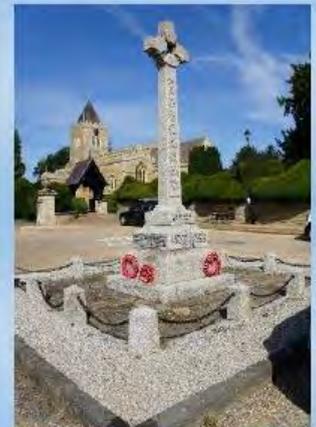


**Turvey Neighbourhood  
Development Plan  
Consultation Statement  
Submission Version  
April 2020**



# **Contents**

**Section 1: Introduction**

**Section2: Community Engagement**

**Section 3: Draft plan Pre-Submission (Regulation 14) consultation**

**Appendix 1: List of Statutory and Other Consultees**

**Appendix 2: Consultation Comments Received and Response Made**

**Appendix 3: Response to Residents relating to choice of Carlton  
Road site**

## Section 1: Introduction

1. This Consultation Statement has been prepared as part of the background evidence of the Turvey Neighbourhood Development Plan (Turvey NDP) in accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended).
2. Turvey NDP has been prepared on behalf of Turvey Parish Council, the qualifying body for the Neighbourhood Plan Area which covers the whole of the Parish of Turvey, as designated by Bedford Borough Council on 5th April 2017 and identified on Map 1 of the plan.
3. Section 15 (2) Part 5 of the Regulations states that a Consultation Statement should contain:
  - details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - an explanation as to how they were consulted;
  - summary of the main issues and concerns raised by the persons consulted; and,
  - a description as to how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
4. In accordance with regulations (referenced above) to ensure the community were involved in neighbourhood planning, the aims of the Turvey NDP consultation strategy was:
  - To inform and engage residents of Turvey throughout all stages of the development of the plan so that the plan was informed by the views of local people and other stakeholders from the start of the Neighbourhood Planning process;
  - To ensure that consultation events took place at critical points in the process where decisions needed to be taken;
  - To engage with as wide a range of people as possible, using a variety of approaches and communication and consultation techniques; and
  - To ensure that results of consultation were fed back to local people and available to read as soon as possible after the consultation events.
5. During the preparation of the plan there has been regular engagement via;
  - Updates in the local Turvey News magazine which is published 4 times a year and delivered to all households in the village,
  - Neighbourhood Plan Newsletters delivered periodically to all homes in the village with progress reports on the development of the plan
  - A dedicated Turvey Neighbourhood Plan website with all relevant documents, consultation material and outcomes, minutes of meetings etc.
  - Leaflets produced for events and exhibitions at the village hall
  - Major exhibitions at the village hall supporting the Sites for Housing consultations in March and September 2019 where an extensive range of information was displayed about the Neighbourhood Plan process, details of the sites assessed for new housing and the approach to site selection taken to identify sites recommended for allocation.

- Events advertised in Turvey News, promoted on Turvey News Facebook, featured in Neighbourhood Plan Newsletters and on display boards located in the centre of the village
- Exhibitions at village Plant Sales and Apple Pressing Days, October 2017 and 2018 as well as Turvey Primary school and the Three Cranes pub in September 2019 to promote awareness of the Sites for Housing Stage 2 consultation

## Section 2: Community Engagement

6. The Neighbourhood Plan Steering Group undertook regular and extensive engagement and consultation on behalf of the Parish Council during the preparation of the Plan. The range of consultation activities delivered are described in the Summary of pre-Regulation 14 Consultations Report supporting document. The main events and surveys undertaken are described below and further details of each event and survey can be found in reports posted on the Turvey NDP website.

### Future Housing Consultation

7. The Parish Council presented an exhibition of the Bedford Borough Council Local Plan Call for Sites information for Turvey in January 2017 and gathered views from residents about the scale, tenure mix and location of development proposed.
8. The key messages highlighted from resident responses were;
  - Residents expressed concerns about larger scale development and were more accepting of smaller developments of less than 20 or 30 houses
  - Residents' concerns about development were focused on traffic, road safety and potential negative effects on the character of the village and the natural environment

### Housing Needs Survey

9. A Housing Needs Survey was commissioned by the Parish Council in January 2017 and undertaken by the Bedfordshire Rural Charities Commission (BRCC) to provide an independent assessment of the need of local people for either affordable housing or market housing in Turvey over the next 10 years, as well as the general views of the local community about housing needed in Turvey.
10. The key findings from the survey were;
  - A need for 16 units of affordable housing survey and up to 19 units of market housing was identified
  - The responses and other evidence considered suggested that there is a need for 2-3 bed houses and 2 bed bungalows or otherwise suitable properties (e.g. houses built to Lifetime Homes criteria) if Turvey is to meet the identified current and future needs for market housing of existing owner occupier residents wishing to stay in the village.

### General Survey

11. In the early stages of preparing the plan, the Steering Group conducted a survey of residents, to ascertain what people liked about the village, what they would like to see changed, and what makes it a good place to live.
12. The key messages from the survey were;

- The features of Turvey that are most highly valued by residents are the environment and countryside, community spirit, shops and facilities, groups and activities.
- Aspects of Turvey that residents would like to see changed are the high volumes of traffic, speeding, lack of adequate parking and the development of more affordable housing

13. From the above, the Steering Group developed a draft vision statement and objectives for the plan, which were tested and refined with residents at the Village Discussion Workshop.

#### Business Survey

14. The Steering Group conducted a survey of businesses in the parish. Questionnaires were sent to 21 businesses in the village and 10 completed questionnaires were returned. The key messages were;

- Concern about limited parking facilities and heavy traffic presenting challenging conditions for some businesses
- Some respondents seeing prospects as stable and steady and others identifying threats from external factors such as Brexit, development in Olney and internet trading

#### Village Discussion Workshop: Site Selection Criteria, Aims and Policy Areas

15. This consultation was organised to provide an opportunity for residents to consider draft aims and objectives for the plan as well as draft site selection criteria against which sites would be assessed. The event took the form of a discussion workshop with attendance limited to 50 people (52 people attended) so that participants could work in groups of about 8 people facilitated by a Steering Group member.

16. Key outcomes from the workshop were as follows;

- Each group provided a list of comments and suggested amendments to the site selection criteria and some of these were adopted to generate the next draft of the criteria
- Each group provided comments and suggestions about the way the Aims and Objectives of the plan were expressed and some of these were adopted to generate the next draft of the plan Aims and Objectives

#### Local Call for Sites

17. The Steering Group advertised a 'Call for Sites' exercise locally to enable landowners interested in releasing land for new housing development to put sites forward. These were combined with expressions of interest made in the earlier call for sites process undertaken by Bedford Borough Council to produce a list of 11 potential development sites. The Steering Group held several meetings with these landowners and their agents to establish their thoughts and aspirations regarding the development opportunities on these sites.

## Sites for New Houses Consultation

18. The site selection criteria were applied to the sites for new housing put forward by landowners to identify the most suitable sites (details are set out in the Site Assessment and Allocation Report supporting document). Technical site assessments were also undertaken by AECOM Ltd, funded by the government's neighbourhood plan programme, to provide independent professional advice to inform the Steering Group and Parish Council's appraisal of available sites.
19. A major exhibition was held over three days in March 2019 in support of this consultation which was designed to test residents' acceptability of the way sites had been assessed and to gather their views on the sites recommended for development. Proposals for Local Green Space designation were also consulted on in the same process.
20. The feedback from this consultation process confirmed support for the recommended sites as follows;
  - 84% respondents agreed with the way the sites were rated and the recommended sites
  - 3% partly agreed with the way the sites were rated and the recommended sites
  - 13% disagreed with the way the sites were rated and the recommended sites
21. There was substantial support for the sites proposed for designation as Local Green Spaces with some suggestions of additional sites that should be considered. The additional sites put forward for consideration were assessed by the Steering Group against the national criteria and one additional site from those suggested was eventually added to the plan for designation.
22. Further details of this consultation provided in the Summary Pre-Regulation 14 Consultations report and the information displayed at the exhibition, are available on the Turvey NDP website.

## Sites for New Houses: Stage 2 Consultation

23. Following the informal consultation process on recommended sites in March/April 2019, described above, a review of site allocation options was undertaken because of the need to identify an alternative to the recommendation to allocate the site at Laws House where concerns had arisen about deliverability.
24. The outcome of the review was agreed by the Parish Council in July 2019 and a 2nd stage consultation with residents took place in September/October 2019 to test acceptability of the proposal to recommend the site at Carlton Road as an alternative to Laws House. Key messages from responses and comments received through this consultation were as follows;
  - 70% respondents supported the choice of the alternative site for housing recommended
  - 62% respondents stated a preference for 25 houses per site to deliver a total of 50

new homes, 32% respondents stated a preference for 20 houses per site to deliver a total of 40 new homes, 6% respondents did not express a preference regarding the scale of development

25. Further details of this consultation provided in the Summary Pre-Regulation 14 Consultations report and the information displayed at the exhibition, are available on the Turvey NDP website.

### Section 3: Draft plan Pre-Submission (Regulation 14) consultation

26. A draft plan was shared informally with Bedford Borough Council in August 2019. Following receipt of comments by Council Officers, amendments were made, and a draft was prepared for public consultation which was endorsed by the Turvey Neighbourhood Plan Steering Group. The Pre-Submission Draft was discussed at a Parish Council meeting on 26 September 2019. The Parish Council resolved that the plan be agreed for Pre-Submission consultation.
27. The formal Regulation 14 Consultation commenced on 6th November 2019 and finished on 19th January 2020. A Neighbourhood Plan summary leaflet with a consultation response form was delivered to every household in the village. A display board with information about the consultation was positioned on the Roundell, High Street. The consultation was publicised on the Turvey NDP website and information posted on Turvey News Facebook. Drop-in sessions were held in the village hall on 24<sup>th</sup> November and at the Christmas Fayre in December, where members of the Steering Group were available to answer questions on the plan and the consultation process.
28. The full set of consultation documents were posted on the website with an online response form available for residents to submit by email. Hard copies of the draft plan, response forms, SEA Screening Assessment and Habitat Regulations Assessment were available for residents to view and borrow at All Saints Church, Three Fyshes, Three Cranes, Corner Stores and Central Stores. A telephone contact number and email address were advertised in the draft plan leaflet for people to raise queries and request any assistance required in accessing documentation.
29. All adjacent Parish Councils, LPAs, statutory bodies, non-statutory bodies, etc. were emailed with details of the consultation. See Appendix 1 for details of the organisations notified.
30. The following responses were submitted;
- Residents x 26
  - Statutory Consultees
    - Historic England
    - Natural England
    - Environment Agency
  - Other Bodies
    - Bedford Borough Council
    - Turvey History Society
  - Land Agents
    - Fisher German on behalf of the Trustees of the Turvey Estate and Turvey House Maintenance Fund
    - Fisher German on behalf of Richborough Estates
    - DLP Planning Ltd on behalf of Inspired Villages
    - DLP Planning Ltd on behalf of Snelson Farms
    - Jackson-Stops and Francis Jackson Homes Ltd jointly on behalf of the Ward Family
    - Gladman Developments
31. The responses received are reproduced in the table included in the Consultation Statement at Appendix 2 with replies from the Steering Group to each response. Where amendments to the draft plan or supporting documents have been made as a result of responses received,

this is shown in the table.

32. A number of residents raised similar points about the choice of the Carlton Road site and related issues. A combined response has been included at Appendix 3 and referenced in the table to where it applies to the comments made.

## **Conclusion**

33. This Consultation Statement demonstrates that Turvey Neighbourhood Plan Steering Group (acting on behalf of Turvey Parish Council) has prepared the Neighbourhood Plan in accordance with the legal obligations as set out in the Neighbourhood Planning Regulations 2012.
34. All statutory requirements have been met and a significant level of additional consultation, engagement and research has been carried out. The Neighbourhood Plan Steering Group has made genuine and committed efforts to engage all those who live, work or have a business interest in the Neighbourhood Area and provided them with every opportunity to influence the content of the Neighbourhood Plan throughout its preparation.
35. This Consultation Statement and supporting appendices have been produced to document the consultation and engagement undertaken and are considered to comply with Part 5, Section 15 of the Neighbourhood Planning Regulations 2012.

## **Appendix 1: List of Statutory and Other Consultees**

Turvey Primary

Pre-School Playgroup

Sharnbrook Academy

Landowners & Developers;

Jackson-Stops, DLP (Neil Osborn, Graeme Free), Taylor Property Consultants, Fisher German, Optimis, Francesca Mack (Laws House), Trevor and Sue Coward (The Burrows), Bill and Jan Nicol (Priory Farm)

Robinson Hall

Village organisations;

TATS, THS, All Saints Church

Local Businesses;

William Lowden & Associates, Arena & Stables, Barton & Royle, Corner Stores, Central Stores, Three Fyshes, Three Cranes, Cox & Co (Accounting), Turvey Motors, Turvey Farms Ltd, Cartwright Farms Ltd. Barton & Royle Homes

Marine Management Organisation

The Environment Agency

English Heritage

Natural England

Network Rail

Highways England

Bedford BC

Stevington Parish Council

Carlton Parish Council

Harrold Parish Council

Bromham Parish Council

Bedfordshire Police

Bedfordshire & Luton Fire Service

East of England Ambulance Service

BT Open Reach

Bedfordshire Clinical Commissioning Group

Healthwatch Bedford

Beds & River Ivel I.D.B. (Bedford Group of Drainage Boards)

Homes England

BPHA

Federation of Small Businesses

Anglian Water

South-East Midlands Local Enterprise Partnership

England's Economic Heartland

Bedford Borough;

Borough Councillor (Jim Weir), Planning Team, Citizens Panel, Education, Health and Wellbeing Board, Bedford BC Environment Services, Highways

The Conservation Volunteers Bedford

Bedfordshire Wildlife Trust

RSPB

Appendix 2: Consultation Comments Received and Response Made

Document	From	Page No.	Para No.	Comment	Response to comment
<b>Resident Responses</b>					
<b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b>	<b>Resident 1</b>	31	5.56	<p>Site H: Area south of river bridge adjacent to The Three Fyshes and area west of Mill Pond (Jonah's statue).</p> <p>Please note that the island on which Jonah and Jonah's wife are situated is not owned by the Parish Council but by the residents of The Mill.</p> <p>Can this please be amended to reflect the correct ownership?</p>	<p>Apologies for the error, we are aware that the piece of land concerned is owned by residents at the Mill.</p> <p><u>Para 5.56 amended</u></p>
<b>Turvey Neighbourhood Development Plan Summary leaflet</b>	<b>Resident 2</b>	7	4.4 A&B 4.5	<p>Agreed</p> <p>Policy T3 Natural Environment - Agreed Policy T4 Local Green Spaces - Agreed Policy T8 Local Character - Agreed Policy T9 Historic Assets &amp; Settings – Agreed</p>	<p>Noted</p> <p>Noted</p> <p><u>No amendment required</u></p>
<b>Turvey Neighbourhood</b>	<b>Resident 3</b>			<p>I live in a small bungalow in Norfolk Road where it meets May Road and would like to add my concerns about the build-up of traffic on local roads in recent years.</p>	

<b>Development Plan Regulation 14 Consultation Version October 2019</b>					
				<p>1. I think you quote statistics about car ownership taken in 2011 in your background for the neighbourhood building plan. I submit it has greatly increased since then as noted by the cars parked on the inside bend of Norfolk Road/May Road and the chicane parking in May Road / Grove Road. This was not the situation when the survey was last undertaken in 2011. I can only assume there has been a similar increase in all areas in Turvey and recent data should be obtained to get a truer picture of the parking problem in Turvey.</p>	<p>The information on car ownership in the village is from the National Census, and 2011 is the latest version of it.</p>
				<p>2.The corner of May Road and Carlton Road has become increasingly dangerous in recent years as cars park on the corner (outside restricted hours).</p> <p>3.The unofficial small passing places of side drives are insufficient to allow proper passing places in Carlton Road. On Saturdays and Sundays when more residents of Carlton Road are at home there are very few places to pull in when faced by oncoming traffic (from The High Street direction.) I observed an elderly man having to back his car (partly along the pavement) half the length of Carlton Road at 9:30 on a Saturday morning. There were cars backed up in both directions.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p>



				For the avoidance of doubt, Abbey Farm and its associated land sits outside the remit of Turvey Neighbourhood Area, operating and managing it's own very successful biodiversity program in conjunction with Natural England, with no connection or input whatsoever from the village of Turvey and should be noted accordingly.	The boundary of the Turvey Neighbourhood Area is coterminous with the Parish boundary as shown on Map 1, page 6. The whole of Abbey Farm and associated land is within the parish boundary and Turvey Neighbourhood Area.
		9	2.9	“Abbey Park” should be either removed from this paragraph, or a note to clarify that it is no longer a park. The Higgins family both created and destroyed the Park that was associated with the Abbey, by removing thousands of trees. The area that was once a Park now forms part of Abbey Farm (that sits outside the Turvey conservation/neighbourhood area) and does not meet the requirements of a Park, as confirmed by a survey carried out by Historic England in 2016. It's historic importance as listed with Natural England refers to the “the ridge & furrow”	The Historic Environment Record and the Bedford Borough Council Landscape Sensitivity Study provide our source of reference for describing the land in this way.
		17	4.12	Clarification of historic parkland around Turvey Abbey – Do you mean the gardens associated with the Abbey or the land belonging to Abbey Farm? Would suggest you change to say Turvey Abbey and it's gardens.	You can find the reference to Abbey Park on the Historic Environment Record at: <a href="https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.heritagegateway.org.uk%2FGateway%2FResults_Single.aspx%3Fuid%3DMBD6984%26resourceID%3D1014&amp;data=02%7C01%7C%7Cb3ae16dd84dc4a5436fa08d77e15e73f%7C84df9e7fe9f640afb435aaaaaaaaaaaa%7C1%7C0%7C637116504839808375&amp;sdata=QzTAf qz8B3OkeLHuB07oteJHlyS WgZ1xXzHa2vfHC6o%3D&amp;reserved=0">https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.heritagegateway.org.uk%2FGateway%2FResults_Single.aspx%3Fuid%3DMBD6984%26resourceID%3D1014&amp;data=02%7C01%7C%7Cb3ae16dd84dc4a5436fa08d77e15e73f%7C84df9e7fe9f640afb435aaaaaaaaaaaa%7C1%7C0%7C637116504839808375&amp;sdata=QzTAf qz8B3OkeLHuB07oteJHlyS WgZ1xXzHa2vfHC6o%3D&amp;reserved=0</a>
		28	5.40	Clarification of Turvey Park	
		28	5.42	Clarification of the parkland around Turvey Abbey. If you are referring to Abbey Farm, then it is Grassland and not Parkland and Abbey Farm's biodiversity program has no connection or input whatsoever from the village of Turvey, in fact quite the opposite. Villagers have a large negative impact on the program interfering with woodland, ground nesting birds, wild fruits and pond life	

		29	T3	Same as above – parkland at Turvey Abbey	<p>The Bedford Borough Council Landscape Sensitivity Study can be found at;  <a href="https://edrms.bedford.gov.uk/OpenDocument.aspx?id=5OEJKSBn4cbkTZm1bogZPW%3d%3d&amp;name=47%20-%20Landscape%20Sensitivity%20Study%20-%20Group%201%20and%20Group%202%20Villages,%20Bedford%20and%20Kempston%20Urban%20Edge.pdf">https://edrms.bedford.gov.uk/OpenDocument.aspx?id=5OEJKSBn4cbkTZm1bogZPW%3d%3d&amp;name=47%20-%20Landscape%20Sensitivity%20Study%20-%20Group%201%20and%20Group%202%20Villages,%20Bedford%20and%20Kempston%20Urban%20Edge.pdf</a></p> <p>The section on Turvey begins on page 78 where paragraph 2 bullet point 4 refers to "the historical parkland around the grade II listed Turvey Abbey". The map which follows page 81 shows Abbey Park as an extensive area of land which is part of Abbey Farm.</p> <p><u>No amendment required</u></p>
		31/34	5.57	<p>Clarification that the piece of woodland marked CG on the Local Green Spaces (in a slightly different shade of colour on the map), does NOT form part of "Site J Local Green space"</p> <p>This piece of land is wholly owned by Abbey Farm and managed in accordance with our woodland program and sits outside the Turvey neighbourhood area.</p>	<p>Agree that the small area of woodland included in the map for Local Green Space J should not be included as part of the nominated LGS.</p> <p><u>Map showing LGS J amended</u></p>
		48	5.115	Note! Any work undertaken in the construction of this path, should ensure the dropped kerb access to the fields is not interfered with.	Noted for future reference

		8	2.6	<p>“Intensive use of chemical sprays”</p> <p>The use of the word “intensive” is both emotive and subjective.</p>	<p><u>Agree to delete the word ‘intensive’</u></p>
<p><b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 6</b></p>			<p>I am in overall agreement with the contents of the document, including the choice of sites and the provision of 50 houses to maximise the number of affordable homes in the village.</p>	<p>Noted</p> <p><u>No amendment required</u></p>
<p><b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 7</b></p>			<p>I am in overall agreement with the contents of the document, and set out particular comments below.</p>	<p>Noted</p> <p><u>No amendment required</u></p>
		15	3.8 & 3.9	<p>I agree with the site selection criteria and the choice of sites – as set out in the Site Assessment and Allocation Report.</p>	<p>Noted</p> <p><u>No amendment required</u></p>
		18	4.16	<p>I agree with the aims and objectives as set out in the paragraph.</p>	<p>Noted</p> <p><u>No amendment required</u></p>
		19	5.4	<p>I agree that 50 houses should be provided to ensure the maximum number of affordable houses are made available to attract families with children to the village.</p>	<p>Noted</p> <p><u>No amendment required</u></p>

		22	5.19	I agree with the selected sites, Mill Rise and Carlton Road, and the expansion of the Settlement Policy Area boundary as shown in MAP 6 – page 25.	Noted
		26	5.28	I agree with following Policy 59S of the Local Plan 2030 re affordable housing	Noted
		29	5.46	I agree with the proposed Local Green Spaces.	Noted <u>No amendment required</u>
<b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b>	<b>Resident 8</b>	22	Policy T1	<p><b>Have the criteria been applied correctly to show Carlton Road as our best second site?</b></p> <p>Newton Lane East differs very little from the Carlton Road site in terms of :-</p> <ul style="list-style-type: none"> <li>• The negative impact on valued landscape, views of the church and the home of wonderful birds and wildlife.</li> <li>• Together with significant encroachment into beautiful open countryside</li> <li>• Both are beautiful areas however the new offering at Priory Farm cannot be looked at in this way</li> </ul> <p>Disadvantages not highlighted in respect of Carlton Road site are :-</p> <ul style="list-style-type: none"> <li>• The proximity to the village cemetery which unarguably should be a place of total tranquillity and which will be hugely impacted particularly during the time of construction but also on a permanent basis.</li> <li>• The exhibition indicated that the impact on traffic in both the Newton Lane and Carlton Road was</li> </ul>	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'

			<p>moderated. The traffic flow base from which we start is very different, anecdotally the Carlton Road traffic is substantially heavier than Newton Lane. This should be tested by a traffic census undertaken during the school term and at rush times.</p> <ul style="list-style-type: none"> <li>• Even before additional housing on the Carlton Road the route from the school to the loop is dangerously congested, with vehicles having to reverse to allow passing as an almost permanent feature. This includes buses vans and HGVs.</li> <li>• The pavement on the above stretch is in a poor state of repair with a very steep camber which makes pushing a wheelchair or pushchair almost impossible.</li> <li>• The curb is almost level with the carriageway. This provides an essential feature for traffic as the passing of oncoming vehicles can only be completed by mounting the pavement.</li> <li>• If, however, the pavement was repaired and levelled the curb would need to be raised to standard height at least. Totally appropriate for pedestrians, but the current traffic practice of mounting the pavement to pass would be rightly stopped making congestion significantly worse.</li> <li>• The traffic dangers with vehicles reversing both on the Carlton Road and backing into May Road creates a very significant road safety risk to children walking to and from the school on that junction and along Carlton Road. To ignore this known risk to school children would indeed be reckless.</li> </ul>	<p><u>Para 5.106 &amp; 5.107 added setting out Bedford Borough's comments on the effect of pavement improvements on rural road widths.</u></p>
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		22	Policy T1	<p>Alternative site options</p> <p>The recent development regarding the current planning application PP-08342675 which is already receiving considerable support changes the whole situation.</p> <p>I totally agree with High Street Homes that their site has the least impact on the village, is safe, feasible and importantly does not increase traffic problems in the village particularly in the Carlton Road where serious traffic issues already exist, as highlighted above. Therefore, the Mill Rise site and Priory Farm together more than meet the new housing needs in Turvey.</p>	<p>See reference to Priory Farm in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p> <p><u>No amendment required</u></p>
<p><b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 9</b></p>	22	Policy T1	<p>I do NOT support the proposed second site of Carton Road.</p> <p>The assessment of the criteria for selection of sites in the plan has not been applied consistently. The following Essential criteria does not appear to have considered current traffic safety issues in relation to the Carlton Road site:</p> <ul style="list-style-type: none"> <li>• Criteria 1 - Safe &amp; Adequate Vehicle Access</li> <li>• Criteria 2 - Impact on Village Traffic.</li> </ul> <p>The proximity of Turvey Primary School to the junction of May Road and Carlton Road is already a high-risk area due to traffic load, parked cars and the volume of traffic using this junction especially at school pick up and drop off times. There is already a road safety risk to children and parents walking to and from school due to the need for traffic to negotiate the congestion on Carlton Road</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p>

				<p>and at this junction and to increase this risk is not acceptable.</p> <p>Traffic on Carlton Road is surely already greater than on Newton Lane given the location of the school, proximity of neighbouring villages for which Carlton Road provides easy access to the A428 (north and south) and the location of the Village Cemetery. Current housing development in the village of Carlton is likely to create a further increase in traffic on an already congested road. As someone who uses both roads, I frequently find myself having to reverse in order to accommodate oncoming traffic on Carlton Road but have never had to do this on Newton Lane.</p> <p>It is recommended that a full traffic census should be conducted on both Newton Lane and Carlton Road during School Term and at all times of the day in order to obtain accurate statistics against which a true assessment can be made.</p>	<p><u>Para 5.106 &amp; 5.107 added setting out Bedford Borough's comments on the effect of pavement improvements on rural road widths</u></p>
		22	Policy T1	<p>The assessment of the following Primary criteria has rated Newton Lane East differently to Carlton Road when there appears to be no difference:</p> <ul style="list-style-type: none"> <li>• Criteria 4 - Impact on Valued Landscapes</li> <li>• Criteria 5 - Impact on setting of heritage assets.</li> </ul> <p>Both sites are impacted equally in the context of these two criteria as surely would most sites located in this part of the village. Further information is needed in order to understand the basis of why these have been assessed differently.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p>

				<p>The assessment of the following Secondary criteria has rated Carlton Road the same as other sites:</p> <ul style="list-style-type: none"> <li>• Criteria 9 - Closeness to village facilities</li> <li>• Criteria 12 - Degree of encroachment on open countryside.</li> </ul> <p>The proposed Carlton Road site is clearly 'outside' the current village given the development would be separated by the allotments, playing fields and the village cemetery. In addition, when looking at the village map there is clearly an imbalance in the current housing distribution on each side of the A428 with the Carlton Road side of the village already having significantly more housing. Surely it would make more sense to 'fill' the space south of the A428 from Newton Lane across to Jacks Lane as highlighted on the map below.</p>	
		22	Policy T1	<p>Following receipt of a letter from High Street Homes regarding their Planning Application (PP-08342678) for the land adjacent to Priory Farm in Turvey which outlines reasons why this site is appropriate safe and feasible I propose that the progression of the Turvey Neighbourhood Plan is delayed until the Priory Farm proposal has been fully considered by the Planning Authority.</p> <p>I fully support the High Street Homes proposal and feel it is better than the proposed second site of Carlton Road for many reasons but especially that it will remove the widely voiced objections to the additional traffic that the Carlton Road site would create in an already dangerous area. As someone who uses the Carlton Road every day I believe there are serious traffic flow issues between May</p>	See reference to Priory Farm in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'

				Road and The Loop together with the very real risks at the junction with May Road which are currently impacting on child safety around the school.	
		29	Policy T4: Local Green Space Designations	<p>I do NOT support the proposal to designate the following land as green space: Four Paddocks between Jacks Lane and Newton Lane</p> <p>This is a significant piece of land that would provide a substantial area for development that would rebalance the layout of the village across either side of the A428. The proposed rationale for designating this area can also be applied to other proposed sites.</p>	This land has not been put forward by the landowners for development, and has no access to Newton Lane. The Local Green Spaces Report (pages 15&16) details the biodiversity and heritage significance of this site.
		44	Policy T11: Transport	<p>Both proposed development sites contravene this policy as there will be an impact on both Carlton Road and Newton Road.</p> <p>Any extra traffic on Carlton Road will significantly increase the danger to both pedestrians and traffic already using this busy road especially in the area of the junction with May Road and the primary school. A neighbourhood plan should NOT be proposing a solution that increases the danger for the children attending the school.</p>	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'
		48/49	5.117 Policy Map	I do not support the change to the Policy Map due to the proposed Carlton Road site and the proposed designated Local Green Space marked J on the map.	See comments above

<p><b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 10</b></p>	<p>22</p>	<p>Policy T1</p>	<p>1.1 Have the criteria been applied correctly to show Carlton Road as our best second site</p> <p>I am comfortable with the plan for up to 50 new homes in Turvey but I have grave concerns regarding the traffic issues on Carlton Road between the school and The Loop</p> <p>The Mill Rise and Newton Lane East are closer to the village facilities than the Carlton Road site and the negative impact on landscape and views of All Saints Church and the Turvey House Parkland and very similar from both those sites and Carlton Road.</p> <p>However, Carlton Road has significantly worse traffic issues than Newton Lane. It is becoming increasingly difficult/dangerous to drive along the Carlton Road often needing to mount the pavement when passing parked cars and giving way to oncoming traffic.</p> <p>Safety around the school should be a priority particularly as it has become larger as a result the increase in the age of children attending. Consequently, there is more cars collecting and dropping off children. Because the road is congested cars are consistently having to reverse around the May Road Carlton Road junction while children are walking in the area.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p>
		<p>22</p>	<p>Policy T1</p>	<p>The Carlton Road site is adjacent to the cemetery the tranquillity of which will be adversely impacted with houses nearby. During the period that the site is under development the associated noise and the presence of construction traffic would be very inappropriate.</p>	<p>See reference to cemetery in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p>

		22	Policy T1	<p><b>Alternative site options</b></p> <p>The recent development regarding the current planning application PP-08342678 which is already receiving considerable support changes the whole situation.</p> <p>I totally agree with High Street Homes that their site has the least impact on the village, is safe, feasible and importantly does not increase traffic problems in the village particularly in the Carlton Road where serious traffic issues already exist, as highlighted above</p> <p>Therefore, the Mill Rise site and Priory Farm together more than meet the new housing needs in Turvey.</p>	<p>See reference to Priory Farm in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'.</p> <p><u>No amendment required</u></p>
<p><b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 11</b></p>	22	Policy T1	<p>I do not agree with the Carlton Road site proposal.</p> <p>How can the traffic impact on Carlton road be viewed as 'minimal' when at present it is heavy, difficult to drive out of the May road junction and sometimes close to chaos at school pick up and drop off times. Child safety is always at risk with vehicles reversing and squeezing in between parked cars. The number of vehicles attempting to exit the May road junction now, on the Carlton road side of the A428, is significantly greater than the rest of the village.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p> <p><u>Para 5.106 &amp; 5.107 added setting out Bedford Borough's comments on the effect of pavement improvements on rural road widths</u></p>

		22	Policy T1	<p>The Carlton road site will also have significant encroachment into open countryside and a negative impact on landscape and views - claimed as a disadvantage for the Newton Lane East site.</p> <p>In my view the criteria is flawed and somewhat biased. Skewed towards an almost 'out of sight out of mind' location beyond the Turvey village sign because the Carlton road site is certainly not close to village facilities.</p>	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'
		22	Policy T1	<p>Alternative site options I can't understand why Newton Lane East is now not an option. Appears ideal and the negative impact on valued landscape, views and heritage setting etc. seem, at best, to be an excuse rather than a real and major disadvantage.</p>	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'
		22	Policy T1	<p>Meadow House should be assessed again. Agreed, that traffic impact via the school is not viable but access to and from the A428, before the Abbey, via a mini roundabout would be safe and if designed appropriately could enhance the entrance to Turvey village.</p>	See reference to Meadow House in Appendix 3 'Response to Residents relating to choice of Carlton Road site'
		22	Policy T1	<p>I think a more balanced distribution of sites in and around the village is a much more sensible option to keep the beauty, character and heritage of our quintessential English village. In my view, the Carlton road site, given its actual location and open space of land around it has the potential, in years to come, to swamp the entire village should there be further 'forced' planning requirements. This would destroy the outlook of the village for ever. The other sites have space limitations, thus, containing</p>	Any further extension of the planning boundary into open countryside can only be agreed through the development plan process

				housing in a more aesthetic manner and leaving the village of Turvey still looking and feeling like a village.	
		22	Policy T1	The recently proposed Priory Farm development submitted by High Street Homes to the Borough Council in my view looks eminently sensible with the least impact on the village. It is safe, has easy access and does not give rise to increased traffic problems as would the Carlton Road site.	See reference to Priory Farm in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'.
<b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b>	<b>Resident 12</b>	22	Policy T1	<p>I do not agree with the Carlton Road site proposal.</p> <p>How can the traffic impact on Carlton road be viewed as 'minimal' when at present it is heavy, difficult to drive out of the May road junction and sometimes close to chaos at school pick up and drop off times. Child safety is always at risk with vehicles reversing and squeezing in between parked cars. The number of vehicles attempting to exit the May road junction now, on the Carlton road side of the A428, is significantly greater than the rest of the village.</p> <p>The Carlton road site will also have significant encroachment into open countryside and a negative impact on landscape and views - claimed as a disadvantage for the Newton Lane East site.</p> <p>In my view the criteria is flawed and somewhat biased. Skewed towards an almost 'out of sight out of mind' location beyond the Turvey village sign because the Carlton road site is certainly not close to village facilities.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p> <p><u>Para 5.106 &amp; 5.107 added setting out Bedford Borough's comments on the effect of pavement improvements on rural road widths</u></p>

		22	Policy T1	<p>Alternative site options</p> <p>I can't understand why Newton Lane East is now not an option. Appears ideal and the negative impact on valued landscape, views and heritage setting etc. seem, at best, to be an excuse rather than a real and major disadvantage.</p>	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'
		22	Policy T1	<p>Meadow House should be assessed again. Agreed, that traffic impact via the school is not viable but access to and from the A428, before the Abbey, via a mini roundabout would be safe and if designed appropriately could enhance the entrance to Turvey village.</p>	See reference to Meadow House in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'
		22	Policy T1	<p>I think a more balanced distribution of sites in and around the village is a much more sensible option to keep the beauty, character and heritage of our quintessential English village. In my view, the Carlton road site, given its actual location and open space of land around it has the potential, in years to come, to swamp the entire village should there be further 'forced' planning requirements. This would destroy the outlook of the village for ever. The other sites have space limitations, thus, containing housing in a more aesthetic manner and leaving the village of Turvey still looking and feeling like a village.</p>	Any further extension of the planning boundary into open countryside can only be agreed through the development plan process
		22	Policy T1	<p>The recently proposed Priory Farm development submitted by High Street Homes to the Borough Council in my view looks eminently sensible with the least impact on the village. It is safe, has easy access and does not give rise to increased traffic problems as would the Carlton Road site.</p>	See reference to Priory Farm in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'

<p><b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 13</b></p>	<p>22</p>	<p>Policy T1</p>	<p>I do not agree with the Carlton Road site proposal.</p> <p>The traffic impact on Carlton road is viewed as 'minimal'. At present it is heavy, difficult to drive out of the May road junction and sometimes close to chaos at rush hours and school pick up and drop off times. Adding extra vehicles to an already overstretched facility can only exacerbate an already unacceptable situation.</p> <p>(See further comment on this below under T11)</p> <p>Carlton road is the only adopted exit from the Northern side of the village on to the A428. Whereas the southern (less populated) side has Jacks Lane, The Green, Newton Lane and Mill Lane.</p> <p>Hence the number of vehicles attempting to exit Carlton road on to the A428, is significantly greater than any other road in the village.</p> <p>.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p> <p><u>Para 5.106 &amp; 5.107 added setting out Bedford Borough's comments on the effect of pavement improvements on rural road widths</u></p>
		<p>22</p>	<p>Policy T1</p>	<p>The Carlton road site will also have significant encroachment into open countryside and a negative impact on landscape and views – this was claimed as a disadvantage for the Newton Lane East site presumably the major reason for its being removed from the plan.</p> <p>The Carlton road site is not confined by any natural or road barriers, it is adjacent to a significant amount of open land. This of itself provides the opportunity for further planning to swamp the village.in the future years.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p>

				<p>I believe that the selection criteria have been applied in an extremely subjective manner which lays the entire plan open to significant legal challenge if/when any planning applications are actually made.</p>	
		22	Policy T1	<p>Alternative site options</p> <p>Newton Lane East</p> <p>During the initial consultation the Newton Lane East development was considered. This has now been deleted from consideration. Why?</p> <p>The NLE site would seem to be less fraught with problems than the Carlton Road site. Compared to the CR proposal NLE certainly has less traffic problems, has no school nearby with its potential safety problems and is closer to the village centre than the CR site. The presumed reason that 'it would have a negative impact on valued landscape, views and heritage setting' . seems another indication of subjective, blinkered views rather than being based on any real objective criterion. Priory Farm site.</p> <p>We are informed that the PF site was rejected on the basis of instructions from Bedford Council that developments away from the core village would not be counted as part of our contribution to the target of up to 50 new houses.</p> <p>While that may be the case I think the Neighbourhood development committee should nevertheless endorse the</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p> <p>See reference to Priory Farm in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p>

				recent proposal from High Street Homes. This plan seems very good, will minimize impact on the village centre and is by a builder with known track record in the local area.	
		44	T11	<p>The policy itself states that</p> <p>'New development must have no significant adverse impact on traffic safety, road and on-road parking capacity, in particular on the following identified congestion points:          Bridge Street;          High Street;          Bedford Road (Station End);          Carlton Road;          Newton Lane,          Junctions with the A428.</p> <p>Given the points already made re the traffic congestion and safety on the Carlton Road and access to the A428 – then this policy in itself would seem to rule out the CR site.</p>	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'
		50	6.3 - 6.4	<p>Extracts from these two paras.</p> <p>6.3The lack of off-street parking in Carlton Road, the Loop, and to an extent, Newton Lane, has the effect of making these roads predominately single track, requiring vehicles to pull in, reverse, or, in extreme cases, mount the pavement to allow oncoming traffic to pass. Parking restrictions do not represent an effective way of resolving the problem as there is nowhere else for the vehicles to park.</p>	

				<p>6.4 The Parish Council will work with the Highway Authority and other relevant bodies to develop a long term sustainable strategy to alleviate local traffic congestion, secure appropriate traffic calming measures and manage car parking around the village to mitigate the impact of development on the community</p> <p>Unfortunately the situation constrained as it is by existing buildings and the rules of the conservation area mean that these aspirations are very hard to achieve. In my opinion the only viable options to achieve these goals are</p> <ol style="list-style-type: none"> <li>1. Compulsorily purchase the currently unadopted part of Bamford's yard that leads directly on to the A428.</li> <li>2. Introduce some additional traffic calming at that junction to allow safe egress or ingress A428/Bamford's yard</li> <li>3. Make the Loop one way – entrance from A428 at the three cranes end, exit on to A428 at the old rectory end. This would mean parking along the entire Loop would be OK and not hold up traffic as at present.</li> </ol>	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'
<p><b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 14</b></p>	<p>22</p>	<p>Policy T1</p>	<p>I do not agree with the Carlton Road site proposal</p> <p>The traffic impact on Carlton road is viewed as 'minimal'. At present it is heavy, difficult to drive out of the May road junction and sometimes close to chaos at rush hours and school pick up and drop off times. Adding extra vehicles to an already overstretched facility can only exacerbate an already unacceptable situation. (See further comment on this below under T11)</p> <p>Carlton road is the only adopted exit from the Northern side of the village on to the A428. Whereas the southern</p>	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'

				<p>(less populated) side has Jacks Lane, The Green, Newton Lane and Mill Lane.</p> <p>Hence the number of vehicles attempting to exit Carlton road on to the A428, is significantly greater than any other road in the village.</p> <p>The Carlton road site will also have significant encroachment into open countryside and a negative impact on landscape and views – this was claimed as a disadvantage for the Newton Lane East site presumably the major reason for its being removed from the plan. The Carlton road site is not confined by any natural or road barriers, it is adjacent to a significant amount of open land. This of itself provides the opportunity for further planning to swamp the village.in the future years.</p> <p>I believe that the selection criteria have been applied in a extremely subjective manner which lays the entire plan open to significant legal challenge if/when any planning applications are actually made.</p>	<p>Any further extension of the planning boundary into open countryside can only be agreed through the development plan process.</p> <p><u>Para 5.106 &amp; 5.107 added setting out Bedford Borough’s comments on the effect of pavement improvements on rural road widths</u></p>
		22	Policy T1	<p>Alternative site options</p> <p>Newton Lane East</p> <p>During the initial consultation the Newton Lane East development was considered. This has now been deleted from consideration.</p> <p>Why?</p> <p>The NLE site would seem to be less fraught with problems than the Carlton Road site. Compared to the CR proposal NLE certainly has less traffic problems, has</p>	<p>See Appendix 3: ‘Response to Residents relating to choice of Carlton Road site’</p>

				<p>no school nearby with its potential safety problems and is closer to the village centre than the CR site. The presumed reason that 'it would have a negative impact on valued landscape, views and heritage setting' . seems another indication of subjective, blinkered views rather than being based on any real objective criterion. Priory Farm site.</p> <p>We are informed that the PF site was rejected on the basis of instructions from Bedford Council that developments away from the core village would not be counted as part of our contribution to the target of up to 50 new houses.</p> <p>While that may be the case I think the Neighbourhood development committee should nevertheless endorse the recent proposal from High Street Homes. This plan seems very good, will minimize impact on the village centre and is by a builder with known track record in the local area.</p>	
		44	T11	<p>The policy itself states that</p> <p>'New development must have no significant adverse impact on traffic safety, road and on-road parking capacity, in particular on the following identified congestion points:          Bridge Street;          High Street;          Bedford Road (Station End);          Carlton Road;          Newton Lane,          Junctions with the A428.</p>	

				Given the points already made re the traffic congestion and safety on the Carlton Road and access to the A428 – then this policy in itself would seem to rule out the CR site.	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'.
		50	6.3 - 6.4	<p>Extracts from these two paras.</p> <p>6.3 The lack of off-street parking in Carlton Road, the Loop, and to an extent, Newton Lane, has the effect of making these roads predominately single track, requiring vehicles to pull in, reverse, or, in extreme cases, mount the pavement to allow oncoming traffic to pass. Parking restrictions do not represent an effective way of resolving the problem as there is nowhere else for the vehicles to park.</p> <p>6.4 The Parish Council will work with the Highway Authority and other relevant bodies to develop a long term sustainable strategy to alleviate local traffic congestion, secure appropriate traffic calming measures and manage car parking around the village to mitigate the impact of development on the community</p> <p>Unfortunately the situation constrained as it is by existing buildings and the rules of the conservation area mean that these aspirations are very hard to achieve. In my opinion the only viable options to achieve these goals are</p> <ol style="list-style-type: none"> <li>1. Compulsorily purchase the currently unadopted part of Bamford's yard that leads directly on to the A428.</li> <li>2. Introduce some additional traffic calming at that junction to allow safe egress or ingress A428/Bamford's yard</li> <li>3. Make the Loop one way – entrance from A428 at the three cranes end, exit on to A428 at the old rectory end.</li> </ol>	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'

				This would mean parking along the entire Loop would be OK and not hold up traffic as at present.	
<b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b>	<b>Resident 15</b>	22	Policy T1	<p>I do not agree with the Carlton Road site proposal</p> <p>How can the traffic impact on Carlton road be viewed as 'minimal' when at present it is heavy, difficult to drive out of the May road junction and sometimes close to chaos at school pick up and drop off times. Child safety is always at risk with vehicles reversing and squeezing in between parked cars. The number of vehicles attempting to exit the May road junction now, on the Carlton road side of the A428, is significantly greater than the rest of the village.</p> <p>The Carlton road site will also have significant encroachment into open countryside and a negative impact on landscape and views - claimed as a disadvantage for the Newton Lane East site.</p> <p>In my view the criteria is flawed and somewhat biased. Skewed towards an almost 'out of sight out of mind' location beyond the Turvey village sign because the Carlton road site is certainly not close to village facilities.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p> <p><u>Para 5.106 &amp; 5.107 added setting out Bedford Borough's comments on the effect of pavement improvements on rural road widths</u></p>
		22	Policy T1	<p>Alternative site options</p> <p>I can't understand why Newton Lane East is now not an option. Appears ideal and the negative impact on valued landscape, views and heritage setting etc. seem, at best, to be an excuse rather than a real and major disadvantage.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p>

		22	Policy T1	Meadow House should be assessed again. Agreed, that traffic impact via the school is not viable but access to and from the A428, before the Abbey, via a mini roundabout would be safe and if designed appropriately could enhance the entrance to Turvey village.	See reference to Meadow House in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'
		22	Policy T1	I think a more balanced distribution of sites in and around the village is a much more sensible option to keep the beauty, character and heritage of our quintessential English village. In my view, the Carlton road site, given its actual location and open space of land around it has the potential, in years to come, to swamp the entire village should there be further 'forced' planning requirements. This would destroy the outlook of the village for ever. The other sites have space limitations, thus, containing housing in a more aesthetic manner and leaving the village of Turvey still looking and feeling like a village.	Any further extension of the planning boundary into open countryside can only be agreed through the development plan process.
		22	Policy T1	The recently proposed Priory Farm development submitted by High Street Homes to the Borough Council in my view looks eminently sensible with the least impact on the village. It is safe, has easy access and does not give rise to increased traffic problems as would the Carlton Road site.	See reference to Priory Farm in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'

<p><b>Turvey Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 16 (2 residents)</b></p>			<p>Having received notification regarding their proposed development at Priory Farm, I have written to Borough Council supporting this application.</p> <p>If approved, this should remove the Carlton Road proposal from the NDP, which is causing much concern within the village, specifically, with regards to the increased traffic and safety implications. Consequently, I would ask that the NDP be delayed and possibly reconsidered, until the result of the Priory Farm application is known.</p>	<p>See reference to Priory Farm in Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p>
				<p>Please confirm that the Mill Rise site is still number 1 choice for any future development.</p>	<p>The sites recommended for allocation for new housing development are Mill Rise and Carlton Road as stated in Policy T1. The sites are not categorised in terms of first choice/second choice.</p>
<p><b>Turvey Neighbourhood Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 17</b></p>			<p>The recommendations on the neighbourhood plan give the best solution to the housing needs of the village overall. There are no roads which are ideally suited to further development and access but the proposals make the best use of what is available within the confines of the village</p>	<p>Noted</p> <p><u>No amendment required</u></p>
<p><b>Turvey Neighbourhood Plan Regulation 14 Consultation Version October 2019</b></p>	<p><b>Resident 18</b></p>			<p>I think the current options outlined in the Turvey neighbourhood plan provides the best and most rationale options to accommodating the additional housing identified for the village</p>	<p>Noted</p> <p><u>No amendment required</u></p>

<p><b>Turvey NDP Reg 14 Consultation Version Oct 2019</b></p>	<p><b>Resident 19</b></p>			<p>Overall comment:</p> <p>The overall content of the Plan indicates that it has been developed with rigour, impartiality, an understanding of the needs of the Parish and sensitivity to its heritage and landscape. It therefore achieves its aim of meeting the needs of the local population whilst protecting its character.</p>	<p>Noted</p>
		22	Policy T1	<p>I am fully in support of the 2 selected sites and the principles to mitigate the impact of these developments.</p>	<p>Noted</p>
		26	5.29	<p>I would have liked to have seen the Plan require a clear statement of a higher proportion of affordable homes than that specified in the Local Plan.</p>	<p>Enforcing a higher proportion of affordable homes than specified in the Local Plan risks making the developments unviable. At least one developer has indicated a willingness to consider a higher proportion of affordable homes.</p>
		29	5.46-5.64	<p>It is very positive that the Plan seeks to protect these green spaces but I would have liked to have seen this extended to the former Abbey Park between Jacks Lane and the footpath opposite Priory Farm. This is an area of particular landscape and also historical importance as it retains medieval ridge and furrow.</p>	<p>As explained in the Local Green Spaces report, this is an extensive area of over 26 ha, beyond the criterion for designation as Local Green Space.</p>
		38	Policy T7	<p>Good to see sustainable design but the Plan should be more ambitious in terms of a requirement for all development to be sustainable in respect of energy use and overall carbon impact.</p>	<p>The policies encourage the use of sustainable technologies, but enforcing a higher level of sustainable energy use and reduction in carbon impact than specified in the Local Plan risks making the developments unviable.</p>

		44	Policy T11	Excellent to see a requirement for electric vehicle charging.	Noted
		41	Policy T9	I strongly endorse the reference to the settings of the heritage assets. This reflects a clear understanding that it is not just the buildings themselves but how they contribute to the landscape, including rural views, that is of value and requires strong protection.	Noted  <u>No amendment required</u>
<b>SEA Screening report</b>	<b>Resident 20</b>	7	4B	Add an extra bullet point sustaining improved air quality by reducing air pollution	This is not one of the objectives agreed for the plan. The majority of air (and noise) pollution in the parish is from road transport, and most of this is external to the village. Traffic reduction from external sources is not something which the Neighbourhood Development Plan can address. The level of development is such that the increase in traffic will be marginal.  <u>No amendment required</u>
<b>Regulation 14 Consultation version – October 2019</b>	<b>Resident 20</b>	13	T6	Include in first sentence that there will be no adverse impact on the risk of flood	Policy T6 requires developers to control the run-off from surface water from their sites
		13	T7	No mention of pollution, air quality or traffic density. These need consideration if design is to be sustainable	See above

		15	T11	Development makes no mention of pollution or air quality as a result of the transport referred to. Noise pollution not addressed	See above  <u>No amendment required</u>
<b>Regulation 14 Consultation version – October 2019</b>	<b>Resident 21</b>	19	5.4	I agree that 50 is the right number of houses, spread over two sites. This supports village facilities and provides affordable housing enabling younger people and families to stay in the village. It is consistent with the Bedford BC assessment in their 'made' plan.	Noted
		22	T1	I agree with the choice of sites in Policy T1, as these are the most suitable areas for development. The Carlton Road site is preferable to the site to the east side of Newton Lane as it has less impact on the views of the village from the surrounding countryside. It is better have development over two sites around the village than on adjacent sites, as it will spread the impact on the setting of the village, and additional traffic.	Noted
		31	5.57	Green Spaces: Site J (Land to the south of the village) should be included. This is a valuable asset to the village and is popular with walkers, it is a valuable historical and biodiversity area.	Noted
		38	T7	Adequate off-street parking should be provided in any new development, taking into consideration the average level of car ownership in the village (see para 5.99).	Noted

		43	5.98	The footways in Newton Lane and Carlton Road will need to be improved, to cater for additional foot traffic, and mitigate the risk to pedestrians from additional vehicular traffic.	See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'  <u>Para 5.106 &amp; 5.107 added setting out Bedford Borough's comments on the effect of pavement improvements on rural road widths</u>
		43	5.100	The possibility of providing off-road parking for residents of Carlton Road and Newton Lane should be investigated	Agreed
		44	T11	Any development should not have a significant impact on traffic levels in the village.	Noted
<b>Regulation 14 Consultation version – October 2019</b>	<b>Resident 22</b>			This document clearly shows the reasons behind Mill Rise and Carlton Road having been chosen for the development of 50 new houses in the village. I agree that the full development should be split between 2 or more sites to minimise the impact of them on the village. I would hate to see the village lose some of its charms, which is one of the reasons I moved here, due to a big development on one site only.	Noted  <u>No amendment required</u>
<b>Regulation 14 Consultation version – October 2019</b>	<b>Resident 23</b>			I support the plan as proposed	Noted  <u>No amendment required</u>

<p><b>Regulation 14 Consultation version – October 2019</b></p>	<p><b>Resident 24</b></p>			<p>Overall the proposed NP is very good. I understand that Turvey has to provide additional homes over the next 10 years and this is not a bad thing. It is not easy to find sites in or around the village and the proposed sites off Newton Lane and Carlton Road are well chosen. The Carlton road site, in particular will mean that residents, including children, will have access to the majority of village facilities without having to cross the main road; this includes the Recreation Ground, the school and the school bus stops.</p>	<p>Noted</p>
				<p>Splitting the sites rather than having a single large development, will disperse the impact. Of course there are concerns about adding to the traffic in both Newton Lane and Carlton Road, which are already busy, but most of the traffic in both roads comes from outside of the village and the additional homes will have little additional traffic impact. Carlton Road in particular is already in need of traffic calming measures and extending and reducing the speed limit, making the loop one-way, providing off-street parking near the school and additional / wider passing places will be a significant improvement. These should go ahead as part of the developments.</p>	<p>See Appendix 3: 'Response to Residents relating to choice of Carlton Road site'</p> <p><u>Para 5.106 &amp; 5.107 added setting out Bedford Borough's comments on the effect of pavement improvements on rural road width</u></p>
<p><b>Neighbourhood Development Plan Consultation Version October 2019</b></p>	<p><b>Resident 25</b></p>			<p>The footpaths on Carlton Road are so bad that wheelchair users, pushchairs and those on crutches find it impossible to use them, they are in bad repair and on a slope.</p> <p>To come out of May Road and turn left into Carlton Road is almost impossible, especially when vehicles are illegally parked on yellow lines.</p>	<p>See Appendix 3 'Response to: Residents relating to choice of Carlton Road site'</p>

				<p>It is impossible to see what is coming up Carlton Road until you pull right out.</p> <p>Safety of children walking to and from school and parking at school drop off and collection times is a hazard.</p> <p>We also have at times funeral traffic from the church to the cemetery (cars and walkers) that needs to be taken into consideration.</p> <p>If housing is to go ahead in Carlton Road the issue of parked cars needs to be addressed</p>	<p><u>Para 5.106 &amp; 5.107 added setting out Bedford Borough's comments on the effect of pavement improvements on rural road widths</u></p>
<b>Neighbourhood Development Plan Regulation 14 Consultation Version October 2019</b>	<b>Resident 26</b>	22	Policy T1	<p>By extending the footway to the proposed new development with presumably street lighting (or are children to walk past the cemetery in the dark?) how will the criteria of tranquillity as mentioned below be maintained? It is difficult to maintain a tranquil environment with adjacent housing containing people, children and pets.</p>	<p>The cemetery is surrounded by hedges and mature trees, which will be retained and which contribute to the tranquillity of the site. Cemeteries in neighbouring villages (eg Harrold) are more open and closer to housing developments and retain their tranquillity.</p>
		24	5.23	<p>Landscape buffer is stated to be a minimum of 30 metres, should this not be 50 metres (width of cemetery) and wrap around north and eastern edges (to provide tranquillity (see below)</p>	<p>We have discussed this detail with the developer, and agreed that the width of the landscape buffer should reach the edge of the cemetery extension (68m from the edge of the carriageway).</p> <p><u>T1 has been amended to reflect this.</u></p>

		31& 32	5.54 & 5.63	In respect of the Carlton Road proposed development There appears to be no forward planning on cemetery extension for the next 100 years. The small extension plot at the rear will be full in 50 years.	The Turvey NDP covers the period to 2030. Responsibility for planning the capacity of the cemetery beyond that date rests with the Parish Council.
				In addition para 5.54 states that the cemetery meets the criteria of tranquillity – how will this be maintained with an adjacent housing development even with a buffer zone for the first 30 metres of the northern boundary.	The cemetery is surrounded by hedges and mature trees, which will be retained and which contribute to the tranquillity of the site. Cemeteries in neighbouring villages (eg Harrold) are more open and closer to housing developments and retain their tranquillity.
				In addition para 5.63 – if the open space assists the transition between village and countryside providing a soft edge to the village, then this will be negated by a development beyond. (This area has already been designated a village open Space in 2013)	This was the citation for designating the allotments as Open Space in 2013. Local Green Space designation gives a higher level of protection to the site.

<b>Other Bodies</b>					
<b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b>	<b>Turvey History Society</b>			The Neighbourhood Plan Steering Group are commended for the time, effort and thought that has been spent in creating this plan and in producing such a professional document.	Noted
				<p>We are encouraged that the plan gives significant recognition to the history of the village and its resulting heritage. We fully concur with the heritage section 2.7 to 2.15 which places the physical characteristics and history of the village as the main attributes that define its character.</p> <p>The Society also welcomes the priority given to issues relating to the need to protect the visual heritage of the village in the Landscape Sensitivity Study (Section 2.16 – 2.18). Whilst readily accepting the vision set out in section 4.1 and the need for “providing housing where need exists whilst protecting the things we most cherish”, we believe that a significant aspect that is cherished and which encourages people to want to live in the village is its heritage. We welcome the fact that your final two recommendations lie outside the Conservation Area and fully support your Policy T9 on Heritage Assets and Settings.</p> <p>Whilst this development plan has been produced in response to current demands, we believe that the</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>

				heritage content of the plan should form a basis for all future planning issues relating to the heritage of the Parish of Turvey.	<u>No amendment required</u>
<b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b>	<b>Bedford Borough Council</b>			The Local Plan 2030 has been adopted and the Core Strategy and Rural Issues Plan has been deleted. There are still saved policies in the 2002 Local Plan and the Allocations and Designations Local Plan 2013. Please check the policy numbers in the Local Plan 2030 as they have changed since the submission plan version.	<u>Paragraph 1.9 has been amended to reflect the adoption of Local Plan 2030. All policy numbers have been checked and amended as necessary</u>
			Para 2.9	We suggest you replace ‘curtilage’ with ‘boundaries’ – curtilage has connotations with private ownership.	<u>Agreed – Para 2.9 amended</u>
			Para 2.11	Are the 58 Listed Buildings et al in the village or the parish?	The 58 Listed Buildings are in the Village. There are a further 10 Listed Buildings elsewhere in the Parish.  <u>Para 2.11 has been amended to clarify this.</u>
			Para 2.12	Perhaps change last sentence to read: “which has generally been constructed in a similar style and from similar materials”.	<u>Agreed – Para 2.12 amended</u>
			Para 2.15	Is it true that areas that contribute little or are detrimental to a CA are included because they have the potential to enhance, or is it because they are simply in the boundary?	<u>Agreed – para 2.15 deleted</u>

		Para 2.20	2017 2 way traffic flow was “9081” ... what does this number refer to? Vehicles or trips made? Over the whole year or within a monitoring period?	Figures are daily averages for numbers of vehicle movements  <u>Para 2.19 amended to clarify.</u>
		Para 3.8	It would be helpful to include an explanation as to what Local Green Spaces are – to provide context for those who don't know.	Agreed – use wording as in para 5.46  <u>Clarification added in para 3.8</u>
		Para 4.8	Landscape Character Assessment is not part of the Development Plan and does not contain policies. This can be misinterpreted as currently written.	Reword to clarify- separate sentence for Landscape Character Assessment.  <u>Para 4.8 amended</u>
		Para 5.16	Should be Strategic Housing Employment Land Availability Assessment.	<u>Agreed – Para 5.16 corrected</u>
		Para 5.21	Add ‘and neighbouring amenity’ at the end of the sentence.	<u>Agreed – Para 5.22 amended</u>
		Para 5.24	Replace ‘The Proximity of both sites to listed buildings’ with ‘The archaeological potential of the area surrounding both sites’. In addition to this the requirement for Predetermination Archaeological Evaluation for both of these sites should be made clear in Policy T1.	<u>Agreed – Policy T1 amended</u>
		Policy T1 Housing Growth	Perhaps add in text after – infill development within an existing built frontage <u>where this would respect existing space around buildings and existing levels of neighbouring amenity.</u>	This is covered in Policy T2

		Policy T2 Housing Mix and Standards	Technical Housing Standards – national described space standard’ does not prescribe number of bedrooms required in housing; it is about the amount of space/ size of rooms. Make sure the requirements of this policy can be accommodated when placed against Policy 59S of the Local Plan 2030. 59S requires that 49% of dwellings in the allocated sites will need to meet category 2 of document M and 5% will need to be category 3. You will need to provide the evidence for requiring screened and secure cycle storage.	<u>T2 Policy wording amended to clarify this.</u>  <u>New paragraph 5.34 sets out requirement to comply with Policy 59S of Local Plan 2030.</u>
		Policy T3 Natural Environment	4th paragraph. The word ‘must’ should be replaced with ‘should’ as it leaves room for flexibility.	We wish to maintain the strength of our position on this matter
		Policy T4 Local Green Space Designation	The word ‘may’ in T5, sentence 3 (development within LGS may be supported) seems to contradict the first sentence where it says development must not encroach. It is suggested to change the word ‘must’ to ‘shall’ as this allows discretion in the second sentence. In planning law the word ‘must’ or ‘must not’ is mandatory, whereas ‘shall’ or ‘shall not’ means ‘may’ and therefore introduces discretion.	This is explained in para 5.66. The first sentence refers to development adjacent to the Local Green Space encroaching onto it, whereas the third refers to development on the Local Green Space relating to its functionality (eg a changing facility on the sports field, or a shed on the allotment site).  The preservation or enhancement of the safety, amenity and accessibility is not subject to discretion, so the use of ‘must’ is appropriate here.
		Para 5.60	This greenspace meets the policy of Bedford Borough Council to: Protect and enhance the countryside biodiversity and geodiversity...” Which policy is this? State the reference for this	This is policy 42S.  <u>Agreed – Para 5.61 amended</u>

		Policy T7 Design	The first dot point potentially conflicts with Policy T3 that seeks to preserve the character of rural roads and lanes. The word 'where appropriate' could be added to the end of this sentence as it may be that there is no pedestrian or cycle path that the development could link to. The last sentence could include the words 'the Conservation Area or the setting of listed buildings' after the word amenity.	The first dot point refers to the new paths and road layout- which must fit with the rural character as well as being convenient for users.  <u>Agreed – Policy T7 amended</u>
		Para 5.76	Insert the words 'and heritage assets' after the word residential amenity in the first sentence.	<u>Agreed – Para 5.80 amended</u>
		Para 5.82	Include Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which states that "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of [a conservation] area". This is just as relevant as Section 66.	<u>Agreed – Para 5.83 amended</u>
		Para 5.85	"non-designated" rather than "undesigned" to better respond to national guidance and policies.  Requires development to have regard to site context in terms of "...the degree of setback from the road and creation of sense of enclosure to adjacent streets and spaces" (2nd bullet) – what if there is no road to set back from?	<u>Agreed – Para 5.85 amended</u>  If there is no road to set back from, this will not apply
		Policy T8 Local Character	Consider whether the mention of 'plastics or other imitations should remain – whilst it can be true that inappropriate use of plastic and materials that have historically not been used in the development of the village can lead to poor outcomes, their use does not	<u>This phrase has been deleted</u>

			<p>automatically mean they will be. The policies require the use of high quality, authentic materials – this should be enough to ensure sympathetic development.</p> <p>Para 5.78 further explains what these authentic materials would be but again we would suggest you are cautious about naming specific materials as guaranteeing bad outcomes.</p>	
		<p>Policy T9 Heritage Assets and Settings</p>	<p>Use capital letter for the word Grade I, Grade II. Retitle this Policy to read ‘Heritage Assets and Setting’ or ‘...their setting’ – this is because an asset only has one setting. Change “the character and interest of the Turvey Conservation Area” to either “the special interest” or “character and appearance” to better respond to national legislation.</p> <p>Concern about listing the assets where particular regard should be paid to changes in their setting, as this list could change in the future. If this is still considered to stay, then the Turvey Conservation Area itself should be mentioned as it is a designated heritage asset (like listed buildings).</p> <p>Change the last paragraph of the policy to read ‘Development should seek to preserve or enhance the archaeological, architectural, and historic interest of non-designated assets within the Neighbourhood Plan Area and their setting’.</p>	<p><u>Agreed – Policy T9 amended</u></p> <p>This list is the listed buildings with individual settings including those outside the Conservation Area. The first paragraph refers to the Conservation Area</p> <p><u>Agreed – Policy T9 amended. We have retained the word ‘must’ as we wish to emphasise the strength of the policy.</u></p>
		<p>Policy T10 Broadband</p>	<p>What is meant by incorporate ‘high speed broadband connectivity’?</p>	<p>Policy T10 has been deleted as Policy 94 of Local Plan 2030 meets our requirements.</p>

			<p>For planners and developers using the policy this is not specific enough. Is the purpose of the policy to ensure suitable infrastructure for the provision of high speed broadband is provided? Refer to Policy 94 of the Local Plan 2030</p> <p>As above the words ‘including facilities and connections’ need clarifying.</p>	<p>This means the facilities for connecting and charging electric vehicles.</p>
		Policy T11 Transport	<p>Congestion is a very subjective description and compared to the town centre and other roads in the borough, the traffic flows are very low. Current levels of car ownership and usage result in restricted traffic flow and some localised delays at points on any local highway network, but especially in areas with historic street layouts, narrow roads, and pavements and considerable on-street parking such as Turvey. These cannot easily be overcome, especially when there are built and historic constraints that also need protecting. Unless/until traffic flows reduce, these issues are likely to persist.</p>	<p>Noted – planning conditions will take into account prevailing conditions at the time of the planning application.</p>
		Policy T11 Transport	<p>It is difficult to know what ‘no significant adverse impact’ is when traffic flows/congestion at the points identified are not significant in context with other locations, may be short-lived and existing local residents and factors (on-street parking, car use) contribute to them. Pinch points and localised delays although inconvenient to local residents can act as a natural deterrent to other through traffic. Removing them through road schemes/ traffic restrictions may make traffic flows higher.</p>	<p>We want a current difficult situation not to be made worse by onerous planning conditions. We will seek advice from Planning and Highways teams at Bedford Borough Council at the time.</p>

		Policy T11 Transport	Signage and traffic regulation orders in the form of HGV controls can help manage non-local traffic, but legitimate access has to be maintained. New development sites can be designed to meet the aims and objectives, but will inevitably generate similar levels of traffic and travel behaviours to existing in the area (unless there is significant and immediate mode shift ) that add to the issues associated with the identified existing constrained areas of the network, especially in the locations selected.	Noted
		Policy T11 Transport	Would further traffic management measures (chicanes, priority narrowing's, build outs to protect parking, widening footways and reducing carriageway widths further) be acceptable locally as this could achieve the objectives but likely introduce further delays, may inconvenience residents (and may not be acceptable in heritage terms). It would be helpful if the NDP gave some suggestions as to what type of measures/where and how they would like to address these issues?	The matter has been referred to the Parish Council. Options for alleviating current problems are currently under consideration
		Policy T11 Transport	Managing car parking around the village may require parking restrictions that compromise resident convenience, or introduce further narrowing's. Specific ideas that would be supported would be more helpful and deliverable.	The issue of car parking is raised as a Non-Neighbourhood Planning issue, section 6. This is not part of the statutory plan
		Policy T11 Transport	Buses are largely commercially provided. Improvements will depend on viability and unless patronage is likely to significantly increase the aspirations for a commuter service and links to Milton Keynes may be difficult to achieve. Would other types of transport be considered?	The issue of public transport is raised as a Non-Neighbourhood Planning issue, section 6.  This is not part of the statutory plan

				To strengthen Policies 7 and 11, an audit of required improvements could be provided as supporting information (apologies if we have missed this). This would help to tie specific improvements to the site allocations and any other development which comes forward.	This will be addressed in due course when planning applications come forward.
			Policy T12 Employment & Community	<p>Requires that the loss of any community facility to development prove that alternative facilities are available to continue availability of the community facility. The policy could be made more flexible to account for these situations.</p> <p>Consider including at the end of the final paragraph words such as "...can provide evidence that sufficient alternative facilities are available within the village to serve local community needs, or can clearly demonstrate, through appropriate evidence, that the existing use is unviable and cannot be made so."</p>	<u>Agreed – Policy T12 amended</u>
			Policy T13	<p>It may be difficult to achieve a continuous shared use footway/cycleway on the south side of the A428 as shown on the plan as there is not enough land within the highway (i.e. outside Turvey Abbey, opposite Priory Farm). Unless local landowners are prepared to provide land, road narrowing may be the only option. Would this be supported? Any development that abuts this route, contrary to the text, would be able to provide the desired route within their boundary.</p> <p>The last sentence reads like a developer would have an option to pick whether to enhance or cause no harm, and no doubt they would opt for the latter as a contribution to enhance the route will be resisted. We suggest this policy wording is reconsidered. Maybe it could say 'new</p>	<p>The difficulties with providing a continuous route are noted. It is not the intention at this stage to reduce the road width to accommodate a path.</p> <p><u>Policy T13 amended to reflect this.</u></p>

				development flanking or near the route shall protect the amenity, safety or accessibility of the route and where necessary enhance the route’.	<u>Agreed – Policy T13 amended</u>
<b>Statutory Consultees</b>					
<b>Strategic Environmental Assessment (SEA) Screening</b>	<b>Natural England</b>			It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.	Noted
				Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where: <ul style="list-style-type: none"> <li>• a neighbourhood plan allocates sites for development</li> <li>• the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan</li> <li>• the neighbourhood plan may have significant environmental effects that have not already been</li> </ul>	Noted

				considered and dealt with through a sustainability appraisal of the Local Plan.	
				We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.	Noted
				We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.	Noted
				<p>Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SEA is necessary.</p> <p>Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA screening stage, should the responsible authority seek our views on the</p>	Noted

				scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.	<u>No amendment required</u>
<b>Habitat Regulations Assessment (HRA) Screening</b>				Natural England agrees with the report's conclusions that the Turvey Neighbourhood Plan would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required.	Noted <u>No amendment required</u>
<b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b>				<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p><u>No amendment required</u></p>

<b>Strategic Environmental Assessment Screening Report Pre submission Consultation (Regulation 14) Plan</b>	<b>Historic England</b>			<p>Thank you for inviting Historic England to comment on the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Turvey Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.</p>	<p>Noted</p>
				<p>The Screening Report indicates that the Council considers that the plan will not have any significant effects on the historic environment. We note that the plan proposes to allocate two sites for development.</p> <p>On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.</p>	<p>Noted</p>
				<p>The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.</p>	<p>Noted</p>
				<p>We should like to stress that this opinion is based on the information provided by you with your correspondence dated 5th November. To avoid any doubt, this does not reflect our obligation to provide further advice on later</p>	<p>Noted</p>

				<p>stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan) where we consider that, despite the SEA, these would have an adverse effect upon the environment.</p>	
				<p>Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.</p>	<p>Noted – Borough Council Conservation Officer has been consulted and has submitted comments.</p> <p><u>No amendment required</u></p>
<p><b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b></p>				<p>We welcome the production of this neighbourhood plan, in particular the emphasis on the conservation of Turvey's special character, including through good quality new design, as set out in Aims and Objectives B. For detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, we would refer you to our published Good Practice Advice Note 11, which can be found here:  <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>.</p>	<p>Noted</p>

			<p>Policy T7</p> <p>We welcome Policy T7: Sustainable Design, in particular the requirement for high quality materials that reflect the prevailing character of Turvey. We would suggest that this policy could be strengthened through the addition of a requirement for new development to be constructed in accordance with government's best practice guidance on urban design: Manual for Streets 1 and Manual for Streets 2.</p> <p>We would also refer you to 'Traffic in Villages: a toolkit for communities' by Hamilton-Baillie Associates in association with the Dorset AONB Partnership. This document contains some helpful advice and case studies regarding the management of traffic in rural places to ensure that their character is maintained while accommodating the needs of vehicle users. It can be found here: <a href="http://hamilton-baillie.co.uk/wp-content/uploads/2017/12/hamilton-baillie-traffic-in-villages.pdf">http://hamilton-baillie.co.uk/wp-content/uploads/2017/12/hamilton-baillie-traffic-in-villages.pdf</a>. We would also suggest that, if sustainability is a key goal of the neighbourhood plan, the retention and conversion of existing buildings - particularly those that make a positive contribution to the character of Turvey Conservation Area - should be encouraged as a general principle by the plan, owing to the embodied energy that they naturally contain. Requirements for electric car charging provision, elimination of gas central heating from new buildings, and dedicated cycle storage could also be included.</p>	<p>Noted</p> <p>The suggested document is referred to in Para 5.74.</p> <p>Noted</p>
			<p>Policy T8</p> <p>Likewise, we welcome Policy T8: Local Character, and are pleased to note that consideration is given to the 'heritage of the future'. We note that the supporting text highlights local materials very briefly, but that there appears to be no supporting evidence in the form of a</p>	<p>Noted</p>

				<p>local character assessment or conservation area appraisal for Turvey upon which to base the requirement for new development to use authentic quality materials. We would recommend undertaking a characterisation exercise for Turvey, which could be done by the community if budgets are limited. There are helpful toolkits available such as the Oxford Characterisation Toolkit (recently used by the Deal Society in a simplified form to great effect.</p>	
			Policy T9	<p>We welcome Policy T9, but would note that nationally designated heritage assets such as listed buildings, conservation areas etc are already protected by local and national planning policy. Repeating this protection in your neighbourhood plan's policies is therefore potentially unnecessary, and may be removed by the Inspector at Examination. The policy could also be strengthened by inclusion of evidence as to precisely how 'the various Grade II buildings...help form the character of historic village core', in order to provide clarity and strength to the policy's requirements.</p> <p>The government's National Planning Practice Guidance <a href="https://www.gov.uk/guidance/neighbourhood-planning--2">https://www.gov.uk/guidance/neighbourhood-planning--2</a> on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale. Your Neighbourhood Plan is therefore an important opportunity for your community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate</p>	<p>Policy T9 is intended to be specifically about the protection of the settings of the listed buildings and conservation area, rather than the buildings themselves.</p> <p>Noted</p>

			<p>this should include enough information about local non-designated heritage assets, including sites of archaeological interest, any existing locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, important views or places of importance to the local community) setting out what factors make them special. These elements could all be informed by the characterisation assessment suggested above. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <a href="https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7">https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7</a></p> <p>The plan could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are at risk or in poor condition if there are any, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/</a></p>	Noted
			<p>We note that you have used the neighbourhood plan process to identify potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or</p>	<p>Assets of Community Value have not been identified in the Neighbourhood Plan.</p> <p>This matter was reported to the Parish Council for consideration as a non-</p>

				<p>again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <a href="http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/">http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/</a> .</p>	<p>Neighbourhood Plan issue. The Parish Council resolved not to put forward proposals to nominate any local buildings/facilities as Assets of Community Value.</p>
				<p>As you are aware, communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Parish Council, you can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <a href="https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/">https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/</a></p>	<p>Noted</p>

			<p>Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here:</p> <p><a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">&lt;https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/&gt;</a>.</p>	Noted
			<p>As noted above, Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: <a href="https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/">&lt;https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/&gt;</a></p>	Noted
			<p>The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan, or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:</p> <p>HE Advice Note 2 - making changes to heritage assets: <a href="https://historicengland.org.uk/images-">&lt;https://historicengland.org.uk/images-</a></p>	Noted

				<a href="#">books/publications/making-changes-heritage-assets-advice-note-2/&gt;</a>  HE Good Practice Advice in Planning 3 - the setting of heritage assets: <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a>	
				We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.	Noted
				Finally, we should like to stress that this advice is based on the information provided by Turvey Parish Council in your correspondence of 25 October 2019. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.	Noted  <u>No amendment required</u>
<b>Strategic Environmental Assessment Screening Report Pre submission Consultation (Regulation 14) Plan</b>	<b>Environment Agency</b>			We agree with the conclusions you have reached.	Noted  <u>No amendment required</u>

<b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b>				<p>We have no comment to make and consider any matters that fall within our remit can be discussed at the planning application stage.</p> <p>The NP will be in accordance with the Bedford Borough Local Plan 2030 policies. There appears to only be a small amount of development proposed in you NP area and that if it does occur it will be within Flood Zone 1 of our Flood Map.</p>	<p>Noted</p> <p>Noted</p> <p><u>No amendment required</u></p>
<b>Land Agent Responses</b>					
<b>Site Assessment &amp; Allocations Report</b>	<b>Agent DLP Planning Ltd on behalf of Snelson Farms</b>	2-3	1-7	<p>Snelson Farms, as a major landowner with extensive landholdings on the fringes of Turvey support, in principle, the preparation of a Neighbourhood Plan and note the reliance placed upon the community arising from Policy 3S of the submitted Borough Local Plan. Nevertheless, Snelson Farms note that arising from the Inspector's Report, Policy 3S is subject to Main Modification which states:</p> <p><i>In rural service centres allocations may exceed 50 dwellings where specific local justification is set out in</i></p>	<p>The Parish Council has considered the evidence of local need, and balanced these with the impact of development on the character of the village, and concluded that the Turvey NDP should aim toward the higher end of the target and plan to deliver up to 50 homes.</p>

				<p><i>Neighbourhood Plans demonstrating that it would be appropriate in terms of the scale, structure, form and character of the settlement and the capacity of local infrastructure.</i></p> <p>It is our view therefore that the Turvey Neighbourhood Plan should allocate sites that can deliver at least 50 dwellings, being the upper end of the range prescribed in Borough Plan policy. We therefore support the statement at paragraph 4 which refers to an aim to provide about 50 dwellings.</p>	<p><u>New para 4.16 records the Main Modification to the Policy</u></p>
		3-4	8-11	<p>Snelson Farms support the approach taken by the Neighbourhood Plan Steering Group to identify suitable sites using a criteria based approach based on robust site assessments. Whilst Snelson Farms have argued that the whole allocation could be accommodated on land off Carlton Road, they respect the decision to provide the requirement on more than one site as appropriate to providing a spread of developments as a means of ameliorating impacts.</p>	<p>Noted</p>
		7-8	Site 1	<p>Snelson Farms own Site 1 (and surrounding land) which they presently farm as part of a wider landholding in the area. Snelson Farms are happy to make the land available for development and broadly agree with the analysis contained in the Assessment Report.</p> <p>Nevertheless, the proposals which have been put to the Steering Group for consideration have acknowledged the need for an appropriate form of development which includes suitable access and landscaping. As a result, we do not consider that there are any overriding impacts on the setting of the village. Site 1 is not contiguous with the Conservation Area and does not affect the Historic Park. Moreover, the site can be provided with landscaping</p>	<p>Noted</p>

				<p>which is better than that which exists at present along the existing village edge. We therefore support the conclusion that Site 1 Carlton Road is <b>suitable</b> for development.</p>	
<b>Green Spaces Report</b>		11	Site E	<p>Snelson Farms agree that the Recreation Ground should be designated as Open Green Space.</p> <p>It forms an important community asset and whilst it was originally identified as Village Open Space as it was described as assisting the transition between the built up area of Turvey and the countryside, its essential community role will not be diminished by the allocation of Site 1 East of Carlton Road. We consider that the formal planning recognition of this open space is complementary to the allocation of land for development and will be of substantial benefit to the residents of the proposed new development as it is to the existing village. Accordingly, it is appropriate that it is brought within the Settlement Policy Area (Neighbourhood Plan Map 6).</p>	Noted
<b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b>		7	1.14 - 1.17	<p>Snelson Farms welcome the intention to review the NDP in due course especially given that the Bedford Borough Local Plan as yet to be adopted has a foreshortened horizon of 2030 and will in any case require to be reviewed within five years in accordance with National Planning Policy Guidance paragraph 33.</p>	Noted
		12	2.28 - 2.32	<p>We note the range of community facilities and services including school, public houses and shops and consider that as a matter of principle it is essential that Turvey accommodates some level of growth in order to help support the viability of these facilities particularly where it</p>	Noted

				notes that the majority of the working population commutes out of the village for employment.	
		16	4.3	Snelson Farms note the need for affordable housing and consider that land at Carlton Road is suitable for the provision of an appropriate proportion of affordable homes.	Noted
		16	4.5	Snelson Farms at the request of the Steering Group have sponsored an assessment of traffic and parking in Carlton Road to assist the Steering Group in understanding the extent of the perceived issues and to identify the broad scope of works that could be carried out to ameliorate problems. Arising from this it has been determined that the development of land at Carlton Road would not significantly impact on current issues but that there are steps that could be taken by the Parish Council and the Highway Authority to relieve some of the matters raised by the community particularly in connection with access to the school and school parking.	Following discussions, Snelson Farms (the developer of the Carlton Road site) has agreed to provide additional public parking spaces within the site which may assist events on the Recreation Ground and parents dropping off and picking up children from school. Policy T1 has been amended to reflect this.  <u>Policy T1 amended</u>
		17, 18	4.14	Whilst Snelson Farms do not disagree with this paragraph they note that arising from the Borough Plan Inspector's Report, Policy 3S is subject to Main Modification which states: <i>In rural service centres allocations may exceed 50 dwellings where specific local justification is set out in Neighbourhood Plans demonstrating that it would be appropriate in terms of the scale, structure, form and character of the settlement and the capacity of local infrastructure.</i>	The Neighbourhood Plan will record the modification to the policy in para 4.16, but this does not alter the Parish Council's conclusion reported in para 7 of the Site Assessment and Selection report, that 'the NDP should aim to ..plan to deliver up to 50 homes.'

				It is our view therefore that the Turvey Neighbourhood Plan should reflect that in the event that development proposals on sites allocated in the Neighbourhood Development Plan were to exceed 50 dwellings, it would not be contrary to the expectations of the Borough Local Plan.	
		19	5.4	For the reasons set out in relation to paragraph 4.14, Snelson Farms support the provision of at least 50 dwelling so as to ensure that the assessed need for affordable homes can be delivered by the allocated sites whilst ensuring a range and mix of open market housing is also created.	Noted
		21 & 24	Policy T1 and 5.23	Snelson Farms support the allocation of land east of Carlton Road. The criteria which are identified in relation to the allocation are reflective of the proposals which they have put forward and which were the subject of public consultation save and in respect of the reference to landscape buffers. The Plan does not define what it understands to be a 'landscape buffer'. Snelson Farms do not believe that this should be construed to be an area of dense screen planting but rather should be landscaped areas reflective of a landscape plan to be included with any planning application. Whilst Snelson Farms agree that development should be set back from Carlton Road by a minimum distance of 30m, they envisage that this buffer may be provided by way of 'parkland' planting comprising a mixture of trees and grassland with public access.	<p>We agree that the 'landscape buffer' should be a mixture of trees and grassland, rather than a dense screen of trees. Details of the most appropriate provision will be agreed at the planning application stage.</p> <p>We have agreed with Snelson Farms that the width of the buffer should be the same as that of the cemetery and cemetery extension at the south end, ie a distance of 68m from the edge of the carriageway.</p> <p><u>Policy T1 amended</u></p>

		23	Map 4	Snelson Farms support the definition of the Settlement Policy Area so far as it is amended to include the Recreation Ground and that part of site T1 which is proposed for development – i.e. specifically excluding the 30m strip to the west of the site which shall be subject to a landscaping scheme and the provision of site access.	Noted
		25	5.25	Snelson Farms support reference to ensuring that the development of the land is provided with safe access which meets the requirements of the Highway Authority.	Noted
		26	5.28 & Policy T2	Snelson Farms note the requirement for affordable homes arising from the Borough Local Plan and support the principles set out in Policy T2	Noted
		29	Policy T3	Snelson Farms consider that the development of Site 1 East of Carlton Road will have no significant impacts on the identified landscape criteria	Noted
		30 & 33	5.53 & Policy T4 & Map 6	Snelson Farms considers that the Recreation Ground forms an important community asset and whilst it was originally identified as Village Open Space, its essential community role will not be diminished by the allocation of Site 1 East of Carlton Road. We consider that the formal planning recognition of this open space is complementary to the allocation of land for development and will be of substantial benefit to the residents of the proposed new development as it is to the existing village. Accordingly, we support its inclusion in Policy T4 and as shown on Map 7.	Noted

		44	Policy T11 6.4 & 6.5	<p>Snelson Farms support this policy in principle but note that the potential impact of traffic has been a consideration in the decision to allocate land at Carlton Road and that the Highway Authority are the body responsible for determining whether the impact of any given development on the safety and capacity of the highway is acceptable or not.</p> <p>Notwithstanding this, work has been done which concludes that the development of Site 1 will not have any significant impact on the perceived traffic and parking issues identified to affect Carlton Road which would give rise to an objection by the Highway Authority to the allocation or development of the site.</p>	<p>Noted</p> <p>Noted</p>
<b>Strategic Environmental Assessment Screening Report</b>		7		We are content with the development principles set out in Policy T1 and the requirements of T11	Noted
<b>Summary Pre-Regulation 14 Consultations</b>		11 - 13		The positive feedback received as part of the consultation period highlights the suitability of the site, and that it would be received well locally, which lead to the site being put forward as an allocation. The issues raised in relation to traffic will be addressed in the development proposals under Policy T11.	<p>Noted</p> <p><u>No amendment required</u></p>

<p><b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b></p>	<p><b>Fisher German LLP on behalf of the Trustees of the Turvey Estate and Turvey House Maintenance Fund</b></p>			<p>The full text of Fisher German’s letter is available on the Regulation 14 Consultation page of our website.</p> <p>Key comments highlighted by the Steering Group for reply are listed below with page and paragraph numbers referenced to the full text of Fisher German’s representations.</p>	
				<p>Ref: page 1 para 1; The submitted Plan and its proposals do not adequately protect these historic assets, particularly having regard for the proposed allocation of land adjacent to these assets on Carlton Road. The Trustees object to this Plan and request that the proposed allocation on Carlton Road is deleted.</p>	<p>See responses below</p>
				<p>Ref: page 2 para 3; Planning Considerations The Trustees have concerns with the lack of evidence base used to support the allocation at Carlton Road. The AECOM report which the Neighbourhood Plan Group commissioned states that a heritage assessment would be required to consider the impact of development at Carlton Road on heritage assets. We consider it is necessary as an integral part of the Plan making process.</p> <p>Paragraph 193 of the NPPF is clear that when considering the impact of proposed development, greater weight should be applied to the conservation of more important assets. As a Grade I Listed Building therefore, significant weight should be afforded to the conservation of Turvey House. There is no recognition of this by the</p>	<p>Specific schemes will be considered through the planning application process. At this time, Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires:</p> <p>‘In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or</p>

			<p>Steering Group in the evidence available to support the Neighbourhood Plan. Furthermore, there is no justification provided for the allocation of the site as required by Paragraph 194 of the NPPF.</p>	<p>any features of special architectural or historic interest which it possesses’.</p> <p>This will apply to the consideration of actual schemes, including detailed design proposals.</p> <p>For the neighbourhood plan, the question is whether development of the site ‘in principle’ would be harmful. Consideration of impacts on listed buildings and their setting should not be interpreted as implying no development.</p> <p>The site being allocated is not within the formal landscape setting of the Grade I listed house but in the wider setting. The site is behind the cemetery and the policy requires a landscape buffer zone.</p> <p>It must not be assumed that impacts on heritage assets equate to harm. Impacts can be negative, but also positive. So development can enhance settings. In this instance, it is unreasonable to conclude that development in principle would be harmful.</p> <p>The neighbourhood plan includes design, character and heritage policies. In addition, the site allocation includes certain landscape requirements, including retention of the cemetery.</p>
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				<p>The proposed landscape buffering would reduce the openness and create a physical boundary between the house and gardens and agricultural land of which it has a tangible historic association.</p> <p>The proposed allocation will serve to urbanise the currently open land adjacent to the registered parkland and within the setting of a Grade I Listed Building with a detrimental impact to both.</p> <p>To enable the Plan to continue, the allocation at Carlton Road must be removed.</p>	<p>It is considered that the buffering will provide an effective means of mitigating the impact on the house and gardens and agricultural land without compromising the setting of Turvey House and the Registered Park and Gardens.</p> <p>Any impacts on rural character and the setting of Turvey House will be minimised through sensitive design.</p> <p>The Carlton Road site is considered to be an appropriate location for development within the terms of the plan policies.</p> <p><u>No amendment required</u></p>

<p><b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b></p>	<p><b>Fisher German LLP</b> <b>On behalf of Richborough Estates</b></p>			<p>The full text of Fisher German’s letter is available on the Regulation 14 Consultation page of our website.</p> <p>Key comments highlighted by the Steering Group for reply are listed below with page and paragraph numbers referenced to the full text of Fisher German’s representations.</p>	
		22	Policy T1 Housing Growth	<p>Ref: page 7 para 2.5 - 2.7; The proposed allocation of 50 new dwellings in Turvey will not come close to meeting the identified need for the settlement. At policy compliant levels of affordable housing this will only achieve 15 affordable homes across the period to 2030, falling drastically short of the identified need of 32 households identified as being in need of affordable housing in Turvey over the period to 2027, let alone to 2030. Given the locally identified housing need, it is considered that the plan should increase the number of dwellings it allocates in Turvey</p>	<p>The recommendations of the Housing Needs Survey undertaken by the Bedfordshire Rural Communities Charity on behalf of the Parish Council was to plan to provide 16 units of affordable housing and 19 units of market housing. The allocations for 50 new dwellings provide adequately for identified local need and also allow for some housing for inward migration.</p>
		19	Para 5.2	<p>Ref: page 8 para 3.1; As detailed in response to ‘New Housing Growth’ (below) Richborough Estates consider that the site selection process lacks transparency and is not justified and, as such the “most sustainable sites” for housing are not allocated within the Plan.</p>	<p>The Site Selection Methodology is set out in the Site Assessment and Allocations Report and is underpinned by and consistent with, the independent site assessments carried out by AECOM and Bedford Borough Council</p>
		19	Para 5.4	<p>Ref: page 8 para 3.2; A minimum of 100 dwellings need to be delivered in Turvey just to meet the affordable housing need identified</p>	<p>The Neighbourhood Plan Growth Strategy is set out in the Site Assessment and Allocations Report. As stated above at policy compliant levels, the allocations</p>

					<p>make adequate provision for identified local need for affordable housing.</p> <p><u>No amendment required</u></p>
<b>Site Selection &amp; Allocations Report</b>				<p>Ref: page 9 para 4.2; Richborough estates object to the approach taken to site selection.</p> <p>Ref: page 9/10 paras 4.4 - 4.6; The conclusions of the site specific assessment of the AECOM Assessment (May 2018) are generally supported.</p> <p>The Assessment concluded that both Newton Road East and Carlton Road were 'potentially suitable for development'. This conclusion however needs to be considered in the context of the site-specific assessments which were undertaken.</p> <p>In reviewing the sites, the Assessment indicated that, for both sites, further evidence would be required in order to determine the potential impact of proposed development on heritage assets.</p>	<p>Noted</p> <p>The advantages and disadvantages of both Newton Road East and Carlton Road identified in the AECOM report were carefully considered in choosing the preferred sites for development.</p>
				<p>Ref: page 10 para 4.7 In respect of landscape impact, the AECOM Assessment advised of a potential adverse impact on landscape setting for the Carton Road site. The assessment states that "development of this site would extend the village into the countryside to the north and does not appear to relate as well to the village as other options". For Newton Lane East (Parcel 4a) the Assessment considered that development could be suitable without harming the rural character of the area. The Assessment for Parcels 4a and</p>	<p>Full account has been taken of the AECOM assessment findings in reaching a balanced view of the impacts on landscape setting on the Carlton Road and Newton Lane East sites.</p>

				4b advised that development could be accommodated with landscape mitigation.	
				Ref: page 10 para 4.9 The scoring of the NDP Steering Group against the NDP Site Selection Criteria is not transparent or based on any evidence.	The Site Selection Methodology is set out in the Site Assessment and Allocations Report and is underpinned by the independent site assessments carried out by AECOM and Bedford Borough Council.
				Ref: page 12 para 4.14; In respect of the criteria 'Impact on Valued Landscapes' it is important to note that Newton Lane East is not a valued landscape.	The consideration of landscape value is based on the value to local amenity and informed by the comments contributed by residents in consultations.
				Ref: page 12 para 4.15; A Landscape and Visual Impact Assessment (LVIA) has been prepared for Newton Lane East and is within the public domain and was in the public domain at the time the Steering Group were undertaking the site assessments. This assessed the landscape in terms of both the overall character and individual features. The assessment concluded that the site is of Ordinary value.	The Steering Group were aware of the Landscape and Visual Impact Assessment (LVIA) submitted with planning application No.16/03688/MAO and this was taken into account in the site selection process.
				Ref: page 13 para 4.18 & 4.19; A Heritage Desk Based Assessment and Statement of Significance has been prepared for Newton Lane East (see supporting documents to these representations). The Assessment advised that the proposed development (80 dwellings) had some potential to cause some change to the wider setting of some listed buildings. However the changes would be limited in nature. It would not change	The Heritage Desk Based Assessment and Statement of Significance prepared for Newton Lane East was drawn to our attention by Fisher German LLP and taken into account in the site selection process.

			<p>the essential nature of the village and the Conservation Area.</p>	<p>Consideration of the impact of development on this site was listed as one of the reasons for refusal of planning permission in the decision notice re Planning Application No.16/03688/MAO Land off Newton Lane as follows;</p> <p>“The proposed development would have a harmful impact on the setting of the Turvey Conservation Area and the setting of the listed buildings known as Turvey Village Hall, Turvey Pre-School, Central Stores, Gable End &amp; The Old Tinkers Inn, Turvey Court, No.8 High Street, The Wollery and The Grange, All Saints Church and Turvey Hall/Dors Cottage and the public benefits of the proposal would not outweigh the scale of harm to the significance of these assets.”</p> <p>Also see above our reply to your comments Ref: page 9/10 paras 4.4 - 4.9</p> <p><u>Site Assessment &amp; Allocations report amended to include the decision notice comments as additional evidence.</u></p>
			<p>Ref: page 14/15 para 4.23 and 4.25; A Heritage Desk Based Assessment of the Carlton Road site has been undertaken (see supporting documents to these representations). It is clear that there are more ‘disadvantages’ on heritage grounds for the Carlton Road site than the consultation document suggests.</p>	<p>The Heritage Desk Based Assessment and Statement of Significance prepared for Carlton Road was drawn to our attention by Fisher German LLP and taken into account in the site selection process.</p>

					<p>Specific schemes will be considered through the planning application process. At this time, Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires:</p> <p>‘In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.</p> <p>This will apply to the consideration of actual schemes, including detailed design proposals.</p> <p>For the neighbourhood plan, the question is whether development of the site ‘in principle’ would be harmful. Consideration of impacts on listed buildings and their setting should not be interpreted as implying no development.</p> <p>The site being allocated is not within the formal landscape setting of the Grade I listed house but in the wider setting. The site is behind the cemetery and the policy requires a landscape buffer zone.</p>
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					<p>It must not be assumed that impacts on heritage assets equate to harm. Impacts can be negative, but also positive. So development can enhance settings. In this instance, it is unreasonable to conclude that development in principle would be harmful.</p> <p>The neighbourhood plan includes design, character and heritage policies. In addition, the site allocation includes certain landscape requirements, including retention of the cemetery.</p>
				<p>Ref: page 15 para 4.26; It is considered that the scores should be reversed, or at the very least both sites scored AMBER.</p>	<p>The NDP Steering Group consider that the potential for effective mitigation of the impacts on heritage settings is greater at Carlton Road, taking into account the prevailing topographical features associated with both sites, thus making Carlton Road a more advantageous site compared to Newton Lane East in this respect.</p>
				<p>Ref: page 15 para 4.29; The development of a single site, or indeed multiple sites in one particular location of the village, does not however necessarily create “negative impacts” which require mitigation through sites being dispersed across different location within the Parish. If negative or cumulative impacts could be evidenced, such an approach may be supported however no such evidence has been provided</p>	<p>The inclusion of the preference for development to be provided for on at least two sites in the village at different locations, as a guiding principle was established through consultation with residents on the site selection criteria.</p>

<p><b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b></p>		33	<p>Policy T4 Local Green Space Designations</p>	<p>Ref: page 1 para 6.19; It is considered that, against the stringent criteria of the NPPF, Parcel J would not qualify as a Local Green Space. Whilst we accept that the site is in reasonably close proximity to Turvey, there is no evidence available to demonstrate that it is demonstrably special to the local community.</p> <p>In addition, Parcel J is considered to be an extensive tract of land.</p>	<p>Parcel J is demonstrably special to the local community in terms of recreational value, tranquillity and richness of wildlife (see page 15 of the Local Green Spaces supporting document).</p> <p>The guidance by the Borough Council for Local Green Space Designations is that sites would normally be less than 10 ha. Parcel J is 4.38 ha</p> <p><u>No amendment required.</u></p>
<p><b>Turvey Neighbourhood Development Plan Reg 14 Consultation Version</b></p>	<p><b>Gladman Development Limited</b></p>			<p>The full text of Gladman’s letter is available on the Regulation 14 Consultation page of our website.</p> <p>Key comments highlighted by the Steering Group for reply are listed below with page and paragraph numbers referenced to the full text of Gladman’s representations</p>	
		22	<p>Policy T1 New Housing Growth</p>	<p>Ref: page 4 para 4; In principle, Gladman support the Parish Council’s decision to allocate land for residential development. However, the Parish Council will need to be mindful that the emerging Local Plan will be subject to review to account for long term housing needs which will likely</p>	<p>NDP para 1.15 states that the plan will be reviewed alongside any Local Plan review undertaken by the Borough Council within the plan period to 2030. Any increase in the</p>

				<p>increase the housing requirement and require Bedford Borough Council to identify additional housing land for residential development. Accordingly, Gladman has concerns with the proposed approach contained in Policy T1 as it only allows for development in a narrow set of circumstances.</p>	<p>housing requirement will be addressed at that time.</p>
		22	<p>Policy T1 New Housing Growth</p>	<p>Ref: page 4 para 5; The policy seeks to direct development to within the Settlement Policy Area, yet it is silent on what forms of development would be considered acceptable beyond this boundary.</p> <p>Gladman recommend that this policy is modified, and the following wording is put forward for consideration:</p> <p>“When considering development proposals, the Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and this Neighbourhood Plan will be supported particularly where they:</p> <ul style="list-style-type: none"> <li>- Provide new homes including market and affordable housing; or</li> <li>- Opportunities for new business facilities through new or expanded premises; or</li> <li>- Infrastructure to ensure the continued vitality and viability of the neighbourhood area.</li> </ul> <p>Development adjacent to the existing settlement will be supported provided that any adverse impacts do not</p>	<p>Policy T1 allocates sites for new housing and proposes extension of the Settlement Policy Area to accommodate these sites. Development beyond the Settlement Policy Area is not supported.</p>

				significantly and demonstrably outweigh the benefits of development.”	
		26	Policy T2 Housing Mix and Standards	In principle, Gladman support the inclusion of the above policy which seeks to include a mix of house sizes and types to meet the housing needs of the local community. However, we would question why the policy requires the provision of 1-2 bedroom homes when the supporting text at paragraph 5.27 highlights a need for 2-3 bed houses.	The recommendations of the Housing Needs Survey undertaken by the Bedfordshire Rural Communities Charity on behalf of the Parish Council include identified need for some 1-2 bedroom affordable homes.  <u>Para 5 amended to refer to 1-2 bedrooms homes identified in the Housing Needs Survey.</u>
		26	Policy T2 Housing Mix and Standards	Gladman take this opportunity to inform the Parish Council that the Written Ministerial Statement (2015) makes clear that technical standards relating to the construction internal layout or performance of new dwellings can only be progressed through a Local Plan based on up-to-date evidence of need and viability and specifically states that these standards should not be progressed through neighbourhood plans. The implementation of NDSS should therefore be removed from the policy wording.	The Neighbourhood Plan does not seek to amend the Nationally Prescribed Standards but to highlight its use in determining whether bedrooms are of sufficient size.  <u>The wording of policy T2 has been amended to further clarify this.</u>
		29	Policy T3 Natural Environment	The policy is too onerous as it seeks to protect the existing landscape features of the village without regard to the approach to national policy. It is recommended that this policy is modified so that it requires development proposals to recognise existing landscape areas and that these features are incorporated within development proposals where possible.	Policy T3 is considered to be compliant with national policy NPPF

		36	Policy T5 Local Green Space	<p>Policy T5 is not considered to be in accordance with national policy and guidance as it states that development shall not encroach on LGS and development flanking these designations must preserve or enhance the safety, amenity and accessibility of the space. This goes beyond the requirements of national policy as the designation of LGS only relates to the land which is designated and not adjacent land which has no significance. Gladman recommend that this element of the policy is deleted.</p>	<p>The NPPF sets out protection for Local Green Spaces, similar to green belts. The policy on impacts on LGS is not contrary to NPPF policy.</p>
		41	Policy T9 Heritage Assets And Settings	<p>Policy T9 does not have regard to the requirements of national policy with regard to non-designated heritage assets. The above policy should be modified so that it reflects the guidance set out within paragraph 197 of the Framework in respect of the two separate balancing exercises in relation to designated and non-designated heritage assets.</p>	<p>Policy T9 does make specific reference to non-designated heritage assets and is considered to be compliant with national policy. It complements NPPF policies by applying them locally.</p>
		44	Policy T11 Transport	<p>If charging demand became excessive then there may be constraints to increasing the electric loading in the area because of the limited size and capacity of existing cables and new sub-station infrastructure may be necessary, the cost of which will likely have significant implications on development viability.</p> <p>It is therefore recommended that this element of the policy is modified to allow for greater flexibility and the following wording is put forward for consideration:</p> <p>“Development proposals that include electric charging facilities for electric vehicles will be supported.”</p>	<p>The technical issue on charging points is noted. However, it should also be noted that these will become a necessity in relatively short period, especially given recent statements by Government.</p> <p>The stronger policy requirement is preferred in this respect.</p>

		44	Policy T11 Transport	In addition, it is noted that the policy states “new development must have no significant adverse impact on traffic safety...”. It is suggested that this element of the policy is reviewed in light of the requirements of paragraph 109 of the Framework.	We acknowledge that Para 109 of NPPF references ‘severe’ adverse impact; our policy relates to particular locations where conditions are already difficult.
		46	Policy T13 Footway and Cycleway Route	Improvements to this route is only an aspiration and is therefore not a land use policy and should be removed from the main body of the TNP and included as an appendix document which outlines other aspirational policies.	Para 5.116 of the plan states that this policy recognises local aspirations to upgrade and realign the footway and cycle route. The purpose of the policy is to protect the route to ensure that it is not compromised by unsustainable development.
				Ref: page 7 para 2; Conclusions Gladman is concerned that the plan in its current form does not comply with basic conditions in its current form and modifications are therefore required.	These representations have been fully taken into account and it is considered that the plan does meet basic conditions.
<b>Site Assessment &amp; Allocations Report – November 2019</b>	<b>Jackson-Stops on behalf of Site 5 Owner</b>	3	7	We support the proposal to positively respond to both general and local housing needs and thus allocate land in the Plan for up to 50 homes in Turvey – being at the upper end of the target quantum of housing considered appropriate for a settlement of this scale and nature.	Noted

		12	All	As representatives of the family owning Site 5 who have been resident in the village for a good many years, we support and endorse the findings of the site assessment on this page and welcome the proposed allocation. In particular, we note and support the findings of the AECOM report that, "Site 5 is the only site that is suitable for allocation with no significant constraints". The site is suitable, available and achievable.	
		20	26	We endorse and strongly support the findings set out in this paragraph - specifically the allocation of Mill Rise, Newton Lane for up to 25 homes.	Noted
<b>Turvey Neighbourhood Development Plan Regulation 14 Consultation version October 2019</b>		22	Policy T1 Housing Growth	We strongly support the allocation of the Mill Rise Site for housing development.	Noted
		22	Policy T1 Housing Growth	<p>We are concerned that the first bullet point (1st development principles point) of the proposed Mill Rise allocation provides no flexibility whatsoever. It states, "Existing trees and tree lines around the boundary to the site must be retained, with sufficient distance from built development so that roots are not affected (see Map 5)."</p> <p>Whilst this is very much the intention, the term "must" is rigid and there is no scope within the policy as drafted for even the consideration of the careful and considered removal or reduction of overhanging limbs, crown lifting,</p>	<p>Agreed</p> <p>The first bullet point relating to the Mill Rise site amended to read;  'Existing trees and tree lines around the boundary of the site must be retained, other than in circumstances where loss is unavoidable, for example to allow safe site access. In this case, replacement trees must be provided. Retained trees should be</p>

				rebalancing of poor form specimens, nor removal of dead, diseased, or dangerous trees or limbs.	at sufficient distance from built development so that roots are not affected (see Map 5).'  <u>Policy T1 amended</u>
		22	Policy T1 Housing Growth	Equally, the new access proposed to serve the site (as shown indicatively on the drawing previously circulated, reference 593/SK01) will inevitably require the removal of some trees and hedge to provide the suitably highway radii, widths, geometry and associated visibility splays, as this will need to be built to BBC Highways Design Standards. As drafted the plan makes no provision for this whatsoever and would force a single point of access down Bakers Close which is not the basis on which the site has been presented or demonstrated to the Public (including residents of Bakers Close) previously.	Agreed - it is understood that access to the site is intended to be directly onto Newton Lane, not via Bakers Close.
		22	Policy T1 Housing Growth	The provision of a suitable, safe, access point must be allowed for along the eastern site boundary please through this area, with some rewording as appropriate to allow for this.	<u>Map 5 is amended to reflect this</u>
		22	Policy T1 Housing Growth	In addition, rather than a blanket restriction on all other works, we would prefer to see an element of pragmatic flexibility in the wording of this policy please, even if this were brackets that added "(subject to detailed survey and professional arboricultural advice on their suitability for retention)".  For the avoidance of doubt, new, additional tree planting will also take place on site as part of the development to	As above  As above

				ensure landscape sensitivity, a high quality environment and demonstrable biodiversity gain	
		24	Map 5	<p>The trees and hedge along the eastern boundary of the site to Mill Rise, Newton Lane are annotated and block shaded as follows, “Retain existing trees and hedge”.</p> <p>As set out in the previous comment, this does not consider the requirement for safe, adoptable Highway access through this frontage and the sensitive removal of some trees and hedging as appropriate (as few as possible will be removed), nor any other circumstances where the removal of trees or suitable pruning is otherwise necessary. The annotation and shading needs revising to reflect these points please.</p>	<p>Noted</p> <p><u>Map 5 amended to allow for direct access from the site to Newton Lane</u></p>
			Maps 3, 5, 6 and 10 respectively	<p>The northern site boundary as per these maps which is colour washed yellow, should follow the boundary line on the OS base plan, which is a post and rail fence line on site.</p> <p>As drawn, the proposed allocated area does not follow this existing and well-defined physical boundary feature on the ground (post and rail fence line), and it is unclear why this boundary should have to taper or deviate from that clear existing boundary. Please can this be revisited and the allocation accord with the existing boundary line as indicated on the OS base map.</p>	<p><u>Agreed</u></p> <p><u>Maps 3,5,6,10 amended to follow the boundary line for the site</u></p>

<b>Neighbourhood Development Plan</b>	<b>Inspired Villages c/o DLP Planning Ltd</b>			The report submitted by DLP Planning Ltd is available on the Turvey NDP website and provides background information to their consultation responses which are listed below in full.	
		22	Policy T1	<p>The Policy should also recognise the site of the former grain store, Turvey Station (AECOM Site Ref 8) as a planning commitment given its status as previously developed land and the extant planning permission for a retirement village.</p> <p>The policy should be amended to read as follows:</p> <p>“Outside of these allocated sites, new housing may be supported where it would comprise:</p> <ul style="list-style-type: none"> <li>• Development within the Settlement Policy Area;</li> <li>• Infill Development within an existing built frontage;</li> <li>• Redevelopment of existing buildings; and</li> <li>• <b>Development on the edge of Station End where it is well related to the scale, structure, form and character of the settlement.”</b></li> </ul> <p>Please see submitted report for more information.</p>	<p>Station End, Turvey is described in Local Plan 2030 as a Small Settlement. Policy 6 of Local Plan 2030 covers development in Small Statements, ‘Within the built form of Small Settlements development will be supported where the proposal contributes positively to the character of the settlement and is appropriate to the structure, form, character and size of the settlement as a whole’</p> <p>New para 5.12 records this policy. Policy 6 of Local Plan 2030 is what applies here, not the amendment suggested.</p>
		26	Policy T2	The site of the former grain store at Station Road, Turvey Station is a planning commitment given its status as previously developed land and the extant planning consent for a retirement village. This should be	The planning consent for the retirement village is noted in Para 2.25 of the plan.

				acknowledged within the Neighbourhood Plan Document and the preamble to Policy T2.	
		42	Policy T11	<p>This policy should acknowledge that Bedford Road (Station End) has already been subject to speed restrictions of 40mph, which was funded by the extant planning permission for a care village (10/02406/MAO) at Station Road, Turvey Station.</p> <p>Please see submitted report for more information.</p>	<p>The speed restriction through Station End is added in para 2.20</p> <p><u>Para 2.20 amended</u></p>

### Response to Residents relating to choice of Carlton Road site

Residents 3, 8, 9, 10, 11, 12, 13, 14, 15, 16 & 25 submitted similar comments in relation to the choice of Carlton Road as a site for new houses.

#### 1. The application of the criteria to the Newton Lane East site and the Carlton Road site is inconsistent

Responses claim that the sites are equal in terms of impact on valued landscapes, effect on wildlife, encroachment into open countryside, impact on the setting of heritage assets.

Responses claim that Newton Lane East is closer to village facilities  
Responses suggest that there is an imbalance of housing distribution to the north and south of the village, and the proposed Carlton Road site is 'outside' the current village given the development would be separated by the allotments, playing fields and the village cemetery

#### Response

The methodology for determining and applying the site selection criteria is set out in full in the Site Assessment and Allocations report. The reasons for the less favourable assessment of Newton Lane East in regard to the criteria for landscape and the setting of heritage assets are set out in full on pages 9 -11 of the report.

The NDP Steering Group findings draw on comments from AECOM, Historic England and the Bedford Borough Council Decision notice regarding the refusal of planning application 16/03688/MAO, Land at Newton Lane. These comments refer to harm from development to the setting of All Saints Church and the listed buildings in the centre of the village. This additional evidence has been added to the amended Site Assessment & Allocations report.

The Steering Group formed the view that at Newton Lane East, the character of the site with northerly views from height, presents significant obstacles to the mitigation of the impacts of development on landscape and heritage settings in this location. Alternatively, extensive areas of level ground provide much better opportunities to soften impacts from the proximity of the Carlton Road site to Turvey House and Registered Park and Gardens.

When the site was recommended for allocation at the Stage 2 Sites for Housing consultation, 91 residents who responded agreed with the proposal to allocate the Carlton Road site, 36 disagreed and 4 did not offer an opinion.

The distance from the main village facilities for the two sites is

	Carlton Road	Newton Lane East
War Memorial (Church, shops, pub)	500m	400m
School	320m	680m
Village Hall/shop	550m	470m

Whilst the Newton Lane site is slightly closer to the War Memorial, the Carlton Road site is considerably closer to the school. Both sites meet the criteria set for a Green rating.

It is true that there is more residential development to the north of the village, for historic reasons, there is no reason why there should be an equal distribution across the A428, and the overall approach to future development set out in the Site Assessment and Allocations report is to base growth on the development of multiple sites, to avoid impacts of development being focussed on one location.

## 2. Traffic Impact

Responses claim that the criteria for assessment of sites has not considered the current traffic and safety issues on Carlton Road and Newton Lane, in terms of safe and adequate vehicle access and impact on village traffic.

Points made include;

- The difference in traffic flow on Newton Lane and Carlton Road should be tested via a traffic census. There is far more traffic on Carlton Road than on Newton Lane.
- The level of parking on Carlton Road results in congestion, requiring vehicles to reverse or mount the pavement on a regular basis; this is not the case on Newton Lane
- Current housing development in the village of Carlton is likely to create a further increase in traffic on an already congested road.
- The junction with May Road is particularly difficult with poor visibility past parked cars.

### Response

The selected sites are intended to support small developments, so traffic increases due to the proposed developments will be marginal. The planning policies require traffic effects to be taken into account and specific improvements will be addressed in the planning consents granted for the developments in due course.

The transport assessments carried out by the Borough Council for the Local Plan 2030 concluded that there was no objection to the principle of development on these sites in terms of highway considerations.

NDP Policy T11: Transport states “New development must have no significant adverse impact on traffic safety, road and on-road parking capacity”

The issues raised in the consultation relate to currently existing traffic conditions, regardless of proposed development. The Turvey NDP Steering Group has raised these concerns with the Parish Council. The Borough Council Highways team have assisted the Parish Council in drawing up options to improve traffic flow and allow easier passing of traffic in Carlton Road. At the January 2020 Parish Council meeting it was agreed that residents will be consulted to gather their views on these proposals.

The developer of the Carlton Road site has agreed to provide additional public parking spaces within the site which may assist events on the Recreation Ground and parents dropping off and picking up children from school. Policy T1 has been amended to reflect this.

### **3. Pavements**

Responses commented on the poor quality of pavements on Carlton Road and Newton Lane and the potential that improvements may bring a risk of making congestion worse.

#### **Response**

The quality of the pavements on Carlton Road and Newton Lane are current issues. Additional resources will be available to the Borough Council from development that could be used to make improvements to pavements to better safeguard pedestrians.

Bedford Borough Council Highways department have confirmed that in response development on the allocated sites at Carlton Road and Newton Lane, improvements to pavements would likely be sought to encourage safe and sustainable travel objectives;

- on Carlton Road, if any widening of the pavement to achieve a safe, continuous, footway, required narrowing of the carriageway, this could only be considered as long as adequate width would be maintained for two vehicles to pass and such narrowing could be achieved safely
- on Newton Lane, it is likely that widening the pavement to enhance pedestrian safety would be beneficial. This would lead to narrowing of the carriageway from Bank Cottage to Winterbourne with a consequent need to restrict traffic to single file with priority for southbound vehicles.

It is not anticipated that improvements of this kind would add to current levels of congestion. (These latest comments from the Highways team have been included in the interpretation section of Policy T11 in the amended plan.)

#### **4. School/Child Safety**

Related to the traffic issue, responses express concern over the risk to child safety at the school from additional traffic on Carlton Road.

##### **Response**

Development on the scale proposed is not considered to be likely to result in increased risks to child safety. If measures to improve traffic flow can be agreed with residents and the Highways Authority, some alleviation of congestion and pressures on parking capacity will result.

Children from the development at Carlton Road would most likely walk to the school without crossing the road

#### **5. Cemetery**

Responses commented that construction and occupation of houses adjacent to the cemetery with consequent increases in foot and vehicle traffic would impact on the tranquillity of the site.

Funeral traffic from the church to the cemetery (cars and walkers) would need to be considered

##### **Response**

The effect of construction noise on the cemetery would be for a limited period, and arrangements would be made with the developers to avoid noisy works and heavy machinery movements during burials.

The cemetery is surrounded by hedges and mature trees, which will be retained and which contribute to the tranquillity of the site. Cemeteries in neighbouring villages (eg Harrold) are more open and closer to housing developments and retain their tranquillity.

#### **6. Potential for further development**

Responses expressed concern that development of the Carlton road site would provide the opportunity for further planning to swamp the village in the future years.

##### **Response**

Each site has the potential for further extension in due course. This is controlled by Policy T1 explicitly setting the size of area for development on each site and extending the Settlement Policy Area boundary only as far as required to accommodate the agreed number of houses. The Turvey NDP delivers the

Borough's requirement for new houses in Turvey to 2030; if the Borough reviews this requirement, the Turvey NDP will be reviewed and updated accordingly.

## **7. Priory Farm**

Responses suggested that the land adjacent to Priory Farm would be a more suitable alternative to Carlton Road site as the site does not increase traffic problems in the village and Carlton Road. One respondent suggested Turvey Neighbourhood Plan should be delayed until the Priory Farm proposal has been fully considered by the Planning Authority.

### **Response**

The Priory Farm site was considered for development by the Turvey NDP Steering Group. The conclusions are summarised in the Site Assessment and Allocations report. AECOM concluded that the site was unsuitable for allocation stating 'the development would not be sustainable given the distance from facilities and amenities; other sites closer to the village of Turvey provide more sustainable options.'

The site assessment undertaken by Bedford Borough Council for the Local Plan 2030 excluded the site for similar reasons, as it is more than 0.5 miles from the village SPA.

The Borough Council have advised that site allocations at Rural Service Centres should be at locations within, or in close proximity to, the Settlement Planning Area boundary. Sites located at a distance from the planning boundary, and specifically sites at Station End, Turvey, would not be accepted as counting towards the Council's housing growth target.

## **8. Meadow House**

Responses suggested that Meadow House should be assessed again with access to and from the A428, before the Abbey, via a mini roundabout, providing safe alternative access for vehicles.

### **Response**

This option was explored with the representative for the Meadow House site who concluded that the option was not financially viable. The site agent also arranged for the Borough Council to be consulted and reported back to the NDP Steering Group that this option would be likely to attract objections from the planning authority in regard to highways and Conservation Area concerns.

The Site Assessment & Allocations report has been amended to provide information about why this option has been determined as undeliverable.