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10<sup>th</sup> March 2023

Dear Mr Robinson,

**Central Bedfordshire Local Plan 2015-35: Housing Policy Technical Guidance Supplementary Planning Document (SPD) Consultation**

**In Relation to Land off High Street, Broom, SG18 9NA**

The following correspondence is submitted in response to Central Bedfordshire Council's ('CBC') ongoing consultation in respect of their recently published (draft) Housing Policy Technical Guidance Supplementary Planning Document (SPD).

The SPD serves to provide supplementary guidance on the implementation of policies contained within the recently adopted Central Bedfordshire Local Plan (2015-35) (CBLP), alongside most notably those policies (H1-H5) which each refer to key topics within the Housing Chapter of the CBLP.

This representation is submitted by Storey Homes, a local family-owned house builder, based in Milton Keynes. Storey Homes currently deliver approximately 50 homes per annum, across sites within the Borough, including 109no units currently under construction at Houghton Regis and 24no units in Upper Caldecote. Storey Homes also have a number of other interests across the Borough, with a range of strategic sites ranging from large parcels of land adjacent to the larger urban centres and smaller parcels close to service villages and smaller centres.

The context of these particular representations has relevance to our land holdings at the Land off High Street, Broom, SG18 9NA. We believe this to be an appropriate location for residential development, owing to the sites edge of settlement location and would therefore comprise a sympathetic addition to the village.

An excerpt from the Site Location Plan has been incorporated below for your information.



*Excerpt from Site Location Plan*

Storey Homes welcomes the principle of producing an SPD to provide clarity and guidance on the implementation of those policies within the CBLP. It is an approach which will serve to manage expectations and provide clarity to all parties including the general public, elected members, officer's and landowners alike. Therefore, the approach is welcomed as a positive addition to the Council's suite of local development documents. However, we would like to bring into question a certain elements of the SPD which is as follows;

In Section 3, the document focuses on Policy H1: Housing Mix, which is contained within the Local Plan. While the document provides guidance on the implementation of this policy, it is considered that the SPD is inflexible in adapting to changing circumstances, not just in terms of need but also regarding changes to the Council's evidence base for housing needs.

Paragraph 3.1 of the document and the corresponding data tables provide a rehearsal of the findings from the Strategic Housing Market Assessment (2017) ('SHMA'). Whilst it is accepted that the SHMA should be the starting point in establishing an appropriate approach to achieving a suitable housing mix, it is quite clear that the conclusions which the SPD relies upon are now out of date. It is therefore urged that all pointed references to the 2017 document be removed and that flexible wording be built into the document to ensure that housing mix is predicated, on a site by site basis, against the backdrop of evidence pertaining to housing needs.

A strict focus on the SHMA to determined housing mix, whilst not inappropriate, is not sound. Such an approach dismisses the important role that Local Housing Needs Surveys and the self-build register play in establishing hidden macro-scale needs that are not identified through strategic assessment.

Therefore, it is considered that the aforementioned evidence base documents should be signposted within the document, rather than the content of the now out of date SHMA being regurgitated into guidance.

Paragraph 4.2.2 discusses the modifications introduced to Part M of the Building Regulations in October 2015, concerning the accessibility requirements for dwellings. Storey Homes expresses its support for the implementation of the discretionary criteria via policy, which necessitate the provision of M4(2) adaptable homes and M4(3) wheelchair adaptable homes to ensure inclusivity of dwellings in the borough. However, paragraph 4.41 mandates that such dwellings should be distributed equally between the market and affordable housing. While acknowledging the necessity for accessible dwellings, Storey Homes views this policy as excessively authoritarian, and believes that market forces should dictate the provision of such dwellings.

There is also concern over the requirements which are set out at Para 5.7-5.13 in respect of extra care and C2 uses. This is an acute area of housing need which needs to be addressed outside of the delivery of market / affordable and specialist housing which would fall within Class C3 of the Use Classes Order (2015) (as amended). It is therefore considered that these references, including the associated triggers, go beyond the remit of SPD and should be catered for in a more appropriate manner, ideally through future DPD.

Paragraph 6.76 refers to the Council's minimum information requirements for affordable housing. For outline applications, it has been requested that an indicative layout is required denoting the indicative locations for the affordable plots. We feel that this is unnecessarily prescriptive for the stage of the application as it represents another barrier to validation, which is simply not required at this stage.

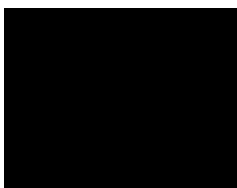
Whilst prescription within the documents reference to affordable housing is concerning, so are the repeated references to the SHMA, which is out of date, the document should contain signposts to the evidence base (as previously stated) to ensure its flexible application.

Finally, in respect of affordable housing, since the adoption of the Local Plan the definition of affordable housing, as contained at Annexe 2 of the National Planning Policy Framework (2021) has been both expanded and updated. The production of this SPD provides a real opportunity to acknowledge this expanded definition and provide much needed guidance on how this expanded definition will be catered for locally.

Storey Homes welcomes the Council's efforts to produce a supplementary planning document to assist in the application of those relevant policies from Central Bedfordshire Local Plan (2015-35). To this end, the Council's intention to produce an SPD is commended and we believe that the proposed alterations will serve to make this non-statutory local development document both sound and fit for purpose. The use of such a tool to provide guidance on the application of the development plan can be powerful, particularly in those proposal which have particular sensitivities as such it is hoped that the document can provide absolute clarity to the reader on the role it will play.

Additionally, if you could confirm receipt of this letter by return it would be greatly appreciated.

Yours sincerely,



Hayden Seed

## Planner