

HOUGHTON REGIS TOWN COUNCIL

Peel Street, Houghton Regis, Bedfordshire, LU5 5EY

Town Mayor: **Cllr Tracey K McMahon**

Tel: 01582 708540

Town Clerk: **Clare Evans**

E-mail: info@houghtonregis.org.uk

2nd November 2020

To: Members of the Planning Committee

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

(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 9th November 2020 at 7.00pm.**

This meeting is being held virtually via Microsoft Teams. If members of the public would like to attend, please click on the meeting link below and follow the online instructions:

[MEETING LINK¹](#)

[MEETING GUIDANCE](#)

To assist in the smooth running of the meeting please refer and adhere to the Council's Virtual Meeting Guidance. To view the Virtual Meeting Guidance please click on the link above.

Debbie Marsh

**Debbie Marsh
Corporate Services Manager**

THIS MEETING MAY BE RECORDED²

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.

¹ If you require a meeting link emailed to you, please contact the Head of Democratic Services at louise.senior@houghtonregis.org.uk

² 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. No part of the meeting room is exempt from public filming unless the meeting resolves to go into exempt session.

The use of images or recordings arising from this is not under the Council's control.

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.

4. MINUTES

To approve the Minutes of the meeting held on the 19th October 2020. **Pages 9 - 19**

Recommendation: To approve the Minutes of the meeting held on 19th October 2020 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/20/03515/FULL	Change of use from a warehouse (use class B8) to health provision (use class D1) including alterations to one of the roller shutters. Unit 6, Nimbus Park Houghton Hall Park, Porz Avenue, Houghton Regis, Dunstable, LU5 5WZ For: East and North Hertfordshire NHS Trust
CB/20/03095/FULL	New dwelling with car parking and new dropped kerb 1 Leaf Road, LU5 5JG For: Mr D Grigore
CB/20/03741/RM	Reserved Matters: following Outline application CB/12/03613/OUT up to 5,150 dwellings and open spaces within the development; in accordance with the Development Parameters Schedule and Plans. Provision of adventure playground equipment along with seating, and hard and soft landscaping, on land adjacent to The Farmstead, within AMP2. Houghton Regis North Site 1 Land on the northern edge of Houghton Regis
CB/20/03768/FULL	Proposed rear conservatory 39 Clarkes Way, LU5 5EN. Mr M Ecyefu

CB/20/03704/FULL Loft conversion with front dormer window to create one studio flat
Site of Former 74 to 76, High Street, Houghton Regis
For: Mrs R Malhotra

CB/20/03855/GPDE Prior notification of householder extension for a single storey flat
roofed extension with lantern light.
173 Tithe Farm Road, LU5 5JF
Mr I Chester

CB/20/03686/LDCP Lawful Development Certificate Proposed: Use of existing
outbuilding as a cattery
The Orchard, Bedford Road, LU5 6JJ
Mr A Kavanagh

For noting

CB/20/03655/DOC Discharge of Conditions 9, 16 and 18 from planning permission
CB/12/03613/OUT (Outline planning permission with the details of
access, appearance, landscaping, layout and scale reserved for later
determination. Development to comprise: up to 5,150 dwellings (Use
Class C3); up to 202,500 sqm gross of additional development in Use
Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1,
B2, B8 (offices, industrial and storage and distribution); C1 (hotel),
C2 (care home), D1 and D2 (community and leisure); car showroom;
data centre; petrol filling station; car parking; primary substation;
energy centre; and for the laying out of the buildings; routes and open
spaces within the development; and all associated works and
operations including but not limited to: demolition; earthworks;
engineering operations. All development, works and operations to be
in accordance with the Development Parameters Schedule and Plans.)
Houghton Regis North Site 1, Land on the northern edge of
Houghton Regis

CB/20/03660/DOC Discharge of Condition 26, 28 and 33 from planning permission
CB/12/03613/OUT (Outline planning permission with the details of
access, appearance, landscaping, layout and scale reserved for later
determination. Development to comprise: up to 5,150 dwellings (Use
Class C3); up to 202,500 sqm gross of additional development in Use
Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1,
B2, B8 (offices, industrial and storage and distribution); C1 (hotel),
C2 (care home), D1 and D2 (community and leisure); car showroom;
data centre; petrol filling station; car parking; primary substation;
energy centre; and for the laying out of the buildings; routes and open
spaces within the development; and all associated works and
operations including but not limited to: demolition; earthworks;
engineering operations. All development, works and operations to be
in accordance with the Development Parameters Schedule and Plans)
Houghton Regis North Site 1 Land on the northern edge of Houghton
Regis

CB/20/03777/DOC Discharge of Conditions 7 & 9 against planning permission

	<p>CB/16/03379/LB (Phased Construction of a new Independent Living Scheme for Older Persons comprising 168 apartments with support facilities, a Restaurant & Bar, Retail Units, Cafe, 2no Reablement Suites, the conversion and Change of Use of a Grade 2 listed building and the demolition of an existing Sheltered Housing scheme with associated parking and landscaping.) All Saints View, Sapphire Place, LU5 5LQ</p>
CB/20/03347/DOC	<p>Discharge of Condition 4 from planning permission CB/16/03378/REG3 (Phased Construction of a new Independent Living Scheme for Older Persons comprising 168 apartments with support facilities, a Restaurant & Bar, Retail Units, Cafe, 2no. Reablement Suites, the conversion and Change of Use of a Grade 2 Listed Building and the demolition of an existing Sheltered Housing scheme with associated parking and landscaping) All Saints View, Sapphire Place, LU5 5LQ</p>
CB/20/03867/DOC	<p>Discharge of Conditions 20, 24 and 25 from planning permission CB/12/03613/OUT (Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Development to comprise: up to 5,150 dwellings (Use Class C3); up to 202,500 sqm gross of additional development in Use Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1, B2, B8 (offices, industrial and storage and distribution); C1 (hotel), C2 (care home), D1 and D2 (community and leisure); car showroom; data centre; petrol filling station; car parking; primary substation; energy centre; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; engineering operations. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans.) Houghton Regis North 1 Land on the northern edge of Houghton Regis</p>
CB/20/03903/DOC	<p>Discharge of Condition 9 against planning permission CB/12/03613/OUT (Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Development to comprise: up to 5,150 dwellings (Use Class C3); up to 202,500 sqm gross of additional development in Use Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1, B2, B8 (offices, industrial and storage and distribution); C1 (hotel), C2 (care home), D1 and D2 (community and leisure); car showroom; data centre; petrol filling station; car parking; primary substation; energy centre; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; engineering operations. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans) Houghton Regis North Site 1, Land on the northern edge of Houghton Regis</p>
CB/TCA/20/00598	<p>Works to Trees in a Conservation Area:</p>

Fell all Trees and open up the canopy for (T1) Ulmus Minor, (T2) Acer Pseudoplatanus, (T3) Ulmus Minor, (T4) Ulmus Minor, (T5) Ulmus Minor, (T6) Ulmus Minor, (T7) Ulmus Minor, (T8) Acer Pseudoplatanus, (T9) Ulmus Minor and (T10) Acer Pseudoplatanus Land to rear of Woodlands Avenue, Houghton Regis

(b) Decision Notices

Permissions/Approvals/Consents:

None at time of going to print.

Refusals:

None at time of going to print.

Withdrawals:

None at time of going to print.

6. APPEAL NOTICE - REFERENCE APP/P0240/W/20/3259218 - 24 DUNSTABLE ROAD, LU5 5DB

Members are advised that an appeal has been submitted to the Planning Inspectorate against Central Bedfordshire Councils decision to refuse planning permission for erection of a one-bedroom single-storey dwelling at 24 Dunstable Road, Houghton Regis, Dunstable, LU5 5DB application number CB/20/01271/FULL.

For information the Town Council submitted the following objections/comments:

- Overdevelopment of the site.
- Inappropriate development style creating a "terrace" from the current semi-detached bungalows.
- Inability to provide adequate vision splays for vehicles leaving the property, creating traffic danger.
- Development right up to boundary fence will have an overbearing impact on the side-on properties, 1 (especially), 2 and 3 Orchard Close.

The Town Council further commented:

With regard to the last point, why does the proposed design have to be so high at just under 5m? The Town Council requests that should Central Bedfordshire Council be minded approving this application then approval be granted, with permitted development rights removed. This is in order to mitigate any automatic additional development of the site i.e. a second storey.

7. CB/20/00687/FULL – LAND TO THE SOUTH OF THE BUNGALOW, BEDFORE ROAD

Members will find (**pages 20-23**) a notification from Central Bedfordshire Council. The above application is scheduled to be considered at the next Development Management Committee on 11th November 2020. Members are requested to consider whether they wish for a representative of the Town Council to participate at this meeting.

Recommendation:

To consider appointing a representative from the Town Council to participate at the Development Management Committee meeting to be held on the 11th November 2020.

8. PRESENTATION RE PROPOSED DEVELOPMENT AT HAND POST FARM, THORN ROAD, HOUGHTON REGIS

Members are advised that a representative from Smith Jenkins, agent for the developer on the land at Hand Post Farm, Thorn Road, will be in attendance to present to members the proposed plans for the site and to receive Town Council comments and feedback.

For information the proposal for this site would be for approx. 61 dwellings. These would be a mix of detached, attached and apartment blocks, all with on plot parking and garden space. The dwellings would be 100% affordable housing. Site layout (**page 24**).

9. LAND EAST OF HOUGHTON PARK ROAD, HOUGHTON REGIS – OUTLINE PLANNING APPLICATION REF CB/19/02053/OUT – PUBLIC CONSULTATION ON UPDATED PLANS AND DEVELOPMENT BRIEF

Members will find attached correspondence which is an update in relation to an outline application for proposed development on land east of Houghton Park Road, Houghton Regis.

All associated documents can be viewed electronically via the links provided within the letter.

Members are advised that the deadline for comments in relation to the revised development proposals and the draft Development Brief is Wednesday 11th November 2020.

Members will find (**pages 25-33**) correspondence received from local residents.

Recommendation: To consider the Town Councils response in relation to the public consultation on updated plans and Draft Development Brief for Land east of Houghton Park Road, Houghton Regis

10. CENTRAL BEDFORDSHIRE COUNCIL LOCAL PLAN - UPDATE

Members are advised that following the close of the consultation on additional Local Plan evidence in August, Central Bedfordshire Council sent the responses to the Inspectors for their consideration. The Inspectors have now confirmed dates for further hearing sessions, to be held on weeks commencing 7th and 14th December.

As part of this process, the Inspectors have prepared a series of Matters, Issues and Questions (MIQ's) ahead of those hearings. The MIQ's set out the detail of what the Inspectors would like to consider during the sessions. They relate to topic matters that have been the subject of the recent consultation, or where the Inspectors would like to seek further clarification on any other matters. It is not intended that the hearings will revisit issues where there has not been any change in circumstance since the previous hearings. Members will find the MIQs (**pages 34-51**), for information.

The dates and programme for the hearings, the MIQs and any related guidance are on the Central Bedfordshire Council's website via the following link:

https://www.centralbedfordshire.gov.uk/info/45/planning_policy/468/local_plan_-_overview/18

The next steps will be for those participating in the process, including Central Bedfordshire Council, to prepare Hearing Statements that respond to the Inspectors MIQ's. The deadline for these being completed is 18th November 2020. The Hearing Statements for all participants will

then be published on Central Bedfordshire Council’s website ahead of the hearings taking place in December.

If the Inspectors are satisfied following the hearings in December, it is anticipated they will invite Central Bedfordshire Council to draft proposed Modifications to address any issues identified throughout the process. Any Modifications that are required, once agreed by the Inspectors, will be subject to their own six-week consultation

11. STRATEGIC DEVELOPMENT SITES– 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 – No substantive update to report.

Bidwell West – No substantive update to report.

Kingsland – No substantive update to report.

Windsor Drive – No substantive update to report.

Section 106 Monies – No substantive update to report.

Recommendation: **To note the information**

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**Houghton Regis Town Council
Planning Committee
19th October 2020 at 7.00pm**

Present: Councillors: D Dixon-Wilkinson Chairman
J Carroll
Y Farrell Substitute
D Jones
S Thorne

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

Public: 8

Apologies: Councillors: M S Kennedy
K Wattingham

Also present: Councillors: T McMahon
S Goodchild Central Bedfordshire Council

11369 APOLOGIES AND SUBSTITUTIONS

Apologies were received from Cllr Kennedy and Cllr Wattingham (Cllr Farrell substituted)

11370 QUESTIONS FROM THE PUBLIC

Members of the public raised concerns in regard to planning application CB/20/03300/REG3 Kingsland Secondary School Parkside Drive.

Issues raised included the layout of the sports pitches and the area on which they were proposed. Members were informed that the area was heavily used by deer and badgers for foraging and grazing. Local observations had shown that foraging had increased, particularly over the last 4 years, probably due to the development of Linnere and other sites around the Town. Due to their nature, badgers were known to travel a number of miles whilst foraging and therefore any fencing should be permeable, or gaps provided at various intervals, to continue to allow wildlife access and egress to the site. It was suggested that the flood lighting as proposed, would further increase the risk of safety to those animals who currently seek refuge in this area. It was proposed that Central Bedfordshire Council look, holistically, during their consideration of planning applications to allow wildlife corridors to be suitably connected.

The proposed cycle path would concrete over the brook. Currently water from the brook backs up to the pond and overflows onto the Kingsland site. The brook needs some overdue maintenance in order to alleviate this serious issue.

Members were informed that the plans showed an ecological buffer, residents felt this was incorrectly described as what was there was not a buffer but a strip of land with a number of dead trees on it and therefore would not provide adequate screening for those residents adjacent to the proposed building.

Proposed location and height of the proposed development would appear overbearing to those residents living adjacent to the site. Residents recommend Central Bedfordshire Council consider siting the new school on the current footprint or on the northern side of the site.

Members of the public raised concerns in regard to planning application CB/20/03539/FULL Sewell Manor, Manor Farm, Sewell Lane, Sewell

Issues raised included discrepancies with the submitted drawings and those of the ones submitted in 2017. Although the planning application in 2017 was subsequently withdrawn, members were requested to compare the two sets of drawings, paying particular attention to the 'existing' plans. Members were advised that, in the resident's opinion, there had been a breach of planning regulations. Proposed development could be viewed from a public footpath which was contrary to that which had been declared by the applicant.

Members of the public raised concerns in regard to planning application CB/20/03557/VOC Stable Cottage, Manor Farm, Sewell Lane, Sewell

Issues raised included the development not being developed in accordance with approved planning permission.

Members of the committee thanked those present for their input and for attending the meeting.

11371 SPECIFIC DECLARATIONS OF INTEREST

None.

11372 MINUTES

To approve the Minutes of the meeting held on the 28th September 2020.

Resolved To approve the Minutes of the meeting held on 28th September 2020 and for these to be signed by the Chairman.

11373 PLANNING MATTERS

(a) The following planning applications were considered:

CB/20/03331/FULL Form a new dormer to rear of property and conversion of existing garage including the raising of the roof level to form new flat roof
11 Cemetery Road, LU5 5BZ
For: Miss M Tavaglione

Comments: Houghton Regis Town Council had no objections to this application.

CB/20/03087/RM

Reserved Matters: following Outline Application CB/15/04918/REG3 (Erection of up to 61,336m² employment development floor space with associated infrastructure and ancillary works. All matters reserved except means of access from Thorn Road) Appearance, Landscaping, Layout and Scale to Plot B.
Land at Thorn Turn, Thorn Road, Houghton Regis LU6 1RT

Comments: The Town Council accepts that this site has outline permission for storage and distribution activity however, the proposed activity on the site causes concern. Houghton Regis Town Council objects to this application for the following reasons:

- **Design - The approved outline application was of a more traditional storage and distribution unit based around HGV's coming in and out with appropriate car parking for employees. The proposed development is a smaller building but is based on packages coming in then being distributed by vans.**
- **Parking provision - Although there is provision for parking for 800 vans on the site, there are concerns that the provision of parking for employees, to cover the operational hours/days, is not acceptable. This could lead to inconsiderate parking on Thorn Road or surrounding roads.**
- **Highways - HRN2 is not a strategic urban extension, it is a residential lead urban extension. Concerns are raised that vehicles will not use the bypass but instead travel along Thorn Road which would impact on the resident's amenity and increase the risk to other road users and pedestrians.**
- **Environmental Impact - Lack of up to date Environmental Impact Assessment, which would assess the impact of the vehicle movements proposed.**

CB/20/03286/RM

Reserved Matters: following Outline Application CB/12/03613/OUT (5,150 dwellings) for access, appearance, landscaping, layout and scale for provision of class E Foodstore.
Land at Sundon Road, Houghton Regis

Comments: Houghton Regis Town Council had no objections to this application.

CB/20/03300/REG3 Erection of a three storey secondary school and sports hall providing 6 forms of entry (900) pupils, together with a 220 pupil sixth form, sports pitches including an all-weather pitch, vehicular access, car-parking, coach parking, pedestrian and cycle access from the north and east, landscaping and associated infrastructure.
Kingsland Secondary School Parkside Drive, LU5 5TH

Comments: Houghton Regis Town Council supports this application in principle, however, would like Central Bedfordshire Council to consider the following comments:

- **Flooding - That maintenance of the brook be undertaken prior to commencement of any building works. This is to mitigate the risk of flooding from the pond which will increase due to additional concreting over of the site and the brook;**
- **Setting - Consideration be given to the siting of the new buildings. Proposed development will be in closer proximity to neighbouring properties and due to the increase in height, will appear overbearing to those residents affected. As an alternative, could consideration be given to siting the new building on the north side of the site access road, where it will not directly impact on nearby housing on Parkside Drive and Sundon Road. In siting it here this would also not impinge on wildlife. The Town Council reiterates that it cannot judge the best location for this school without sight of the feasibility study for the whole of the Kingsland site, promised by Central Bedfordshire Council in the Spring, but still to be available;**
- **Highway – Request to remove the proposal for an additional entrance from Grange Way. Local residents are concerned that having an entrance here would cause traffic issues in this area;**
- **Ecology - The ecological buffer will not screen the proposed 3 storey building, as the vegetation that is there is very sparse and comprises mainly of bushes or dead trees. Central Bedfordshire Council are requested to review this buffer and provide a more suitable alternative i.e. planting of mature trees;**

- **Wildlife - The Town Council supports residents in their concerns in regard to the layout of the sports pitches and the area on which they are proposed. This area is heavily used by deer and badgers for foraging and grazing. Local observations had shown that foraging has increased, particularly over the last 4 years, probably due to the development of Linnere and other sites around the Town. Due to their nature, badgers are known to travel a number of miles whilst foraging and therefore any fencing should be permeable, or gaps provided at various intervals, to continue to allow wildlife access and egress to the site. It is suggested that the flood lighting as proposed, would further increase the risk of safety to those animals who currently seek refuge in this area. It is proposed that Central Bedfordshire Council look, holistically, during their consideration of planning applications to allow wildlife corridors to be suitably connected.**

Finally, the Town Council continues to register its disappointment with Central Bedfordshire Council in the lack of public and Town Council engagement in regard to this site.

CB/20/03391/FULL Construction of 9 residential dwellings and all ancillary works
Land at The Orchard, Bedford Road, LU5 6JJ
For: Bilsby Properties Ltd

Comments: Houghton Regis Town Council objects to this application for the following reasons:

- **Overdevelopment**
- **No footpath or cycle access to the site, thereby making an enclosed standalone development and out of keeping.**
- **Layout appears cramped**

CB/20/03406/RM Reserved Matters: following Outline Application
CB/12/03613/OUT (Development to comprise: up to 5,150 dwellings and various other classes (retail) (public house) (take away) (offices, industrial and storage and distribution) (hotel) (care home) (community and leisure)): RM sought for appearance, landscaping, layout, and scale of furniture and play equipment.
Houghton Regis North 1, Sundon Road, Houghton Regis

Comments: Houghton Regis Town Council had no objections to this application.

CB/20/03539/FULL Conversion of the former surgery building to a residential dwelling with outdoor garden space and vehicle parking area Sewell Manor, Manor Farm, Sewell Lane, Sewell, LU6 1RP Mr A Buckland

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

- **The provision of parking is not included within the footprint of the current building and therefore would constitute overdevelopment of the site.**
- **The proposed development appears cramped.**
- **The existing building is within the curtilage of a Listed Building there should be no fencing around the building, on order to protect the openness of the site and the Conservation Area.**
- **This structure can be viewed from an adjacent public footpath (FP24), contrary to the declaration on the application form.**
- **Most worryingly is the previous application (CB/17/03582/FULL) which was withdrawn 13th October 2017, shows the building as it was then. What is being presented with this application as being existing is not the same and in fact poses as an unauthorised development of the building that has taken place in the meantime. The Town Council strongly requests planning enforcement investigates this matter to ascertain whether there has been a breach of planning regulations.**

Members requested the ward councillor be asked to call in this application

CB/20/03557/VOC Variation to Condition 12 of Planning Permission CB/19/0323/VOC Variation of Design to keep the ridge level as approved but lower the pitch of the roof to raise the eaves level of the dwellings to alleviate the need for dormers and create small gable on the two storey front projection. Stable Cottage, Manor Farm, Sewell Lane, Sewell, LU6 1RP For: JAW Construction

Comments:

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

- **This site has already been subject to a previous VOC application (CB/19/03323/VOC) which, in the Town Councils opinion, included so many variations that it constituted a revised application and did not fall under the criteria for VOC. For example, the variation also increased the size of the footprint of the proposed developments, albeit by not much but by a figure in total of around 3**

metres, removal of bay windows to be replaced with bi fold doors and two additional windows in plots 2 and 4 on the gable end.

- **The proposed design does not compliment or harmonise with the local surroundings, in particular to the adjacent listed building. Nor does the design pay regard to its setting in a conservation area.**
- **Insufficient parking provision.**
- **The original application (CB/17/05378/FULL) provided very little in design elements. The previous VOC application and this application, should it be approved, will leave a set of semi-detached dwellings of ‘box’ like design with absolutely no design elements and contrary to Central Bedfordshire Councils Design Guide and thereby incongruous in the hamlet of Sewell.**

Members requested the ward councillor be asked to call in this application

The following applications were noted:

CB/20/03374/NMA Non-Material Amendment to planning permission CB/19/00883/RM (Reserved matters of appearance, scale and landscaping for residential development of 255 dwellings Following Outline CB/15/0297/OUT): Substitution of house types on plots 167, 168, 169 & 170 from Irwell to Weaver. Parcels 4a and 4b Bidwell West Houghton Regis Bedfordshire LU5 6JQ

CB/20/03178/DOC Discharge of Condition 1 from planning permission CB/20/00449/RM (Reserved Matters: following Outline Application CB/12/03613/OUT planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Development to comprise: up to 5,150 dwellings (Use Class C3); up to 202,500 sqm gross of additional development in Use Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1, B2, B8 (offices, industrial and storage and distribution); C1 (hotel), C2 (care home), D1 and D2 (community and leisure); car showroom; data centre; petrol filling station; car parking; primary substation; energy centre; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; engineering operations. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans. Reserved matters planning application for 309 new homes, public open space, landscape and associated infrastructure pursuant to Conditions 3 and 4) Houghton Regis North 1 (HRN1) Land on the northern edge of Houghton Regis, Houghton Regis

- CB/20/03495/DOC Discharge of Conditions 12 & 14 against Planning Permission CB/19/03232/RM (Reserved matters: Appearance, scale and landscaping for residential development of 336 dwellings on Development Parcels 5a & 5b Bidwell West, Houghton Regis. Outline application (CB/15/0297/OUT) was supported by a full Environmental Statement (ES))
Parcels 5a & 5b, Bidwell West, Houghton Regis, Bedfordshire, LU5 6JQ
- CB/20/03399/DOC Discharge of Condition 5 to planning permission CB/15/00297/OUT (Outline 'hybrid' planning application with details of main access routes, primary road network and associated drainage in detail only and layout in outline with details of landscaping, appearance and scale reserved for later determination. Development to comprise: Up to 1,850 residential (C3) dwellings (including affordable housing), 2FE Primary School (D1), employment land (Use Classes B1 [a-c], B2 & B8), local centre comprising retail (A1, A2, A3, A4 & A5) and community/leisure uses (D1 & D2), layout of public open spaces including sports pitches and changing rooms, natural wildlife areas and all associated works and operations including engineering operations and earthworks)
Land West of Bidwell (Houghton Regis North Site 2)
Houghton Regis
- CB/20/03400/DOC Discharge of Condition 20 against planning permission CB/15/00297/OUT (Outline 'hybrid' planning application with details of main access routes, primary road network and associated drainage in detail only and layout in outline with details of landscaping, appearance and scale reserved for later determination. Development to comprise: Up to 1,850 residential (C3) dwellings (including affordable housing), 2FE Primary School (D1), employment land (Use Classes B1 [a-c], B2 & B8), local centre comprising retail (A1, A2, A3, A4 & A5) and community/leisure uses (D1 & D2), layout of public open spaces including sports pitches and changing rooms, natural wildlife areas and all associated works and operations including engineering operations and earthworks)
Land West of Bidwell (Houghton Regis North Site 2),
Houghton Regis
- CB/20/03574/DOC Discharge of Condition 19 against planning permission CB/20/00388/RM (Reserved Matters; following outline Application CB/12/03613/OUT Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. 5,150 dwellings (use class C3) 202,500 sqm of additional development in Use Classes A1,A2,A3,A4,A5,B1,B2,B8,C1,C2,D1,D2 All development, works and operations to be in accordance with the Development Parameters Schedule and Plans. Reserves

matter for 153 dwellings with access, parking, landscaping and associated works)
Land To The North And East Of Houghton Regis, Sundon Road, Houghton Regis

- CB/20/03576/DOC Discharge of Condition 12 to Planning Permission CB/20/00388/RM (Reserved Matters; following Outline Application CB/12/03613/OUT Outline Planning Permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. 5,150 dwellings(use class C3) 202,500 sqm of additional development in Use Classes A1,A2,A3,A4,A5,B1,B2,B8,C1,C2,D1,D2 All development, works and operations to be in accordance with the Development Parameters Schedule and Plans. Reserves matter for 153 dwellings with access, parking, landscaping and associated works)
Phase 1 Parcel 3 Houghton Regis, North Site 1, Houghton Regis
- CB/20/03553/DOC Discharge of Conditions 3, 6, 7, 8, 10, 11, 12, 13, 14 & 15 to Planning Permission CB/20/00449/RM (Reserved Matters: following Outline Application CB/12/03613/OUT planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Development to comprise: up to 5,150 dwellings (Use Class C3); up to 202,500 sqm gross of additional development in Use Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1, B2, B8 (offices, industrial and storage and distribution); C1 (hotel), C2 (care home), D1 and D2 (community and leisure); car showroom; data centre; petrol filling station; car parking; primary substation; energy centre; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; engineering operations. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans. Reserved matters planning application for 309 new homes, public open space, landscape and associated infrastructure pursuant to Conditions 3 and 4)
Houghton Regis North 1 (HRN1) Land on the northern edge of Houghton Regis, Houghton Regis
- CB/TRE/20/00538 Works to Trees Protected by Tree Preservation Order SB/80/00004/T4:
Remove decayed large limb of Aesculus Hippocastenum (Horse Chestnut) with weight bias towards Park Road North Land Adjacent to 80 Tennyson Avenue, LU5 5UG

(b) The following decision notices were noted:

Permissions / Approvals / Consents

Refusals:

None received.

Withdrawals:

None received.

**11374 MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT
(PLANNING CONSULTATIONS)**

Members received a response from NALC to MHCLG on the Changes to the current planning system consultation, which was based on all the responses NALC received from Town and Parish Councils.

11375 LOCAL PLAN

No substantive update to report.

Resolved: To note the information.

**11376 STRATEGIC DEVELOPMENT SITES/LOCAL PLAN–
UPDATE/PROGRESS**

Woodside Link – No substantive update to report.

A5 M1 Link – Members were advised that Highways England were now in receipt of the Road Traffic Safety Audit. Members were informed that there was an intention to amend the current road markings before the end of the financial year.

For information this major road project opened on the 11th May 2017.

All Saints View – No substantive update to report.

Linnere – No substantive update to report.

Bidwell West – No substantive update to report.

Kingsland – Members were referred to planning application CB/20/03300/REG3 as above.

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 8.48pm

Dated this 9th day of November 2020

Chairman

DRAFT

Development Management

Central Bedfordshire Council

Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ
www.centralbedfordshire.gov.uk



Mrs C Evans
Town Clerk
Houghton Regis Town Council
Peel Street
Houghton Regis
Beds
LU5 5EY

Date 29 October 2020

Dear Mrs Evans,

Application No: CB/20/00687/FULL
Location: Land to the south of The Bungalow, Bedford Road, Houghton Regis, Dunstable, LU5 6JS
Proposal: Residential development of 31 affordable dwellings with formation of two vehicular accesses, sustainable urban drainage and associated landscaping

The above application is scheduled for the next Development Management Committee on 11 November 2020. It has been recommended for approval however, the Committee is free to make a decision which is not in line with this if it considers there is grounds to do so.

Further to your Council's comments, you now have the opportunity for a representative to address the Committee. To request a speaking slot, you must notify Governance Services. All speaking requests must be received by 5pm on 10 November, 2020.

Requests can either be made by telephone (0300 300 5649) or via email (committeemeetings@centralbedfordshire.gov.uk). It is essential that you provide a contact telephone number. Further details of the speaking procedure are set out in the enclosed information sheet.

The Committee will be held virtually via Microsoft Teams due to the current Covid-19 outbreak. Further details will be provided by Governance Services when you register to speak. Please contact Governance Services if you wish to address the Committee but are unable to participate in the virtual meeting.

The Development Management Committee's start time is subject to confirmation and you should note that the meeting could begin at either 9.30am or 10.00am. The agenda for the meeting will show the start time and it will be published on the Council's website at least 5 clear working days before the Committee is held. The agenda can be viewed using the following link:

https://www.centralbedfordshire.gov.uk/info/31/meetings/219/development_management_committee/2.

Councillor contact details can be found at <http://www.centralbedfordshire.gov.uk/council/councillors/overview.aspx> or by telephoning customer services on 0300 300 8692.

Yours sincerely,

Andrew Davie

Andrew Davie
Assistant Director - Development Infrastructure

Development Management

Central Bedfordshire Council

Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ
www.centralbedfordshire.gov.uk



Speaking at Development Management Committee Meetings – Have YOUR say!

Members of the public can speak at the Council's Development Management meetings on planning applications submitted under the Town and Country Planning legislation.

The purpose of this scheme is to allow applicants, objectors, agents, supporters and representatives from Town and Parish Councils/Parish Meetings to make their views known to the Committee in person. Letters of support or objection will be taken into account during the consultation period.

The scheme only applies to applications which are submitted to the Committee and not to applications dealt with under Officer delegated powers.

How long can I speak for?

A **maximum of three minutes** is available for each collective group of speakers i.e.

- Group 1: representatives from each Town or Parish Councils/Parish Meetings;
- Group 2: any individual and organisation **objecting** to the application; and
- Group 3: any individual and organisation **supporting** the application, including the applicant and agent.

This time limit will be strictly adhered to. The Council strongly encourages speakers to get together and make a joint case, appointing a representative to speak on their behalf. If no spokesperson is appointed, speakers will be heard in the order that requests have been received until the three minutes have been used up.

Please note that the requests to speak will be recorded on a **'first come, first served'** basis. Should there be more than one request to speak on a particular item, the first person registered will be asked if they agree to share the three minutes speaking allowance.

Further information is provided in the Council's Constitution: Part 4G - Public Participation Procedure - Annex 3: Procedure for Public Participation in Development Management Committee Meetings when determining Planning or other Applications
(<https://centralbedfordshire.app.box.com/s/tnatqkq10fd74azjl23eys2psx697ozn>).

When do I speak?

The Planning Officer will introduce the application including slides of the location and the Chairman will then invite the speakers to address the Committee in the following order:

- Town or Parish Councils/Parish Meetings representatives;

- Objectors/representatives; and
- Supporters including applicants/agents.

How can I best use my time when speaking to the Committee?

It will help if you limit your views to relevant planning issues. Examples might be:

- The suitability of the site for the particular development;
- The design, appearance and layout of the proposal;
- Any loss of light or overshadowing;
- Highway safety and traffic issues;
- Effect on residential amenity;
- Noise, disturbance and odour problems; and
- Planning policy and Government guidance.

You should try to avoid reference to matters which are not relevant in reaching planning decisions. Examples might be:

- Matters covered by other laws (e.g. alcohol licensing);
- Private property rights (e.g. boundary or access disputes);
- Personal remarks (e.g. the applicant's motives);
- Effect on the value of property;
- Possible future development; and
- Loss of view over other people's land.

What time is the application heard?

The Committee Meeting will start at 10.00am and you are requested to arrive at least 15 minutes before the start of the meeting.

The Agenda will be considered in the order printed unless the Chairman exercises his right to vary the order of business.

Can I circulate information at the meeting?

Written or illustrative material **will not** be circulated at the meeting. If you have any such material or any additional information to be considered by the Committee, please provide this to the relevant Case Officer/Planning officer at the Council by midday on the Friday before the Committee date. Additional information will be published to the Council's website the evening before the meeting.

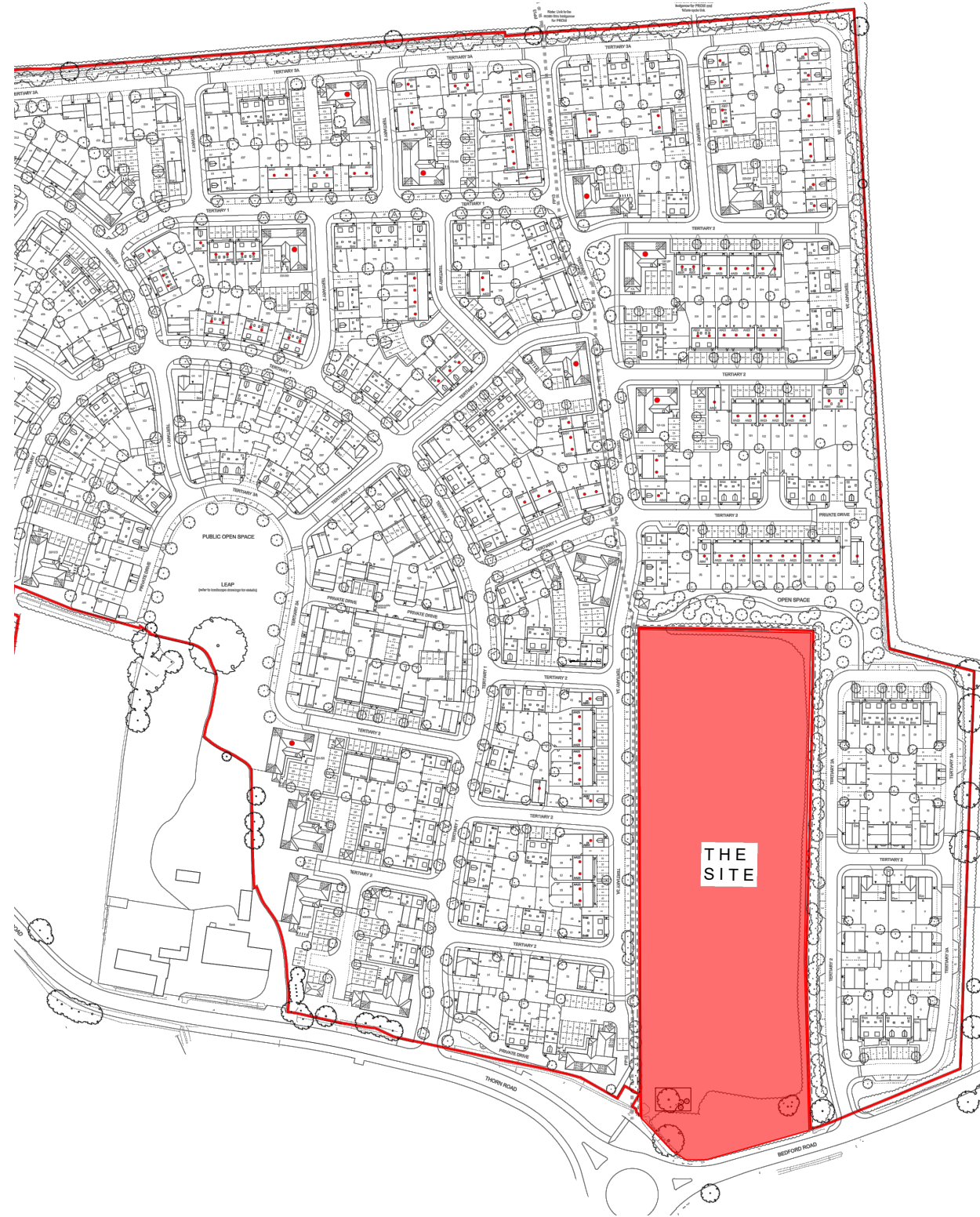
How will the application be determined?

The Planning Officer will provide clarification on any matters arising from the public participation. The Committee will then consider the application and vote. Should an application be deferred, your views can be restated at that time.

For more information

If you would like to know more about public participation, please contact Sophie Sherwood on telephone number **0300 300 5649** or email:

committeemeetings@centralbedfordshire.gov.uk



REVISION:	DATE:	DRAWN:	CHECKED:	DESCRIPTION:
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	SCALE: 1:2500	PROJECT CODE: 1916
	DRAW DATE: 05.02.20 DRAWN: BH CHECKED: -	DRAWING NUMBER: PA-02
	DRAWING STATUS: PRE APP	REVISION DATE: - DRAWN: - CHECKED: - REVISION: - PAPER SIZE: A3

352/58/1

21 October 2020

Houghton Regis Town Council

By Email Only: Debbie.marsh@houghtonregis.org.uk

21 Prince Street
Bristol BS1 4PH

0370 777 6292
info@rapleys.com
rapleys.com

LONDON
BIRMINGHAM
BRISTOL
CAMBRIDGE
EDINBURGH
HUNTINGDON
MANCHESTER

Dear Councillors,

Re: Land east of Houghton Park Road, Houghton Regis – Outline Planning Application ref. CB/19/02053/OUT - Public Consultation on Updated Plans and Draft Development Brief

I write on behalf of Gallagher Developments to provide an update in relation to an outline application for proposed development on land east of Houghton Park Road, Houghton Regis. As part of this update Gallagher Developments is seeking your views on:

- a) Updated development proposals as described within public consultation newsletter and accompanying Design and Access Statement; and
- b) A draft Development Brief for the site as required by draft Policy HA1 (Small and Medium Allocations), allocation ref. HAS29, of the emerging Central Bedfordshire Council Local Plan 2015-2035.

The outline application for the erection of up to 350 residential dwellings and associated works was submitted to Central Bedfordshire Council in June 2019 (application reference: CB/19/02053/OUT). As part of the emerging Local Plan the site has been allocated for new homes and associated greenspace.

Following submission of the application engagement has taken place with officers, local ward members, the Town Council and local residents. The first public consultation newsletter was circulated to local residents and stakeholders in November 2019. In seeking to respond to and address the comments and issues that have been raised as part of these discussions an update to the application proposals will, in due course, be made to the Local Planning Authority.

Prior to submitting the application update Gallagher Developments is undertaking further consultation on the revised development proposals as well as a draft Development Brief. A public consultation newsletter was posted to local residents on 21st October 2020 and comments are sought until 11 November 2020. Further details are contained within the enclosed consultation newsletter and are summarised below.

Updated Development Proposals

The masterplan for the site has been revised to take into consideration comments made by members of the public during the public consultation exercise in November 2019 and responds to comments made by consultees. In addition, further survey work has been completed on the site which has necessitated some further minor adjustments to the development proposals. Further detail on the proposed scheme amendments can be found in the updated Design and Access Statement, which can be accessed via the link contained at the

end of this letter. Members of the public can also access this document using the same online link, which has been cited on the consultation newsletter. A summary is set out below:

1. The easement for the overhead cables along the western boundary of the site has been widened to meet appropriate standards. This has impacted on the dimensions of the development parcels and road structure.
2. The public open space and footpath / cycle path provisions along the western site boundary have been enhanced, as have the amenity spaces across the site more generally.
3. Additional pedestrian and cycle access points are provided to better integrate with the adjacent Parkside area to the west with suitable future opportunities to provide suitable access to the east also included. Pathways now create a continuous loop around the whole development together with enhanced boundary landscaping.
4. The positioning of the attenuation basins has been amended to reflect updated drainage information. Attenuation and infiltration basins are now proposed.
5. The Masterplan now includes retention of an existing Cherry tree within the southern pocket park.
6. The proposed development parcels adjoining the north eastern boundary have been brought further within the Site and additional green space / buffering provided. This is in response to a request as part of the consultation process and will improve the potential future relationship with land to the east.
7. Proposals for the improvement of Conquest Road leading from Parkside Drive and to the Site have been agreed with the Highways Department. This will include the provision of new, safe and appropriate pedestrian and cycle routes in addition to the provision of suitable car parking arrangements. Further, public realm improvements are proposed to Conquest Road that would enhance the immediate area.
8. The layout of new homes to the south of the site have been adjusted to account for a small change in the red application boundary line.
9. Following further consultation with the Council, the play facilities have been consolidated into two larger areas that will provide a comprehensive range of play opportunities for all ages and will be available for residents of the new homes as well as residents from the existing Parkside Estate.

Development Brief

A Development Brief has been developed in response to the requirements set out under Draft Policy HA1, allocation ref. HAS29, of the emerging Local Plan. The purpose of the Development Brief is to inform the detailed design of the development, which will be assessed by the Local Planning Authority at a future reserved matters stage.

The Development Brief provides further detail on the key parts of the Masterplan and sets out the elements that will make the site a distinctive and characterful new place. Essentially it sets out the 'design rules' for how the development should come forward. Further details are summarised within the enclosed public consultation newsletter.

The Development Brief forms Part 2 of the Design and Access Statement and can be downloaded electronically using the link provided below.

Due to the COVID-19 pandemic we are limiting, as far as possible, the production of hard copy documents and are instead encouraging responses to be made electronically using the email address provided below. The consultation approach has been agreed with the Case Officer for the application, Stuart Robinson. Should you or any of your constituents have any difficulty accessing the document please do not hesitate to contact us.

- **Electronic link to public consultation newsletter:** <https://rapleys.sharefile.com/d-sbfd314b06e94399a>
- **Electronic link to Design and Access Statement (incl. Development Brief):** <https://rapleys.sharefile.com/d-s3136c33c2b148ac8>
- **Contact email address:** houghtonpark@rapleys.com

The deadline for comments in relation to the revised development proposals and the draft Development Brief is Wednesday 11 November 2020. Beyond this date we will be gathering all comments made before finalising the application update and Development Brief for submission to the Local Planning Authority.

Please do get in touch should you require any further information or clarification at this stage.

Yours sincerely,



SarahRSmith (Oct 21, 2020 09:08 GMT+1)

Sarah R Smith
BA (Hons) MRTPI
Partner - Town Planning

RESIDENTS COMMENTS – HOUGHTON PARK ROAD

1)

NO, Gallagher Developments may NOT use Conquest Road to access their new proposed development of hundreds of homes, instead they will not have to build a bridge in order to access their own development.

If Gallagher Development cannot afford to build their own access, to their own development, then they should not be allowed to develop anything.

The new residents of the new Gallagher Development deserve their own new entrance and exit, into their own new development. Emergency services deserve to have a dedicated entrance into any new housing development built in the UK.

Gallagher Development is taking advantage of the Coronavirus Pandemic to try and finagle their way into being able to use Conquest Road.

Gallagher Development should be ashamed.

We, the current residents of Houghton Regis, in 2019, already told them, “NO!”

The residents who lived along Conquest Road, complained last year in 2019. The Houghton Regis Council rejected the Gallagher Development proposal and asked the Central Bedfordshire Council to reject and dismiss this dangerous idea of trapping thousands of new residents in a development that relies on one small road for access. Central Bedfordshire Council has spent quite a bit of taxpayer money to build a new beautiful road to be used to access this land, but it is the responsibility of landowner to build their own access. Gallagher Development cannot use our internal estate, over 40 year old, road, because they are too cheap to build their own access.

Gallagher Development also has lied on their proposal, they state that they are building two “Vehicular Access to HRN1”, and that is a lie, because I have seen the plans to HRN1 and there are no vehicular access between the two developments only cycle/walking paths connect the two parcels of land according to the plans for HRN1. So, this proposal, is trying to fool us, into believing that Conquest Road will not be the only access into the development, but the truth is, it will be.

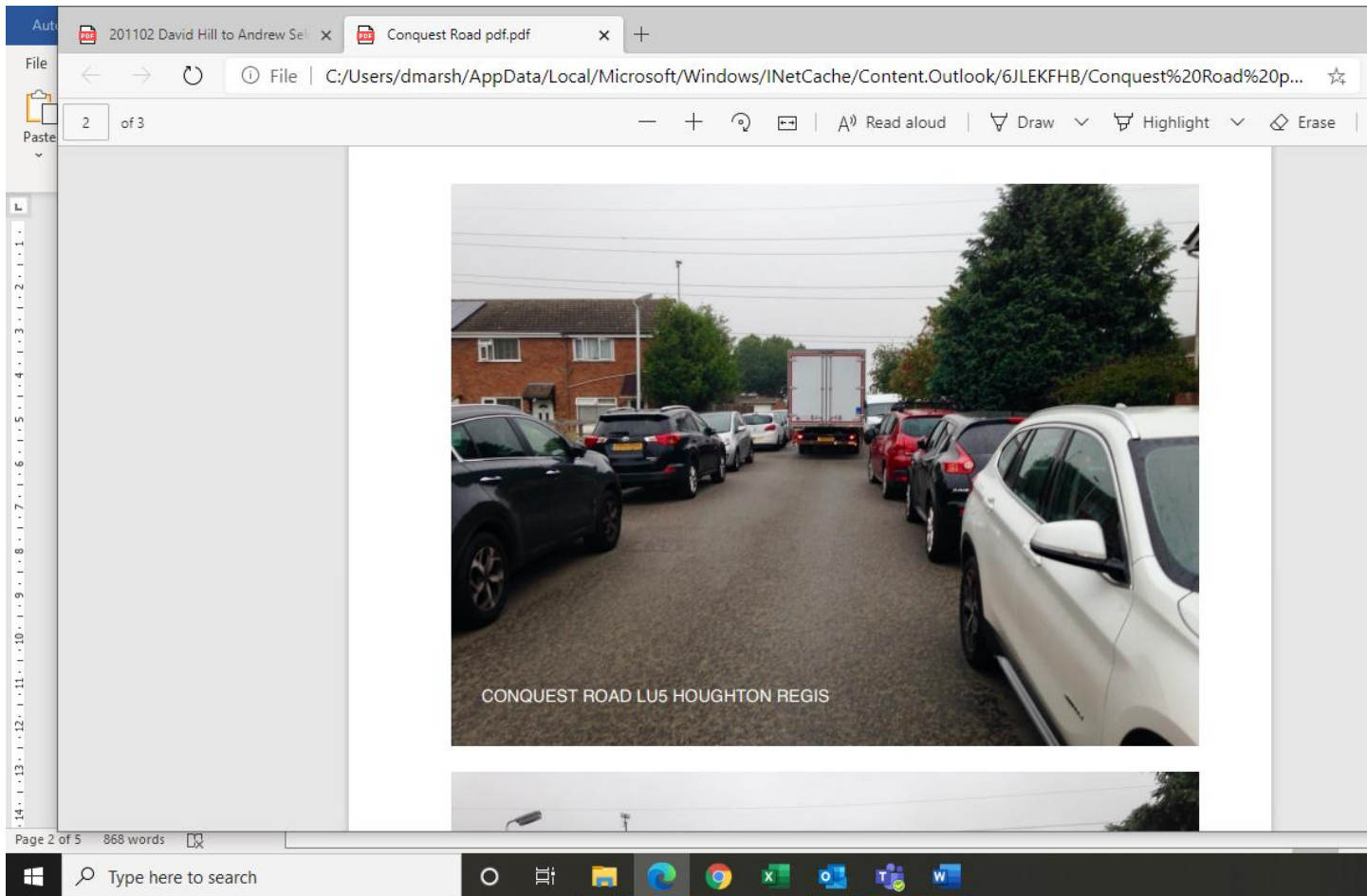
Conquest Road was not built to handle our current traffic demands, much less all this new traffic, for hundreds maybe thousands of new home owners, and was not built to be a thoroughfare, or to handle the traffic demands, onto this new proposed area for development.

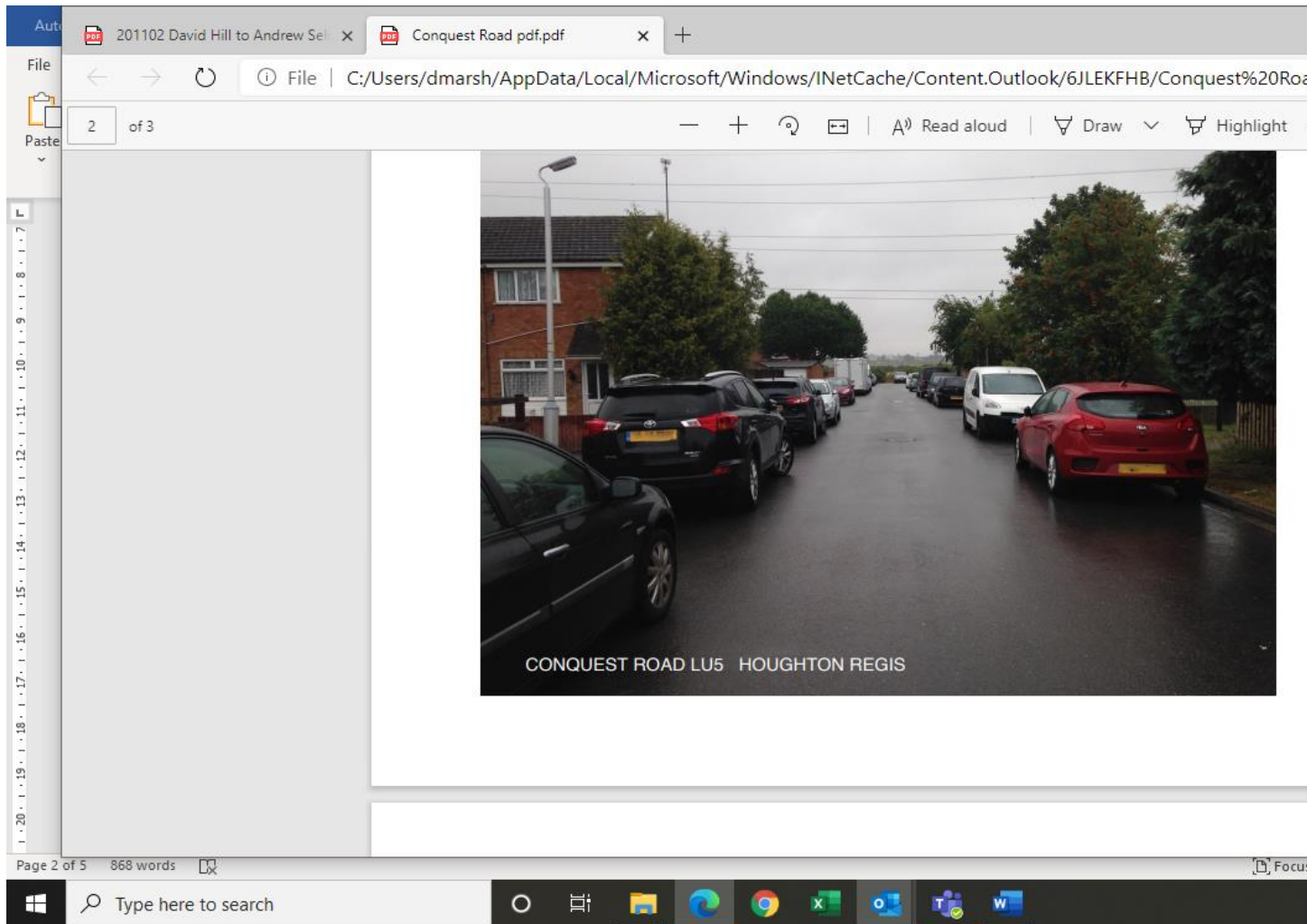
There is only one answer to the request by Gallagher Development, and that is to decline their deceptive underhanded proposal, and to recognize Gallagher Development for exactly the company that they are, a company that wants to profit and benefit by burdening and causing extreme detriment to the existing residents, and homeowners, of Houghton Regis.

2)

I write in connection with the above development. Local residents are expressing serious concerns in regard to this development, these mainly focus on the proposal to use Conquest Road as the main route not only to the site but to the possibility of a link to the adjacent site called Linmere. There is also another road that they want to use, Houghton Park Road. If you look at the attached pictures you will see Conquest Road is not a road which is suitable to take traffic for two developed estates. The road has mainly narrow grass verges either side of the roadway if

these are taken away residents will step out of their homes right into the road? We also have serious parking problems in Conquest Road and Long Meadow which is at the end of the road, cars and vans are parked either side at off-peak times and as seen in the picture large lorries can only just get through if carefully driven. Another issue is fumes from motor vehicles effecting residents and also there are young families living nearby and two Schools. When the development is built 350 houses will be erected on the site that means that possibly 700 cars will be using Conquest Road, if each family has two cars. In addition, there will be friends visiting residents. Add to this, cars going to the Linmere the figure increases. Clearly there is enough evidence that the developers need to build a bridge at the Woodside Link end of the site that would take traffic direct on to the Woodside link and the Motorway without the need to use Conquest Road as a primary access route.





3) Dear All,

Attached is a further Public Consultation Newsletter I have just received. The Development Brief is prior to formal submission to the local Planning Authority. I would strongly urge you to send in your comments. It seems that they are still intent to use Conquest Road as a main primary through route to the development, it seems that nothing has changed very much. I am confident that local people around Conquest Road are strongly against the roads use as a Primary Access. I would recommend you looking at:

<https://rapleys.sharefile.com/d-s3136c33c2b148ac8>

I have added a couple of paragraphs to this email from the Rapleys document 'Site Access and Highways' and 'new vehicular linkages' which refer to Conquest Road. It should be noted that the road after going through the development could have a potential link with the other estate development.

The email address for replies/comments is at houghtonpark@rapleys.com

Kind regards

How has our proposal evolved?

A new residential neighbourhood...



How have we developed our ideas?

Since submitting the application in June 2019 the applicants have been working with officers at Central Bedfordshire Council to further improve the development proposals for the site.

The masterplan for the site is shaped by technical input from a consultant team of specialists on matters such as transport / traffic, landscaping, ecology and drainage. Further updates to the masterplan, as summarised in this newsletter, are now proposed in response to comments made by the Council's officers, as well as public comments received following the first consultation newsletter in November 2019.

The key changes are highlighted opposite.

Development Brief



The application is submitted in outline which means that the detailed design considerations such as layout, scale, appearance, and landscaping for the development are 'reserved'. The full design of the development will, therefore, be considered at a future 'reserved matters' stage.

The local authority now requires new developments to produce a Development Brief as part of the outline planning application.

It provides further detail on the key parts of the Masterplan, and what will make this a distinctive and characterful new place. Essentially it sets out the 'design rules' for how the development should come forward.

At the heart of the Brief is the Regulating Plan - shown opposite. This is a controlling plan and shows how the future development should be designed and put together.

Following this plan are a series of tables, plans and sections that provide more detail.

SITE ACCESS AND HIGHWAYS

A single vehicular access point is available to the site through an existing residential area along Conquest Road, and as such, some off site improvement works will be required to ensure these routes are suitable to accommodate traffic from the new development.

In order to potentially integrate with the proposed wider masterplan to the east of the site, two connection points to this boundary will potentially be provided within the new layout.

A further emergency access will be needed to serve the new development, that will also link into the existing residential areas to the west of the site.

3 New vehicular linkages

A new vehicular access point from Conquest Road is proposed and will form the main entrance point into the site. Emergency vehicle access will be accommodated from Houghton Park Road to the north. An internal primary route will allow efficient vehicular access around the site, with potential to provide future connections to the adjacent proposed HRN1 development to the east.

EXAM 121:

Further Matters Issues and Questions

16 October 2020

Central Bedfordshire Local Plan 2015-2035

A great place to live and work.



Independent Examination of the Central Bedfordshire Local Plan

Further Matters, Issues and Questions for Examination

Matthew Birkinshaw BA(Hons) Msc MRTPI

Helen Hockenhull BA(Hons) B.PI MRTPI

Inspectors appointed by the Secretary of State

Date: 16 October 2020

Introduction

The hearing sessions as part of the examination of the Central Bedfordshire Local Plan were held between May and July 2019. Following the hearings, in September 2019, the Inspectors published their Initial Findings.¹

Central Bedfordshire Council has produced additional information in response to the main soundness and legal compliance issues raised by the Inspectors. The documents are available to view on the examination website and have been subject to public consultation held between 18 June and 12 August 2020.² Where the additional information suggests that Main Modifications are made to the submission version Local Plan, these are summarised in Examination Document EXAM 117.

Prior to the hearing sessions, responses are invited from participants on the following additional Matters, Issues and Questions ('MIQs'). The further MIQs are based on the issues raised by representors in response to the public consultation. They also seek to address any material changes in circumstances which have occurred since the initial hearings in 2019.

In responding to the MIQs participants should also be aware of (and where applicable provide a response to) additional information provided by the Council following the close of the hearings in Examination Documents EXAM 86 to EXAM 100.

Further information about the format of the additional hearings and submission of written statements is provided in the accompanying Guidance Note, which should also be read alongside the MIQs.

¹ Document EXAM69

² Documents EXAM106 – EXAM115

Matter 1 – Sustainability Appraisal ('SA')

Issue 1 – Housing Strategy

Paragraph 4.36 of the Supplementary SA states that urban extensions perform better than village extensions. This is because development on the edge of larger urban areas would provide residents with easier access, particularly via sustainable modes of transport, to services, facilities and employment opportunities.

The submission version Local Plan does, however, allocate land for housing on the edge of villages in Area A. The Supplementary SA confirms that this is to provide a mix of sites which can come forward in the short term, without relying solely on larger, strategic sites.

In considering how much land to allocate for residential development in the villages, the Inspectors' Initial Findings (paragraph 6) queried why only two options had been considered; either 2,000 dwellings across the villages or no development at all.

- Q1. Where does the submitted evidence justify the scale and distribution of development in the Area A villages? Is the spatial strategy for this area justified having regard to reasonable alternatives?
- Q2. The Supplementary SA Non-technical Summary (page 11), states that the SA has considered options of not allocating development at North of Luton or Luton West, allocating smaller scale development at North of Luton and Luton West, and, relying on village extensions instead. Where does the SA, through its various iterations, test the final option (relying on village extensions instead)?
- Q3. Does the Supplementary SA take into account the Council's suggested Main Modifications to the submission version Local Plan which seek to delete some of the Small and Medium allocations from Area A? If fewer homes are provided in Area A as a result of suggested changes to the Plan, do the same overall conclusions apply?
- Q4. What is the justification for the heritage scores in the Supplementary SA in respect of North of Luton? Would the effects of development on designated heritage assets be the same, or materially different when comparing options with, and without, the 'Eastern Bowl'?
- Q5. Does the assessment in the Supplementary SA provide robust, justified and clear reasons for allocating land North of Luton?
- Q6. What is the justification for assessing Checkley Wood Garden Village as an employment allocation, rather than a residential development in Area A?
- Q7. Prior to the hearing sessions in 2019, the Council confirmed that a new school would be required to support the level of growth proposed in Harlington. Does the SA, through the various iterations, test Site HAS20 against reasonable alternatives based on this requirement to accommodate a new school? Is the strategy for Harlington (and the provision of a new school) justified when considered against reasonable alternatives?

Issue 2 – Employment Strategy

- Q1. The Supplementary SA tests two employment growth options. Option 1 provides land to meet some 'footloose' demand for strategic warehousing. Option 2 does not. What are the reasons for testing these scenarios, rather than considering different amounts of strategic warehousing based on identified needs, for example?
- Q2. How were the 16 reasonable alternative employment options in the Supplementary SA determined?
- Q3. Is the assessment of Policy SE3 (Holme Farm, Biggleswade) in the Supplementary SA based on the submission version Local Plan, or the Plan as suggested to be modified by Examination Document EXAM 112?
- Q4. The Inspectors' Interim Findings queried the Regulation 19 SA in respect of Policy SE3. In particular, the conclusion that the site is located in close proximity to Biggleswade railway station and would reduce the need to travel for potential employees. However, the Supplementary SA (page G-51) appears to reach the same conclusion, despite the fact that the train station is approximately 3km away and is on the opposite side of the A1. Are the conclusions in the Supplementary SA accurate, robust and justified?
- Q5. The Supplementary SA includes an assessment of New Spring Farm, Biggleswade, as a reasonable alternative. Does the site area reflect that which has been put forward through representations?
- Q6. In assessing New Spring Farm against landscape objectives, the Supplementary SA states that the site is highly visible, with concerns about the potential for development to spread south of the town into an area characterised by large scale arable land. It is scored '0?' for landscape.
- In contrast, the Supplementary SA scores Holme Farm '+?' for landscape, without mention of development extending south of Biggleswade into an area characterised by large scale arable land. Are the conclusions in the Supplementary SA accurate, robust and justified?
- Q7. The Inspectors' Interim Findings also queried the positive landscape score in respect of Policy SE2 (Marston Gate Expansion). However, the Supplementary SA (page G-32) appears to reach the same conclusion. Are the conclusions in the Supplementary SA accurate, robust and justified?
- Q8. What evidence-based documents are the landscape conclusions drawn from the in the Supplementary SA?
- Q9. What were the reasons for discounting land at Junction 12 of the M1 from the Supplementary SA? Does the Supplementary SA adequately consider reasonable alternatives for the provision of strategic warehousing?
- Q10. Once the Supplementary SA had been completed, how did the Council conclude on which sites should be allocated?
- Q11. Given the need for strategic warehousing in the area, what are the reasons for not taking forward additional sites based on the findings in the Supplementary SA?
- Q12. Is the strategy for the provision of strategic employment sites justified?

Matter 2 – Housing and Economic Needs

Issue 1 – Housing Needs

The supporting text to Policy SP1 states that the objectively assessed housing need for Central Bedfordshire amounts to 32,000 dwellings over the plan period. The Local Plan also commits to providing 7,350 dwellings as a contribution towards Luton’s unmet housing need. This results in a total housing requirement of 39,350 dwellings.

When assessing housing and economic development needs, the Planning Practice Guidance relevant to this examination (‘the PPG’) advises that:

“Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.”³

On 29 June 2020 the ONS published 2018-based household projections. The Inspectors subsequently wrote to the Council⁴, seeking its view on whether the latest household projections represented a ‘meaningful’ change in the housing situation for the purposes of the PPG.

In summary, the Council’s response⁵ states that the 2018-based projections identify a lower level of household growth (2,290 fewer households) than the Strategic Housing Market Assessment (‘SHMA’). However, the 2018-based projections are derived from migration trends over a 2 year period. The Council’s additional evidence suggests that using a longer-term perspective provides a more robust basis for establishing housing need. When using 5 and 10-year trends the evidence states that the projected level of growth is within 1% of the SHMA projection.

On this basis, Examination Document EXAM 119 concludes that there is no material difference between the SHMA and the 2018-based household projections, and thus, there is no meaningful change in the housing situation.

Taking this into account:

- Q1. What is the difference in the objectively assessed need for housing in Central Bedfordshire when calculated using the 2018-based household projections, compared to the 2014-based projections?
- Q2. Have the figures for Central Bedfordshire in Examination Document EXAM 119 been arrived at correctly and on a robust basis? Are the key assumptions reasonable?
- Q3. Has there been a meaningful change in the housing situation in Central Bedfordshire for the purposes of the PPG?

³ Paragraph:016, Reference ID: 2a-016-20150227

⁴ Document EXAM118

⁵ Document EXAM119

- Q4. Have the figures for Luton in Examination Document EXAM 119 been arrived at correctly and on a robust basis? Are the key assumptions reasonable?
- Q5. Has there been a meaningful change in the housing situation in Luton for the purposes of the PPG?
- Q6. If there has been a material change in the housing situation in Luton, what implications does this have for the soundness of the Central Bedfordshire Local Plan?

Issue 2 – Employment Needs

The Employment Land Update⁶ states that in order to meet the Local Plan target of 24,000 new jobs, a further 64 hectares of land is needed for 'general' employment uses for local needs over the plan period. It concludes that based on 30 hectares being provided at Marston Vale and 7 hectares at North of Luton (as suggested to be modified), there will be a shortfall of almost 27 hectares.

Taking this into account:

- Q1. Should the need for employment land be set out in the Local Plan, including a list of sites which are allocated for employment uses? Should the Local Plan identify that there is a shortfall of employment land?
- Q2. What is the most appropriate way of addressing the identified shortfall in employment land? Should the Local Plan include a mechanism, such as requiring an early review and update, to identify and bring forward additional sites? If so, what should this include?

The Employment Technical Paper⁷ suggests that Policy SE3 (Holme Farm, Biggleswade) could be modified to provide approximately 25 hectares of general employment land in order to meet the identified shortfall.

- Q3. Is such a Main Modification necessary in the interests of soundness?
- Q4. Does the evidence base supporting the Local Plan justify allocating Holme Farm, Biggleswade for 25 hectares of general employment land?
- Q5. In the event that Policy SE3 was modified to provide a reduced amount of strategic warehousing, what implications would this have on the supply of land for such uses? Would additional sites for strategic warehousing be required to offset the loss at Biggleswade?
- Q6. What is the justification for providing 8 hectares of land for a petrol filling station and service uses as part of Policy SE3? Is this justified in this location?

⁶ Examination Document EXAM 109

⁷ Examination Document EXAM 112

Matter 3 – Strategic Site Allocations

Issue 1 – North of Luton – Policy SA1

- Q1. What is the justification for the suggested Main Modification which seeks to remove land to the north of the proposed M1-A6 link road from the allocation? Is this necessary in the interests of soundness?
- Q2. Would the removal of land to the north of the link road require any consequential changes to the amount of housing and employment land proposed across the site?
- Q3. In the interests of clarity and effectiveness, is it necessary to identify the 'Eastern Bowl' within the Local Plan and/or Policies Map?

The Council's Matter 6 Hearing Statement (for hearings held in 2019) suggested that the Eastern Bowl should be removed from the proposed allocation, with a subsequent reduction in site capacity to 3,100 dwellings. Paragraph 4.10.1 stated that its removal will "...provide substantial mitigation, significantly reducing the impact of development on the AONB and its setting, as well as preventing harm to the nearby designated heritage assets."

Examination Document EXAM 113 now suggests that the Eastern Bowl should be retained as part of the site boundary and removed from the Green Belt, with the allocation providing up to approximately 3,600 new homes.

- Q4. What specific evidence can the Council point to which justifies the suggested change in approach? How does this compare with the evidence prepared in support of the 2019 hearings?
- Q5. How do the suggested Main Modifications in Examination Document EXAM 113 relate to the heritage-led mitigation measures identified in the Council's Matter 6 Hearing Statement (for hearings held in 2019)? For example, how will the allocation ensure that the necessary buffers are provided around the Dray's Ditches Scheduled Monument?
- Q6. Is the potential for development within the Eastern Bowl a soundness matter for the purpose of the Local Plan examination, or, a design issue to be considered as part of the planning application process? Could the type, amount, size and scale of development in the Eastern Bowl be adequately controlled through the use of appropriately worded development criteria in Policy SA1?
- Q7. Subject to answers to the above questions, is it necessary to modify the total amount of development proposed in Policy SA1? Would the policy be justified and effective by referring to a figure of 'up to' 4,000 dwellings – with the final amount, including the type and quantum of development in the Eastern Bowl determined through the planning application process?
- Q8. What is the justification for seeking to remove recently completed employment development from the site boundary? Is this necessary for soundness?

Issue 2 – Sundon RFI – Policy SE1

- Q1. Examination Document EXAM 107 has been prepared in response to the Inspectors' Initial Findings. Does the additional evidence now demonstrate that the exceptional circumstances, as required by paragraphs 79-86 of the Framework, exist to justify the proposed revisions to the Green Belt boundary in this location?
- Q2. What is the justification for the suggested Main Modification to Policy SE1, which states that development proposals must contribute to the delivery of the M1-A6 link road? Is this necessary for soundness?
- Q3. How has the viability of the proposed development been considered, having regard to the expected contributions referred to in Question 2? Is it clear what contributions would be required and how they have been determined?
- Q4. Is it clear to decision-makers, developers and local communities what highway works will be necessary to facilitate the proposed development (other than the spur to the M1-A6 link road)? For effectiveness should they be set out in Policy SE1?
- Q5. For effectiveness is it necessary to specify when the intermodal rail facility shall be provided, rather than referring to the 'first phase of development'? Does the Local Plan include sufficient safeguards to ensure that the rail terminal will be constructed?

Issue 3 – East of Arlesey – Policy SA3

- Q1. Examination Document EXAM 113 has been prepared in response to the Inspectors' Initial Findings. Does the additional evidence justify the scale of development proposed at Arlesey?

In response to the Inspectors' Interim Findings, Examination Document EXAM 113 proposes three options. Option 1 would retain the existing site boundary but proposes to designate land to the east as a country park. Option 2 seeks to remove land immediately adjacent to Fairfield Park, whilst Option 3 also reduces the site boundary at the point where the proposed relief road joins Hitchin Road. Under Option 3 the capacity of the site allocation would be reduced from 2,000 to 1,800 new homes.

- Q2. How would Option 1 address the concerns in paragraphs 66-67 of the Inspectors' Initial Findings? If land to the east of the high-pressure gas pipeline, nearest Fairfield, is intended to remain as open agricultural fields, what is the justification for its inclusion in the allocation site boundary?
- Q3. Under Option 1, would it be clear to decision-makers, developers and local communities how future planning applications would be determined in this area?
- Q4. Would the suggested Main Modifications as set out in Examination Document EXAM 113 be effective in preventing any harmful coalescence between the development proposal and Fairfield?
- Q5. Under the suggested Main Modifications in Examination Document EXAM 113, is it sufficiently clear what type of leisure uses would be permitted in and around the Blue Lagoon?

Issue 4 – East of Biggleswade – Policy SA4

- Q1. What is the justification for the suggested Main Modification which seeks to identify the site as a commitment in the Local Plan, rather than a site allocation? Is this necessary for soundness?
- Q2. What is the latest position regarding the proposed access to the site? Has this now been resolved or are alternative access arrangements required?
- Q3. Is it necessary for soundness reasons to refer to the status of the site as a Garden Community or Garden Village?
- Q4. Does it remain the Council's intention to create a community which is visibly and physically separate from Biggleswade? Is it sufficiently clear to decision-makers, developers and local communities what is required at the detailed design stage?

Issue 5 – RAF Henlow – Policy SE4

As submitted, Policy SE4 allocates RAF Henlow for a mixed-use development comprising 85 hectares of specialist employment land and 45 hectares for a mixed-use visitor economy and residential scheme. In response to the Inspectors' MIQs (for hearings held in 2019), the Council confirmed that there is no justification for allocating the site for specialist employment uses and suggested that it should be deleted. Examination Document EXAM 112 states that the site should be considered as part of a partial review of the Local Plan.

- Q1. What is the justification for seeking to delete the entire allocation, which includes 45 hectares of visitor-economy and residential uses? Is this necessary for soundness?
- Q2. What is the latest position on the planned closure of the site?
- Q3. The Supplementary SA refers to "*...a significant lack of certainty as to what the site could deliver and how the impacts would be mitigated.*" Does this take into account the additional information submitted on behalf of the landowners as part of the examination process?
- Q4. What would be the most effective way of identifying the site as part of a future review? Is it necessary to modify Policy SE4, or, include specific reference to RAF Henlow in a standalone review policy, for example?
- Q5. What should the proposed review mechanism include? Is it necessary to identify the type of uses envisaged for the site and likely timescales, or should greater flexibility be sought?

Issue 6 - Marston Vale New Villages – Policy SA2

Insofar as Junction 13 of the M1 is concerned, paragraph 2.2.11 of Examination Document EXAM 114 states that the Council and Highways England are now in agreement that the impacts of development proposed in the Local Plan can be mitigated, and, what that mitigation should be. This follows the completion of further modelling work and assessments in Examination Documents EXAM 114 and EXAM 114A-C.

- Q1. Does the additional evidence provided demonstrate that improvements can be undertaken within the transport network that cost effectively limit the significant impacts of development, as required by paragraph 32 of the Framework? Is the allocation justified?
- Q2. For clarity and effectiveness, should the necessary mitigation measures and upgrades to Junction 13 of the M1 be set out in the Local Plan?

The Council's Matter 6 Hearing Statement (for hearings held in 2019) suggested that a Main Modification was needed to change the requirement to provide a 'minimum' of 40 hectares of employment land to read 'up to' 40 hectares of employment land. Paragraph 6.3.4 stated that this change would provide greater flexibility whilst still allowing the jobs target to be met. This was in part due to the "*reasonable contingency on employment land*".

- Q3. Is the suggested Main Modification justified? Is it necessary for soundness?

Issue 7 – M1 Junction 13 (Marston Gate Expansion) – Policy SE2

The Inspectors' Interim Findings stated that 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. 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.

In response, Examination Documents EXAM 112 and EXAM 106 set out a series of mitigation measures. These include the use of multi-barrel vaulted roof profiles with lower eaves and no parapets, colour banding to match the surrounding landscape, targeted off-site planting and a reduction of maximum building heights across different 'zones'.

- Q1. Will the measures identified be sufficient to mitigate the landscape impacts of the proposed allocation, especially in 'development zones' 2 and 3?
- Q2. Subject to the proposed mitigation measures, what effect would the proposed development have on the setting of the medieval Ringwork at The Round House and the setting of The Round House?
- Q3. Subject to the proposed mitigation measures, what effect would the proposed development have on the setting of Segenhoe Manor?
- Q4. Paragraph 6.4.25 of Examination Document EXAM 112 states that whilst the SA identified that the proposal "*...may have an effect on the setting of the heritage assets, it is considered that the economic benefit of the proposals outweigh any potential harm*". Where has this balancing exercise been carried out, including establishing the level of harm that would be caused to the significance of relevant heritage assets?

Issue 8 - Holme Farm, Biggleswade – Policy SE3

The Inspectors' Interim Findings raised concerns regarding the proposed allocation boundary, which would result in two separate sites connected by a narrow access road. Paragraph 70 also stated that southern 'half' 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. Combined, 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.

In response, Examination Documents EXAM 108, EXAM 108A-D and EXAM 112 suggest modifying the Local Plan by increasing the size of the site by to create a more logical boundary.

- Q1. How do the suggested Main Modifications address the concerns raised in paragraph 70 of the Inspectors' Interim Findings?
- Q2. In assessing New Spring Farm against landscape objectives, the Supplementary SA states that the site is highly visible with concerns about the potential for development to spread south of the town into an area characterised by large scale arable land. Do the same conclusions apply to Policy SE3, which would extend development south of Biggleswade to a similar point on the opposite side of the A1?

The Inspectors' Interim Findings also raised concerns regarding the accessibility of the site in the location proposed. In response, Examination Document EXAM 108 states that a shuttle bus service will be provided for those working and visiting the new development. A new pedestrian footbridge is also proposed over the A1 in addition to an ancillary retail outlet.

- Q3. How have the costs of the shuttle bus service and pedestrian footbridge been taken into account? Would the scheme be viable and deliverable with these additional infrastructure requirements?
- Q4. At what stage would the shuttle bus and pedestrian footbridge be provided? How would the Local Plan ensure that they were delivered?
- Q5. Is the proposed pedestrian footbridge deliverable? Who would it be delivered by and when?
- Q6. What existing or proposed pedestrian routes would the footbridge connect to on the eastern side of the A1? Are there any site ownership constraints that would prevent the bridge from coming forward?
- Q7. Examination Document EXAM 108 also states that the subway underneath the A1 to the north of the site will be upgraded. From the subway, Biggleswade Town Centre is described as approximately a 20-minute walk. How far would the proposed employment area be on foot from residential areas and the town centre in Biggleswade?
- Q8. Paragraph 5.4 of Examination Document EXAM 108 states that the area proposed for a petrol filling station and service uses will include a "...*hotel, conference centre and leisure facilities.*" What is the justification for these uses and do they form part of Policy SE3, either as submitted, or proposed to be modified?

Matter 4 – Small and Medium Allocations

Issue 1 – Harlington – Site HAS20

Additional information provided by the Council demonstrates that the necessary school in Harlington can be accommodated on site HAS20 without extending the site boundary as initially expected. This is primarily due to the removal of on-site sports pitches, with a preference for financial contributions towards off-site provision elsewhere, and by increasing site density.

- Q1. Does the approach to off-site provision accord with other Local Plan policies? Is it clear to decision-makers, developers and local communities what is required?
- Q2. Is the proposed increase in density justified? Will the suggested changes have any significant impact on the type of housing proposed or its design?

In response to the Inspectors' Interim Findings, Examination Documents EXAM 113 and EXAM 113D state that pedestrian and cycle access to the school could be taken from Westoning Road. The additional information also includes details of highway improvements proposed to Station Road and Toddington Road.

- Q3. What changes would be required to the footpath underneath the Midland Mainline on Westoning Road? What impact would this have on the safe and efficient operation of this stretch of highway?
- Q4. In seeking to demonstrate that the school can be delivered as part of HAS20, what consideration has the Council given to the likelihood of parents parking on Westoning Road to drop off and pick up school children?
- Q5. Would the proposed highway improvements on Station Road and Toddington Road overcome previously expressed concerns?

Issue 2 – Hockcliffe – Sites HAS24, HAS25 and HAS26

Additional information provided in Examination Document EXAM 92 concludes that on-site flood mitigation can be provided for sites HAS25 and HAS26. The new evidence, provided in January 2020, confirms that the sites can deliver around 14 and 27 dwellings respectively.

- Q1. What are the reasons, therefore, for the suggested Main Modifications which seek to delete (rather than reduce the capacity) of sites HAS25 and HAS26? Are the suggested Main Modifications necessary for soundness?

In relation to site HAS24, the Inspectors' Interim Findings noted that it was difficult to understand what the site boundary was based on, as it follows no obvious physical features on the ground, contrary to paragraph 85 of the Framework. The L-shaped site boundary was also found to be at odds with the linear form and character of Hockcliffe, with further information required to demonstrate that the allocation was justified. In response, Examination Document EXAM 113 suggests a Main Modification to delete the site.

- Q2. What is the justification for the suggested Main Modification which seeks to delete the site in its entirety? Is it necessary for soundness?

- Q3. What is the justification for the suggested Main Modification in Examination Document EXAM 113 which seeks to clarify that amendments to the Green Belt boundary may be made by a Neighbourhood Plan? Is this necessary for soundness?
- Q4. What would be the justification for this approach in Hockcliffe, but not other villages?

Issue 3 – Shillington – Site HAS45

- Q1. Is the suggested Main Modification in Examination Document EXAM 97 necessary for soundness?
- Q2. Is the revised site boundary capable of delivering approximately 15 dwellings?

Matter 5 – Supply of Housing

Issue 1 – Total Supply

Following the hearing sessions in 2019, the Council produced an updated housing delivery by source note (Examination Document EXAM 86). In summary, this identified a total supply over the plan period of 44,082 dwellings. Policy SP1 sets out a housing requirement for 39,350 new homes.

- Q1. What is the current position regarding completions, existing commitments and expected delivery from the allocations in the Plan (as proposed to be amended)? To assist the examination, it would be useful for the Council produce an updated version of the housing delivery by source note as set out in Examination Document EXAM 86.
- Q2. Based on the suggested Main Modifications, and any material changes in circumstances since the hearings in 2019, will the policies and allocations ensure that the Local Plan meets the objectively assessed need for housing in Central Bedfordshire, with sufficient flexibility to adapt to change?

Examination Document EXAM 41 includes a suggested Main Modification to Policy SP1, as discussed during the hearing sessions in 2019. In summary, it lists those sites which are intended to contribute towards Luton’s unmet housing need.

- Q3. What is the most up-to-date position regarding the likely contribution of the sites listed in Examination Document EXAM 41? To assist the examination, it would be useful for the Council to produce an updated version of the housing trajectory (Examination Document EXAM 90) and updated schedule of changes (Examination Document EXAM 91).
- Q4. Based on the suggested Main Modifications, and any material changes in circumstances since the hearings in 2019, will the policies and allocations in the Plan ensure that the contribution towards Luton’s unmet housing need (7,350 dwellings) will be met?

Issue 2 – Five-Year Housing Land Supply

- Q1. What does the updated version of the housing trajectory (see Issue 1, Question 3 above) show? Have there been any significant changes in the expected delivery of housing sites?
- Q2. Will the policies and allocations in the Local Plan ensure that there will be an up-to-date supply of specific, deliverable sites sufficient to provide five years’ worth of housing land against the requirements of Policy SP1 upon adoption?

Matter 6 - Meeting Housing Needs

Issue 1 – Custom and Self Build – Policy H7

During the hearing sessions in 2019, the need for custom and self-build housing was discussed, along with the requirement for potential Main Modifications to Policy H7. Further to the hearing sessions, the Council produced Examination Document EXAM 93.

In summary, this includes a suggested Main Modification to Policy H7 that would require proposals for 10 or more dwellings to deliver a minimum of 10% and no more than 20% of the site's capacity as custom and self-build plots. Where plots have been made available and appropriately marketed for at least 12 months, and have not sold, they may be constructed by the developer and sold.

- Q1. How was the minimum requirement of 10% calculated? Is it an accurate and robust calculation?
- Q2. Does the evidence justify that a minimum of 10% of plots as custom and self-build will be required over the plan period?
- Q3. Are the Council's suggested Main Modifications justified, effective and necessary for soundness?
- Q4. What is the justification for a 12-month marketing period?
- Q5. Is a threshold of 10 dwellings or more justified?

Issue 2 – Housing Mix, Housing Standards and Housing for Older People – Policies H1, H2 and H3

- Q1. Are Policies H1, H2 and H3 positively prepared, justified, effective and consistent with national planning policy?

Issue 3 – Affordable Housing – Policy H4

- Q1. Is Policy H4 positively prepared, justified, effective and consistent with national planning policy for the purposes of this examination?

Issue 4 – Gypsy and Traveller and Travelling Showpeople Accommodation – Policy SP8

The Council's Matter 9 Hearing Statement (for hearings held in 2019), suggested that a Main Modification was required to Policy SP8 in order to amend the number of pitches required for gypsies and travellers over the plan period, from 71 pitches to 28. Examination Document EXAM 21 confirms that since the base date of the Gypsy and Traveller Accommodation Assessment ('GTAA'), planning permission has been granted for an additional 31 pitches (excluding temporary permissions and those which have lapsed).

- Q1. Have there been any material changes in circumstances, either in the assessment of need or the supply of pitches for gypsies and travellers (and plots for travelling showpeople) since the hearings in 2019? What is the most up-to-date position?
- Q2. Is the approach taken to calculating and accommodating 'unknown household' need in the Council's Matter 9 Hearing Statement robust, accurate and appropriate?

Matter 7 – Retail and Town Centres

Issue 1 – Town Centres, Primary Shopping Areas and Shopping Frontages

The Council's Matter 12 Hearing Statement (for hearings held in 2019) includes a review of the Town Centre boundaries as proposed on the submission version Policies Maps. This review concludes that some alternations are required as discussed at the hearings.

Paragraph 23 of the National Planning Policy Framework states that, amongst other things, local planning authorities should define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres. Examination Document EXAM 95 therefore includes further suggested changes to the Policies Maps to include primary shopping areas and primary and secondary frontages.

- Q1. Are the proposed changes justified? Do they accurately reflect the type and distribution of uses throughout the designated centres?

Paragraph 23 of the National Planning Policy Framework also states that in addition to defining the extent of town centres and primary shopping areas, local authorities should set policies that make clear which uses will be permitted in such locations. Examination Document EXAM 95 includes a suggested Main Modification to Policy R1 to reflect this requirement.

- Q2. Are the suggested Main Modifications necessary for soundness?
- Q3. Subject to the suggested Main Modifications, will the Local Plan be justified, effective and consistent with national planning policy?

Examination Document EXAM 95 also includes a suggested Main Modification which seeks to delete the section entitled 'Outside designated town centres' from Policy R1 and to introduce a new policy into the Local Plan setting out the requirements for retail impact assessments.

- Q4. What is the justification for this suggested change to the Plans retail and town centres policies? Is it necessary for soundness? Are the local criteria justified by the evidence?

Issue 2 – Changes to Use Classes Order

On 21 July 2020, the Government published The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. The changes came into force on 1 September 2020.

In summary, parts of use classes A, B and D no longer exist, and have been replaced by a new class E (commercial, business and service).

- Q1. What implications does this have for the evidence base and policies in the submission version Local Plan, including the suggested Main Modifications in Examination Document EXAM 95?
- Q2. Do any of the policies in the submission version Local Plan need to be modified for soundness reasons to reflect the changes to the Use Class Order, including policies relating to economic and business development?