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**Central Bedfordshire  
Pre Submission Local Plan  
2015 - 2035  
January 2018**

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**Site:** Glengarriff Park Road Toddington  
Bedfordshire LU5 6BY

Include land in the Settlement  
Envelope and remove from the  
Green Belt

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**Representation on behalf**

**of:** Mr C Burke

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ALP Ref : 12/068

**Prepared by:-**

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This is a representation to the Central Bedfordshire Local Plan 2015 - 2035. Dated January 2018 - Submission Version:

The NPPF paragraph 182 comments;

**The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" - namely that it is:**

- **Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;**
- **Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;**
- **Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and**
- **Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework .**

This submission also seeks a request to participate in the Examination.

This is an Objection to Submission 9.2 of the Local Plan and Policy SP7 . It is also an expressed objection to the Settlement Envelope and the Green Belt boundary

The NPPF provides no advice on defining Settlement Envelopes (SE).

The Local Plan at section 9.2.3. advises that an updated Settlement Envelope will be illustrated on the proposal map.

It adds that they will;

**Accompany the Pre Submission version of the Plan**

First, they have not been produced, the plans are still awaited. The Settlement Envelopes are normally shown as a series of inset plans for ease of reference, but it looks like the intended approach is to produce one plan. This will not be sufficiently clear at this small scale and it would be sounder to produce plans for each individual settlement.

At 9.2.4 the plan comments;

**In some instances, where there is ambiguity in defining that boundary, the Envelope will be used to reflect the character of the predominant land use, using the most appropriate and clear physical features on the ground. That land use must be settlement related, for example residential development, domestic gardens, playing fields and community facilities; and not related to agriculture or considered to be part of the countryside.**

The following text in the plan provides no further analysis on how to define the Settlement Envelope. The policy SP7 starts with;

**Settlement Envelopes provide a definition between settlements and countryside.**

Accordingly, this is a submission in which the Settlement Envelope Reviews Appendices and shows that the Council have accepted the point that the Settlement Envelopes should include the property and a small part of the garden. However, the way the line is drawn now does not use the most appropriate and clear physical features on the ground, i.e. the boundary of the rear garden.

Attached to this submission is a proposed Settlement Envelope line showing it should include all the residential curtilage inside the Settlement Envelope. Paragraph 79 of the NPPF states;

**the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.**

This is elaborated in NPPF paragraph 80, which advises that Green Belts should serve five purposes, as set out below. The NPPF does not infer that any differential weighting should be applied to the five purposes. This is elaborated in NPPF paragraph 80, which states that Green Belts should serve five purposes, a namely,

**The purposes of Green Belt**

- **To check the unrestricted sprawl of large built-up areas.**
- **To prevent neighbouring towns merging into one another.**
- **To assist in safeguarding the countryside from encroachment.**
- **To preserve the setting and special character of historic towns.**
- **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

The NPPF emphasises in paragraph 83 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. The Framework adds,

**once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period**

For clarity, the preparation of a local plan is the appropriate time to have that review. Paragraph 84 of the NPPF confirms,

**'when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'**

This is therefore the first opportunity to review the policies since the publication of the NPPF and consequently the first time to take account of the sustainable approach to development advocated, so strongly in The Framework. This point is emphasised in para 85 (first indent) of NPPF.<sup>1</sup>

**Ensure consistency with the Local Plan Strategy for meeting identified requirements for sustainable development.**

And additionally, of relevance to this submission

**Define boundaries clearly using physical features that are readily recognisable.**

The standard or test for this submission is contained in the National Planning Policy Framework (NPPF) at paragraph 182 it comments;

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- **Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.**

Soundness has four components which need to be considered. This Green Belt in this part of Toddington makes little sense. It does not follow any established or long term defensible boundary and should be extended to exclude the residential curtilage.

The enclosed plan shows the area of land to be removed from the Green Belt and included in the Settlement Envelope.

Additionally, as consequence of removing the land from the SE, the land

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<sup>11</sup> CBLP Policy SP1 also seeks to increase an emphasis on sustainability.

should be removed from the Green Belt.

