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20718/A3/OG/sl  
13<sup>th</sup> March 2023

Dear Sir/Madam,

**CENTRAL BEDFORDSHIRE COUNCIL HOUSING TECHNICAL GUIDANCE SPD –  
CONSULTATION RESPONSE ON BEHALF OF HOUGHTON REGIS MANAGEMENT COMPANY  
(HRMC)**

Central Bedfordshire Council ('CBC') is consulting on the Draft Housing Technical Guidance SPD. The documents are being presented for consultation during an eight-week period between 17<sup>th</sup> January 2023 and 16<sup>th</sup> March 2023. The contents of the SPD cover how the policies within the Local Plan, should be implemented, including details of the following:-

- Housing Mix
- Housing Standards (accessible and adaptable homes)
- Housing for older people
- Affordable Housing (level of provision, tenure split, design standards and other key areas of guidance in relation to affordable housing)
- Rural Exception Sites
- Self and Custom-Building Houses

We have reviewed the Draft SPD on behalf of HRMC, who are bringing forward the Linmere development scheme in Houghton Regis. The HRMC team is actively involved in discussions with CBC Officers across several teams about several submissions which are being considered by the Council at this time – including advanced infrastructure, Area Masterplans, reserved matters submissions and other discharge of condition submissions.

**Detailed Comments**

Policy H1 – We note that housing mix must be in accordance with that set out within the SHMA, when applied across strategic allocations this should be across the entire site not each reserved matters. Clarity needs to be provided on the requirements of the up-to date evidence to be submitted to

demonstrate how the development meets the SHMA. Also the SHMA is currently out of date and needs to be updated. We are supportive of the reference of delivering a range of tenures including private rented units.

Section 3.2 - The market housing which is identified as being needed within the SHMA is not up to date and does not take into account the current affordability and mortgage constraints. Further to this there needs to be flexibility on how this is achieved in strategic sites, so that the whole development is in accordance, but phasing and character areas are able to be created.

Section 3.5 – A further point is needed on 'more up to date evidence base' to cover research into the depths of demand for unit sizes, particularly in the context of affordability and mortgage constraints.

Section 3.10.1 – The wording of this policy needs to include an understanding of how housing mix is approached on strategic allocation sites.

Section 3.10.3 – We strongly disagree with the wording here as regards reserved matter and full applications submitting their accommodation schedule by tenure to confirm the application aligns with the SHMA. As previously stated, it needs to be acknowledged that the SHMA should be complied with on the strategic site scale not on a reserved matters basis, we believe that greater flexibility is necessary for delivery across a strategic site, and the differing densities across different character areas within the site.

Policy H3 – We note that while bungalows are included as housing for older people, there is a large land take used for bungalows, which often make them unfeasible and unviable within developments. From EPC data the past 3 years up until Q4 2022, that only 2% of total new dwellings delivered have been bungalows. As housebuilders build to their anticipated target market this would heavily suggest that there is a limited demand for bungalows and any policy should reflect this.

Section 5.5.2 – We are very supportive of the use of innovative alternative approaches to delivering accommodation for older people.

Section 5.9.2 – We note that the policy says this is for delivery onsite, we assume this is a typo and should be offsite.

Section 5.11 – We are aware of the importance of the location of extra care for older people housing, however it should be taken into consideration that trends show that there is a much lower number of residents that will leave care homes regularly due to being in ill health and therefore the location should be carefully considered.

Section 5.13.5 – We believe that whether C2 should be required to provide affordable housing and other planning obligations, should be clarified within the SPD not left open for further discussion.

Furthermore, do developers have to engage with MANOP specialists if they are delivering any form of care provisions?

Section 5.15.2 – Key services of GPs and Post offices within 10-20 minute walks are difficult to achieve due to the current issues with their viability and funding – which in the case of the former is controlled at national level, not by CBC for example.

Section 5.16.2 – We believe that retirement villages are in fact a positive way to deal with older people housing and are able to provide key services and promote interactions between residents and provide amenities, whilst also open to the wider public.

Policy 4 – Affordable Housing policies need to state that they explicitly do not apply to sites with a signed S106 agreement.

Section 6.21.2 – We would like to see reference to Discount Market Rent as well.

Section 6.29 – This needs to include Discount Market Rent.

Policy 6 – This needs to clearly state that it is not relevant to sites with an agreed S106.

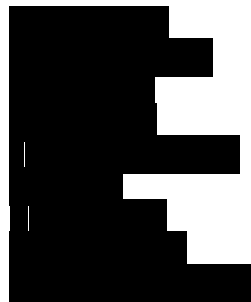
We are happy to meet with the Strategic Growth Team to further discuss the comments set out above. Please keep us updated with all future stages of the development of the draft SPD.

Yours faithfully,

*Olivia Glenn*

**OLIVIA GLENN**  
Planner

Cc: By EMAIL:



- CBC
- CBC
- Land Improvements Holdings
- Land Improvements Holdings
- Land Improvements Holdings
- Land Improvements Holdings
- Savills
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