Local Plan Consultation
Central Bedfordshire Council
Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire
SG17 5TQ

29 August 2017

Dear Sir / Madam,

Re: Central Bedfordshire Local Plan 2015-2035, Draft Plan July 2017
Land to the south east of Leighton Road, Toddington (NLP152 & NLP153)

We write regarding the above consultation; thank you for inviting comments, and allowing us the opportunity to respond on the Draft Local Plan. Specifically our comments are in relation to land to the south east of Leighton Road, Toddington.

Growth Strategy
We are broadly supportive of the Local Plan growth strategy, whereby it directs increased development to sustainable locations such as Toddington. In particular the Spatial Strategy Approach which seeks to deliver between 20,000 and 30,000 new homes through moderate extensions to existing towns and villages, along with entirely new towns and villages. However, we encourage the Council to be cautious in terms of delivery rates from the proposed large sites and query both the timing and the likelihood of delivery of key infrastructure, such as the A1 improvements and the east of Bedford section of East West Rail. Delays in delivery of such key infrastructure would severely undermine the anticipated trajectory of housing delivery from such large sites.

Toddington is identified as a Minor Service Centre in the draft Local Plan, under the Settlement Hierarchy, defined as “larger settlements with a good level of services, possibly including a school, doctor’s surgery, a basic retail offer and frequent public transport links”. The settlement is ‘inset’ from the Green Belt. Toddington is located within Growth Area A, as set out in the Shaping Central Bedfordshire Consultation, undertaken in autumn 2016, whereby the Spatial Strategy contains options for new villages and urban extensions near to the M1. This area also offers opportunities for development to contribute to improvements of the road and public transport networks.

Area A South is also required to take some of the unmet housing need from Luton HMA, providing for 7,350 in Central Bedfordshire, some of which (around 2,000 homes collectively) will be in the form of highly sustainable extensions of a more moderate scale to larger towns and villages that are inset into the Green Belt. Under Policy SP1: Growth Strategy, we therefore strongly support development planned at the Inset Green Belt Villages (Village Extensions) within Area A.

We are, however, concerned by the Council’s proposal (paragraph 8.3.2 of the draft Local Plan) that when supply is low, to include a policy which negates the requirement to apply the ‘presumption in favour of sustainable development’. Of course, the presumption is ‘at the heart of’ the NPPF, and should be seen as a ‘golden thread running through both plan-making and decision-taking’.
We would be interested to know how this proposed policy aims to ‘boost housing supply’, i.e. would the Council draw on reserve sites? And if so, one would require these to be contained in the Plan so as not to be seen to ‘bypass’ it. Clearly if supply is low, then the Council should, at this early stage of the plan making process, ensure that there is a continual over-supply to avoid such a scenario, and to avoid further delay should the Plan be found unsound.

It is disappointing to note that even though Toddington is in the process of producing an emerging Neighbourhood Plan, the draft Local Plan does not provide an indication in terms of the number of dwellings to be allocated at each settlement. This would be a helpful minimum requirement guide for the formation of Neighbourhood Plans, and would indicate how much each settlement is capable of accommodating.

**Site Specifics**
A site location plan is provided at the end of this letter.

The site comprises 2 parcels located on the south western edge of Toddington with main road frontage to Leighton Road. Proposed residential development would relate well with existing development to the north east at Peartree Close and Frenchman’s Close. Houses would be a mix of size and tenure according to local need and market conditions, but would be mainly 2 storeys, with appropriate landscape buffering, given the edge of settlement location.

Under the Council’s Site Assessment Technical Document, Appendix D: Preliminary Site Assessment Results, the site is referenced as NLP152 & 153, land to the south east of Leighton Road, Toddington, measuring 2.8ha in total. The site was submitted as suitable for residential development to the Council’s Call for Sites exercise during spring 2016.

The outcome to NLP153 (the larger parcel) is as follows; “A portion of the site will be considered further as part of the Local Plan” justified as follows; “Portion of site only to progress because of the impact the full site, due to its size, scale and local topography, would have on the character of the settlement”. We believe a scheme could be devised that would have regard to the topography and perceived landscape constraints along the southern boundary, such as the inclusion of a number of single storey dwellings along that edge NLP152 (the smaller parcel) was considered wholly suitable as part of the Local Plan.

Other than the more major projects which look at new villages in Aspley Guise, Marston Vale, RAF Henlow Camp, east Arlesey, East Biggleswade and a new town at Tempsford, we expect remaining allocations required to meet such a level of growth to be presented in the next publication of the Local Plan. It is understood that this will look at sites on the edges of settlements, based on the Call for Sites assessments exercise previously undertaken. It is also understood that sites such as land at Toddington will be considered and allocated through the future Neighbourhood Plan.

Of all the sites in Toddington only land at south east of Leighton Road (NLP153) (NLP152), Middle Lakes, Russell Road (NLP184), land at Leighton Road (NLP378), land to the east of Leighton Road (NLP405), and Alma Farm (NLP411), were identified as being suitable for further consideration. The total amount of dwellings capable of being delivered from these sites is circa 500 units. Clearly these would not all come forward immediately and those which are not adjoined to the existing settlement (NLP405, for example) would have to follow.

We therefore suggest that, land to the south east of Leighton Road (NLP152 & 153) should be allocated as suitable for residential development in the emerging Local Plan and future Neighbourhood Plan, should this be progressed. Allocating smaller sites for development as opposed to over reliance on larger, strategic land dependent on significant infrastructure enhancements would mean that housing targets are more deliverable and achievable.
We would be grateful if the above comments could be considered towards the consultation of the draft Local Plan. We look forward to receiving confirmation of receipt.

Yours sincerely,

Emily Hale

Emily Hale
**Development Planner**
For and on behalf of South Midlands Division, Bloor Homes Limited