



HOUGHTON REGIS TOWN COUNCIL
Peel Street, Houghton Regis, Bedfordshire LU5 5EY

Town Mayor: **Cllr M S Kennedy**

Tel: 01582 708540

Town Clerk: **Clare Evans**

E-mail: info@houghtonregis.org.uk

4th November 2019

To: Members of the Planning Committee

Cllrs: D Dixon-Wilkinson (Chairman), J Carroll, D Jones, M S Kennedy, S Thorne, K Wattingham and T Welch.

(Copies to all Councillors for information)

Notice of Meeting

You are hereby summoned to a Meeting of the **Planning Committee** to be held at the Council Offices, Peel Street on **Monday 11th November 2019 at 7.00pm.**

Debbie Marsh
Corporate Services Manager

THIS MEETING MAY BE FILMED/RECORDED

Agenda

- 1. APOLOGIES AND SUBSTITUTIONS**
- 2. QUESTIONS FROM THE PUBLIC**

In accordance with approved Standing Orders 1(e)-1(l) Members of the public may make representations, ask questions and give evidence at a meeting which they are entitled to attend in respect of the business on the agenda.

The total period of time designated for public participation at a meeting shall not exceed 15 minutes and an individual member of the public shall not speak for more than 3 minutes unless directed by the chairman of the meeting.

- 3. SPECIFIC DECLARATIONS OF INTEREST & REQUESTS FOR DISPENSATIONS**

Under the Localism Act 2011 (sections 26-37 and Schedule 4) and in accordance with the Council's Code of Conduct, Members are required to declare any interests which are not currently entered in the member's register of interests or if he/she has not notified the Monitoring Officer of any such interest.

Members are invited to submit any requests for Dispensations for consideration.

**This meeting may be filmed by the Council for subsequent broadcast online and can be viewed at <http://www.houghtonregis.org.uk/minutes>*

Phones and other equipment may be used to film, audio record, tweet or blog from this meeting by an individual Council member or a member of the public. The use of images or recordings arising from this is not under the Council's control.

No part of the meeting room is exempt from public filming unless the meeting resolves to go into exempt session.

4. MINUTES

To approve the Minutes of the meeting held on the 21st October 2019.

(Attached)

Recommendation: To approve the Minutes of the meeting held on 21st October 2019 and for these to be signed by the Chairman.

5. PLANNING MATTERS

Members are advised that, on receipt of a planning application Central Bedfordshire Council will send the Town Council a full set of plans and a copy of the planning application form only. All supporting documents, that have previously been printed and posted, will only be available on their website. Therefore, members are advised that should they require sight of these documents that they request them prior to the meeting.

(a) To consider the following applications:

- | | |
|------------------|--|
| CB/19/02870/RM | Reserved Matters: Following Outline CB/15/00297/OUT (1850 dwellings and mixed class use) matters for access, landscaping, layout and scale for 160 dwellings on phase CA2
Thorn Green, Bidwell West
For: Abbey Development Ltd
<i>Members will find attached a report from the Town Councils Planning Consultant.</i> |
| CB/19/03232/RM | Reserved matters: Appearance, scale and landscaping for residential development of 336 dwellings on Development Parcels 5a and 5b Bidwell West, Houghton Regis. Outline application (CB/15/0297/OUT) was supported by a full Environmental Statement (ES)
<i>Members will find attached a report from the Town Councils Planning Consultant.</i> |
| CB/19/03470/FULL | Single storey rear extension & garage conversion
Householder developments
14 Lake View, LU5 5GJ
Mr & Mrs Mayling |
| CB/19/03347/FULL | Single storey side extension
Householder developments
29 Dellmont Road, LU5 5HU
Mr & Mrs Dye |

(b) Decision Notices

Permissions/Approvals/Consents:

CB/18/0461/REG3	The development of a 20 unit, 3-storey transitional housing scheme with associated access, parking and landscaping Land adjacent to St Thomas Meeting House, Windsor Drive
CB/19/00883/RM	Reserved matters of appearance, scale and landscaping for residential development of 255 dwellings following outline CB/15/0297/OUT Land to West of Houghton Regis, Watling Street
CB/19/00840/FULL	Sub-division of barn into two dwellings 4 Bidwell Farm Barns, Bedford Road, LU5 6JS
CB/19/01218/RM	Erection of 625 dwellings in parcels 6A & 6B with associated public open spaces following outline planning permission CB/15/0297/OUT Parcels 6A & 6B Land West of Bidwell
CB/19/01112/FULL	Extension of existing car showroom and workshop areas Grovebury Cars, Mayer Way, LU5 5BF
CB/19/01134/FULL	Two storey rear extension and single storey front extension 22 Drury Lane, LU5 5ED
CB/19/01657/FULL	Part single part two storey rear extension and extension to garage 42 Douglas Crescent, LU5 5AT
CB/19/01771/FULL	Rear single storey extension, replacement porch and internal alterations 39 Manor Park, LU5 5BU
CB/19/01480/FULL	Conversion of existing integral garage into additional living space 57 Yew Street, LU5 5PA
CB/19/02214/FULL	Double storey side extension 1 Fareham Way, LU5 5RE
CB/19/02165/FULL	Part first storey, part double storey side & single storey rear extension 2 Olma Road, LU5 5AF
CB/19/02244/REG3	Single storey side extension 2 Manor Park, LU5 5BX

Refusals:

None at time of going to print.

Withdrawals:

None at time of going to print.

6. LOCAL PLAN

Members will find attached a copy of a letter from the Planning Inspectorate, dated 30th September 2019, which followed the public examination of the Local Plan.

A copy of Central Bedfordshire Councils response, dated 14th October 2019, is also attached.

Following this response Central Bedfordshire Council has issued a Frequently Asked Questions sheet for information.

Recommendation: To note the report.

7. **NEIGHBOURHOOD PLAN**

No substantive update to report.

Recommendation: To note the information

8. **STRATEGIC DEVELOPMENT SITES/LOCAL PLAN– UPDATE/PROGRESS**

Woodside Link – No substantive update to report.

A5 M1 Link – For information this major road project opened on the 11th May 2017.

All Saints View – No substantive update to report.

Linnere – In advance of an impending Reserved Matters Planning application that will be submitted by CBC Assets, the Town Council have been advised of the following:

Background

Up to 43,000 new homes are expected in Central Bedfordshire by 2035. The Council's Schools for the Future programme has been established to ensure that CBC plan for the estimated 9,700 new school places that will be needed and ensure that they are in the right places, delivering the best education. In the Houghton Regis North development 'HRN1' (known as Linnere) 7,055 homes are planned. The planned housing development creates a need for additional primary school places within Houghton Regis. The exact timing of the requirement for the new primary places is dependent on the actual rate at which the new housing is built and is forecast to be needed by 2021. Thornhill Primary School is the closest school to the proposed area of development and will benefit additional land secured under the s106 for the proposed expansion. The governing body of Thornhill Primary is supportive of the expansion and understand the need to provide additional primary school places to meet the forecast demand from the Linnere area development. The school is also rated as 'good' by Ofsted (April 2016).

The expansion will allow the school to admit an additional 2 forms of entry from September 2021, to accommodate both local children plus additional children from the Linnere area development. This equates to an additional 60 school places in each year group (420 pupils), plus 60 additional full-time early years (nursery) places. The total outcome will be a 3FE Primary School (630 pupils) plus a 90-place full time nurse

Timescales:

- Anticipated submission date: < 8th November 2019
- Validation/consultation goes live: 1 -2 weeks
- Determination: CBC are currently working towards representation at February 2020 Development Management Committee.

Houghton Regis Town Council
Planning Committee
21st October 2019 at 7.00pm

Present: Councillors: D Dixon-Wilkinson Chairman
J Carroll
D Jones
S Thorne
K Wattingham
T Welch

Officers: Debbie Marsh Corporate Services Manager
Louise Senior Head of Democratic Services

Public: 6

Also present: Councillor: S Goodchild

Absent: Councillor: M S Kennedy

10093 APOLOGIES AND SUBSTITUTIONS

None.

10094 QUESTIONS FROM THE PUBLIC

Residents of Park Avenue addressed the committee in regard to CB/19/02056/FULL Greenside, 134 High Street. Amendments to the proposed plans had been received following comments from Central Bedfordshire Councils Highways officer.

The concerns raised were:

- That the footprint of the building has not changed even though one bedroom had been removed from the plans;
- That there is a breathing pipe located adjacent to the property which raised concerns of contamination;
- That vehicles, regardless of size, would not be able to access the proposed property without having to travel over a number of residents' land;
- That the newly proposed bin collection point was still not suitable and would lead to reduced visibility for all highway users.

Members thanked those attending and advised that the Town Council was only being requested to consider the revised plans in connection with the comments raised by Highways. Members confirmed that the Town Councils previous comments still stood.

Sally Gray addressed the Committee in respect of planning application CB/19/03232/RM Parcels 5a and 5b Bidwell West.

Members were advised that on previous plans a structure had been included which was to support a proposed Visitors Centre. This was now omitted. This was a concern, as should a Visitor Centre be realised in the future, now was the time to forward plan with plans to also include road access.

The proposed site appeared to consider itself in isolation and was ignorant of its close proximity to a Site of Special Scientific Interest (SSSI).

Concern was also raised in that building materials could be discarded into the Chalk Pit, as the development was so close to its edge.

Members were informed that due to the lack of proposed landscaping or management to the boundary of the permissive path, cyclists and walkers, could be put in danger.

The Chalk Pit is of great importance to wildlife and any disturbance of their habitat or the opportunity to move around the site, via green corridors, should be kept to the minimum.

Members advised that this application would be considered fully by committee at the next planning meeting to be held on the 11th November 2019.

10095 SPECIFIC DECLARATIONS OF INTEREST

Councillor D Dixon-Wilkinson declared a personal interest in planning application CB/19/03158/FULL Treow House as the applicant was known to him.

10096 MINUTES

The Committee received the minutes of the Planning Committee meeting held on 30th September 2019 for consideration.

Resolved To confirm the Minutes of the meeting held on 30th September 2019 and for these to be signed by the Chairman.

10097 PLANNING MATTERS

(a) The following planning applications were considered:

Non - Delegated

CB/19/02784/FULL Single storey front extension
10 Fenwick Road, LU5 5RP
For: Mrs S Mhlanga

Comments: No objections

CB/19/02870/RM Reserved Matters: Following Outline CB/15/00297/OUT (1850 dwellings and mixed class use) matters for access, landscaping, layout and scale for 160 dwellings on phase CA2
Thorn Green, Bidwell West
For: Abbey Development Ltd

Members were advised that the Town Council had been granted an extension for when responses needed to be received by. In light of this Members agreed to defer this item until the next meeting in order for them to receive a report from the Town Councils planning consultant.

CB/19/02534/FULL Two storey rear extension
66 Milton Way, LU5 5UE
For: Mr & Mrs A Bassi

Comments: No objections

CB/19/02686/FULL Two storey side extension
1 Leaf Road, LU5 5JG
For: Mr D Grigore

The Town Council makes no objection to this application however has the following comment:

- **The Town Council are concerned that the visibility splay is sufficient enough for highway and pedestrian users.**

CB/19/02865/FULL Overcladding of existing elevations and replacement of glazing on the front elevation
Unit 33, Humphreys Road, LU5 4TP
For: Legal & General Assurance

Comments: No objections

CB/19/03232/RM Reserved matters: Appearance, scale and landscaping for residential development of 336 dwellings on Development Parcels 5a and 5b Bidwell West, Houghton Regis. Outline application (CB/15/0297/OUT) was supported by a full Environmental Statement (ES)

Members were advised that the Town Council had been granted an extension for when responses needed to be received by. In light of this Members agreed to defer this item until the next meeting in order for them to receive a report from the Town Councils planning consultant.

CB/19/01907/FULL Erection of single storey storage outbuilding with use class B2 (general industry)
Bcs House, Blackburn Road, LU5 5BQ
Revised proposals have been received in respect to the above property. Revised proposals – the proposed storage outbuilding would now have a planning use of B2 (general industry) to more closely resemble the prevailing activities of the site. For information Members of the planning committee considered this application at their meeting held on the 19th August 2019.

The Town Council makes no objection to this application however has the following comment:

The Town Council want to be assured that the land proposed for development is within the applicant's ownership.

CB/19/03158/FULL 1.8m high close boarded fence along approx. 3m line to Sundon Road boundary
Treow House, Parkside Drive, LU5 5QL
For: Mr G Lapham

The Town Council objects to this application for the following reasons:

- **The proposed fence is not in keeping with the Conservation Area;**
- **The proposed fence would have an adverse effect on the setting of the adjacent Listed Building;**

Comments: The Town Council would support the reinstatement of the original hedge, similar to that which was in place prior to any fence being installed.

Members requested that Councillor A Ryan call this application.

CB/19/02056/FULL New dwelling
Greenside, 134 High Street, LU5 5DT
Members were advised that revisions had taken place following the issues raised by Central Bedfordshire Councils Highways Management Team.

The Town Councils previous objections still stand and further objects to this application for the following reasons:

- **Although the Town Council recognises that a bedroom has been removed from the plans, now detailed as a dressing room, in order to circumnavigate the need for additional parking provision, this application is still overdevelopment;**
- **Lack of visitor parking;**

- Adjacent public car park is already oversubscribed and cannot be relied upon to support visitor parking;
- Proposed bin collection point would still pose a risk to all highway users, bearing in mind the quantity and variety of bins that are now being utilised.

Comments: These amendments do not address the issue of unacceptable development in a Conservation Area. The Town Council respectfully request that Central Bedfordshire Councils Conservation Officer consider this application and maintain their previous opposition to this development for the reasons stated in response to two previous applications in 2014 & 2018.

(b) The following decision notices were noted:

Permissions / Approvals / Consents

Refusals:

None received.

Withdrawals:

None received.

10098 BUDGET REVIEW

Members received the Planning budget to date.

Resolved: To note the information

10099 APPEAL DECISION – APP/PO240/W/19/3223086 – HIGHFIELD HOUSE, BEDFORD RD

Members considered the outcome of an appeal submitted against Central Bedfordshire Councils planning decision to refuse proposed development at the above location.

Resolved: To note the information

10100 LOCAL PLAN

Central Bedfordshire Council provided the following update:

Over the summer, Examination in Public hearings were held at the Council's main offices in Chicksands. These hearings gave the Inspectors the opportunity to explore the plan and its policies in detail and to hear evidence from Council officers and other stakeholders.

Since the close of the hearing sessions, the Council had been anticipating the Inspectors' feedback and this week the Council received a letter from the Planning Inspectorate in relation to the plan.

This correspondence gave the Council confidence that the Inspectors were content with a number of critical points of policy. However, the letter also raised a number of questions, some of which related to correspondence which the Authority had not seen. In this context, the Council were seeking urgent clarification from the Inspectors about information they seemed to be drawing on and why this had not been shared.

Until the Council received clarification on these important points, the Council's legal advice was that the inspectors' letter should not be published.

Town and Parish Councils would be kept up to date with any developments.

Resolved: To note the information.

10101 NEIGHBOURHOOD PLAN

The Chair of the Neighbourhood Plan Steering Group along with the Town Councils Planning Consultant met with Central Bedfordshire Council officers, on the 3rd October 2019 to discuss the emerging Regulation 14 consultation.

At this meeting Central Bedfordshire Council highlighted some issues they felt should be dealt with prior to public consultation.

The Neighbourhood Plan Steering Group, with the support of BRCC, were due to meet on the 16th October 2019 to find a way forward to address these issues.

Members were advised that the Neighbourhood Steering Group did not meet on the 16th October 2019 as proposed. Members of the group agreed that a delay to the timing of the public consultation was a preferred option to rushing at the last stage and risk the plan being rejected by Central Bedfordshire Council.

Members were assured that work was continuing to happen and that the group were looking to meet in November to discuss a work plan which would enable them to achieve public consultation February/March 2020.

Resolved: To note the information.

10102 STRATEGIC DEVELOPMENT SITES/LOCAL PLAN- UPDATE/PROGRESS

Woodside Link – No substantive update to report.

A5 M1 Link – No substantive update to report.

All Saints View – A series of three manholes need to be dug directly between the site and the war memorial, to allow for storm water and foul drainage from All Saints View to connect to the main drainage system.

These works were planned to start on Monday 7 October and be finished by week commencing 28 October. During this time, sections of road and pathway will be closed and diversions in place. The area needs to be closed off to keep people safe, as some of the holes will be dug to 7 metres deep. The diversions either take people back towards the pedestrian crossing in front of the Green, or via an alleyway into Whitehouse Close and onto the High Street opposite All Saints Church.

Concerns were raised regarding residents' feedback on the deteriorated condition of the small grassed area by the Memorial Stone due to construction vehicles parking on the soft ground.

Members acknowledged that the parking issues had been somewhat alleviated since the agreed use of the old Netto car park, a height barrier installation was awaited to prevent unauthorised encampments; for the interim, it had been agreed that the car park behind the Memorial Hall could be used. Temporary Parking Permits had also been agreed to allow parking behind Bedford Square during the school closure.

Linnere - No substantive update to report.

Bidwell West – Members were requested to consider further themes or street names for this site.

Members were advised that the names previously supplied, which were along a Roman theme, have been used.

Members discussed this matter and supported a proposal to use the names of resorts situated in the North East of England.

Members agreed to provide any other suggestions to the Corporate Services Manager, via email, by the 24th October 2019.

Kingsland – No substantive update to report.

Windsor Drive – No substantive update to report.

Section 106 Monies – No substantive update to report.

Resolved: To note the information

The Chairman declared the meeting closed at 9.02pm

Dated this 11th day of November 2019

Chairman

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Application CB/19/02870/RM (follows CB/15/00297/OUT) – for 160 homes on four blocks of land at Upper Thorn Green, Houghton Regis

Observations by Houghton Regis Town Council: November 2019

The Application

The site for 160 homes is on four blocks of land situated either side of Thorn Road (shown outlined in yellow).



The outline applicant approved in November in 2015 was for up to 1,850 homes, roads, landscaping recreation and open space, two schools, employment and a local centre. The whole site extends westwards from Bedford Road, from the new A5 dual carriageway southwards to the edge of the Chalk Quarry Nature Reserve. The proposals (covered by the outline consent) for schools, employment, and local centre are not included in this reserved matters application. The housing is set within a green setting of grass and landscaping

Recommendation

It is recommended that the Town Council raises no overall objections but may wish to comment on the following issues:

- the Council would welcome details on how footpath and cycle routes in these housing blocks are connected to facilities such as schools in adjoining areas,
- the Council is concerned that there will be inadequate means for non-car transport users to have direct access routes into Houghton Regis town centre,

- the Council welcomes the range of affordable homes as part of this scheme but requires assurances that the 'affordable' housing is within the financial reach of those in need of homes locally, and how this could be supported to assist key workers, teachers, health workers and others important to support the community in this part of Houghton Regis,
- A weakness of the proposed layout is the lack of play area and equipment, the locations and ranges of play areas and equipment within the site needs to be clearer, especially provision for older children / young teenagers, or if the scheme is relying on off-site provision this needs to be detailed,
- The loss of existing trees is a matter of concern - there needs to be provision for monitoring new tree-planting and re-planting in the event of these new trees being damaged or dying,
- The tree species mix should be native species appropriate to the area and soil type. As well as the proposed grassed areas, native woodland flower species should be introduced so that when established, the landscaping reflects the habitat and ecosystems of the former copses and field edges.
- There are no details within the plans of features such as solar panels, electric car charging points.

**HOUGHTON REGIS (NORTH)
FRAMEWORK PLAN**

14 JUNE 2012



The Reserved Matters application covers the four blocks of land here. The application relates to 160 dwellings, a mix of dwellings in varying sizes and flats. The application site itself is currently an arable field and trees.

Development Parcels were defined by the plans approved under the outline permission. Condition 1 of the outline permission required the approval of the following details for each Development Parcel – scale and appearance of the development, plus landscaping of the site (details of access arrangements were determined at the outline stage) to accord with the Bidwell West Design Code (approved June 2015).

The Design & Access statement describes a conventional urban design approach with building frontages onto the roads through the residential areas, particularly where Thorn Road is intersected by a new north-south road with a roundabout. The new homes comprise 12x 2 bedroom flats, 4x 2 bedroom houses, 37x 3 bedroom houses and 59x4 bedroom houses as 112 private dwellings, with 48 affordable homes (shared ownership and rental) as follows:

6x1 bedroom flats, 18x 2 bedroom flats, 7x2 bedroom houses, 11x 3 bedroom houses, and 6x4 bedroom houses.

The majority of new homes will be two-storey with some single storey and three storey flats positioned around the new roundabout. Most houses have drives and garages to one side with rear gardens. The layout appears to be dense – however this alleviated by the surrounding green / open space and landscaped areas. The scheme includes bicycle stores (where there are no garages) and bus stops along the Main Street.

A weakness of the proposed layout is the lack of play area and equipment shown as part of the scheme.

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Application CB/19/03232/RM (follows CB/15/00297/OUT) – Parcels 5a & 5b for 336 homes on land west of Bidwell , HRN2, Houghton Regis

Observations by Houghton Regis Town Council: November 2019

NB The Council has previously commented on Reserved Matters for parcels 4a and 4b, and 6a and 6b .

The Application

The outline applicant approved in November in 2015 was for up to 1,850 homes, roads, landscaping recreation and open space, two schools, employment and a local centre. The whole site extends westwards from Bedford Road, from the new A5 dual carriageway southwards to the edge of the Chalk Quarry Nature Reserve.

NB the outline approval was granted 2 years after the Framework for the whole HRN proposal was agreed by Central Beds.

The site of the current application is the area adjoining the Chalk Pit Nature Reserve and the existing homes on Millers Way, Arnald way and Rosslyn Way. The details show the proposed layout, landscaping, house types and materials, boundary treatment and parking. The homes are in two areas served by a main spine road feeding a series cul-de-sacs (ie no road connections to existing roads). The main spine road connects northwards into the rest of the HRN network. (The proposals do not for instance connect the new road network with the end of Bidwell Hill and thus onto Bedford Road.)

The proposals (covered by the outline consent) for schools, employment, and local centre are not included in these reserved matters. The housing is set within a green setting of grass and landscaping – a key feature of HRN is the large expanse of open space including sports pitches which connects southwards with the Chalk Quarry Nature Reserve, however these are not included in this application.

Recommendation

It is recommended that the Town Council raises no overall objections but may wish to comment on the following issues:

- the Council would welcome reserved matters details on the open space proposals to the west of sites 5a / 5b to show how these parts of HRN inter-relate,
- as these parcels occupy visually prominent land towards the top of the chalk scarp slope, the reserved matters should include details of the scheme's appearance in views from the north, to ensure that the new housing is screened where appropriate with landscaping, alternatively the design could include a 'landmark' building or structure suitable to this location,
- the Council is concerned that there will be inadequate means for non-car transport users to have direct access routes into Houghton Regis town centre, the details of access routes for pedestrians and cyclists, children, parents with pushchairs, etc to nearby facilities – schools, local centre, recreation areas etc. need to be clearer,
- the Council welcomes the range of affordable homes as part of this scheme but requires assurances that the 'affordable' housing is within the financial reach of those in need of homes locally, and how this could be supported to assist key workers, teachers, health workers and others important to support the community in this part of Houghton Regis,
- the locations and ranges of play areas and equipment within the site needs to be clearer, especially provision for older children / young teenagers.

- Tree-planting around the edges of the site appears to be very low density. It would be preferable to use a variety of tree sizes as part of the new landscaping, and denser planting patterns with provisions for later thinning. The tree species mix should be native species appropriate to the area and soil type. As well as the proposed grassed areas, native woodland flower species should be introduced so that when established, the landscaping reflects the habitat and ecosystems of the former copses and field edges.
- There are no details within the plans of features such as solar panels, electric car charging points.

**HOUGHTON REGIS (NORTH)
FRAMEWORK PLAN**

14 JUNE 2012



The Reserved Matters application covers Parcels 5A and 5B here. The application relates to 366 dwellings, a mix of dwellings in varying sizes and flats. The application site itself is currently an arable field and is steeply undulating in certain areas, extending to some 9.6 hectares.

Extracts from Applicants' Planning Statement

- Parcels 5a and 5b are separated from Parcels 4a and 4b to the north by a large block of existing woodland (Bluewaters Woodland) and existing arable land lying to the west is due to form public open space for countryside recreation, which abuts the Community Wildlife Site,
- The site will be accessed from the main spine road, which leads into the wider site from Thorn Road to the north. Parcels 5a and 5b will also be connected to Houghton Regis via the existing Public Rights of Way network; Public Footpath No.3 runs to the east of Parcel 5a and connects with FP4 to the north and with existing development in Houghton Regis to the south,
- As part of the proposed residential development of 336 residential dwellings, 101 units will be affordable housing; equating to 30% and complying with the S106 agreement in this respect. Whilst the changes in

levels across the site have meant that apartments are not included within this scheme there will be a mix of 2, 3 and 4 bedroom properties, and a mixture of affordable and open market dwellings, all of which will help contribute to a mix of housing within the local area in order to meet housing requirements,

- The scheme will have a range of buildings across the site, with detached, semi-detached and terraced houses of 2 and 2.5 storey,
- the undulating landscape creates changes in levels throughout the site, has added interest to the development and street scenes demonstrating the design approach are included within the Design Compliance Statement. These include street scenes for the varying road hierarchy, as well as sections through the site itself to demonstrate how properties will relate to one another, whilst maintaining the requisite separation distances,
- The site access has been fixed by virtue of the outline permission, with the main access to the wider Bidwell West site being taken from Thorn Road,
- The proposed layout includes a swathe of on-street parking bays along the northern and southern edges of Main Street, to the north of the main area of Parcel 5b. No direct access to properties is proposed from Main Street, with direct access from either the tertiary routes or via private drives; once again in accordance with the provisions of the Design Code,
- The proposed layout includes a swathe of on-street parking bays along the northern and southern edges of Main Street, to the north of the main area of Parcel 5b. No direct access to properties is proposed from Main Street, with direct access from either the tertiary routes or via private drives; once again in accordance with the provisions of the Design Code,
- All of the new houses will have access to their own private amenity area, and where changes in levels occur gardens have been stepped, so that these properties will have a patio area immediately to the rear of the house, and a lawned area at a lower level,
- There is an existing block of woodland separating Parcels 5a and 5b which is proposed to be retained, as are many of the trees on the boundaries of the site.

Development Parcels were defined by the plans approved under the outline permission, including Parcels 5a and 5b. Condition 1 of the outline permission required the approval of the following details for each Development Parcel – scale and appearance of the development, plus landscaping of the site (details of access arrangements were determined at the outline stage) to accord with the Bidwell West Design Code (approved June 2015).

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The Planning Inspectorate

Examination of the Central Bedfordshire Local Plan

Inspectors: Matthew Birkinshaw BA(Hons) Msc MRTPI and

Helen Hockenhull BA(Hons) B.PI MRTPI

Programme Officer: Ian Kemp

idkemp@icloud.com

Andrew Davie
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
SG17 5TQ

30 September 2019

Dear Mr Davie,

Examination of the Central Bedfordshire Local Plan

1. As you will recall, during the recent examination hearing sessions we raised concerns regarding the soundness and legal compliance of the submitted Local Plan. We committed to providing detailed comments on the main issues in writing, which are set out below.

Sustainability Appraisal ('SA')

2. The Environmental Assessment of Plans and Programmes Regulations (2004) apply to this examination. The Regulations state that where an environmental assessment is required it should identify, describe and evaluate the likely significant effects of implementing the plan, and, reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. As the Planning Practice Guidance ('PPG')¹ confirms, the role of the SA is to make sure that proposals in the Plan are the most appropriate given the reasonable alternatives available.
3. One of the aims and objectives of the Central Bedfordshire Local Plan is to contribute towards the unmet housing needs from Luton. This is a positive and commendable strategy given the tightly drawn nature of Luton's urban area, which is bounded on all sides by the Green Belt.

¹ Paragraph: 001 Reference ID: 11-001-20140306 - the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement

4. A critical part of the strategy is Policy SA1, which allocates land for 4,000 dwellings to the north of Luton. Along with commitments at Houghton Regis North (Policy SA5), this represents one of the Plan's key sites for helping meet Luton's housing needs to 2031. A further 1,625 new homes are planned throughout surrounding towns and villages in the Luton Housing Market Area ('HMA') within Central Bedfordshire.
5. The January 2018 SA tests 5 Growth Scenarios. For 'Area A' (the area nearest Luton) the scenarios distribute housing to the North of Luton (Policy SA1), the Green Belt villages and a strategic site to the west of Luton. Land west of Luton has a longstanding history as a potential location for new housing.
6. However, the 4,000 dwellings allocated at North of Luton is a constant in all the growth scenarios. The only option where it is excluded is the 'No Development' scenario, which has zero growth for Area A. All the growth scenarios except the 'No Development' option also attribute at least 2,000 dwellings to the Green Belt villages. We therefore fail to see how the SA has adequately considered reasonable alternatives for Area A. Given that growth in Area A is so critical to the Plan's strategy for contributing towards Luton's unmet housing needs, we would expect the SA to thoroughly consider the alternatives available.
7. It is also unclear why the SA has used a capacity of 2,000 dwellings to consider land west of Luton. Representations put forward by the site promoters included provision for 5,500 dwellings, whilst the *Luton HMA Growth Options Study*² estimated a net capacity of 2,500 new homes over the Plan period. Without considering the full potential of the site it is difficult to see how the Council has concluded that Policy SA1 is the most appropriate strategy for expanding Luton.
8. Furthermore, a significant amount of additional information has been prepared and submitted following the start of the examination. In light of this evidence, the Council considers that Policy SA1 is now unsound and requests that the capacity of the site is reduced from 4,000 to 3,100 dwellings. Although a *SA Addendum Report*³ has been produced, it seeks to justify the allocations in the Plan and remove "...the uncertainties regarding significance from the previous SA". It does not consider whether the preferred strategy for Area A remains the most appropriate, compared with the reasonable alternatives, based on a reduced capacity of 3,100 homes.
9. In response to questions at the examination hearing session on Wednesday 12 June, the Council confirmed that the North of Luton allocation is derived from the *Land North of Luton and Sundon RFI Framework Plan*. The document was published in 2015 and includes a concept plan showing the alignment of the proposed M1-A6 link road. However, it does not form part of the statutory development plan for the area and has not been subject to any formal examination in public. Identification of the site in the Framework

² Examination Document C15

³ Examination Document EXAM7T

Plan does not remove the need to test alternative options adequately and objectively through the SA.

10. We also have concerns with the way in which the SA has considered alternative strategies for employment growth. One of the objectives of the Plan is to provide strategic warehousing sites to cater for 'footloose' demand in the logistics and distribution sector. Again, this is a positive response to substantial market demand along the M1/A1 corridors. However, the SA only tests 2 scenarios. They are based on the number of jobs expected to be provided from the allocations in the Plan with, and without, Policy SE1 – the Sundon Rail Freight Interchange ('RFI'). Whilst some alternatives (such as Stratton Business Park) have only come forward at Regulation 19 stage, they should still be considered in order to reach an informed decision on whether the strategy for economic growth is the most appropriate. This is especially important when the Plan is seeking to release land from the Green Belt, where the National Planning Policy Framework ('the Framework') requires that alterations to boundaries should only be made where there are exceptional circumstances. Some of the alternative sites for strategic warehousing being pursued by representors do not require land to be released from the Green Belt.
11. Aside from the consideration of reasonable alternatives, we also have concerns with the way in which the SA has concluded on some of the sustainability objectives, which have ultimately informed the Council's decision on which sites to allocate. For example, Holme Farm (Policy SE3) scores ++? for Sustainable Transport, with the SA stating that the site is located in close proximity to Biggleswade railway station and would reduce the need to travel for potential employees. However, the *Strategic Employment Site Assessment Technical Document*⁴ scored the site 'Red' for its proximity to public transport, concluding that the nearest bus stops are 1.3km away and the train station approximately 3km away. As discussed at the hearings, the main employment area would be accessed through the proposed services to the south of Biggleswade on the opposite side of the A1. It would not be conducive to walking and cycling. The Council also advised that strategic employment sites would typically attract workers from further afield, hence the reason why a jobs uplift has not been applied to the housing requirement. This is not consistent with the assessment in the SA.
12. Similarly, for the Marston Gate expansion (Policy SE2) the Site Assessment scores the allocation Red/Amber for landscape character. It suggests that there is some limited scope for development to the west, with farmland to the east and north forming an attractive open setting to the Greensand Ridge. In contrast, the SA scores the allocation + for landscape, with the potential for minor long-term positive effects.
13. We appreciate that the SA does not test sites to the same level of detail and is intended to provide an overview against a range of sustainability indicators. Issues such as landscape impact are also subjective. Nevertheless, such significant discrepancies only serve to undermine the robustness and objectivity of the process.

⁴ Examination Document F02

14. In conclusion therefore, the SA does not adequately demonstrate that the Plan is the most appropriate strategy when considered against the reasonable alternatives. It also contains unsupported conclusions against the sustainability objectives of two strategic sites. As a result, key parts of the Plan are not justified, and it thus fails the test of soundness in paragraph 182 of the Framework.
15. We return to the implications of this finding in our overall conclusion below. The remainder of this letter sets out our further concerns regarding the main issues raised during the examination, which are based on the four component areas of the Plan.

South Area

North of Luton – Policy SA1

16. In the previous section we outlined concerns regarding the assessment of reasonable alternatives to the North of Luton allocation as part of the SA. In addition, we also have specific concerns regarding the size and location of the allocation, which extends into the Chilterns Area of Outstanding Natural Beauty ('AONB').
17. At the hearings it was confirmed that the curved nature of the northern site boundary is based on the proposed alignment of the new M1-A6 link road. The provision of the link road is a requirement of Policy SA1(2) and would require major development in the AONB.
18. The 2012 Framework, which applies to this examination, is clear that great weight should be given to conserving the landscape and scenic beauty in AONBs. Along with National Parks and the Broads they have the highest status of protection in relation to landscape and scenic beauty.
19. Paragraph 116 of the 2012 Framework states that planning permission should be refused for major development in AONBs except in exceptional circumstances, and where it can be demonstrated that development would be in the public interest. In reaching this conclusion it is necessary to consider the cost of, and scope for, developing elsewhere outside the area or meeting the need in some other way. This is one of Natural England's primary objections to the Plan, namely; where is the evidence to suggest that the link road has to go through the AONB?
20. In justifying the alignment of the road we are referred to documents submitted in support of the current planning application. They demonstrate that several options have been considered, including routes outside the AONB. In summary, Route 6 was taken forward through the 2015 *Land North of Luton and Sundon RFI Framework Plan*. It states that the:

"...proposed route maximises the amount of developable land, in order to make sure that the right amount of development can be accommodated on the sites and ensures that the new homes, employment and community uses relate well and form a natural extension to the existing Luton area."

21. There are clearly several benefits to the proposed alignment of the new road, which avoids Sundon Wood, creates a new defensible boundary to the Luton urban area and provides land sufficient to accommodate up to 4,000 new homes. But as we explored at the hearings, there are other options available to the Council in contributing towards the unmet housing need from Luton without requiring major development in the AONB. This includes the possibility of using sites in other locations or providing a smaller development without a link road. Based on the evidence provided these options have not been adequately tested as part of the Plan's preparation.
22. It has been brought to our attention by the Chilterns Conservation Board that on 11 September 2019 the Council resolved to grant planning permission for the link road subject to referral to the Secretary of State. Clearly matters have moved on quickly since the close of the hearing sessions in July. In responding to this letter, could the Council confirm that 1) the information from the Chilterns Conservation Board about the planning application is correct, 2) if the outstanding objections from Natural England and Highways England referred to at the examination have been resolved and 3) what bearing the Council considers that this position has in relation to the soundness of Policy SA1? In the event that planning permission is granted, then this could represent a material change in circumstances, and one which we may need to consider further through reconvened hearing sessions.

Sundon Rail Freight Interchange – Policy SE1

23. The proposed RFI at Sundon is dependent upon the new M1-A6 link road. The concerns identified above (i.e. the assessment of reasonable alternatives that do not require major development in the AONB) therefore have direct implications for Policy SE1. The reports referred to by the Council clearly show that a link road *could* be constructed outside the AONB.⁵
24. In addition to requiring major development in the AONB, Policy SE1 requires around 45 hectares of land to be removed from the Green Belt for the RFI and associated warehousing. Further justification for this has been provided in Examination Document EXAM25. From the evidence it is clear that the proposal would make a positive contribution towards the need for strategic warehousing along the M1 corridor and have substantial economic benefits. It is also estimated that based on 4 trains per day, the RFI would remove around 160 daily HGV movements from the highways network. Situated at a point where the M1 and the Midland Mainline converge, the site is ideally located for such a development.
25. Nevertheless, the Framework is clear that the Government attaches great importance to Green Belts, the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. Once established, Green Belt boundaries should only be altered in exceptional circumstances.

⁵ Examination Documents EXAM51-EXAM55

26. Our primary concern is the absence of robust evidence to justify the exceptional circumstances necessary to alter the Green Belt boundary at Sundon. As already established, the demand for warehousing and logistics in Central Bedfordshire is 'footloose', with operators looking for premises along the M1 corridor, not all of which is within the Green Belt. EXAM25 also confirms that operators will typically look for sites with a distance of up to 3km between an interchange and the strategic road network. We are therefore not currently persuaded that this is the only realistic location for a development of this type to serve the wider Luton/Dunstable/Houghton Regis conurbation.
27. In response the Council suggests that there are no alternative sites which have been put forward outside, or within the Green Belt, which have any reasonable prospect of use as a rail freight interchange. But this is a relatively specialist form of development, which is unlikely to have been put forward by land owners responding to a Call for Sites exercise. There is also nothing to suggest that the Council assessed the suitability of potential employment sites for such uses when carrying out the *Strategic Employment Site Assessment Technical Document*. Nor has a wider site assessment seemingly been pursued through discussions with neighbouring authorities, given that such a facility will not just serve the Luton area. At this moment in time there is insufficient evidence to justify releasing a further 45 hectares of land from the Green Belt, in addition to the 20 hectares of employment land from the Green Belt under Policy SA1, which would only be a short distance away.

Green Belt Villages

Harlington

28. Policy HA1 seeks to remove over 18 hectares of land from the Green Belt to the west of Harlington for 435 dwellings (Site HAS20). Prior to the hearings, the Council acknowledged that, in order to facilitate the allocation, a new primary school is also required. The Matter 7 Statement therefore seeks to enlarge the site and release more land from the Green Belt on Westoning Road.
29. The additional area of land has not been assessed as part of the *Central Bedfordshire Green Belt Study (Stage 3)*,⁶ nor through the SA process. In fact, the allocation was actually reduced in size from that submitted through the Call for Sites exercise. Examination Document EXAM5BB Annex 27 confirms that "*The western portion of the site is an illogical extension to Harlington and extends the settlement too far west...Therefore the site has been portioned to only include the eastern portion*". The additional parcel of land would go beyond the existing field boundary, which is clearly demarcated by landscaping. It would extend the settlement further west and create an arbitrary boundary which the Council previously sought to avoid.

⁶ Examination Document C11

30. At the hearings it was suggested that the allocation could be modified to include the primary school *within* the submitted site boundary. There are two issues with this approach.
31. Firstly, accommodating a new primary school with associated play areas and pitches would reduce the yield of the proposed residential development. At this stage it is unclear what the scale of any reduction would be. If significant, the Council would have to reconsider the benefits that the allocation would deliver against the harm to the Green Belt.
32. Secondly, without releasing more land from the Green Belt, access to the site, and therefore the school, would have to be taken from Toddington Road. This would require children, and parents with pushchairs, having to use the narrow footpath over the railway bridge and cross the road on a sharp bend at the junction of Toddington Road and the entrance to the station car park. Having seen the site, we agree with representations put to us that this would significantly increase the risk of accidents occurring, especially during the morning and afternoon peaks when the car park entrance is likely to be in frequent use by commuters using the station. It is difficult to see how appropriate highway improvements could be made to maintain pedestrian safety.
33. In the absence of additional school places, the allocation is therefore unsound and would result in residents with young children having to travel further afield to meet their day-to-day needs. Unfortunately, the Council's suggested changes would not be justified due to the harm that would be caused to the landscape character of the area and/or highway safety.

Barton-le-Clay

34. Land at Luton Road (Site HAS04) is subject to a long-term lease with Barton-le-Clay Parish Council. The Parish Council would have to relinquish that lease to bring the site forward for housing.
35. The position of the Parish Council at the hearing session was clear – it objects to the scale of development proposed in the village and does not support the cumulative growth from HAS04 and HAS05. There is nothing to suggest that the Parish Council has any intention of relinquishing the lease, which would have to be subject to a vote by Members at a public meeting. The site is therefore not considered to be deliverable within five years and there is no clear evidence that it would become so at any stage over the plan period.

Chalton

36. The *Central Bedfordshire & Luton Green Belt Study (Stage 1&2)*⁷ assessed the character of Chalton and concluded that it maintains a sense of openness. As a result, it recommended that the village continues to be washed over by the Green Belt. This is consistent with paragraph 86 of the Framework, which states that if it is necessary to prevent development in a

⁷ Examination Document C10

village because of the important contribution that its open character makes to openness, the village should be included in the Green Belt.

37. Allocating land for 54 dwellings in Chalton is directly at odds with the Green Belt Study. It is also contrary to the Plan's strategy which states that new homes are proposed "*...in the form of highly sustainable extensions of a more moderate scale to large towns and villages that are inset into the Green Belt.*" As the Stage 3 Green Belt Study found, the lack of distinction between the inset allocation and the remainder of the village would also weaken its status as a washed over village and weaken the remaining Green Belt boundary. The exceptional circumstances necessary to justify releasing HAS09 from the Green Belt have not been demonstrated, and the allocation should be deleted from the Plan.

Hockliffe

38. The Council's Matter 7 Statement confirms that sites HAS25 and HAS26 are subject to additional modelling work to determine the extent of the previously identified flood risk. On the day of the hearing it was reported that as a result of the additional modelling the capacity of both sites will need to be reduced.
39. This additional work would need to be published, consulted on and examined so that other developers and members of the local community can understand the reasons for allocating these sites over others with a lower risk of flooding. Without knowing what each site can deliver it is also impossible to reach a conclusion that the exceptional circumstances exist to justify their release from the Green Belt, especially if the number of homes is going to be significantly reduced.
40. Elsewhere in Hockliffe site HAS24 is an allocation which the Council has reduced in size from that submitted as part of the Call for Sites exercise. But it is difficult to understand what the revised site boundary is based on. The allocation extends beyond the footprint of the village and follows no physical features on the ground. This is contrary to paragraph 85 of the Framework which states that Green Belt boundaries should be defined clearly, using physical features that are readily recognisable. The L-shaped site would also be at odds with the linear form and character of Hockliffe. Further justification would therefore be required to demonstrate that the allocation meets the requirements of the Framework and would not lead to an uncharacteristic form of development that would be harmful to the character and appearance of the area.

East-West Area

M1 Junction 13

41. The *Transport Modelling Stage 1C & 1D Report*⁸ identifies 25 'hot spots' on the highway network. Each one has been scored based on the number of

⁸ Examination Document C26

users likely to be affected and the level of stress or junction delay experienced.

42. Hotspot 10A is located at Junction 13 of the M1. Based on committed growth to 2025 it scores 9/10, with 10 being the highest scale of impact. This increases to 10/10 by 2035. Even without the growth proposed in the Local Plan, the already heavily congested junction is therefore going to get worse.
43. Examination Document C28 includes details of junction improvements that could be carried out to accommodate the additional growth proposed. The works are expected to cost between £2.5-£5m and would not undermine the viability of strategic allocations at Marston Vale (Policy SA2) or Marston Gate (Policy SE2).
44. However, Examination Document C28 confirms that further work has been commissioned to understand the cumulative impact on Junction 13 from growth in Central Bedfordshire, Milton Keynes and Bedford. Paragraph 8.8 confirms that "*...the outcome of this study may result in alternative options to the one discussed in this report.*" The previous Inspector, Mr Hayden, raised concerns in September and October 2018⁹ regarding the considerable degree of uncertainty arising from the need for further studies.
45. In response the Council has helpfully provided a Statement of Common Ground with Highways England.¹⁰ But this only reiterates that "*...additional work will be undertaken to further explore mitigation schemes necessary in relation to the SRN to deliver the proposed level of growth in the CBLP*". It confirms that the Councils are working with Highways England to undertake the modelling, and that it will set out the relevant improvements, including likely costs.
46. The latest update indicates that the additional modelling is now expected by late autumn. Whilst the Council and Highways England consider that this work should not delay adoption of the Plan, it is clearly going to form a critical piece of evidence which directly relates to the location of the Plan's largest allocation for up to 5,000 new homes at Marston Vale. In order to reach a robust, substantiated conclusion on the soundness of the Plan it would be necessary to consider the implications of the new evidence when it emerges and test it through further examination hearing sessions.
47. In the absence of this modelling we continue to have reservations about the cross-boundary impacts which have been identified. In particular, Examination Documents C24-C28 suggest that there will only be 'limited interactions' between the Marston Vale allocation and Milton Keynes via the A421, with less than 50 vehicle movements in the AM and PM peak. Although the Marston Vale allocation is intended to create new mixed-use development, and therefore reduce the need to travel, it is ideally placed for accessing Milton Keynes along the A421. In the context of an allocation for up to 5,000 new homes, we fail to see how the evidence is an accurate

⁹ Examination Documents EXAM4 and EXAM6

¹⁰ Examination Document 7R

reflection of likely future transport patterns. If, as the Council suggests, motorists will choose other routes, such as Salford Road instead of the A421, then this needs to be justified, and the impacts tested.

48. In summary therefore, given the already high levels of congestion around Junction 13, and the planned level of growth nearby, the modelling is critical to understanding whether improvements can be undertaken that effectively mitigate the impact of additional development in this location.

Marston Gate – Policy SE2

49. Most of the allocation is relatively flat running parallel to the M1 and the A507 before the land rises up to the north and east. The change in topography reflects the site's proximity to the Greensand Ridge, which runs south-east to north-west through this part of Central Bedfordshire.
50. The majority of the site is within the 'Salford-Aspley Clay Vale' Landscape Character Area, as defined by the *Landscape Character Assessment*.¹¹ One of the key characteristics of this area is the low-lying, flat landform, which is bordered by the pronounced, elevated landscape of the Greensand Ridge. The location of the site at the foot of the Greensand Ridge is especially prominent when viewed from parts of the John Bunyan Trail and Greensand Ridge Walk.
51. The Landscape Character Assessment sets out guidelines for new development. Amongst others this includes safeguarding the open land at the foot of the ridge to provide for its setting, conserving the clear views and relationship with the Greensand Ridge Character Area and ensuring that any growth of business parks does not further dilute the rural character of the area.
52. The strategic warehousing proposed under Policy SE2 would be viewed alongside the existing business park and the infrastructure associated with the M1/A507. However, due to the topography of the site, its prominence and the size and type of development proposed, the allocation would have a significant visual impact from the surrounding network of public footpaths. Situated on rising ground at the foot of the Greensand Ridge its appearance would be harmful to one of the defining landscape characteristics of the area. Similar views were expressed by the Council's Landscape Officer in Examination Document F02, finding that the farmland to the east and north forms an attractive setting to the Greensand Ridge.
53. Given the size of buildings proposed, the visual impact of the allocation would not be mitigated by additional landscaping. Although it would bring about significant economic benefits, in its current form, the extent of the allocation under Policy SE2 is not justified due to the harm that would be caused to the landscape character of the area.

¹¹ Examination Documents EXAM 56 – EXAM68

Aspley Guise Allocation – Site HAS03

54. The *Green Belt Topic Paper*¹² sets out the justification for releasing land from the Green Belt. Aside from contributing towards Luton's unmet housing needs, the main reason is to provide additional housing for the southern half of Central Bedfordshire in locations where growth will secure the sustainable future of settlements.
55. Aspley Guise is on the northernmost periphery of the Green Belt close to the boundary with Milton Keynes. It is not within the Luton HMA. New housing in this location will therefore not help to address Luton's unmet needs. Nor is there any evidence to suggest that the site is needed to help support local facilities. Significant new development in addition to site HAS08 is proposed around Aspley Guise, in Central Bedfordshire and in Milton Keynes. As such, we fail to see how the exceptional circumstances exist to release land from the Green Belt for an additional 37 new homes in this location. The allocation is not justified and should be deleted from the Plan.

Central Area

Former RAF Base, Henlow – Policy SE4

56. The submitted Plan allocates 85 hectares of land at RAF Henlow for specialist high-technology, science and research and development uses. A further 45 hectares is allocated for a mixed-use 'visitor-economy and residential scheme'. The Council has previously confirmed that the residential element would be up to 500 dwellings.
57. In response to the *Inspectors' Matters, Issues and Questions* the Council conceded that there is no need for the type and scale of development proposed in Policy SE4. The policy is therefore not justified and should be deleted from the Plan.
58. At the hearings it was suggested that the Council's preferred way forward was to consider the site as part of a Review, envisaged to start within 6 months of adoption. Chapter 5.5 of the Plan states that an early review will be necessary due to the Cambridge-Milton Keynes-Oxford Arc and the new East-West railway line.
59. However, the preferred route of East-West Rail from Bedford to Cambridge has not yet been determined, and no coordinated analysis has been published to consider the best location for any new or expanded settlements as part of the Cambridge-Milton Keynes-Oxford Arc. Furthermore, as and when details do emerge, Examination Document EXAM12 confirms that the Council will undertake a fresh Call for Sites exercise with options assessed to determine an appropriate strategy. Further discussions are also going to be required as part of the Duty to Cooperate, with the revised Plan subject to Examination in Public. Determining the scale and distribution of any additional growth is therefore not going to be a straightforward exercise and it could take several years before a revised Plan is in place.

¹² Examination Document C12

60. The Ministry of Defence intends to start the phased vacation of RAF Henlow next year, with the site fully vacated by 2023. Homes England have entered into a Partnering Arrangement with the Defence Infrastructure Organisation ('DIO') and is working towards redeveloping the site alongside its phased closure. Postponing a decision on the future of RAF Henlow until the future strategy of the next Plan has been determined therefore risks the site becoming vacant with no positive strategy for its future reuse.
61. The need to plan positively for the future of the site is important due to the presence of MBDA UK Limited. MBDA is a missile systems provider to the Ministry of Defence which is estimated to have contributed £600m to the UK economy since 2010. It has operated from Henlow for over 40 years and has recently made a significant investment in the future of its operations, with on-going work planned over the next 2-3 years.
62. As we heard at the examination hearing sessions, MBDA must operate under licence from the Health and Safety Executive ('HSE'). The classification of the adjacent A600 as a 'minor road' (less than 10,000 vehicle movements per day) permits MBDA to operate under a particular set of safety distances. Increasing traffic levels above 10,000 vehicle movements could result in the reclassification of the road and require greater distances to be achieved. This would inevitably affect the operation of the business. The presence of MBDA will also affect the development potential of the former airfield.
63. Planning for the future reuse of RAF Henlow would therefore not only provide clarity to key stakeholders, but also ensure that the relationship with MBDA can be accounted for as part of comprehensive plans for the area. There are also other considerations that need to be taken into account, such as the reuse of the listed hangers and what happens to the large grass airfield. This is best achieved through the Local Plan process in consultation with the local community. We return to this issue below, in our overall conclusions on the most appropriate way forward for the examination.

A1 Corridor

East of Arlesey – Policy SA3

64. The *Settlement Capacity Initial Study*¹³ concludes that Arlesey has Medium-High capacity for growth and that development could contribute to the enhancement of new services and facilities. Development to the east of the town also allows for the provision of a new link-road to relieve congestion on High Street. In principle therefore, the strategy of extending Arlesey is appropriate.
65. However, Arlesey is 'Minor Service Centre' with roughly 2,470 dwellings. In contrast, Policy SA3 allocates up to 2,000 dwellings on over 200 hectares of land. A further 1,000 dwellings are also committed on land to the north of Policy SA3, with around 90 dwellings proposed on land off High Street. In total, the level of growth planned for Arlesey would more than double the size of the town. We therefore fail to understand how Policy SA3 would meet

¹³ Examination Document C42

one of the Plan's Key Spatial Objectives to grow existing communities across Central Bedfordshire "...proportionate to their scale and environment context".

66. Furthermore, due to its size, Policy SA3 extends all the way up to Fairfield to the east. With the exception of a single, square parcel of land, the settlement boundaries of Arlesey and Fairfield would coalesce and adjoin one another. Although Policy SA3 requires the provision of a country park to provide some separation, formalising the use of the open space between Arlesey and Fairfield would be very different to the existing situation, with the two urban areas separated by fields. There is a risk that the country park could become actively used as an open space linking Fairfield and Arlesey, not separating them.
67. In summary therefore, we have concerns regarding the level of growth proposed in Arlesey and the effect that this would have on its character, identity and potential for visual and physical coalescence with Fairfield. As submitted, the scale and location of development is not justified.

Holme Farm – Policy SE3

68. The proposed allocation to the south of Biggleswade and to the west of the A1 effectively comprises two separate sites connected by a narrow access road. Despite following land ownerships, it results in a very contrived boundary that would create two separate sites lacking any real integration.
69. The northern section of the allocation is reasonably well related to Biggleswade. It would be viewed in the context of the existing industrial buildings on Stratton Business Park to the east and the wind farm to the south and west of the site.
70. In contrast, the remainder of the allocation would spread a significant distance to the south of the town, extending the main built-up area of Biggleswade with linear development adjacent to the motorway. The size, shape and location of the allocation would result in a visually prominent development that would fail to integrate with the form and character of Biggleswade, which is almost entirely concentrated to the east of the A1.
71. Similar concerns were identified in the Council's assessment of the site in Examination Document F02. It found that there would be some limited scope for mid-scale development at the northern end of the site, but that warehousing would be inappropriate as it would block extensive views and create a sense of enclosure at a gateway to Biggleswade. When travelling north along the A1 the topography of the area affords wide-ranging views over the arable land to the west of Biggleswade. This would become dominated by strategic warehousing that would appear divorced from any other forms of intensive commercial development in this location.
72. The Site Assessment concluded by stating that the site "*...is large enough that with appropriate mitigation, the issues can be overcome.*" Although the allocation in the submitted Plan is smaller, the reduction in size has not overcome the issue of strategic warehousing blocking extensive views over

the vale landscape and creating a sense of enclosure on the approach to Biggleswade. Given the likely size of strategic warehousing, it would be very difficult to effectively screen the site by landscaping alone. In its current form Policy SE3 is therefore not justified due to its harmful impact on the landscape character of the area.

East of Biggleswade - Policy SA4

73. One of the criteria of Policy SA4 is that the development will form part of a sustainable village that will be visibly and physically separate from Biggleswade. The rationale behind this approach was to create a well-designed, standalone village with the potential to form part of a wider development in the future. Land to the east of Biggleswade is in Appendix 7 as an Identified Area for Future Growth.
74. However, for the reasons set out below, the Council considers that the 'Appendix 7 sites' are no longer justified and should be removed from the Plan. Without additional development to the east of Biggleswade Policy SA4 would effectively result in the creation of a small satellite village opposite an existing housing development separated by Baden Powell Way. As a result of deleting the area for future growth we fail to see how Policy SA4 would integrate successfully with the rest of the town. In addition, the second phase of development appears to form part of the assessment of the allocation in the SA. If this is no longer proposed, then the SA would have to be revisited in order to consider whether the strategy for Biggleswade remains the most appropriate one in the absence of any further planned growth.
75. It also remains unclear how strategic site SA4 will be accessed. The land is situated to the east of Baden Powell Way but the submission policies map illustrates the King's Reach development (HO8(8)) on both sides of the road. Whilst planning permission was granted in March 2019, the developers of King's Reach have confirmed that they own the land necessary to form the access and are not signatories to the relevant legal agreement. Based on the evidence provided the site cannot be considered deliverable until the ownership issues have been resolved.
76. In summary therefore, although the site now has planning permission, its inclusion as a strategic housing allocation for Biggleswade is not supported by the SA, which, as Policy SA4 does, assumes that further land to the east of Biggleswade will come forward as part of a wider, standalone settlement. There are also unanswered questions regarding how the site will be accessed. Further work would therefore be required to justify its inclusion as a strategic allocation in the Plan.

Identified Areas for Future Growth

77. The Identified Areas for Future Growth are included in Appendix 7 of the Plan and defined as sites which could meet possible longer-term development needs.

78. In contrast, the Council's updated position as set out in Examination Document EXAM12 accepts that there is insufficient evidence and/or supporting infrastructure to support their allocation at this moment in time. EXAM 12 also confirms that the sites are not given any preferred status through this Local Plan, and that future needs will be met through a new Call for Sites exercise to determine the most appropriate locations for growth.
79. If the Council's intention was to carry out a full review of development options once more details on East-West Rail and the Cambridge-Milton Keynes-Oxford Arc are known, then including the sites in Appendix 7 only serves to confuse decision-makers, developers and local communities. Without any corresponding policies the sites in Appendix 7 and the requirements of paragraph 7.9 are also ineffective. For these reasons, they should be deleted from the Plan.
80. As a consequence of deleting the identified Areas for Future Growth the corresponding sites designated as 'Important Countryside Gaps' (Policy SP5) are also unnecessary. Examination Document C22 describes how several of the gaps are intended to prevent coalescence between existing settlements and future growth locations. Because the future growth locations have not yet been determined, there is no justification for designating land to maintain any physical or visual separation from them. The implications of removing these sites are discussed below.

Conclusions and Next Steps

81. Our concerns with the submitted Plan fall into two main areas. Firstly, the SA has not adequately demonstrated that the spatial distribution of housing and employment is the most appropriate strategy given the reasonable alternatives available. There are also discrepancies with the scoring of sites which undermine its robustness as an objective assessment. Rectifying this issue would involve re-doing large parts of the SA with an open mind, and that could potentially lead to significant changes to the Plan.
82. Secondly, for the reasons given above, we have serious concerns regarding the soundness of several strategic allocations. Some of these issues are interrelated, such as the relationship between the Sundon RFI, the North of Luton allocation and the route of the new M1-A6 link road. Others require significant modification and/or the preparation of further evidence before they could be found sound.
83. In considering the most appropriate way forward we have had regard to James Brokenshire's letter of 18 June 2019, which reminds us about the importance of being pragmatic in getting plans in place that represent a sound plan for the authority. This is especially important for Central Bedfordshire, which currently does not have a single Local Plan for the area.
84. It is not inconceivable that the Council could spend the coming months considering the issues raised in this letter, producing additional information, carrying out a further SA and proposing more changes to the Plan. However, reaching this stage is going to require the preparation of a

substantial amount of new evidence which is likely to take a significant period of time.

85. To put this into context, this is a Plan that was submitted almost 18 months ago, and prior to the hearings starting already had a post-submission library with over 100 entries. The majority of this information was produced at the request of the previous Inspector, who raised concerns with some of the issues in this letter, such as the route of the M1-A6 link road and the need for highways modelling. At the hearing sessions participants raised serious concerns with how difficult it had become to follow the process given the volume of additional material, and the apparent way in which post-submission evidence sought to retrospectively justify the Plan's strategy. Following the examination must be even harder for local residents, especially when the Council is seeking changes on strategic issues mid-way through, such as the deletion of RAF Henlow, removing 900 homes from North of Luton, deleting Identified Areas for Future Growth and Important Countryside Gaps and making allocations larger to accommodate new or expanded schools.
86. Due to the scale and significance of the issues identified above it is also highly likely that this would require large parts of the examination to be re-run. Additional evidence would need to be made available and subject to full public consultation, alongside any changes that the Council consider necessary. We would then have to consider the representations made, publish additional Matters, Issues and Questions, invite written statements and hold further hearing sessions. If any further changes were required, this would then need to be subject to its own formal public consultation as Main Modifications to the Plan.
87. If the examination were suspended for a significant length of time, then it is likely that the objectively assessed need for housing ('OAN') would also have to be revisited. The OAN for housing in the *Luton & Central Bedfordshire Strategic Housing Market Assessment* (December 2017) ('SHMA')¹⁴ is based on a downward adjustment due to concerns regarding the accuracy of mid-year estimates and the resulting household projections. In the event that new national household projections had been published, any reconvened hearing sessions would have to consider whether the change was meaningful, as required by the PPG. There would also need to be a further assessment to see if the downward adjustments in the SHMA remained relevant.
88. Suspending the examination for a significant period is therefore not likely to represent an efficient or effective use of time or resources. It has the potential to delay, rather than accelerate the adoption of a Local Plan for Central Bedfordshire. Some of the decisions that need to be considered going forward, such as the future of RAF Henlow, are also more appropriate for the Council to take in consultation with local communities and interested parties, rather than recommended by ourselves.

¹⁴ Examination Document C36

89. Before deciding on the most appropriate way forward in seeking to address these concerns, we would be grateful for the Council 's comments on the status of the M1-A6 link road application, and the potential implications this has on the examination. In the event that the link road is granted planning permission, then this clearly has implications for future growth around Luton which will need to be discussed with participants. If the application is called-in for determination by the Secretary of State, then there are also potential implications for the timetable of the examination which will need to be considered.

90. In conclusion therefore, we would be grateful for the Council's clarification on the current position regarding the link road application, timescales going forward and the implications that this decision has for the examination in light of the concerns set out above.

91. We have asked the Programme Officer, Ian Kemp, to upload a copy of our letter to the website for those who are following the examination, but we are not seeking any comments from participants at this stage.

Yours Sincerely,

Matthew Birkinshaw and Helen Hockenhull

Inspectors
30 September 2019

Faint, illegible text, possibly bleed-through from the reverse side of the page.

Mr Birkinshaw & Mrs Hockenhull
C/O Ian Kemp PO Box 241
Droitwich
Worcestershire
WR9 1DW

Your ref: CBC Local Plan
Our ref: CBC LP 141019
Date: 14.10.19

Dear Mr Birkinshaw & Mrs Hockenhull,

Examination of the Central Bedfordshire Local Plan

Thank you for your letter, dated 30 September 2019, in relation to the Central Bedfordshire Local Plan.

It is unfortunate that the Council have been delayed in publishing the content of this letter, but as you are aware, we did feel it necessary to ensure we were in receipt of, and had time to consider, all information that informed it.

The letter refers to a communication the Council was not privy to, which you have now shared. During communications between us to resolve this issue, it then came to light that other correspondence had been received and not shared with the Council or made publicly available. Again, this has now been made available and has been published on the Council's examination webpages. The Council would like to make clear that it is fully committed to ensuring an open and transparent examination process, and that concerns have been raised with regard to the approach that has been taken.

We note the tone of the letter and its lack of clarity does not appear to be consistent with a desire to work proactively with the Council to progress this plan, which is not hugely helpful. However, bearing in mind we have now had time to process the content of the letter and its implications, the Council is comfortable that the plan can be progressed and that subject to the additional work it suggests being undertaken and, of course, main modifications, the plan is capable of being made sound.

We have considered the issues raised within the letter and we understand your concerns are as follows:

1. **Area A** – you raise concerns in relation to the ‘reasonable alternatives’ considered within the Sustainability Appraisal (SA) for Area A, including the capacities of land to the north and west of Luton.
2. **Employment sites** – we understand you have concerns in relation to the scenarios tested within the SA to cater for ‘footloose’ warehousing demand.
3. **Conflicts between the SA and the findings of other evidence studies** – you have raised these concerns in relation to Holme Farm (Policy SE3) and Marston Gate (Policy SE2).

The above issues (Points 1-3), very clearly relate to the SA methodology and its findings. As such, to resolve these issues, we intend to appoint a new independent consultant to review and revise the SA, particularly in relation to those issues raised above. This will require the publication and consultation of a revised piece of evidence to inform the plan.

4. **M1, J13** – we understand you have concerns around the potential outcomes of the modelling work currently being undertaken, including how it might allow for other options to become available.
5. **M1-A6 link road** – you have requested further information in relation to a post-hearing communication received from the Chiltern’s Conservation Board (now published as an Examination Document).
6. **Sundon RFI** – we understand you have concerns around the demonstration of Exceptional Circumstances required to alter the Green Belt boundary and whether alternative locations were adequately considered (via discussions with neighbouring authorities or within the evidence base).
7. **Harlington** – we understand you have concerns that neither the Green Belt Study, nor the SA, adequately assess either an enlarged site or a site with reduced residential capacity. You also raise concerns relating to access from Toddington Road.
8. **Hockliffe (SA24 – SA26)** – you state that the additional modelling work would require publication, consultation and examination. You raise concerns about the justification for Green Belt release and the basis for the site boundary, for SA24, based on the proposed reduced capacities.
9. **Marston Gate** – in addition to the SA point raised above (point 3), we understand you have concerns relating to harm that would be caused to the landscape character of the area.
10. **Former RAF base, Henlow** – we understand you accept the Council’s position that inclusion of the site is no longer justified but have concerns relating to the postponement of a decision on the future of this site, risking the site becoming vacant with no positive strategy for its future and the impact of this on MBDA albeit you acknowledge decisions in respect of this site is a matter for the Council and stakeholders rather than yourselves
11. **East of Arlesey** – we understand you are concerned that the growth proposed for Arlesey will result in over-development and coalescence with Fairfield.

12. **Holme Farm** – in addition to the SA point above (point 3), we understand you have concerns relating to harm that would be caused to the landscape character of the area.
13. **East of Biggleswade (Policy SA4)** – we understand you have concerns that this allocation as a standalone site has not been assessed within the SA. You also raise questions around access.
14. **Aspley Guise** – you suggest the allocation should be deleted from the plan.
15. **Barton-le-Clay** – you suggest that this site is not deliverable within the plan period.
16. **Chalton** – you suggest the allocation should be deleted from the plan.

In response to the above issues (Points 4 to 16), and in addition to updating the SA, the Council intends to take the following actions:

- Respond to the specific questions raised in relation to the M1-A6 link road in the form of an update note
- Provide a technical paper on transport to address the M1, J13 concerns
- Provide a technical paper on employment to address concerns relating to Marston Gate, Holme Farm and Sundon RFI.
- Provide a technical paper on housing to address the points relating to Harlington, RAF Henlow, Hockliffe, East of Arlesey and East of Biggleswade.

We expect we will be able to address most of these points through the revision of the SA and by clarifying the findings of existing evidence. If, however, any additional/revised evidence is required, a summary of findings and resulting implications for the plan will be clearly set out within the relevant technical paper for each site affected.

We expect to complete this work and consultation on the further documentation by April 2020.

Following that, and if required, additional hearings can be held from June 2020. Following the submission of the plan, the Council requested under Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended) that the Inspectors recommend main modifications to make the plan sound and legally compliant. As such, those sites you have made clear should be removed from the plan can be dealt with via this method.

We are pleased that you referenced Mr Brokenshire's letter of 18 June and welcome the acknowledgement that progressing the plan forward is particularly important for Central Bedfordshire, as we currently do not have a single Local Plan in place. We welcome the opportunity to work with you to continue to do this.



The Council remains committed to adopting this Local Plan to deliver the growth required to meet Central Bedfordshire's needs, but also those unmet needs of Luton Borough Council, and will commit the resources required to deliver the additional work in a timely and efficient manner.

Yours Sincerely

Andrew Davie

Assistant Director – Development Infrastructure

Direct telephone 0300 300 4426

Email Andrew.Davie@centralbedfordshire.gov.uk

Local Plan Update – Frequently Asked Questions October 14 2019

Why do we need a Local Plan?

The Council has a legal duty to maintain an up to date Local Plan. The current plans are now old and need updating.

The area needs an up to date plan to guide growth to the most appropriate locations and provide certainty to both communities and developers. Without it, the area is vulnerable to speculative and uncontrolled development.

Once adopted and in place, the Local Plan sets the Development Framework for the area. Planning applications will then be considered against its content and the council will work with developers to ensure that sites are delivered quickly and to a high standard and that all policy requirements set out in the final adopted Local Plan are applied.

What does the Local Plan deliver for local communities?

The Local Plan proposes a number of allocations of land to deliver 20,000 new homes and 19,000 jobs. With the number of homes already committed, this would mean some 43,000 new homes being delivered in Central Bedfordshire between 2015 and 2031.

The housing numbers includes a significant level of affordable housing and a housing mix to meet the identified needs of Central Bedfordshire.

All the allocations include requirements for development to provide a range of new schools, health facilities, leisure and recreational facilities depending on the location and scale of development.

What sort of jobs will the plan provide for local people?

The Local Plan places a strong emphasis on job creation and business growth that will be supported as our population grows. The land allocated for employment growth will ensure that jobs growth accompanies the housing growth that the plan supports.

The employment land will support a combination of inward investment and the growth of business, capitalising on a strong record of local jobs growth in a range of economic sectors over recent years.

When was the Inspectors' letter received by the Council?

The letter was received on 30th September. Our publication of it was slightly delayed whilst we sought resolve a number of legal issues regarding the content and process being followed.

We sought copies of correspondence from third parties referred to by the Inspectors which they, unusually, had not sent to us as the Local Planning Authority and the promoter of the Local Plan.

What are the implications of the letter for the Draft Local Plan?

Letters like this from the Inspectorate on the submitted Local Plan are not unusual, given the complex issues involved and the competing issues that the examination has been considering.

The letter provides us with detailed feedback, which we welcome.

It is a focused letter, raising a limited number of issues for the council to respond to; in particular clarifying the content of some of the policies for strategic sites and issues around the current Sustainability Appraisal (SA).

The Inspectors have not raised concerns on matters such as the 'Duty to Cooperate' (the important process of engaging with neighbouring councils), gypsy and travellers, retail policy and other issues that the Plan has to consider, which provides the Council with comfort that the plan can be progressed.

The Council has taken legal advice to provide guidance on how the matters flagged by the Inspectors are best resolved in a 'sound' way.

We are intending to deliver a revised Sustainability Appraisal and to respond to the Inspectors' other observations within a 4-6month timeframe.

Does the delay present difficulties?

The Inspectors draft letter makes a series of observations regarding key sites, the council believes that all points of concern can be addressed quickly to secure a sound plan that is compliant with the regulations and fit for purpose.

The Local Plan took time to prepare as it has to proceed through a series of steps and stages, with evidence commissioned and consultation undertaken. Once we submitted our draft plan to the Planning Inspectorate a period of more than 18 months passed before we proceeded to the Examination of the Plan.

Central Bedfordshire Council has committed significant resources to preparing the plan and the communities of the area need to have certainty about where development is to take place. Further lengthy delay is in no-one's interests and is not consistent with the view from Government about the urgency of getting Local Plans in place as quickly as possible.

Furthermore, the record of delivery of new jobs and housing in Central Bedfordshire is a strong one. Further delay runs the risk of imperilling continued housing and commercial delivery to meet the needs of local people.

Will more houses be needed than originally required?

No.

Feedback from the Inspector means that the case presented for a number of key sites needs to be refined and appraised further.

The extra work required is a reflection of the fact that Central Bedfordshire sits in a hugely complex geographical area and is divided by 4 housing market areas which means that identifying sites to address the requirements of individual housing market areas (such as Luton) is complex.

Does this mean further hearings will be required into the Local Plan?

Whether further hearings will be required is a matter for the Inspectors to decide, but it wouldn't be unusual for this to happen. If they are held, the Council will attend to explain and clarify our proposals and to get the plan adopted.

How does the Local Plan address climate change?

The Local Plan will guide the development that takes place in Central Bedfordshire over the long term. It recognises that in seeking to consider the best locations for meeting the housing and jobs growth that we are required to plan for, that climate change is an issue that must be taken into account.

By allocating new land for employment growth the Local Plan is able to help reduce the distances commuted by providing more local job opportunities. The Local Plan also includes a proposed rail freight interchange at Sundon to help reduce the volume of freight moved by road.

The plan also stresses the importance of good housing design (alongside national building standards) supports the Millennium Forest that is underway to the north west of the area, and proposes housing growth in the least environmentally sensitive parts of Central Bedfordshire.

Why is the M1-A6 link road so important?

The road is a strategic road that is proposed to provide an important new connection between the M1 and A6 to reduce the level of traffic passing through Luton from the north to reach the airport and other destinations. Highways England supports the project as an extension of the Strategic Road Network, the major roads in England.

This is a road scheme that has been discussed in various forms for over 20 years and not had sufficient funding in the past to proceed. The road now has funding to be built (from Central Bedfordshire Council, SEMLEP and Highways England), but needs to complete the planning process before construction commences.

Why does the unmet housing need of Luton have to be met?

As a town with a very tight administrative area, Luton has difficulty in meeting all of the projected housing that it is assessed to need.

The southern part of Central Bedfordshire has close link to Luton and sits within a common housing market area. The council needs to consider where best to locate housing growth in that area to meet the unmet housing need of Luton. The locations in which that growth is to be met is a matter for Central Bedfordshire Council to consider, though it needs to be in the most sustainable locations.

Agreement on these issues has long been an issue of debate between the two councils, but a thorough process of engagement between the two councils has taken place.

Our draft Local Plan provides 7,300 houses to meet Luton's unmet housing need, so the delay to agreeing the draft Local Plan will have implications for Luton as well as Central Bedfordshire.

Does the Local Plan respond to the proposed Cambridge to Oxford Corridor?

Government is proposing that the Oxford to Cambridge Corridor is to be a new "growth corridor", driving housing and economic growth in the area between the two cities. This is still at an early stage and the draft Local Plan makes reference to it as a factor that we will need to consider in the future.

Local Plans are required to be reviewed every five years and the implications of the Oxford to Cambridge Corridor will be an issue for the review of the Central Bedfordshire Local Plan in future.

One issue from the development of the corridor will be the decision about the final route of the East-West rail project between Bedford and Cambridge around Sandy and its implications for the North East of Central Bedfordshire.

It also includes the strategic importance of Junction 13 M1, for the Strategic Road Network and as a key national location for logistics. We are working closely with Highways England, Bedford and Milton Keynes

on how the junction might be further improved to effectively manage the current traffic volume and projected traffic growth at the junction.

Thornhill Primary School

Expansion within the HRN 1 Development

Planning Context

In 2019 the first Area Masterplan within the Houghton Regis North 1 (Linmere) development was approved. This forms the part of the wider Houghton Regis North development.

The HRN 1 development site included a proportion of land adjacent to Thornhill Primary School, which was allocated for the provision of a new primary school.

Central Bedfordshire Council in conjunction with Thornhill Primary School has undertaken the feasibility and concept design process with the appointment of a multidisciplinary design team through Keegans that included ECD Architects, to investigate the optimum solution for the site in relation to its proximity to the existing one form of entry Thornhill Primary School and the sites requirement with the new development. The reserved matters planning application for the new school will be submitted in early November and the information will be available to view on Central Bedfordshire Council's website.

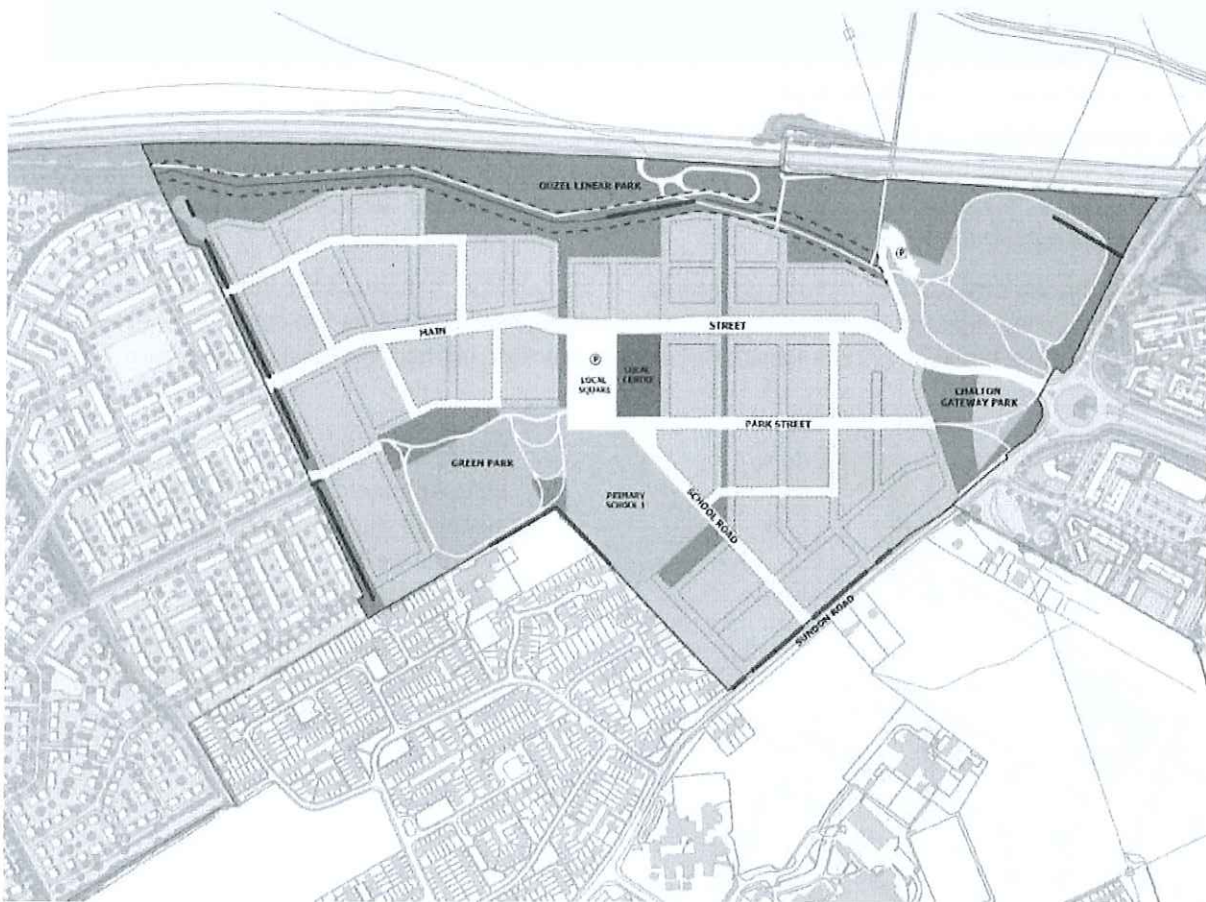


Image 01: 20684 - RG-M-Ai27F - (AMP-1) Framework Plan

Emerging Proposal

The proposal is to expand the existing one form of entry school to a three form of entry school. The three forms of entry are proposed to be split across the two buildings, with nursery, reception year and year one's to be accommodated within the existing building. Years two to six to be located within the new school building on the new site.



Image 02: 3D Visualisation of the New Build School

The new school building will include: 15 classrooms, large two-storey library resource space, main hall capable of accommodating the whole school for key events, flexible studio spaces, outdoor teaching and learning spaces for all year groups, outdoor learning space and social seating area located centrally to be accessible to all the school.

The existing school is proposed to undergo an internal reconfiguration to increase the library space, improve the group learning and resource facilities. The landscape will be designed to create a coherent external environment between both buildings and include new soft and hard external play areas.

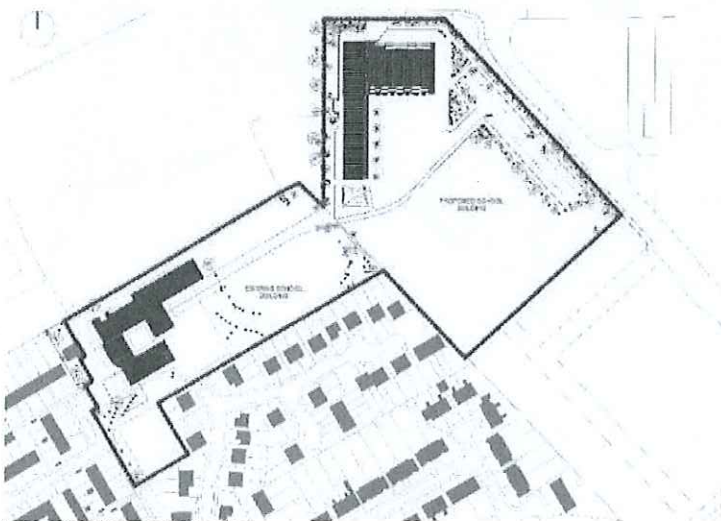


Image 03: Proposal Site Plan

Contact us...

by telephone: 0300 300 8301 by email:
customers@centralbedfordshire.gov.uk

or on the web:

www.centralbedfordshire.gov.uk

Write to Central Bedfordshire Council,
Priory House, Monks Walk, Chicksands,
Shefford, Bedfordshire SG17 5TQ