that this form of action should be singled out for favour, in principle, over a course designed from scratch.

#### Recommendation

9.16 I recommend that the Local Plan be modified to incorporate PIC's 374-375, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY LR4 - WATERSPORTS

#### Objections and Key Issues

9.17 City and St James Property Ltd 456/13, Environment Agency Central Area 319//10, Cyclists' Touring Club 711/30, FRCA 320/5, British Horse Society 369/37, MA & NA Rogers 1071/1

remove reference to non-essential ancillary built facilities, requirements for landscape features and habitats; mention need for adequate spectator facilities

reword to ensure no adverse impact on flood plain

refer to access by bicycle and horse

add criterion safeguarding good agricultural land

a new access would affect operation of Castle Mill Airfield; delete reference to Willington and add safeguarding criteria about businesses, economic activity and agriculture

#### Council Reply

9.18 The Council's written response is contained in Documents BBCEV 98, 280, 446 and 503-504.

#### Appraisal

9.19 The precise location of a rowing course is not known, so at this stage access by the various modes of travel cannot be worked out accurately. When new developments are proposed the interests of cyclists and riders are already well protected by policies such as LR10 and T14. There is no need for a "belt and braces" additional reference in this policy. I

have no evidence before me to suggest that Castle Mill Airfield's operation or access would inevitably be harmed by a nearby rowing course. As the Council says, the development control process is there to see that such a consequence does not happen.

9.20 The Council has put forward PIC's 376-377. The first meets the Environment Agency Central Area objection, and the second that of the FRCA by inserting a new criterion (vi) into the policy on the lines requested. The City and St James objection appears to me to demand too much. It mentions such enabling development as an hotel or commercial leisure facilities, which could have a very significant adverse impact on the open countryside. I find that the amended policy and supporting text safeguard the situation well; they would not intrinsically prevent the construction of appropriate spectator accommodation or facilities, but they do set down reasonable and necessary constraints for a major project in the countryside.

## Recommendation

9.21 I recommend that the Local Plan be modified to incorporate PIC's 376-377, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY LR5 – RADWELL LAKES AREA

### Objections and Key Issues

9.22 Bedfordia Developments Ltd 293/21, English Sports Council East 297/1, British Horse Society 369/45, CPRE 388/8

make less negative and more positive towards enabling development

do not preclude a range of watersports

protect existing bridleway and encourage alternative access methods

strengthen to preclude use by speedboats and water skiers

### Council Reply

9.23 The Council's written response is contained in Documents BBCEV 133, 229, 706 and 1210.

### Appraisal

9.24 The Council has put forward pre-Inquiry Change PIC378, which alters wording in the policy statement and its criteria, but maintains opposition to non-essential built facilities at Radwell Lakes. Its basic stance is that sport and recreational activity has to be limited to what is compatible with the setting of the site and its rural location. The PIC produced a Counter Objection from Bedfordia Developments Ltd 293/P61, who had themselves suggested two forms of altered policy wording, in 1997 and 1999. The last of these would remove mention of "sport" altogether. Their objection to this policy is linked with another objection, to NE15, which I consider in Chapter 2 above.

9.25 The Bedfordia concept for this open area of c.150 ha is not fully worked out, but includes such items as a fishing village, fishing lodge, fishing lakes, leisure and sport complex, hotel

and conference centre, golf club and clubhouse. The site contains some existing structures built for former farm and mineral extraction activities.

9.26 Both The ASP and Deposit Plan favour built-up areas for new sports and leisure facilities. This site is relatively remote, away from good public transport facilities. I find that the Council's reworded LR5 is in the spirit of adopted Structure Plan policy 68 about organised sport in the countryside, which also takes a conservative approach to accompanying built development. It signals that major commercial development allied to sport and recreational provision would not be countenanced. However, I find it does leave sufficient room for the essential creative dialogue between Council and prospective developer, as to the type and scale of facilities needed to ensure the viability of an acceptable project.

9.27 The amended policy appears to me to have adequate criteria to assess the acceptability of particular kinds of active water sport and recreation. However, it does not give them specific automatic acceptance, as the English Sports Council would like, and I consider this stance to be correct. The BHS is satisfied by the amended policy.

#### Recommendation

9.28 I recommend that the Local Plan be modified to incorporate PIC 378, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

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### POLICY LR7 – RECREATIONAL USE OF THE RIVER OUSE

#### Objection and Key Issue

9.29 Cyclists' Touring Club 711/36

mention route for walkers and cyclists in (ii)

#### Council Reply

9.30 The Council's written response is contained in Core Document 10.

#### Appraisal

9.31 The objector appears to be satisfied if the Council were to add the words "... (see also policies T13 and T14)." at the end of paragraph 10.35 of the supporting text. I consider this would be an improvement to the text.

#### Recommendation

9.32 I recommend that the Local Plan be modified as indicated in paragraph 9.31 above.

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### POLICY LR9 – SHORT STAY MOORINGS

#### Objection and Key Issue

9.33 Environment Agency Central Area 319/11



mention avoidance of adverse effect on river flow and floodplains

#### Council Reply

9.34 The Council's written response is contained in Core Document 10.

#### Appraisal

9.35 The Council has accepted the objection and put forward PIC 379, making a verbal addition to criterion (iii).

#### Recommendation

9.36 I recommend that the Local Plan be modified to incorporate PIC 379, as set out in Core Documents 11, 11A and 11B.

\*\*\*\*\*

### POLICY LR10 – ACCESS TO THE COUNTRYSIDE

#### Objection and Key Issue

9.37 British Horse Society 369/63

Public Rights of Way should be mentioned

#### Council Reply

9.38 The Council's written response is contained in Document BBCEV 393.

#### Appraisal

9.39 Since making the objection, the BHS has accepted that its point is adequately covered by the wording of LR10.

#### Recommendation

9.40 I recommend that no modification be made to the Local Plan in respect of this objection.

\*\*\*\*\*

### POLICY LR11 – LEISURE AND RECREATION IN THE COUNTRYSIDE

#### Objection and Key Issue

9.41 CPRE 388/6

recognise the need for tranquillity

#### Council Reply

9.42 The Council's written response is contained in Core Document 10 and Documents 378, 707 and 997.

#### Appraisal

9.43 The Council – rightly in my view - has ruled out the use of the word "tranquility" in the Plan text: a word meaning something like calmness or serenity. However, it has put forward pre-Inquiry Change PIC381, refining the wording of paragraph 10.42. This produced Counter Objection/s from Davison & Co (Barford) Ltd 284/P6, Bedfordia Developments Ltd 293/P49, and The Babour Partnership 1251/P3, decrying the blanket constraint of certain activities which need a countryside location. I have a certain sympathy with this sentiment. I see no need to alter the Council's preferred wording of paragraph 10.42; it seems to me hard to disagree with the sentiments expressed therein. However, the present awkwardly expressed policy would read better and retain a proper rigour if expressed as follows:

"Where proposed development in the open countryside appears likely to generate noise, planning applications will be determined taking into account the effect on sensitive locations and uses. Such proposals will only be permitted where the applicant can demonstrate that the development would cause no material harm to interests of acknowledged importance "

#### Recommendation

9.44 I recommend that the Local Plan be modified to incorporate PIC 381, as set out in Core Documents 11, 11A and 11B, and the rewording of policy LR11 in my paragraph 9.43 above, but that no other modification be made to the Local Plan in respect of these objections.

#### POLICY LR12 – SANTA POD RACEWAY

##### Objections and Key Issues

9.45 Environment Agency Central Area 319/1, CPRE 388/5, Podington PC 444/1, Wellingborough BC 531/1, Odell PC1031/1,

take account of potential threat to water environment

stop any increase in events; traffic impact and noise disturbance

needs more substance and better definition; lacks a defining boundary

no rave parties, all night discos or other mass events

##### Council Reply

9.46 The Council's written response is contained in Document BBCEV 1211 and 1212.

##### Appraisal

9.47 The Council has put forward pre-Inquiry Change PIC 382, which rewords much of the policy and would satisfy the Environment Agency, CPRE and Wellingborough BC, the last of these because the seeming approval of a new access road has been removed. It produced Counter Objections from Podington PC 444/P2 and Trakbak Racing 1255/P1. Trackbar find the new wording unduly overbearing and unreasonable. I do not consider Podington PC's desire for a new criterion demanding a comprehensive land use/ management plan is necessary. If this policy is well drafted, the development control system can require all necessary information on the overall operation when it examines a planning application.

9.48 Nevertheless, I believe the policy text can be further improved. I do not find the phrasing of the revised text unreasonably hostile to the operators of the facility. There is nothing wrong with an applicant being required by the PIC to demonstrate a lack of harm under various relevant headings. However, the altered criterion (ii) seems to me incapable of being complied with in practice, since motor racing noise must necessarily impinge to some extent

over a wide area around. Any changes in operation should ameliorate present environmental deficiencies. To that end I consider that criterion (ii) should be redrafted to read:

"the applicant can demonstrate that the transmission of noise generated by permitted activities on the site would be reduced to the maximum practicable extent, through physical works such as landscaping, as well as other organisational means"

#### Recommendation

9.49 I recommend that the Local Plan be modified to incorporate PIC 382, as set out in Core Documents 11, 11A and 11B, but amended by the altered wording I suggest in my paragraph 9.48 above; also, that no other modification should be made to the Local Plan in respect of these objections.

\*\*\*\*\*

### POLICY LR14 – PLAYING FIELDS AND ALLOTMENTS

#### Objection and Key Issue

9.50 De Montfort University 419/7

(i) and (ii) are inflexible and contra PPG17

-

#### Council Reply

9.51 The Council's written response is contained in Core Document 10.

#### Appraisal

9.52 The Council has accepted the main thrust of the objections and put forward PIC's 383-385 to improve the expression of its intentions. It has included a relevant explanatory paragraph about the approach of the English Sports Council to these matters. The national guidance on getting the best outcome after a small part of the site is developed is added to criterion (ii). I agree with the Council that these criteria are quite adequate to cope with proposals on "fall-in" sites. The objector appears more or less satisfied by the PIC's.

#### Recommendation

9.53 I recommend that the Local Plan be modified to incorporate PIC's 383-385, as set out in Core Documents 11, 11A and 11B.

\*\*\*\*\*

### POLICY LR15, LR17 and LR18 – OUTDOOR SPORT, CHILDRENS' PLAN AND AMENITY OPEN SPACE

#### Objections and Key Issues

9.54 Re LR15: House Builders Federation 454/10, BT plc 170/21, J & J Design 263/19, DH Barford & Co 269/18

should only require for development of 100+ dwellings (HBF) or 10+ (BT) and where needed

contra national advice

Re LR16: House Builders Federation 454/9, BT plc 170/22, J & J Design 263/20, DH Barford & Co 269/19

be flexible; not all developments should provide pro rata to the full NPFA standard

only apply to sites for 10+ dwellings

contra Circular 1/97; could be applied to non family accommodation

Re LR17: House Builders Federation 454/8, BT plc 170/23, J & J Design 263/21, DH Barford & Co 269/20

should only apply to schemes of 50+ (HBF) or 10+ (BT) dwellings where a useable area on site; maintenance contributions only reasonable where no general use

#### Council Reply

9.55 The Council's written response is contained in Documents BBCEV 149, 505-507 and 1213-1215.

#### Appraisal

9.56 The Council has made efforts to change disputed text for all three policies through PIC's 386-392 inclusive. They certainly do not answer all the points of objection, and PIC's 389 and 390 produced Counter Objections from DH Barford & Co 269/P21-/P22. Most of the changed text refines the requirements of the policies in a more sophisticated way, with greater differentiation between different sizes of new development.

9.57 In view of the shared concerns of objectors, I believe applicants would be surer of the matters on which they had to negotiate if the text of paragraphs 10.54 and 10.62 were adjusted to allow inclusion of the following words:

"It is not the Council's intention that the application of this policy should require new developers to make up for any existing deficiencies of pitch (LR15)/ play(LR16) space. Any development that generates a measurable demand for space should make a contribution fairly related to its size, but only if the space provided or augmented would be easily accessible from the new development".

This wording would enable the Council to address minor development, but it would have to demonstrate need. I am not convinced that the principle can reasonably be extended down to the very smallest developments. Nevertheless, my words allow the matter to be debated in a focused manner site by site - rather than by imposition of an arbitrary numerical limit - and the Council to make a plausible case.

9.58 Concerning the proposed references in the criteria of all three policies to contributions for future management and maintenance, I consider the text should make the following clear statement in an appropriate place in the text:

"All contributions sought will reflect current national advice on planning obligations which, at the time of adoption of this Plan, look favourably on commuted maintenance sums only where the facility provided is principally of benefit to the development itself, rather than to the wider public."

#### Recommendation

9.59 I recommend that the Local Plan be modified to incorporate PIC's 386-392, as set out in Core Documents 11, 11A and 11B, further amended by the additional wording I suggest in my paragraphs 9.57 and 9.58 above, but that no other modification be made to the Local Plan in respect of these objections.

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## POLICY LR18 – COMMUNITY FACILITIES

### Objection and Key Issue

9.60 David Wilson Estates Ltd 144/1

note flexibility, but still appears too onerous

### Council Reply

9.61 The Council's written response is contained in Document BBCEV 119.

### Appraisal

9.62 The Council's evidence makes it clear that the purpose of the policy is to resist the loss of needed facilities, housed in existing community halls or centres that can accommodate wide uses. It would be unusual if a facility did not need some kind of replacement, but I find that the Deposit Plan policy is phrased in a rather too inequitable way. Its force and purpose could be retained if it read:

"Development which would result in the loss of a recreational or community use will only be permitted if:

(i) that use or facility is to be replaced by an equivalent or better standard facility of equal convenience to existing users, or

(ii) no clear need or deficiency can be identified, to justify such a replacement."

### Recommendation

9.63 I recommend that the Local Plan be modified to incorporate the altered wording I suggest in my paragraph 9.62 above.

\*\*\*\*\*

## POLICY LR19 – COMMUNITY HALLS

### Objections and Key Issues

9.64 DH Barford & Co 269/14, Old Road Securities plc 393/35

not clear how level of facilities will be determined, and the basis for contributions

must be directly related to the proposed development

### Council Reply

9.65 The Council's written response is contained in Documents BBCEV 230 and 508.

### Appraisal

9.66 The Council has put forward PIC 393 to placate Old Road Securities, and I agree that this is helpful. I do not consider that the criteria need further amendment, but the concerns of both objectors should be diminished if the first line of the policy is refined to read:

"Any need which is directly created for the provision of a new community hall...(etc)"

### Recommendation

9.67 I recommend that the Local Plan be modified to incorporate PIC 393, as set out in Core Documents 11, 11A and 11B, and the altered wording I suggest in my paragraph 9.66 above, but that no other modification be made to the Local Plan in respect of these objections.

## CHAPTER 10

### OBJECTIONS TO THE CHAPTER ON UTILITIES AND TELECOMS

#### POLICY U1 – INFRASTRUCTURE PROVISION

##### Objection and Key Issue

10.1 David Wilson Estates Ltd 144/2 , Environment Agency Central Area 319/12, Hallam Land Management Ltd 455/7

define larger sites; unrealistic to suggest postponing development before adequate infrastructure provision

reword "on larger sites"

unnecessary because of statutory duties of utility companies

##### Council Reply

10.2 The Council's written response is contained in Documents BBCEV 597 and 1216.

##### Appraisal

10.3 The Council has taken the point of the Environment Agency's objection and put forward PIC 394, to bring all developments within the scope of U1. The policy has some purpose as a prudent warning; nevertheless, I agree with Hallam that it does not really merit its place and that its sentiment could just as well be added to the criteria of policy BE30.

##### Recommendation

10.4 I recommend that the Local Plan be modified to delete the policy and take the action I outline in paragraph 10.3 above.

\*\*\*\*\*

#### POLICY U2 – FLOODING AND SURFACE WATER DRAINAGE

##### Objection and Key Issue

10.5 CPRE 388/3, GOER 516/13, Environment Agency Central Area 319/7

not consistent with Circular 30/92; "etc" and "significantly" are ambiguous

identify flood plains on Map and mention in policy

show areas prone to flooding on the Proposals Map

##### Council Reply

10.6 The Council's written response is contained in Documents BBCEV 231-232.

### Appraisal

10.7 The Council has accepted rewording of the policy suggested by the Environment Agency to avoid ambiguity, through PIC 395. During the writing of this report there has been major flooding in England in the last quarter of 2000. The scale and extent of the problems caused to low-lying housing reinforces the validity of the other objections. I conclude that the Council should accurately define areas liable to flood on the Proposals Map, in a manner acceptable to the Government Office, and make necessary textual mention of this. By the time this report is acted upon, there may be specific advice available from DETR about best practice in making such definitions.

### Recommendation

10.8 I recommend that the Local Plan be modified to incorporate PIC 395, as set out in Core Documents 11, 11A and 11B, and to show details of areas in the Borough liable to flood on the Proposals Map.

\*\*\*\*\*

## POLICY U3 – SEWAGE DISPOSAL

### Objection and Key Issue

10.9 Environment Agency Central Area 319/5 & /20

change heading to "Waste Water Management"

should refer to Agency and use of private package sewage treatment plants

### Council Reply

10.10 The Council's written response is contained in Documents BBCEV 527 and 627.

### Appraisal

10.11 The Council has put forward pre-Inquiry Changes PIC 396 and 397. The former renames this section of the chapter as requested. The latter, subsequently amended in detail by PIC 495, produced a Counter Objection from the Environment Agency Central Area 319/P42. This was because, despite the addition of the Agency as a named consultee in paragraph 11.7, the Council has not chosen to refer to private package sewage treatment plants in the text. I do not think that this detail demands mention in a land use plan, and the Council is unwilling to put it in.

### Recommendation

10.12 I recommend that the Local Plan be modified to incorporate PIC's 396 and 495, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

\*\*\*\*\*

## POLICY U4 – TELECOMMUNICATIONS (SATELLITE DISHES ETC)

### Objection and Key Issue

10.13 BT plc 170/12, J & J Design 263/22,



should strike balance between environmental protection and benefits; clarify that policy only deals with satellite dishes of non-network providers

"where appropriate" and "larger developments" imprecise

#### Council Reply

10.14 The Council's written response is contained in Documents BBCEV 384 and 1217.

#### Appraisal

10.15 BT gives no good reason why the policy should only deal with the satellite dishes of non-network providers; I can see no such reason. J & J represent clients opposed on grounds of belief to occupying dwellings that have communal facilities. As a very small minority group I cannot see that their human rights would be affected by a policy of this kind, given the amount of choice in available housing locally, and the fact that they only choose to occupy detached houses. I consider that the policy could be made less vague through re-wording. The Council would not demur from defining "larger developments" as 10 or more units.

#### Recommendation

10.16 I recommend that the Local Plan be modified to incorporate a rewording of U4 as follows:

"Where planning permission is necessary, the Borough Council will require satellite dishes and associated physical equipment to be erected in positions that minimise their visual impact; and where there would be appreciable visual benefit it will seek the provision of communal facilities for larger developments and multi-occupied premises (generally defined as 10 or more units) and require the removal of redundant equipment."

No other modification should be made to the Local Plan in respect of these objections.

\*\*\*\*\*

#### POLICY U5 – TELECOMMUNICATIONS (MASTS AND AERIALS)

##### Objection and Key Issue

10.17 BT plc 170/13, CPRE 388/2, Orange PCS Ltd, 781/3

reword with criteria for assessing aspects of the development, showing the balance as in PPG8

needs words on measures to prevent significant and unnatural intrusion on the skyline

##### Council Reply

10.18 The Council's written response is contained in Documents BBCEV 628-629 and 1218-1219.

#### Appraisal

10.19 The Council has put forward pre-Inquiry Change PIC 398, entirely rewording the criteria of the policy. It based its rewording on text suggested by Orange from a recent Local Plan in Darlington. This satisfied CPRE, but produced Counter Objections from BT plc 170/P32 and, strangely enough, Orange PCS Ltd 781/P4. The counter objectors were not basically

unhappy with the new text but wanted additions to the amended criteria (iii) and (iv). Both suggested additions seem to me merely to diminish the force of the criteria. The PIC's amended text is fair and balanced; it does not go against the thrust of current national policy advice.

#### Recommendation

10.20 I recommend that the Local Plan be modified to incorporate PIC 398, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

\*\*\*\*\*

### SUGGESTED NEW POLICIES

#### Objection and Key Issue

10.21 Anglian Water Services 1045/10, Oil & Pipeline Agency 1199/1

enabling policy to support major utility development needed for new projects

state that no policies in the local plan must lead to interference with any high pressure pipeline in the District

#### Council Reply

10.22 The Council's written response is contained in Document BBCEV 1220 and Core Document 10.

#### Appraisal

10.23 Anglian does not suggest any wording for the policy it suggests, and I agree with the Council's sentiment that all contingencies can be dealt with under the existing policies set out in this chapter of the Deposit Plan. The other objection does not seem to me to merit a specific statement in the Plan.

#### Recommendation

10.24 I recommend that no modification be made to the Local Plan in respect of these objections

## CHAPTER 11

### OBJECTIONS TO THE CHAPTER ON IMPLEMENTATION

#### SUPPLEMENTARY PLANNING GUIDANCE - PARAS. 12.11-12.13

##### Objection and Key Issue

11.1 City & St James Property Ltd 456/97 & /99, Bellway Homes Ltd 275/20, Bedfordia Developments Ltd 293/12 & /38, Hallam Land Management 455/13, David Wilson Homes 998/33

the year of adoption to be added to each piece of supplementary planning guidance

refer to preparation of SPG for Bromham Road Site

review all SPG in light of Circular 1/97

Elstow Development Brief should not be an alternative to details of proposals and an Inset Map in the Local Plan

##### Council Reply

11.2 The Council's written response is in Documents BBCEV 19, 528-529, 988 and 1221-1222.

##### Appraisal

11.3 The Council has put forward PIC400 to answer the Bellway, Bedfordia, Hallam and David Wilson Homes objections. The date of adopted Briefs has been added to paragraph 12.11 through PIC399. I agree with the Council's opinion that Circular 1/97 will apply to current supplementary planning guidance where planning obligations apply, and that there is no strong need to amend it formally. The matter of how to treat the Elstow proposal in the Plan is fully dealt with in the Joint Report about Elstow objections, written by Mr Parry and myself and submitted to both Councils in February 2001.

##### Recommendation

11.4 I recommend that the Local Plan be modified to incorporate PIC's 399 and 400, as set out in Core Documents 11, 11A and 11B, but that no other modification be made to the Local Plan in respect of these objections.

## CHAPTER 12

### OBJECTIONS TO THE APPENDICES, OPPORTUNITY SITES AND PROPOSALS MAP

#### APPENDIX B: PERFORMANCE INDICATORS

##### Objection and Key Issue

##### 12.1 Environment Agency Central Area 319/6

amend text re policies U1-U3 to say "number and scale of planning permissions gained against advice of Utility Companies and other agencies"

##### Council Reply

12.2 The Council's written response is in Core Document 10.

##### Appraisal

12.3 The Council has put forward PIC 404 to meet this objection.

##### Recommendation

12.4 I recommend that the Local Plan be modified to incorporate PIC 404, as set out in Core Documents 11, 11A and 11B.

\*\*\*\*\*

#### APPENDIX C: ENVIRONMENTAL APPRAISAL

##### Objections and Key Issues

##### 12.5 Environment Agency Central Area 319/8-/9

change entry for policy LR4/criterion 8 from "beneficial impact" to "?"

make specific changes to categorisation of the relationship between NE1 and NE3

##### Council Reply

12.6 The Council's written response is in Core Document 10.

##### Appraisal

12.7 The Council accepts the objector's judgement on these matters and has put forward PIC's 406 and 409 to meet the specific points made.

##### Recommendation

12.8 I recommend that the Local Plan be modified to incorporate PIC's 406 and 409, as set out in Core Documents 11, 11A and 11B.

#### APPENDIX D: OPPORTUNITY SITES

### Objections and Key Issue

#### 12.9 Environment Agency Central Area 319/29, /35-/39, /40-/41

acknowledge Opportunity Sites 5-7 and 9-12 are all potentially in the River Great Ouse Floodplain

### Council Reply

12.10 The Council's written response is in Documents BBCEV 291-297.

### Appraisal

12.11 The Council has altered the text of paragraph D.1 through PIC 410, to make an encompassing statement about several of the Opportunity Sites and the Floodplain, and the possible action necessary when development proposals are brought forward. However, this produced a Counter-Objection 319/P43: that the potential risk should be mentioned at each individual site. I agree with this more thorough procedure.

### Recommendation

12.12 I recommend that the Local Plan be modified to incorporate specific site by site text referring to the potential risk of flooding for Opportunity Sites 5-7 and 9-12, in a manner acceptable to the Environment Agency Central Area.

\*\*\*\*\*

## APPENDIX D: OPPORTUNITY SITE 4

### Objection and Key Issue

#### 12.13 Nijjar Dairies 1072/1

identify the site as a night club

### Council Reply

12.14 The Council's written response is in Document BBCEV 858.

### Appraisal

12.15 According to the objector, the former Howard Congregational Church has both planning permission and listed building consent for conversion to night club use. Should the new use not have started before the adoption of this Local Plan, it is plain to me that any account of what would still be an Opportunity Site must mention all the current permissions and consents.

### Recommendation

12.16 I recommend that the Local Plan be modified to incorporate the gist of my conclusion in paragraph 12.15 above.

\*\*\*\*\*

## APPENDIX D: OPPORTUNITY SITE 8

### Objections and Key Issues

#### 12.17 Railtrack Property 366/2, Boots Properties plc 371/3

the site should be allocated for non-food retailing in addition to what is proposed

permit retail uses where in accordance with other plan policies

### Council Reply

12.18 The Council's written response is in Documents BBCEV 299 and 1224.

### Appraisal

12.19 The Council wants to see mixed uses that will include housing and office based employment. A bias towards non-food retailing here would go against the Plan's shopping policies, especially SH12. The likelihood that shopping would be easier to attract than the preferred land uses is not a sufficient planning reason to give it overt favour in a formal plan. SH12 already allows for cases where it can be convincingly argued that retail proposals cannot be put within or on the edge of the primary shopping area, or in a district centre.

### Recommendation

12.20 I recommend that no modification be made to the Local Plan in respect of these objections.

\*\*\*\*\*

## APPENDIX D: OPPORTUNITY SITE 9

### Objection and Key Issue

#### 12.21 Railtrack plc 366/3, Wyncote Developments 995/4

whole site would be suitable for housing, not just southern corner

mixed development with possible discount food retailing appropriate

### Council Reply

12.22 The Council's written response is in Documents BBCEV 300 and 859.

### Appraisal

12.23 A possible use like discount food retailing on this site lacks planning merits, given the clear Shopping policy guidance in the Deposit Plan. It is well outside the primary shopping area, and I think it would tend to remove trade from the London Road local centre, rather than complement or strengthen it.

12.24 However, I consider there are good reasons to float the acceptability of more housebuilding on this site. There are few brownfield sites in Bedford, and national policy looks increasingly askance at all but unavoidable building on green field land. Furthermore, the owner appears to see good prospects of actually developing housing. Significant environmental works would probably be needed to achieve good quality housing so close to nearby non-residential uses. Nevertheless, if this were stated in the text as a necessary pre-

condition for housing here, then I see no reason why housing should not be set down as an acceptable alternative, or complement, to employment related uses on the site.

#### Recommendation

12.25 I recommend that the Local Plan be modified to incorporate altered wording as suggested in my paragraph 12.24 above, but that no other modification be made to the Local Plan in respect of these objections.

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### APPENDIX D: OPPORTUNITY SITE 10

#### Objections and Key Issue

12.26 UCC for Cauldwell & Kingbrook 230/7, Railtrack Property 366/4

make provision of open space a requirement

Railtrack wants to discuss and make comments if needed

#### Council Reply

12.27 The Council's written response is in Documents BBCEV 301 and 1223.

#### Appraisal

12.28 The Council has accepted the sense of the UCC's proposal and put forward PIC 411 to alter the text accordingly. Any Railtrack comments could be incorporated in altered text before adoption of the Plan.

#### Recommendation

12.29 I recommend that the Local Plan be modified to incorporate PIC 411, as set out in Core Documents 11, 11A and 11B.

\*\*\*\*\*

### APPENDIX D: OPPORTUNITY SITE 11

#### Objection and Key Issue

12.30 Bedfordia Developments Ltd 293/24

the timing of the site's development is objected to; allow it within a specific road alignment

#### Council Reply

12.31 The Council's written response is in Document BBCEV 290.

#### Appraisal

12.32 The Council has put forward PIC 412, the wording of which allows a meaningful planning application to be made, by confirming the existence of a preliminary road alignment.

## Recommendation

12.33 I recommend that the Local Plan be modified to incorporate PIC 412, as set out in Core Documents 11, 11A and 11B.

\*\*\*\*\*

## APPENDIX D: OPPORTUNITY SITE 12

### Objection and Key Issue

12.34 Railtrack Property 366/1, BG plc 780/2

housing is supported, but opposes having to make a new access to the brewery

### Council Reply

12.35 The Council's written response is in Documents BBCEV 298 and 387.

### Appraisal

12.36 The objectors dislike the Council appearing to require an alien industrial road as planning gain, when this aim is unconnected with the owners' interest in developing the site in a beneficial way as housing. This is a dispute that could very probably be resolved in the course of normal negotiation on a detailed scheme. The Council should amend the text to express its aspiration in a less bald manner. It should state briefly but clearly why the situation makes it so desirable to improve the existing arrangements and, if possible, that such a course of action need not prevent the resulting development achieving the kind of housing density that the owners could expect on an untrammelled site. The indicative road line shown on the Proposals Map Inset 1 should also be reconsidered in the light of the subsequent planning applications referred to by the Council.

## Recommendation

12.37 I recommend that the Local Plan be modified to incorporate altered wording as suggested in my paragraph 12.36 above, but that no other modification be made to the Local Plan in respect of this objection.

\*\*\*\*\*

## APPENDIX D: SUGGESTED NEW OPPORTUNITY SITE

### Objection and Key Issue

12.38 City and St James Property Ltd 456/14-/15 and /96

there should be a Site 13 at Kempston Lakes, as this has the potential for exciting sports and leisure facilities

the Area of Special Restraint and County Wildlife Site notations are inhibitions and should be deleted

### Council Reply

12.39 The Council's written response is in Documents BBCEV 95, 302 and 584.



### Appraisal

12.40 This is an area of land and water bounded by the Bletchley-Bedford railway, the main line railway, the Southern Bypass, and Manor Road to the south. However, it does not fit with the Council's intention to limit Opportunity Sites to places in the Urban Area that are run-down, under-used and derelict. The Council is confident that any proposals can just as well be discussed and negotiated on their merits through the development control process, bearing in mind other plan designations. I see no good reason to doubt that judgement.

### Recommendation

12.41 I recommend that no modification be made to the Local Plan in respect of these objections

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### PROPOSALS MAP

#### Objections and Key Issues

#### 12.42 CPRE 388/1 & /15

the site south of Kempston, between the B530 and the railway line, should be shown as a wildlife definition because of its glow-worm colony

the important view of Elstow Abbey from the west should on Inset 1 and Inset 14

#### Council Reply

12.43 The Council's written response is in Document BBCEV 861.

### Appraisal

12.44 The Council has referred the glow-worm matter to the County Ecologist for investigation. If a designation is made, the site would be protected under policy NE4.

12.45 I support that part of the objection seeking formal designation of an Important Open Space, to mark the view from the west towards Elstow Abbey. My remarks on the David Wilson Estates objections, which seek a large housing development at Elstow (my paragraphs 4.2.44-64 above), and on policy H25 are relevant here. I consider that the Council should devise a designation additional to the Area of Special Restraint hatching, to indicate the valuable longer distance views of the historic village core it would wish to see retained.

### Recommendation

12.46 I recommend that the Local Plan be modified to incorporate altered text as indicated in my paragraph 12.45 above.

\*\*\*\*\*

**END**

**Copies of the appendices and correspondence are only available as**

**hard copy from the Borough Council, and for inspection purposes at the Town Hall and public libraries**

Mr. Chris Pritchard,  
Development Plans Division,  
The Planning Inspectorate,  
Room 210,  
Tollgate House,  
Houlton Street,  
Bristol. BS2 9DJ

Your ref: PINSM/W0205/429/2  
Our ref: RM/5/100/B4  
Contact: Mr R McKay  
Telephone Ext. 2732  
Direct Dial (01234) 221732

23 March 2001

Dear Mr. Pritchard,

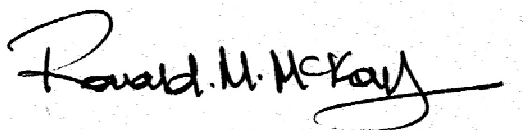
**Bedford Borough Local Plan Inquiry: Report of Mr. C.J Hoile.**

Further to my letter to you dated 14<sup>th</sup> March 2001, I have now prepared a schedule of points requiring clarification and a copy is attached. I have also attached a list of those PIC numbers which are not specifically referred to in the report.

I would be grateful if you would kindly ask Mr. Hoile to clarify each of these points and advise the Council of whether or not he supports the PIC's listed.

Thank you for your assistance in this matter.

Yours sincerely,



Ronald M McKay  
Principal Planner (Policy)

cc. Simon Bird

**Bedford Borough Local Plan Deposit Draft  
Report of Mr. C J Hoile  
Points requiring clarification**

Page No.	Para. No.	Point requiring clarification
Chapter 1: Strategy, the Introduction and other objections of a general nature		
9	1.50	PIC's 423-427 are supported in the text. Clarification is sought as to whether this should appear in the recommendation at 1.53.
15	1.78	Clarification is sought as to whether the Counter Objection from <u>Potton Developments Ltd</u> 268/P18 should read 268/P14.

16	1.82	This states that the plan should state specifically that Bromham's growth should be held in check until H6, H7 and H8 are virtually built out. Clarification is sought as to whether this should appear in the recommendation at 1.91.
16	1.83	This states that the plan should emphasise that no more significant growth should be allowed in Wilstead whilst the Elstow New Settlement is establishing itself within this plan period. Clarification is sought as to whether this should appear in the recommendation at 1.91.

## Chapter 2: Natural Environment

23	2.5	Clarification is sought as to whether counter objection from <u>St Albans Diocese BOF 223/P11</u> should read 292/P11.
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## Chapter 4: Housing

85	4.1.27	This states that " it is not necessary for me to take a view on this 1997 objection about the merits of refurbishing Austin Canons House." This appears to be based on an assumption that the planning application for 25 dwellings (referred to in the first sentence) incorporates the house. This is not the case. The application relates to land to the rear of the house.  Clarification is sought as to whether, in the light of this information, the Inspector may wish to review para 4.1.27 and any subsequent recommendation.
89	4.1.46	Clarification is sought as to whether the reference to <u>Cyclists' Touring Club</u> 71/1 should read 711/1.
97	4.1.70	PIC 456 is listed twice. Clarification is sought as to whether the reference should say 456 and 457.
105	4.1.93	The reference to PIC 457 is incorrect. PIC 457 relates to H8. Clarification is sought as to whether the Inspector wishes to substitute another PIC No.
107	4.1.100	Clarification is sought as to whether, in the last sentence, reference should be to 2002 rather than 1992.
145	4.2.70	Clarification is sought as to whether in the case of <u>Twigden Homes, Eagle Homes &amp; Connolly Homes</u> ; the list of objection nos should include 1090/7. The summary of this objection is included in the text.
148-9	4.2.84-89	In response to the objections, clarification is sought as to why the Inspector prefers the H15 allocated site to the site proposed by the objectors.
218	4.2.441	Clarification is sought as to whether the reference to "Wilstead's primary built framework" should read 'Willington's primary built framework"
229	4.2.497	Clarification is sought as to whether the text should be amended to read "...his suggested sites occasions the dualling..." or "...his suggested sites require the dualling ..." rather than "...his suggested sites occasions require the dualling of ...".

240-241	4.4.19-20	In para. 4.4.19 the Inspector states that the designation of Important Open Space E at Cleat Hill is "unjustified". No specific recommendation is made in para 4.4.20 for its deletion. Clarification is sought as to whether the recommendation should be amended to include reference to Important Open Space E.
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#### Chapter 5: Employment and Tourism

260	5.48	Clarification is sought as to whether the sentence "However, that does mean that any proposal is acceptable anywhere at Wyboston Lakes" should be amended to read "However, that does not mean that any proposal is acceptable anywhere at Wyboston Lakes"
268	5.90	Clarification is sought as to whether the PIC referred to in the recommendation should read 270 rather than 268.
271	5.106	Clarification is sought as to whether the PIC referred to in the recommendation should read 275-276 rather than 75-276.

#### Chapter 6: Shopping

273	6.5	Clarification is sought as to whether the text should be amended to read "...to ban A2 and A3 uses..." or "...to bar A2 and A3 uses..." rather than "...to ban bar A2 and A3 uses..."
273	6.7	Clarification is sought as to whether the text should be amended to read "..., and I can find no good reason...".
277	6.30	Clarification is sought as to whether the reference to <u>Terleys</u> 114/1 should read 1214/1
278	6.34	Clarification is sought as to whether the Inspector supports PIC 483 which deals specifically with bulky goods.

#### Chapter 10: Utilities and Telecoms

322	12.21	Clarification is sought as to whether the second bullet point should be amended to read "...food retailing appropriate."
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## **Bedford Borough Local Plan Deposit Draft**

### **Report of Mr C J Hoile**

#### **List of PIC Numbers which are not referred to in the Report**

#### **Chapter 2: Natural Environment**

78 (objs. 275/3\*, 455/19\*)

439 (Proposed Change)

#### **Chapter 3: Built Environment**

440A (Proposed Change)

#### **Chapter 4: Housing**

155 (obj. 436/1\*)

170 (obj. 455/12\*)

174 (obj. 293/22\*)

177 (obj. 711/2\*)

192 (obj. 319/21 CW)

#### **Chapter 5: Employment & Tourism**

480 (Proposed Change)

#### **Chapter 6: Shopping**

483 (Proposed Change) [See also schedule of points requiring clarification]

## **Chapter 8: Transport**

361 (obj. 711/8\*)

## **Chapter 10: Utilities & Telecoms**

493 (Proposed Change)

494 (Proposed Change)

## **Chapter 12: Appendices & Proposals Maps**

503 (Proposed Change)

504 (Proposed Change)

506 (Proposed Change)

\*     Objection still stands

CW   Objection conditionally withdrawn

# The Planning Inspectorate

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Your Ref: RM/5/100/B4  
Our Ref: PINSM/W0205/429/2

Date: 3 April 2001

Mr Ronald McKay  
Bedford Borough Council  
Town Hall  
St Paul's Square  
Bedford  
MK40 1SJ

Dear Mr McKay

## **INSPECTOR'S REPORT INTO OBJECTIONS TO THE BEDFORD BOROUGH PLAN - REQUEST FOR CLARIFICATION**

I refer to your letter of 23<sup>rd</sup> March 2001 requesting clarification of certain points contained within the Inspector's report.

The matters have been raised with the Inspector, and his response has been submitted to our office. The following points have been raised:

### **Chapter 1: Strategy, the Introduction and other objections of general nature**

Mr Hoile agrees with all four suggestions made by the Council.

### **Chapter 2: Natural Environment**

Mr Hoile agrees with the suggestion that the objection number should read 292/P11.

### **Chapter 4: Housing**

Page 85 Para. 4.1.27: The Inspector takes no view on what is a development control matter. Therefore he makes no comment on this point.

Page 105 Para. 4.1.93: Please delete the reference to PIC 457

Page 148-9 Para.4.2.84-89: The reason the Inspector prefers the H15 allocated site to the site proposed by the objectors, is that is better sited in relation to the existing village.

Page 229 Para. 4.2.497: Mr Hoile agrees with the Council's suggestion of "...his suggested sites require the dualling....."

The six points left for clarification Mr Hoile has agreed with the Council's recommendation.

## **Chapter 5: Employment and Tourism**

Mr Hoile agrees with Council's three recommendations

## **Chapter 6: Shopping**

Page 273 Para. 6.5: Mr Hoile agrees that the text should be amended to "....to bar A2 and A3 uses....".

Regarding the remaining three points, Mr Hoile agrees with the Council's recommendations.

## **Chapter 12: Utilities, Telecoms and Appendices etc**

The point requesting clarification, Mr Hoile agrees with the Council's amended version.

Mr Hoile has also corrected the literal errors mentioned on the attached floppy disc. This should form part of the Local Plan report and be published accordingly.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bernadette Parfitt', with a large, stylized initial 'B' and 'P'.

Bernadette Parfitt  
Development Plans Division



Mr. Chris Pritchard,  
Development Plans Division,  
The Planning Inspectorate,  
Temple Quay House,  
2 The Square,  
Bristol,  
BS1 6PN

Your ref: PINSM/W0205/429/2  
Our ref: RM/5/100/B4  
Contact: Mr R McKay  
Telephone Ext. 2732  
Direct Dial (01234) 221732

19 April 2001

Dear Mr. Pritchard,

**Bedford Borough Local Plan Inquiry: Report of Mr. C.J Hoile.**

I am writing to seek further clarification on a number of points in respect of Mr. Hoile's report. These are: -

Page 96 Para No. 4.1.67

Clarification is sought as to whether the reference in the third sentence to "important details about the new development" is intended to cover the concerns raised by the Bromham Road Service Road Residents Group.

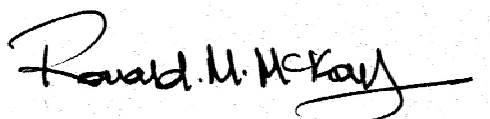
Pages 166, 234, 236 Para No. 4.2.175, 4.3.1, Table 1

In respect of land proposed as important open space C the Inspector recommends that the site be identified as a village housing site. Clarification is sought as to whether the para 4.2.175 which states that the site should be identified for 30 dwellings should be changed to read 25 dwellings for consistency with para 4.3.1 and Table 1.

Attached to my letter dated 23<sup>rd</sup> March 2001, was a list of PIC numbers which are not referred to in the Inspector's report. The Inspector has now indicated his support for PIC 483, but his views on the remaining PIC's are outstanding.

Thank you for your assistance in this matter.

Yours sincerely,

A handwritten signature in black ink, reading "Ronald M. McKay". The signature is written in a cursive style with a long horizontal stroke at the end.

Ronald M McKay  
Principal Planner (Policy)

# The Planning Inspectorate

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Our Ref: PINSM/W0205/429/2

Ronald M McKay  
Principal Planner (Policy)  
Bedford Borough Council  
St Paul's Square  
Bedford  
MK40 1SJ

Dear Mr McKay

## **INSPECTOR'S REPORT INTO OBJECTIONS TO THE BEDFORD BOROUGH LOCAL PLAN - REQUEST FOR CLARIFICATION**

I refer to your letter of 19 April requesting clarification arising from the Inspector's report into objections to the above Local Plan. The matters have been raised with the Inspector and we have now received his response. The following is based on comments received from the Inspector.

Page 96, Paragraph 4.1.67

The Inspector confirms that the reference in the third sentence to "important details about new development" is intended to cover the concerns raised by the Brougham Road Service Road Residents Group. Pages 166, 234 236, Paragraph 4.2.175, 4.31, Table 1 The Inspector does not consider that there is any inconsistency. Paragraph 4.2.175 says "up to 30 dwellings. With regard to the outstanding responses to the PIC's, there are either no specific counter-objections that have been made, or no other representation of any kind have been put before the Inspector in these instances.

Yours sincerely

Chris Pritchard  
Development Plans Division