



04 May 2021

Central Bedfordshire Council
Local Plans Team

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By email only

Dear Sir / Madam,

Central Bedfordshire Local Plan 2015-2035: Main Modifications Consultation

Thank-you for the opportunity to comment on the above consultation. Our authorities have worked collaboratively in the preparation and subsequent examination of your Plan. This is reflected in the Memorandum of Understanding (MoU) agreed between the two Councils. (your reference Exam 5C Annex 2). The MoU included, in its Appendix 1, a number of agreed Main Modifications on transport matters which, subject to their inclusion, resolved North Hertfordshire's outstanding concerns.

From review of the published Main Modifications, North Hertfordshire is pleased to see the significant majority of these reflected in the proposed changes to the Plan. Specifically:

- **MM35** / Policy SA3 in relation to proposed development East of Arlesey where modifications are included as agreed and this change is **supported**;
- **MM38** / Policy SA4 in relation to proposed development East of Biggleswade where modifications are included as agreed and this change is **supported**;
- **MM141** / Paragraph 14.5.2 in relation to assessments of transport capacity where modifications are included broadly as agreed, making reference to cross-boundary traffic movements, and this change is **supported**;
- **MM143** / Policy T1 in relation to the cumulative transport impact of cross-boundary development where modifications are included as agreed and this change is **supported**;
- **MM190** / Policy HQ2 in relation to the securing of developer contributions where modifications are included as agreed and this change is **supported**.

Of the other agreed changes references in our MOU:

- Changes to Paragraph 14.3.2 in relation to cross-boundary transport movements are included as agreed in the schedule of additional modifications (**AM45**). Although the additional modifications are not subject to formal consultation, we support your intention to make this change;
- The proposed allocation of RAF Henlow for mixed-used redevelopment is proposed for deletion by MM42, rendering our previously agreed changes obsolete. We note your intention, as expressed through **MM134** and **MM135** to further consider the future of this site outside of this Plan process and / or to inform the proposed review. We would welcome an ongoing dialogue with you on the future of this site given its location close to the administrative boundary (*see also our comments below on masterplanning and delivery and the proposed plan review*).

- The previously agreed changes to Policy SE3 in relation to the cumulative traffic impacts of proposed employment development at Holme Farm, west of the A1 at Biggleswade have been excluded from **MM40**. North Hertfordshire **objects** to this omission and requests that the previously agreed changes are incorporated into the changes to this policy for effectiveness and consistency with the approach taken elsewhere. This is for the reasons set out in our previous MoU.

Beyond these issues, the Council **supports** the continued provision made in Central Bedfordshire's Plan towards unmet development needs from Luton and the identification in **MM14** and **MM15** of the specific sites within Central Bedfordshire that will achieve this.

We note the proposed policy requirement in **MM8** for an early review of the Plan to commence six months from adoption. We anticipate playing an active part in this review and the development of any relevant evidence and policies under the Duty to Cooperate (or any successor arrangements under the Government's planning reforms) given our proximity, shared housing and economic market areas and linked transport and green infrastructure.

Our own Local Plan for the period to 2031 is similarly progressing. The Inspector's proposed Further Main Modifications were issued in March 2021 and are due to be consulted upon following the upcoming local elections. These latest amendments do not propose any significant alterations to the spatial strategy but do include significantly strengthened requirements in relation to the masterplanning and design of strategic and significant development sites in the District.

Recognising that the modifications to both Plans are issued without prejudice to the Inspectors' final conclusions, we would welcome opportunities to discuss the masterplanning and implementation of sites close to our shared administrative boundaries on an ongoing basis. These sites provide the potential to jointly deliver and / or contribute towards the provision of linked strategic green infrastructure (including opportunities for biodiversity net gain), walking and cycling provision and public transport to the benefit of existing and future residents.

This particularly relates to the proposed strategic allocation east of Arlesey and developments in and around Stotfold, Henlow (including any future plans for the RAF base) and Lower Stondon in Central Bedfordshire and proposed sites in and around Baldock, Letchworth, Hitchin and Ickleford in North Hertfordshire.

If you would like to discuss any of the comments raised in this response in more detail, please contact me using the details provided.

Yours sincerely,

Nigel Smith
Strategic Planning Manager, MRTPI
North Hertfordshire District Council