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Central Bedfordshire Local Plan 2015 - 2035

Pre-submission Draft – January 2018

Iceni Projects Limited on behalf of
Orchestra Land

February 2018

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ON BEHALF OF
ORCHESTRA LAND

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APPENDICES

A1. SITE LOCATION PLAN

1. INTRODUCTION

- 1.1 On behalf of our client, Orchestra Land Ltd, we hereby provide our comments on the Central Bedfordshire Pre-Submission Local Plan (Reg19), which was published for consultation In January 2018.
- 1.2 Our client has an agreement in place to promote the Land to the south of Blunham Road in the village of Chalton, located between Blunham to the north and Moggerhanger to the south, to develop the site for residential led development. The site, identified on the Site Location Plan included at Appendix 1, measures approximately 2ha and is enclosed by existing residential development to the east and west and Blunham Road to the north, with open countryside to the south. It is located approximately 2km to the west of Sandy, within the northeastern part of the District.
- 1.3 Our client considers that the land south of Blunham Road represents an opportunity for new residential dwellings in the area, to assist in meeting the District's significant housing needs, and is capable of delivering up to approximately 50 new homes, providing further definition to Blunham, enhancing the sense of place.
- 1.4 Development at this location would enhance the sustainability and vitality of the village and surrounding area, and would boost demand for local services and facilities within the wider Blunham-Chalton-Moggerhanger area. The site is also conveniently located within close proximity to Sandy, a Major Service Centre which provides a significant range of local facilities, services and employment opportunities, as well as sustainable transport links to other places within and outside Central Bedfordshire.
- 1.5 Furthermore, the site should be considered in light of the emerging infrastructure context in the wider area, particularly the Oxford to Cambridge Arc, which will positively support the growth of large areas of Central Bedfordshire.
- 1.6 Having reviewed the current consultation document, we provide comments below on a number of aspects of the Pre-submission Local Plan (2018), with regards to the spatial strategy, core policies and the key benefits of the site moving forward.

2. SPATIAL STRATEGY

Introduction

Potential for Growth Arising from the Oxford-Cambridge Corridor

- 2.1 Central Bedfordshire benefits from a strategically unique position, at the centre of the Oxford to Cambridge Corridor, which presents opportunities for significant growth over the coming decades. As outlined in National Infrastructure Commission Report (2017) there is major potential for improved connectivity and growth within Central Bedfordshire, providing a once-in-a-generation opportunity to capitalise on the planned infrastructure improvements which have been given significant weight by Central Government in the most recent Autumn Statement (2017).
- 2.2 The development of the East-West Rail and the Oxford-Cambridge Expressway to deliver substantial new, coordinated residential and employment growth in order to address significant issues facing various authorities across the corridor, including a chronic under supply of homes and associated affordability.
- 2.3 The coordination of major growth at a sub-regional level presents the opportunity to align new jobs, housing and infrastructure to deliver a sustainable form of development, recognising the districts strong links with London, Milton Keynes, Bedford and Luton. Central Bedfordshire is ideally placed within the corridor to take full advantage of the planned infrastructure improvements, unlocking significant levels of growth, given its strategic position within the centre of the Corridor.
- 2.4 Notably, the settlement of Sandy is anticipated to be a key node within the East-West Rail route, enhancing its sustainability and connectivity to the wider sub-region. It is important to recognise that Central Bedfordshire is comparatively unconstrained in terms of the availability of land for development compared to other authorities in the Corridor such as Oxford, Cambridge and Luton, with a clear opportunity to respond to unmet housing need in these areas, taking advantage of the impending infrastructure improvements within the area.
- 2.5 As such, we support the reference within paragraph 1.2.7 to exploiting the wider opportunities in the Corridor highlighted in the NIC report (2017), delivering comprehensive economic-led growth across the corridor through the local plan process. We therefore urge the Council to give greater consideration to the growth facilitated by new infrastructure within the preparation of this plan; limiting the need to subsequently amend the plan through an early review.
- 2.6 A partial review of the plan has already been proposed within the pre-submission version; this will consider the potential for capacity upgrades of the A1. There is an acknowledgement that the east-west rail stations and Oxford to Cambridge route will have a major impact on the scale of development and growth potential at strategic sites. The Council will conduct a further assessment

of the identified areas for future growth. This is likely to have a significant impact on planned growth in the central corridor and should also include a re-examination of the OAN in-line with the new national standardised methodology.

Spatial Strategy Approach

Housing Targets

- 2.7 We have not been assured that the 32,000 dwellings figure does actually represent the full Objectively Assessed Need (OAN) for Central Bedfordshire. We note that this figure appears to derive from the July 2017 Initial Strategic Housing Market Assessment for Luton and Central Bedfordshire document, which cautions that its findings may be subject to change, and explains that its assessment was focussed on the Luton housing market area.
- 2.8 In light of the fact that Central Bedfordshire falls within 4 separate housing market areas, notwithstanding that the largest number of Central Bedfordshire residents live within the Luton functional HMA, it remains unclear whether the 32,000 dwelling figure is fully representative of the entire OAN for the whole District.
- 2.9 We therefore encourage the Council to confirm the relevant figure for the full, Objectively Assessed Housing Need for Central Bedfordshire and clarify whether this relates to a sufficiently comprehensive geographic area to be fully representative of the housing need within the boundaries of the Local Authority.
- 2.10 We support the intention to accommodate the unmet need arising from neighbouring authorities within the same housing market area, given the opportunities for significant growth in Central Bedfordshire and the relatively constrained nature of areas such as Luton. This principle is advocated by the Duty to Cooperate and the emphasis within the NPPF on seeking to meet Objectively Assessed Needs within the housing market area, thereby avoiding the significant negative socio-economic consequences of failing to do so.
- 2.11 We strongly encourage the Council to ensure that the Central Bedfordshire Local Plan seeks to meet unmet need arising from Luton and other neighbouring authorities, as well as making an appropriate contribution towards the unmet needs of the wider Oxford-Cambridge Corridor. This would likely further increase the housing targets for the district.
- 2.12 Furthermore, the current OAN is not based on the new standardised methodology outlined by the Government in September 2017. The new methodology would increase the OAN to 51,060 dwellings over the plan period, representing a 60% increase in the number of homes that would be required to be delivered per annum to meet just the districts own housing need. The council have acknowledged that OAN is likely to rise within Para 1.4.1 and as such we stress the importance in

looking to maximise short term housing delivery at an early stage to minimise any shortfall to be addressed when the housing requirement is reviewed to reflect the higher OAN figure.

- 2.13 We note the intention to target 39,350 homes over the plan period, as set out in Section 6.6 of the Plan. The derivation of the Local plan Housing target is set out in Table 6.1, which presents the OAN as being 32,000 with unmet need from Luton being addressed by a further 7,350 homes. Therefore the plan targets 39,350 houses to be delivered during the plan period 2015-2035 to meet the recognised housing need in the District.
- 2.14 Having regard to the housing target figures in Table 6.2, we note that when the 23,528 committed sites are taken into account along with the expected new housing growth figure of 18,302 in the plan period, this would appear meet the housing targets including the unmet need derived from Luton. However we note that there is a heavy reliance on strategic and large windfall sites, planned to provide a total 10,813 dwellings. Furthermore, the housing need/delivery figures do not incorporate lower and upper end ranges for housing delivery, which provide contingency proportions into account in the previous draft version of the plan.
- 2.15 In identifying the housing requirement within the Pre-Submission version of the Local Plan, we strongly encourage the Council to seek to deliver or exceed the upper end of the range identified at the Reg 18 stage in Table 7.2. The revised housing target fails to set out the potential contingency uplift of between 10% - 20%. The upper end range total, planned housing delivery in the Draft Plan (Reg 18) was set at 54,960 homes and we are concerned that the current housing target figures reflect the lower end of the range.
- 2.16 The higher end of this identified range would more appropriately reflect the significant opportunities that exist given Central Bedfordshire's position within the Oxford-Cambridge Corridor, its potential to make a valuable contribution to the wider strategic growth of the sub-region, and the significant sustainability benefits arising from committed infrastructure such as East-West Rail and the Oxford-Cambridge Expressway.
- 2.17 This would maximise the opportunities presented by the relatively unconstrained nature of the district and enable significant improvements to socio-economic issues such as the lack of affordability of housing in the District. The 2017 Initial SHMA highlights the significant affordability issues in Central Bedfordshire and the wider housing market area, illustrating how it is simply unaffordable for many residents to purchase a property. This issue can only be substantially addressed by an increase in the supply of housing to ensure needs are met in full. Therefore we encourage the Council to adjust the housing requirement which appropriately seeks to address such issues.

- 2.18 We consider that the Plan should additionally make it clear that the housing requirement will increase taking into account developments at the sub-regional level, which are likely to have a significant influence. The potential increase in housing targets is set against the backdrop of the housing target figures are not structured with a sufficient buffer or the fact that they are far lower than the standardised methodology figures, while underproviding for unmet need in the surrounding Districts.
- 2.19 In summary, the current OAN doesn't appear to fully reflect the housing need within the District. It remains unclear if the figure has accurately been derived for the district as whole and if it responds to all of the surrounding unmet need. We would have expected the housing targets to appropriately reflect the significant opportunities within the district to not only meet unmet need in surrounding areas, but to also make a more substantial contribution to the wider strategic growth of the sub-region. Central Bedfordshire is currently not using the standardised methodology to calculate its OAN, which would significantly increase the assessed need by 60%. The standardised methodology is expected to be adopted in March 2018. If adopted we would expect the OAN to be increased and housing targets to be appropriately revised within the Local plan submission.

The Proposed Growth Locations

- 2.20 We note that 'A1 Corridor Area' which includes Sandy is identified in the Plan as having great potential to accommodate large scale growth. Given Sandy's role as a Major Service Centre, and the anticipated sustainability enhancements arising from planned infrastructure such as East-West Rail, we would have anticipated that significant growth could be accommodated in this area. It is therefore surprising; given this acknowledgement that Sandy is not identified as a Growth Location of the draft Plan. There is some indication that this is likely to be planned within the Partial plan review, informed by further details on the route of the expressway and the Central section of East West Rail.
- 2.21 However as outlined within the plan central Government have made a clear indication of the continued support for the timing and funding of the east-west connectivity proposals in the Autumn Budget (November 2017) and we assert that the council should at this stage be considering the potential capacity for further homes in this area. We note that the review is planned for 10,000+ homes, to the land North, South and East of Tempsford.
- 2.22 The Proposed Growth Locations support the proposed development of new villages (Marston Vale and east of Biggleswade) and Town expansions of East Arlesey for approximately 2,000 homes and North of Luton for approximately 4,000 new homes. There are clearly sustainability benefits in a limited amount of growth in the villages surrounding key towns such as Sandy. Clearly, any benefits to Sandy in terms of improved infrastructure and local facilities will also benefit the surrounding area, and such benefits can be maximised through the provision of improved public transport and connections to the key towns in this area. Meanwhile the relatively unconstrained

nature of the land around Sandy makes it an ideal location for limited growth to enhance the vitality and sustainability of local village clusters such as Blunham-Chalton-Moggerhanger.

- 2.23 As such we consider that Blunham-Chalton-Moggerhanger should be considered a Growth Location, and the plan should also make reference to the potential for suitable scale growth in villages, particularly those in close proximity to large towns. This will facilitate a more evenly distributed growth strategy and ensure the affordability and sustainability of the rural areas is also enhanced through planned growth.
- 2.24 A small site allocation has been made in the village of Moggerhanger (HAS40). This allocation is 30 homes within the village, acting as a small village extension. This scale and nature of this allocation is similar to that proposed on Land south of Blunham Road. The clear benefit of allocating small sites is that they have potential to be delivered in the short to medium term and can respond to the housing pressures as early as possible. There is a balance to strike between the large strategic allocations and small scale deliverable sites across the district.
- 2.25 We also note that a large area of land around Tempsford, to the North of Chalton has been designated for future development. This land would help to support significant housing growth in the wider area. This indicates that this area of the district has been considered suitably sustainable location appropriate for substantial housing growth. The land south of Blunham Road could act as complementary smaller site, deliverable in the short term; responding to the likely increase in the housing targets.
- 2.26 Planning for an appropriate level of growth in the rural areas surrounding the existing major settlements such as Sandy will assist with delivering a co-ordinated strategy for growth that will address the piecemeal approach which has resulted from the Council's inability to demonstrate a 5 year housing land supply in recent years. This will facilitate the delivery of new services and infrastructure to support growth, thereby enhancing sustainability and the capacity of villages to accommodate additional housing. We believe that the submitted local plan should plan for future growth within the area at this stage and wait for the partial review to confirm that the need for growth in-line with infrastructure improvements.
- 2.27 The Local Plan should include a strategy for delivery of appropriate growth in the rural areas surrounding major settlements such as Sandy, in addition to the major areas for growth identified in the current consultation draft. The Blunham-Chalton-Moggerhanger group of villages would be one such area that in our view would be particularly suitable for some limited growth in this regard.

Coalescence & Important Gaps

Policy SP5: Coalescence and Important Gaps

- 2.28 We note that Policy SP5 seeks to identify and protect important/ particularly sensitive gaps between existing settlements, and consequently Policy SP5 would seem to achieve the aim of preventing settlement coalescence. For those areas of countryside not covered by Policy SP5, where gaps between settlements are not considered to be as sensitive and thus not considered worthy of specific identification, we cannot see the justification for a separate policy which would potentially prevent all development outside identified settlement boundaries (aside from allocated sites) on the basis that it may reduce the openness of land in the countryside.
- 2.29 Given Policy SP5 should ensure that sensitive gaps where development would lead to settlement coalescence are appropriately protected, those areas not covered by Policy SP5 will by definition be less sensitive, and consequently may be capable of accommodating development without resulting in undue coalescence. We note that previous site assessments have determined that the development of the land would not create coalescence.
- 2.30 We are now principally in support of the policy wording for SP5. However we would like to suggest that the following amendments are made to the wording in order to strengthen the policy position:

‘new development in the countryside must avoid unduly reducing open land’

‘maintaining the individual identity of towns and villages and will resist any extensions to built-up areas that would lead to unacceptable coalescence between settlements’

Settlement Envelopes and Settlement Hierarchy

Settlement Hierarchy

- 2.31 The land south of Bunham Road is located Chalton (Moggerhanger Parish), which it is not identified as a specific settlement within the hierarchy.
- 2.32 We note that whilst Chalton (Moggerhanger Parish) is not identified as a specific settlement within the hierarchy, Blunham is identified as a Large Village, and Moggerhanger and Charlton are identified as a Small Village. Given the close proximity of Blunham, Chalton and Moggerhanger it is clear that residents of Chalton would benefit from the services and facilities available in both of the two neighbouring villages, and in this sense Chalton may be regarded as having a degree of overlap with both of the neighbouring settlements. The site in question should therefore be considered in the wider context of Chalton which will have good access to Sandy major service centres.

2.33 Furthermore, Sandy is identified as a Major Service Centre, providing a focus for employment, shopping and community facilities for the local community and surrounding rural communities. Consequently villages such as Chalton which are in close proximity to Sandy will clearly benefit from the wider sustainability benefits provided by the town.

3. CORE POLICIES

Housing

Policy H1: Housing Mix

- 3.1 Whilst we consider that it would be entirely reasonable for Policy H1 to require development proposals to include an appropriate mix of units having regard to the latest SHMA/ needs assessment, the nature of the site, and other site-specific/ local factors, we are concerned that the current wording of the draft policy would appear to suggest that all development proposals will be required to include a uniform mix of housing types regardless of specific circumstances.
- 3.2 Any such requirement would be illogical and unjustifiable; for example, an urban, town centre site located in a highly sustainable location may be more suited to smaller houses or flats, whilst a rural site on the edge of an existing settlement may be more suited to lower density, larger dwellings in order to reflect the character of the local area. Consequently a policy requirement for “all developments...include a mix of housing types and sizes in order to meet the needs of all sections of the community” would thus be contrary to the principles of good design.
- 3.3 Clearly, provided the overall housing mix delivered across the District meets the identified need for Central Bedfordshire, it would be unjustifiable to require each site to provide a uniform mix of dwelling types in all or sections of the District. As such, we consider that the current wording of the policy is unjustified and thus unsound, having regard to the requirements of paragraph 182 of the NPPF. In order to make the policy sound, in our view the policy text should be amended to indicate that an appropriate mix of housing should be provided for each site, having regard to the latest housing needs, the nature of the site and its surroundings, and any other site-specific considerations such as viability.

Policy H3: Supporting Older People

- 3.4 We have no objection to the general aims of the policy to respond to the challenges relating to older people set out within Chapter 12 of the Local Plan. However, we would encourage the Council to carefully consider the wording of the text within the policy.
- 3.5 In particular, the stated requirement to “ensure that properties are built to a good quality standard and meet the needs of older people...” is somewhat vague and does not give a clear indication of how a decision maker should react to a development proposal as required by paragraph 154 of the NPPF. It is unclear in these circumstances what a “good quality standard” would comprise, and how the needs of older people should specifically be met.
- 3.6 Meanwhile the proposed requirement to “consider the strategic aims of the Council” to ensure that housing for older people is provided throughout the Council area is also vague and does not

appear to identify a specific requirement against which individual proposals can be assessed. We therefore encourage the Council to reconsider the wording of the policy accordingly.

- 3.7 Furthermore, given the lack of reference to viability within the policy or supporting text, we encourage the Council to explain whether the viability of delivering the requirements set out within Policy H3 has been fully considered. We consider that any such requirements to deliver dwellings to a certain standard should be subject to the site being suitable, and the development being able to viably provide any such specialist accommodation, having regard to the requirements of paragraph 173 of the NPPF.

Policy H4: Affordable Housing

- 3.8 We object to the current wording of Policy H4 on the basis that it does not explain that the 30% affordable housing requirement will be subject to viability. The lack of any such provision implies that 30% affordable housing will be required on all sites that meet the size threshold irrespective of whether it would be viable to provide, which would clearly be inconsistent with paragraph 173 of the NPPF which states that the costs of any such requirements should provide competitive returns to a willing landowner and developer to enable the development to be deliverable.
- 3.9 Furthermore, in our view it is necessary for the policy text to explain that the identified 73%-27% affordable rent – intermediate tenure split is a starting point for negotiations on a site-by-site basis rather than a uniform requirement across all sites. Clearly, some sites may be more suited to a different tenure split depending on the site’s location, the nature of development and the type of dwellings proposed.
- 3.10 Viability will also have a significant impact on the potential tenure split of affordable dwellings that can be provided. Provided the identified need in relation to tenure split is broadly delivered across the District, we do not consider that it would be justifiable to require each individual development proposal to provide a uniform tenure split in every case. In order to make the policy sound, we therefore consider that the text should be amended to indicate that the identified tenure split will be a starting point for negotiations, with the final mix being determined on a site-by-site basis taking account of site-specific factors and viability.
- 3.11 We also object to the requirement within the draft policy for affordable units to be dispersed throughout the site in clusters of no more than 10 affordable houses or 15 affordable flats. We consider that such a requirement is too rigid and does not enable sufficient flexibility for site-specific circumstances to be taken into account. Furthermore, we encourage the Council to justify the 10 and 15 unit figures and clarify whether these have been based on evidence from affordable housing providers.

Policy H6: Starter Homes

- 3.12 Consistent with our comments above regarding Policy H4, we consider that the requirement to provide Starter Homes should be subject to viability, and that this should be explicitly stated within the policy text. In the absence of a viability clause the policy would be inconsistent with national policy as set out within paragraph 173 of the NPPF as it would not ensure competitive returns to a willing landowner and developer to enable the development to be deliverable.

4. BENEFITS OF RESIDENTIAL DEVELOPMENT AT LAND SOUTH OF BLUNHAM ROAD

- 4.1 It is clear that Central Bedfordshire has a significant need for new housing which needs to be delivered over the Plan Period (2015-2035), in order to meet Objectively Assessed Needs (OAN) and maximise the significant opportunities for large-scale sustainable growth facilitated by major infrastructure projects and the emerging wider sub-regional strategy for the Oxford-Cambridge Corridor. As set out above the current OAN hasn't been produced using the new standardised methodology, with which the new OAN would be 60% higher.
- 4.2 As such, all new potential opportunities for accommodating this housing growth should be considered in detail, with due consideration given to the significant socio-economic benefits of residential development. In this context, the land south of Blunham Road, Chalton (as identified on the Site Location Plan enclosed at Appendix 1) presents an excellent opportunity to deliver a sustainable residential development that would make a valuable contribution to the supply of housing in the District. Subject to demand and feasibility, our client considers that the site could be developed to provide bungalows and/ or custom build/ self-build properties, providing significant community benefits.
- 4.3 The site currently comprises a single arable field measuring approximately 2ha located immediately to the south of Blunham Road. Existing residential properties bound the site to the east and west, with employment uses located a short distance to the northwest, on the northern side of Blunham Road. The site is relatively flat, with existing hedgerows and vegetation largely defining its boundaries, screening the site largely from public view.
- 4.4 The land south of Blunham Road is relatively unconstrained, being located outside the AONB, Green Belt, Flood Zones 2 & 3 and any other relevant environmental designations, as noted within the Council's 2017 Site Assessment Technical Document. The site would not appear to be constrained by any significant issues regarding technical matters such as ecology, flood risk & drainage, highways, air quality or contamination.
- 4.5 Furthermore, the development of the site could help create a new healthy sustainable community enhancing the existing sense of place within the Charlton. Significant community benefits would be incorporated into any future development of the site, including potentially providing a new cycleway linking surrounding villages and the major service centre of Sandy, and development of well-defined communal space, with upgraded footpaths.
- 4.6 We consider that this site presents a suitable and sustainable location for a limited quantum of residential development, proportionate to the rural location. The site is relatively well contained by existing residential development immediately to the east and west, with the centre of Chalton

located a short distance to the west. As such, development of the site would infill a gap between the established residential properties within the cluster of dwellings along Blunham Road and would be located in an area considered to be part of the existing physical extent of the built form along Blunham Road, notwithstanding the lack of a defined settlement boundary on the Proposals Map.

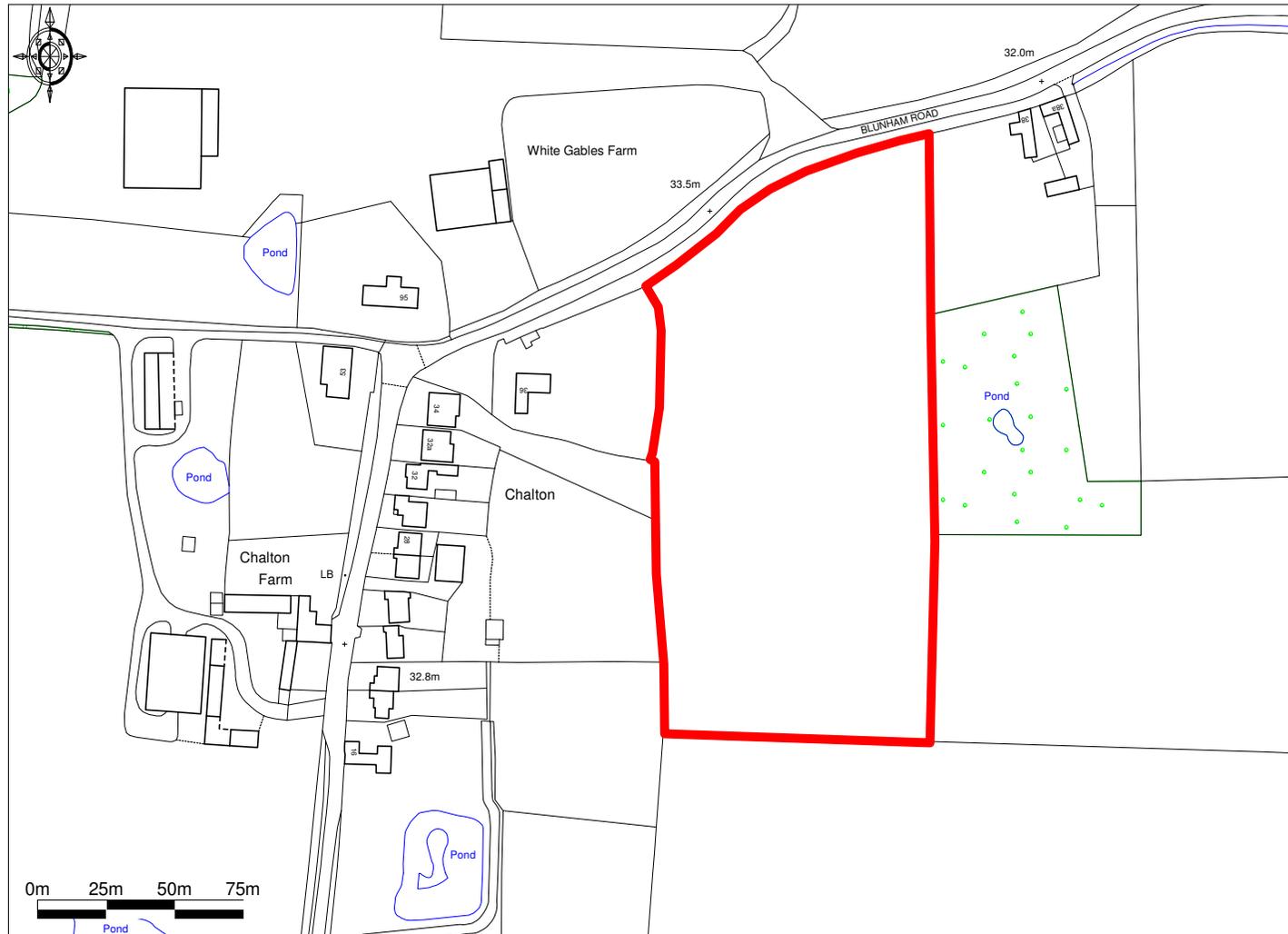
- 4.7 While we acknowledge that Chalton is not identified in the settlement hierarchy as a specific Small Village, it does include a number of residential properties as well as employment generating uses. Given the proximity to Blunham and Moggerhanger, Chalton also benefits from the services and facilities provided by these settlements and may thus be considered as part of a wider cluster of villages that overlap and interrelate. The site should therefore be considered in the context of the villages to the east of Sandy.
- 4.8 Furthermore, the close proximity of Chalton to Sandy, a Major Service Centre, also significantly enhances its overall sustainability. Meanwhile the delivery of new residential dwellings within Chalton would enhance the vitality of the village and increase the demand for local services and facilities, thereby enhancing their viability and long term sustainability.
- 4.9 Consequently given the sustainability of Chalton and the suitability of the site for residential development, our client considers the land south of Blunham Road to be available, suitable and achievable for development in order to assist in meeting Central Bedfordshire's housing requirement. The site would particularly make a welcome contribution towards the supply of housing in the early years of the Plan prior to larger strategic scale sites being delivered, and would also help to ensure a sustainable distribution of growth delivering the benefits of new development to the rural areas and smaller settlements alongside larger scale development.

5. SUMMARY AND CONCLUSIONS

- 5.1 This document sets out our representations on the Pre-Submission (January 2018) draft of the Central Bedfordshire Local Plan on behalf of our client, Orchestra Land Ltd. Our client has an agreement in place to promote the land south of Blunham Road, Chalton and is working to deliver a sustainable residential development on the site, which could make a valuable contribution towards the supply of new housing in Central Bedfordshire.
- 5.2 As discussed we have outlined in this report, whilst we broadly support the overall objectives set out within the proposed submission version of Local Plan, we encourage the Council to take account of the points we have raised in order to ensure the Local Plan seeks to deliver an appropriate level of housing growth which fully meets the District's Objectively Assessed Needs (responding to the standardised methodology for producing the OAN figures) whilst also maximising the opportunities presented by planned infrastructure developments and the ongoing work to establish the Oxford-Cambridge Corridor.
- 5.3 There needs to be an element of flexibility in the plan's housing targets which need to respond to firstly the Government's new housing methodology which could be in place by March 2018 and would significantly affect the number of homes needed in Central Bedfordshire. Furthermore, the housing figures should actively respond to the district being one of the most connected locations in England, located in a strategically important corridor for infrastructure delivery. Further clarification over the transport projects provision should lead to the delivery of higher levels of growth across the district.
- 5.4 In this context, we consider that the land south of Blunham Road represents a valuable opportunity to assist in meeting Central Bedfordshire's housing requirement for the Plan period, and can make a welcome early contribution within the first 5 years following adoption of the Local Plan. The site is not subject to any significant technical constraints that would preclude residential development, and thus would be capable of delivering a high quality development in this suitable and sustainable location. The site offers the an opportunity to deliver new housing in the short to medium term, close to strategically important infrastructure improvements, providing significant community benefits to Charlton, enhancing connectivity to surrounding settlements.
- 5.5 We trust the Council will take the above comments into account when reviewing consultation comments and that they can help influence the allocation of the site with the any revised plan, and we welcome the opportunity to work collaboratively and constructively with the Council as matters progress.

A1. SITE LOCATION PLAN

Land south of Blunham Road, Chalton



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