

Sent by email to: localplan@centralbedfordshire.gov.uk

05/05/2021

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the main modifications to the Central Bedfordshire Local Plan

Thank you for consulting the Home Builders Federation (HBF) on the proposed main modifications. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

MM8

Proposed wording is unsound because it is ineffective.

In order to be effective policies requiring the review of a local plan needs not only to include a start date for that review but also when a revised local plan will be submitted for examination and the consequences for a failure to achieve this policy. At present MM8 commits the Council only to a review and as such cannot be considered to be an effective policy.

We recognise that at the time of writing there may have been uncertainty about the Cambridge to Oxford Arc and the route of any infrastructure. This has now been clarified with the Government setting out the scope and timescale for the production of policy guidance relating to the Arc¹. Statement by the Government commits them to publishing a final statement by Autumn 2022. As such we would suggest that a more detailed timeframe could now be included in this policy that commits the Council to submitting a new plan for examination by the summer of 2023 or 6 months after the publication of the Arc Spatial Framework, whichever is later. This will ensure the Council's plan is progressed alongside the guidance that is being prepared for the Arc and enable the plan to be adopted soon after the Government Guidance has been published.

We would also suggest a further clause is added stating that should the Council fail to meet this deadline those policies relevant to housing delivery will be considered out of

¹ <https://www.gov.uk/government/publications/planning-for-sustainable-growth-in-the-oxford-cambridge-arc-spatial-framework>



date in accordance with national policy. This ensures that there is a consequence the Council failing to adhere to the timescale for the review and submission of the local plan. A similar approach was considered appropriate in the Bedford Local Plan and we consider it to be a necessary modification to ensure policy SP1a is sound. Our proposed amendments to SP1a are set out below.

Policy SP1a: Partial Review of the Local Plan

The Council will commence a Partial Review of the Plan within six months of adoption of the Local Plan 2035. and submit a new local plan for examination by July 2023 or six months after the publication of the Arc Spatial Framework, whichever is the later.

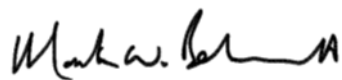
The Partial Review will investigate, as part of the wider statutory plan-making processes and identify where necessary opportunities for future growth that can capitalise on any appropriate commitments to improve existing, or provide new, strategic infrastructure.

Following the review, the plan will be updated, where necessary, and a revised plan submitted for examination by June 2023 or six months after the publication of the Arc Spatial Framework, whichever is the later.

In the event that this submission date is not adhered to, the policies in the Local Plan which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019.

We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



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