



WOOTTON PARISH COUNCIL



3 Longden Close
Haynes
Bedfordshire
MK45 3PJ

Tel: 07531 930788

Email: Clerk@Wootton-PC.gov.uk

Website: Wootton-pc.gov.uk



[www.facebook.com/](https://www.facebook.com/WoottonParishCouncilBedfordshire)

WoottonParishCouncilBedfordshire

David Hogger BA MSc MRTPI MCIHT
Examiner

24th September 2021

Dear Mr Hogger

Wootton Neighbourhood Development Plan Examination

Thank you for your letter dated 10th September 2021 regarding the Wootton Neighbourhood Development Plan Examination.

Bedford Borough Council intends to respond separately to the two questions that require responses from both themselves and the parish council, and so please find our responses as follows:

1. In light of the publication of the revised version of the National Planning Policy Framework, we have reviewed the references made to the NPPF within the WNDP and set out below a table summarising the changes that are required to be made to take into account the revised NPPF.

Paragraph of WNDP	NPPF Reference in WNDP	Amendment
68	Refers to paragraph 105.	This should now refer to paragraph 107.
72	Refers to paragraph 99.	This should now refer to paragraph 101.
73	Refers to paragraph 100.	This should now refer to paragraph 102.
79	Refers to paragraph 170.	This should now refer to paragraph 174.
80	Refers to paragraph 170.	This should now refer to paragraph 174.
90	Refers to paragraphs 28, 83 and 92.	Paragraph 28 is still relevant, however, paragraph 83 should now refer to paragraph 84 and paragraph 92 should be amended as paragraph 93.
93	Refers to paragraphs 83 and 92.	This should now refer to paragraphs 84 and 93.
95	Refers to paragraph 112.	This should now refer to paragraph 114.
97	Refers to paragraphs 83 and 84.	This should now refer to paragraphs 84 and 85.

103	Refers to paragraph 193.	This should now refer to paragraph 199.
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In regard to the publication of the National Model Design Code (NMDC), we would suggest that reference is made to the NMDC in regard to the Technical Evidence to Policy W12 of the WNDP, and would suggest that paragraph 87 of the WNDP is amended to read as:

“National planning policy acknowledges that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. This is reinforced within the guidance provided within the National Model Design Code. As confirmed within the NPPF, neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development”.

2. In regard to the current planning appeal (APP/K0235/W/19/3243154) this is still undecided. To confirm, interested party comments on the planning appeal were required by 16th July 2021.

Turning to the question of why this site was not allocated in the WNDP, it is important to bring to your attention that this site was not brought to the attention of the parish council or the Borough Council in the ‘call for sites’.

Furthermore, the site promoter made no approach or engagement at the public consultation of neighbourhood plan events held since September 2017 which included two public exhibitions and an Issues and Options consultation which took place over six weeks.

The parish council were first approached by the site promoter on 23rd April 2019, on this same day the application for up to 81 dwellings (19/00894/MAO) was validated by Bedford Borough Council. In light of this, the parish council assessed the proposal as part of the formal planning application process. The parish council were particularly concerned with the impact of the scale of development on the existing highway given the close proximity of the school, Wootton Academy, exacerbating an existing problem in the area. Furthermore, there was significant local opposition to the site (71 letters of objection from residents) and this was further reinforced when the parish council held a public meeting to discuss the application.

To confirm, at no point did the site promoter suggest a smaller development at this site given their actions in lodging the planning application for up to 81 dwellings and the subsequent planning appeal(s).

In relation to the preliminary questions for the parish council, we now set out below our responses:

1. In light of the current Local Plan 2040 Review and anticipated adoption for December 2023, the parish council agrees to review the timetable and monitoring of the Local Plan 2040 as detailed in Section V of the WNDP.

2. At the Pre-Submission consultation stage, the response received from Bedford Borough Council included views on the site allocation policies and in particular, recommended that land at The Chequers Public House, Hall End Road (Policy W5 in the Pre-Submission Version of the WNDP), which sought to allocate 25 dwellings, be removed from the WNDP. In addition, Bedford Borough Council made comments in regard to the scale of the other site allocations. In light of this response received from Bedford Borough Council, the Neighbourhood Plan Steering Group resolved to uphold that advice. Furthermore, the volume and content of representations received from residents of the parish at the Regulation 14 public consultation stage further influenced the Neighbourhood Plan Steering Group’s decision to remove the land at The Chequers Public House, reduce the scale of development within site allocation policies W4, W5 and W6 and include the extra requirement in each of these site allocation policies to include ‘respect the existing linear form of development’.

3. In respect to paragraph 60 which refers to the quantum of development being marginally reduced in response to further resident feedback, this principally refers to Policies W4, W5 and W6 where the allocation of proposed units was reduced marginally by 5 units in each case. We consider this point has not perhaps been expressed appropriately in the WNDP.

The Housing Needs Survey (completed in August 2017) determined 133 residents were looking to purchase a property in the next 20 years – an average of 6.65 dwellings per year. The plots initially identified gave the parish council 145 dwellings, with a low density layout. After considering Bedford Borough Council's comments, this was reduced to 105 dwellings – a difference of 45 dwellings and an actual shortage of 27 dwellings. We are now entering the fifth year since this survey was completed and using a linear scale of dwellings purchased per year, this determines 33 dwellings would have been purchased. We are therefore on track to deliver the number of dwellings highlighted in the Housing Need Survey. Furthermore, since the Housing Needs Survey was completed, two in-fill developments within the village have provided a further 13 dwellings – (19/01590/FUL – 41 and 43 Cause End Road (eight dwellings) and (20/01842/OUT – 18 and Land at 16 Bedford Road (five dwellings)).

4. The justification for including the bullet point for both public transport and education transport within Policies W3, W4, W5 and W6 was confirmed within the consultation response received from Bedford Borough Council at the Pre-Submission (Regulation 14) stage. Bedford Borough Council recommended the site allocation policies included a clause for developers to contribute towards both education transport and public transport, if required, and the Neighbourhood Plan Steering Group resolved to include this within the plan.

5. In regard to the grade of agricultural land, reference was made to the Natural England agricultural land classification map (Eastern Region) which shows the parish in an area of both Grade 3 and Grade 2 Agricultural Land. This map, however, does not accurately split Grade 3 into Grades 3a or 3b, therefore it was not possible to accurately confirm the Grade 3 land without undertaking site specific soil surveys. This was not pursued. Furthermore, we are aware that other Site Assessment Reports submitted in support of a number of other Neighbourhood Plans within Bedford Borough did not quantify the grade of agricultural land in their assessments.

6. To confirm, the parish council agrees to include a plan(s) identifying the heritage assets within the main body of the WNDP.

7. The parish council is aware of the aspirations to develop the Bedford and Milton Keynes Waterway Park, however, there are no formal plans in place or indeed any defined route determining how the connection will be made between the Grand Union Canal and the River Great Ouse. In light of this, the parish council considered it was premature to include any reference to this project in the WNDP.

8. The parish council understands the option in determining which station will best assist in the delivery of the East West Rail project has yet to be resolved. Given this uncertainty, it is difficult to determine any potential cycle and pedestrian links from the parish and therefore, it was not considered appropriate to address this matter in the WNDP.

9. The parish council is satisfied with its aspiration to improve accessibility, particularly for pedestrians and cyclists as detailed within the Non Land Use Actions section of the plan, without harm to the character and appearance of the area. Any proposals will of course be assessed to ensure there is no conflict with any other policies within the WNDP, in particular policies W1 and W12.

10. To confirm, there were several opportunities for the site promoter to bring this site to the attention of the Neighbourhood Plan Steering Group – including two public exhibitions and an Issues and Options consultation (six week period) prior to the first approach made by site promoter on 23rd April 2019.

It is important to note on the same day the site promoter provided a letter (23rd April 2019) to the parish council, an application for up to 81 dwellings (19/00894/MAO) on land to the west of Wootton Upper School, Hall End Road was validated by Bedford Borough Council. The application was made on 18th April 2019. In light of this, the parish council assessed the proposal as part of the formal planning application process. The parish council was particularly concerned with the impact of the scale of development would have on the existing highway given the close proximity of the school, Wootton Academy – exacerbating an existing problem in the area. Furthermore, there was significant local opposition to the site (71 letters of objection from residents) and this was further reinforced when the parish council held a public meeting to discuss the proposal.

11. On the issue of reserve housing sites, it was noted the current adopted Local Plan 2030 made no provision for housing in Wootton. The need for an early review of this plan and the knowledge Wootton is considered a sustainable settlement for development, were all contributing factors in why the parish council took a proactive approach to determine the location and level of housing. It was therefore considered that the parish council had already made a future commitment for housing development and as such there was no need for reserve housing sites.

12. In regard to the planning permission granted in 2016 for 600 dwellings on the east side of Cranfield Road, we can confirm that the implementation of this permission has commenced. It is anticipated all development will be completed by June/July 2021. The parish council's aspirations were to further avoid large scale developments within the parish and enhance the approach taken within the emerging WNDP. Furthermore, the affordable provision on this site is provided by the housing association, bpha¹ who allocate housing to those who live outside the parish. The parish council is keen to address affordable housing be provided for those living in, or with a connection to the parish.

13. The parish council can confirm that the policy references are incorrect and as detailed within Regulation 16 Representations Reference 36 (Savills) should refer to Policy W10 and not Policy W12.

14. Firstly, the total provision of open space is 19.53 ha and not 17.53ha. In regard to the securing the open space, the parish council has engaged with the landowner agents to resolve the transfer of land and have sought to resolve the transfer of open space within Policies W3 and W10 (a) by utilising a S106 planning obligation. Turning to other important green space as identified in Policy W10 (b), discussions with the landowner agents have proposed this land be transferred to the parish council as a payment in kind for Community Infrastructure Levy arising from the proposed development provided at Policy W3. In regard to securing open space with the other housing sites, it was considered this was not appropriate given the scale of development proposed.

15. To confirm, the Local Green Space (LGS) comprising 'Recreation Ground, Church Road (LGS2)' is owned by the parish council and the remaining LGS, namely LGS1 (Amenity Open Space, Lorraine Road), LGS3 (Berry Wood (west)) and LGS4 (Berry Wood (north)) are owned by Bedford Borough Council. At the early stage of the plan preparation, the Neighbourhood Plan Steering Group approached Bedford Borough Council (by letter dated 8 October 2018), advising of its intention to designate those areas of land as Local Green Space within the emerging WNDP.

16. The parish council can confirm that Policy W11 – Protection of Views is only applicable to public views.

17. The parish council agrees to amend criterion c of Policy W12 and would suggest the following amended text to this part of the policy:

"c. be designed to reflect the prevailing pattern and scale of development in the immediate location."

¹ Bedford Pilgrims Housing Association.

18. In regard to requirement h) of Policy W12, we can confirm that a similar clause is provided within Policy S1 of the Sharnbrook Neighbourhood Plan². This plan has been examined and will now proceed to referendum (the vote is to take on 21st October 2021). The parish council is seeking to address whether developments need to be converted or adapted for changing needs of the occupier (for example, to be adapted to allow an individual to live independently within their existing home due to change in health circumstances). In addition, given developments should address climate change and look to increase the use of renewable energy, Policy W12 seeks to ensure that measures to improve energy efficiency can be adapted on existing buildings or introduced within new developments.

19. To confirm, the 'or' at the end of Policy W13 is an error and should be deleted.

20. The consultation response received from Bedford Borough Council at the Pre-Submission (Regulation 14) stage suggested defining 'major development' in the supporting text and in response to this, an amendment was made to the Technical Evidence to Policy W15 (paragraph 95) to address the comments received.

21. The parish council considers there are no brownfield sites within the village suitable for development.

22. In regard to Policy W18, the approach taken with this policy has also been adopted within Policy CC13 of the made Carlton and Chellington Neighbourhood Plan³ as well as Policy S16 of the Sharnbrook Neighbourhood Plan. Can we suggest that the following is added after the a) to g):

"Monies from the local element of the Community Infrastructure Levy will be applied to these various priority projects."

If you need any further advice or information, please contact either myself (Clerk@Wootton-PC.gov.uk) or Cllr Gareth Lloyd (Gareth.Lloyd@Wootton-PC.gov.uk).

Yours sincerely,

Gareth Lloyd

Gareth Lloyd BSc (Hons)
Chairman, Wootton Parish Council

Sue Edgar Playford

Sue Edgar Playford BA (Hons) PSLCC
Clerk to the Council and Responsible Financial Officer

² <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/neighbourhood-planning/sharnbrook-neighbourhood-development-plan>.

³ <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/neighbourhood-planning/carlton-and-chellington-neighbourhood-development-plan>.