

**BEDFORD BOROUGH LOCAL
PLAN 2040 – DRAFT PLAN
STRATEGY OPTIONS
RESPONSE
ON BEHALF OF AXIOM GREAT
BARFORD LIMITED**

Table of Contents

1.0	Introduction	2
2.0	Level of Growth Required	3
3.0	Growth and Spatial Strategy Options	4
4.0	Site Assessments	8
5.0	Summary and Conclusions	9

1.0 Introduction

- 1.1 This Issues and Options representation is made on behalf of Axiom Great Barford Limited ('Axiom') who have land interests in Great Barford. The Axiom site forms part of the Policy H1 housing allocation in the emerging Great Barford Neighbourhood Plan, which is currently at examination. The site is also put forward for consideration through the call for sites process in 2020.
- 1.2 Axiom are promoting land off Bedford Road, Great Barford on behalf of two landowners and their site can accommodate at least 350 new dwellings, community facilities, open space and landscaping.
- 1.3 The emerging Neighbourhood Plan Policy H1 allocation encompasses a wider area of land, to meet the 500 home requirement for Great Barford identified in the adopted Local Plan 2030. The remainder of the land within the emerging allocation is controlled by Countryside Properties, who will be making separate representations to this consultation.
- 1.4 Whilst Axiom continue to work closely with the Great Barford Parish Council, Bedford Borough Council Assets and Countryside Properties to secure allocation of the site through the Neighbourhood Plan, Axiom continue to promote the merits of Great Barford in general as a location for growth, and the suitability of their land for development through the preparation of the Local Plan 2040.
- 1.5 It is worth noting that the Draft Strategy Options were prepared ahead of the publication of the revised NPPF, which introduced the requirement at Paragraph 22 for Local Plans which include new settlements or significant extensions to towns/villages, to be set within a vision which looks at least 30 years ahead. This policy clearly applies to the Bedford Borough Local Plan 2040 and it is considered likely that the Council will need to undertake additional work to establish a longer-term vision within which the policies for the Local Plan 2040 can be set.

2.0 Level of Growth Required

- 2.1 Chapter 3 of the Strategy Options consultation document sets out that the standard method figure for Bedford Borough is 1,275 dwellings per year or 25,500 dwellings in total and that after existing commitments are taken into account, the Local Plan 2040 needs to allocate land to provide a further 12,500 new dwellings over the plan period.
- 2.2 It is unclear whether the existing commitments include allocations in the emerging Neighbourhood Plans which will satisfy the requirements of the adopted Local Plan 2030 Policy 4S. If these are included as commitments, it is important to note that the minimum level of growth that will need to be delivered via the Local Plan 2040 may need to increase should any of the emerging Neighbourhood Plans fail at examination or not pass referendum.
- 2.3 Should any Neighbourhood Plan not progress as expected it will be important that the Local Plan 2040 firstly allocates the growth directed to rural settlements such as Great Barford, before any consideration is given to the wider development strategy, which could include an additional level of growth at the Key Service Centres.
- 2.4 It is also important to note that the 25,500-home requirement is the minimum number of homes that need to be delivered over the plan period. To ensure this figure is delivered, there will need to be an additional allowance made in the allocation of land to allow for slippage in the expected delivery of sites and any unforeseen delays.
- 2.5 Normal practice would suggest a 10% additional allowance should be made which would equate to a further 2,550 homes. Whilst reference is made to 'choice and flexibility' at paragraph 1.50, this is only in response to the potential additional growth that could come forward via Neighbourhood Plans. This is an unknown and it is therefore important that the level of growth planned for in the Local Plan 2040 is in excess of the required 25,500 to ensure the minimum number of homes are delivered.
- 2.6 We suggest this means planning for 28,050 homes (25,500 +10%) rather than the 25,500 currently being considered in each of the options. Subject to the strategy being adopted, this approach would also help ensure that the requirements of NPPF paragraph 68, which require a deliverable supply of land for years 1-5 of the plan, plus an appropriate buffer.
- 2.7 The Council will also need to consider the level of growth to be planned for in the Oxford to Cambridge Arc, where Bedford Borough sits in a key central area. If the economic benefits of the Arc are to be realised, it is likely that additional housing will be required to support a growing working age population. If the economy grows without the required housing, it may have knock-on impacts for existing residents in terms of increased house prices and worsening affordability.
- 2.8 Therefore, in addition to the need to plan for flexibility and contingency in setting the housing requirement, we would encourage giving full consideration to the impacts of longer-term economic growth to understand if there may be additional housing requirements.

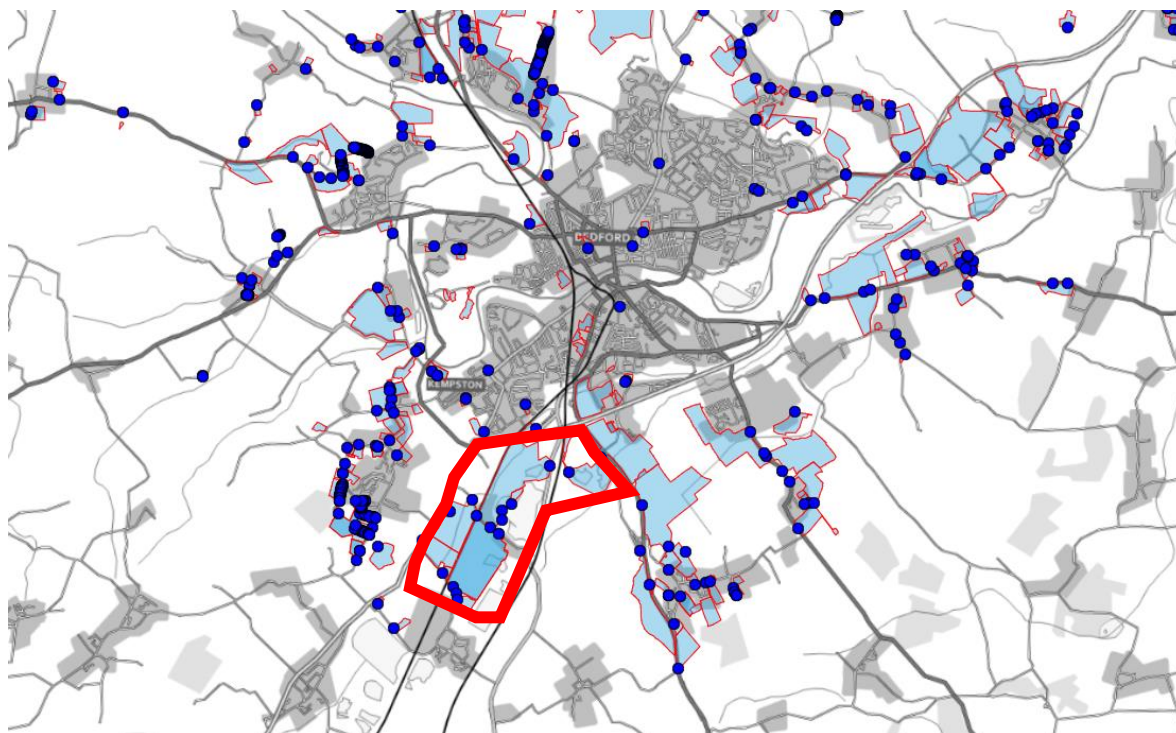
3.0 Growth and Spatial Strategy Options

- 3.1 Axiom are generally supportive of the rationale of future growth being focused around transport corridors, in particular along the A421 which is the key route through the Borough, connecting Milton Keynes and Cambridge, and is well related to Bedford as the areas main service centre.
- 3.2 We note from the Development Strategy Topic Paper that the A421 corridor, urban area and rail-based options set out at the Issues and Options stage were the most popular options for those who commented.
- 3.3 We also note that the SA process showed that the A421 corridor and rail based growth options performed favorably against the new settlement options with only urban growth and urban edge growth performing better in sustainability terms.
- 3.4 In this regard, we do not consider Option 2c, which would focus development on the urban area plus two new settlements in the east of the Borough to be a realistic option. Whilst there may be scope for the inclusion of one new settlement in the Local Plan 2040, particularly given the new NPPF paragraph 22 requirement for the strategy to be set within a longer-term vision, to include two new settlements at the expense of other options would be unsustainable and a highly risky strategy to deliver much needed homes in the short to medium term.
- 3.5 Whilst growth in and around the urban area is clearly a sustainable option, particularly given Bedford is the main economic centre in the area, we have doubts whether the 3,000 homes (plus 51ha of employment land) is capable of being delivered in these areas over the plan period.
- 3.6 There may be small scale opportunities in the town, but finding land for 1,500 homes will be a challenge. Equally, finding suitable sites for 1,500 homes on the edge of Bedford – which is effectively limited to the north/north east of the town. Constraints to the south east which overlap with other options to the south – will also be a challenge, particularly given the character of the landscape and topography in this area.
- 3.7 Both of these considerations increase the importance of looking closely at all the options for the A421 corridor and reinforce the position that the A421 and rail corridors should play an integral part of any future development strategy.
- 3.8 It is encouraging to see that growth in the A421 corridor is included within three of the four options presented in the paper – with our thoughts of the fourth, two settlement option, noted above.
- 3.9 However, we have some concerns about the make-up of the three options which include A421 growth primarily being focused on the 'southern parishes', the ability of a new settlement to deliver early in the plan period, and the ability to deliver the 5,500-7,000 homes directed to the rail corridor – also to the south of the town.

Rail related growth

- 3.10 Whilst focusing 50% of the required additional growth close to the rail stations to the south of the town is a laudable proposition, it is unclear how this would be delivered. Below is an extract of the call for sites map with the rail related growth area from the options consultation document overlaid in red. It can be seen that there are a limited number of sites put forward in the rail related growth area – with those large sites that have been put forward identified as having employment potential by their promoters, given the surrounding context.

Figure 1: Call for Sites Map Extract



- 3.11 Whilst additional opportunities may be available on the periphery of this area which could contribute to delivery (some of which may be classed as being in the A421 corridor), we would question whether there is suitable land available to deliver up to 7,500 homes in this area.
- 3.12 Along with concerns about the ability to deliver 3,000 homes in and around the urban area, this places further emphasis on the role of land in the A421 corridor within the development strategy

Delivery in New Settlements

- 3.13 Whilst there is a role for a new settlement as part of the development strategy, we question the ability of any such allocation to deliver in the short to medium term. There will be a significant lead in time with any new settlement and first completions would not be realised until well into the plan period.
- 3.14 In the context of the requirement to have a long term, 30 year vision to satisfy Paragraph 22 of the NPPF, it is logical to plan for a new settlement through the Local Plan 2040. However, this shouldn't be to the detriment of meeting housing requirements in the short to medium term,

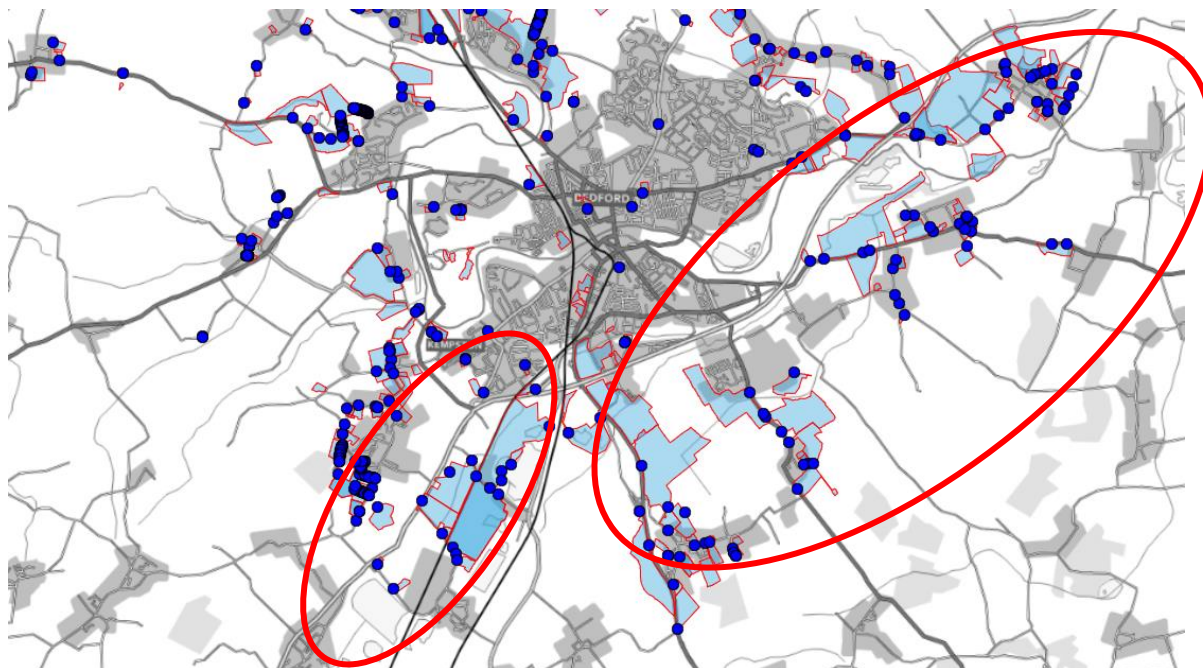
particularly when there appears to be sufficient suitable and deliverable sites available to meet the need in a timely manner.

- 3.15 We therefore suggest that if a new settlement is to be included in the strategy, the number of homes to be delivered in the plan period is realistic. At the current time, the options appear to assume the completion of either settlement option in the plan period. We don't believe this to be a realistic assumption given the current stage of the plan and the lead in time associated with matters including land assembly, planning and infrastructure delivery.
- 3.16 Once delivery rates are looked at in more detail, we believe there will be a residual requirement that will need to be covered in the development strategy. Given the constraints with other elements of the strategy, we again put emphasis on the importance of the A421 corridor to deliver growth in the Local Plan 2040.

The Apportionment to the Southern Parishes

- 3.17 Aside from option 2c (the two-settlement option), which has been addressed above, each of the options include an element of growth in the A421 transport corridor. This level of growth varies from 1,500 dwellings in option 2b and 2d to 2,000 dwellings in option 2a. In our view, each of the options significantly downplay the potential of the area to deliver additional housing numbers.
- 3.18 As can be seen from the call for sites map below, there are a number key service centres in this corridor with the ability to expand and where sites have been put forward for consideration. This includes Wootton, Wixams, Wilstead, Shortstown and Great Barford, where Axiom are promoting land. In the adopted Local Plan, Key Service Centres were seen as suitable for 500 dwellings, and indeed higher levels of growth were assessed early in the process as being appropriate in some locations.

Figure 2: Call for Sites map Extract



- 3.19 Given there are other settlements in the corridor that could also take growth, such as Willington and Cotton End, it is unclear why the options limit potential growth to 2,000 dwellings. This is particularly the case when the issues raised above with the other options are taken into account.
- 3.20 It is suggested that a finer grain assessment of site availability and suitability needs to be undertaken to inform the development strategy. In our view, if this is undertaken, it will identify a greater level of potential for growth in the area.
- 3.21 Within the three options, we are unclear why areas to the east (land within the parishes of Cardington, Cople, Great Barford, Little Barford, Roxton, Willington and Wyboston) are only included in one of the options, despite being in the same transport corridor as Wootton, Wilstead, Cotton End and Shortstown, which are included in all three. A review of the evidence does not make this distinction clear.
- 3.22 We suggest that in developing the strategy further, the whole of the A421 corridor should be looked at as one, with no distinction between the eastern and southern parishes. This will allow a proper review of all settlements and sites on a comparable basis and avoid suitable sites being missed out of the development strategy based on an arbitrary decision to split the parishes along the corridor.

Neighbourhood Plans

- 3.23 Should any of the Neighbourhood Plans currently at examination not progress as expected, including the Great Barford Neighbourhood Plan, it is essential that the starting point for the development strategy is the allocation of land within those settlements identified for growth in the adopted Local Plan. This should be the baseline position, from where further decisions are made on the apportionment for growth.
- 3.24 This is in accordance with policy 4S of the Local Plan 2030 where the Council has made a commitment to allocate sites through the Development Plan process, should Neighbourhood Plans not deliver in a timely manner.

4.0 Site Assessments

- 4.1 Whilst we have not reviewed all of the Council's site assessments, we do have some concerns regarding the conclusions drawn and the approach taken in assessing the suitability of sites for development.
- 4.2 As already noted, Axiom's site at Great Barford (referred to as ID767) has been robustly assessed by the Parish Council and their consultants and is considered to be the most appropriate location for growth in the settlement (see Policy H1).
- 4.3 A detailed Vision Document has been prepared for the site, which was submitted through the call for sites process, which contains details of the opportunities and constraints presented by the site.
- 4.4 We understand Countryside have also engaged in pre-application discussions with the Council and received initial advice on the suitability of the emerging proposals for Great Barford West.
- 4.5 None of this background information appears to have informed the assessment of the site published online, which in our view is an error and has led to some unjustified responses to the assessment questions.
- 4.6 We would expect the assessment of sites to be underpinned by a robust evidence base, which justifies the conclusions on the suitability of sites. Instead the assessment of Axiom's site includes unevidenced conclusions such as 'Potential access requiring mitigation' and 'Serious capacity constraint' in relation to highways, conclusions which are not justified.
- 4.7 Moving forward, we would expect the assessment of sites to be more thorough and refer to the evidence base used to justify decisions. We have seen other plans fall down in recent years on a lack of transparency in the assessment process, which undermines the conclusions made. All sites should be assessed on a fair and equitable basis, utilising the available evidence, which does not currently appear to be the case.

5.0 Summary and Conclusions

5.1 This representation sets out a number of comments and concerns with the Draft Strategy Options. These can be summarised as:

- There is a need for clarity over the treatment of emerging Neighbourhood Plan allocations. The inclusion of sites to meet existing Local Plan growth in areas such as Great Barford should be the baseline position for the Local Plan 2040 – whether that be through a successful Neighbourhood Plan allocation or, should the Neighbourhood Plan fail, through an allocation in the emerging Local Plan 2040.
- The Local Plan 2040 needs to be set within a longer-term vision to satisfy NPPF paragraph 22.
- Additional land needs to be identified to provide flexibility and contingency in supply and consideration needs to be given to a potential uplift in relation to wider economic growth in the Oxford to Cambridge Arc.
- There is support for the identification of the A421 corridor as a focus for growth.
- The two new settlement option is not considered a robust or sustainable approach to meeting housing need.
- There is a concern over the assumed capacity of the urban area/urban fringe and the rail focused options to deliver the stated level of development.
- There is a concern that the assumed delivery of the settlement options may be overstated.
- There is an unjustified split in the parishes along the A421 corridor, with a more appropriate approach being to look at the area as a whole and identify the most appropriate available sites.
- There is a need to increase the level of development focused along the A421 corridor, given the constraints with other growth options.
- The site assessment process needs to be made robust through the use of available evidence allowing a proper consideration of site suitability.