

Intelligent Plans and Examinations (IPE) Ltd.,  
3 Princes Street,  
Bath,  
BA1 1HL:

12<sup>th</sup> February 2021

Dear Ms Burden,

**Turvey Neighbourhood Plan Examination Reference 01/WB/TNP**

As the independent examiner of the Turvey Neighbourhood Plan, you put a number of questions to the Turvey Parish Council (TPC) in December 2020. TPC have placed their reply to you on their website. Having read the response, I am concerned that, in the context of your question 5, the response of TPC does not constitute a full disclosure of the facts.

The first part of your question 5 was

*“What advice has been provided to TPC with regard to highways issues which has helped to inform the assessment of the two allocated housing sites?”*

Point 1.

The TPC response does not record that I sent a formal letter to TPC, addressed to all Council members, on the 23<sup>rd</sup> April 2019 alerting them to the conditions that Bedford Borough Highways (BBH) had imposed on a previous planning application (16/03688/MAO) for a housing development on Newton Lane and advising them to take this into account when assessing the sites. These conditions state categorically that the consequence of that development would have been the imposition of a single carriageway at the north end of Newton Lane, with loss of on-road parking and resident amenity. I have attached a copy of this letter as appendix 1.

Point 2

The TPC response states that the site assessment process used information from planning application 16/03688/MAO. However, it does not state when, how or in what context this information was included in the “assessment process”, or who used it. I can find no record of any assessment citing the conditions imposed on the previous planning application, any approach to Bedford Borough Highways in respect of developments off Newton lane, or any discussion, in the publicly available documents for the period between April 2019 and October 2019, when the draft Neighbourhood Plan (DNP) for the Regulation 14 consultation was issued.

Point 3

Paragraph 5.102 of the Regulation 14 draft NDP states that *“New development must not rely on the removal of existing on-road parking capacity”*. Therefore, if, as the TPC have implied in their response, the BBH conditions imposed in planning application 16/03688/MAO (specifically requiring the removal of on-road parking on Newton Lane) were taken into account in the site assessment process, why was Mill Rise not disqualified?

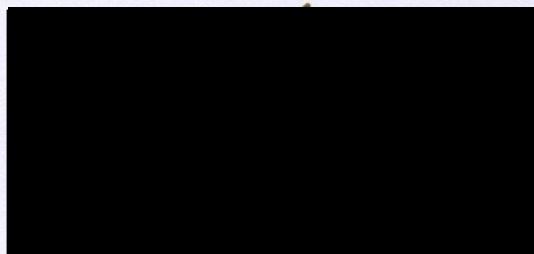
Point 3

The TPC response states that

*“The measures referred to in paragraph 5.106, were added to the Plan following the Regulation 14 consultation and discussions at Parish Council meetings, where the Steering Group were asked to strengthen the assurances that parking would not be affected as stated in the Regulation 14 statement, to illustrate how potential impacts of development at the TNP allocated sites on the highways network are likely to be considered and mitigated. The measures were drawn from email correspondence between the Parish Council and Bedford Borough Council Highways Team (see appendices 5c & 5d). The addition of paragraph 5.106 is recorded in the Consultation Statement Appendix 2 & Appendix 3. This was in papers submitted at the Extraordinary Meeting of the Parish Council held on the 25<sup>th</sup> June 2020 but no direct discussion took place on it at that meeting.”*

This statement does not make it clear that, the Bedford Borough Highways Team was not asked to provide advice until the Regulation 14 consultation had ended, nor is it made clear that resulting correspondence revealed that the situation regarding development off Newton Lane had not changed, i.e. that it was essentially the same as that described in my letter of April 2019.

Yours sincerely,



Appendix 1 Letter to Turvey Parish Council

23<sup>rd</sup> April 2019

Parish Council members

I am concerned that the Neighbourhood Plan has not given sufficient consideration to the issue of traffic volume and smooth flow, or to road safety, on the northern end of Newton Lane.

The Newton Lane East and the Mill Rise Newton Lane sites, both appear to have been rated as having only "moderate" impact upon village traffic. However, there is a widely held view that this assessment is not correct.

In the recent, unsuccessful planning application for a housing development on the Newton Lane East site, the Highways Authority made it a condition that, before any development could take place, the stretch of pavement on Newton Lane between Tandy's Close and the junction with the A428 would have to be widened.

This part of the road is within the Turvey conservation area and on the section between Bank Cottage and Winterborne Cottage it is very narrow. Consequently, the widening of the pavement required that this section of road be made permanently single lane. Furthermore, this single lane would be so narrow that the large vehicles currently using the road would have difficulty negotiating it safely.

As proposed, this single lane road, with priority given to southbound traffic, would have a major impact on the north-south traffic flow through Turvey, a major impact on access for service vehicles on Newton Lane and a significant, negative impact upon road safety, both on Newton Lane itself and on the A428. The detailed reasons for this assertion with evidence, including photographic evidence, were submitted in writing to the BBC Planning Department in 2017 and 2018 and were presented at meetings of the BBC Planning Committee in 2017 and 2018.

Since the original proposal to develop Newton Lane East was made in 2016, the traffic levels through Turvey and, particularly, the crossing traffic heading to Milton Keynes and avoiding Olney have steadily increased, are still increasing and will continue to increase as the new

housing developments to the north of Turvey are completed. The consequences of reducing Newton Lane to single file on a permanent basis would result in major traffic problems at the junction between Newton Lane and the A428.

Any application for significant developments on either of the Newton Lane sites would reopen this issue.

Therefore, when considering both the Newton Lane East and Mill Rise Newton Lane sites, the question is not whether there is easy vehicular access, or even the number of additional cars on Newton Lane, it is whether the additional footfall would lead the Highways Authority to, once again, require the developer to turn Newton Lane into a single lane road with all the attendant problems that this would cause.

For this reason, I maintain that both sites should be rated as "unsuitable" for development.

I would be grateful if you would take this matter into consideration when you next discuss the Neighbourhood Plan.

[REDACTED]