



*dynamic development solutions™*

For and on behalf of



**BEDFORD LOCAL PLAN 2040 –  
DRAFT PLAN STRATEGY OPTIONS AND DRAFT POLICIES CONSULTATION**

**Land at Ford Lane, Roxton – LPA Ref: 754**

**Prepared by  
DLP Planning Ltd  
Bedford**

September 2021



Prepared by:	[REDACTED]
Approved by:	[REDACTED] [REDACTED]
Date:	September 2021

**DLP Planning Ltd**  
**4 Abbey Court**  
**Fraser Road**  
**Priory Business Park**  
**Bedford**  
**MK44 3WH**

**Tel: 01234 832740**

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care, and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

<b>CONTENTS</b>	<b>PAGE</b>
<b>1.0 Introduction and Structure of Representations .....</b>	<b>4</b>
<b>2.0 Background to the Local Plan Review and Its Relationship with National Policy and Other Material Considerations.....</b>	<b>6</b>
Summary of Local Plan 2030 and Requirement for Immediate Review .....	6
National Policy and Guidance .....	7
Other Material Considerations (Notably Ox-Cam Arc Spatial Framework) .....	9
Emerging Oxford Cambridge Arc Spatial Framework.....	9
<b>3.0 Representations – Draft Plan Vision, Objectives and Strategy Options.....</b>	<b>11</b>
Comments on Strategy Options / Proposed Approach and Supporting Evidence.....	11
Paragraph 1.5 (proposed plan period)– Object .....	11
Paragraph 1.14 (Scope of the Plan) – Object.....	12
Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object.....	13
Section 2 (Draft Vision) – Object.....	15
Paragraph 3.17 and Option 2d – Comment.....	16
<b>4.0 Response to Site Assessment Pro-Forma (Call for Sites ID 754) .....</b>	<b>18</b>
Response to Borough Council’s Site Assessment Pro-Forma (Site ID: 773) .....	19
Site Assessment Criteria.....	19
Best and most versatile agricultural land.....	21
Access, Highways and Sustainable Transport .....	21
 <b>APPENDICES</b>	
Appendix 1 Site Plan (Land at Ford Lane, Roxton – ID: 754).....	22

## 1.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS

- 1.1 This representation has been prepared by **DLP Planning Ltd (DLP)** on behalf of [REDACTED] in response to the Bedford Borough Council Local Plan 2040 consultation.
- 1.2 This representation relates to Land at Ford Lane, Roxton. A location plan identifying the site is provided at Appendix 1.
- 1.3 DLP, on behalf of [REDACTED], welcomes the Council's decision to review and update the various elements of the extant development plan and provide for a new local plan document that will fully reflect the policies of the National Planning Policy Framework (the Framework) and provide for the up-to-date development needs of the borough and its residents in a sustainable manner.
- 1.4 DLP wishes to make a number of comments on the consultation document as part of the background context to the representations we are submitting on the site itself.
- 1.5 This Report addresses the Council's consultation proposals and identifies in-principle support for those elements of Council's Preferred Strategy Options that indicate growth in the 'east' transport corridor parishes, specifically at Roxton. Reservations are, however, expressed in the context that the inclusion (and resultant levels of development) of the 'east' corridor parishes is unconfirmed and contingent upon only **Option 2d** being selected.
- 1.6 The other main components of the Council's Preferred Options, if pursued and associated with the levels of development as set out, will not provide the basis for a sound or legally compliant strategy without support from growth within the 'east' corridor parishes and more widely recognising the benefits of village-related growth as part of a 'hybrid' strategy.
- 1.7 Modifications are suggested to enable preparation of a version of the draft Local Plan 2040 that addresses the issues identified, ahead of further consultation and subsequent Submission and Examination.
- 1.8 Our client's Land at Ford Lane provides for a suitable development opportunity that would provide for development well-related and commensurate in scale to the existing village of Roxton. Identification of a suitable developable area from within the wider site area would enable a level of growth consistent with the Council's testing of strategy options for 'east' corridor parishes, representing a more flexible approach to the 'one size fits all' numbers

applied to the Council's testing of 'village-related' growth more generally.

- 1.9 **Section 2** provides a background to the Local Plan Review and its relationship to national policy and other material considerations
- 1.10 **Section 3** addresses specific comments on the Council's Preferred Strategy Options and Preferred Option Policy Proposals together with their supporting evidence.
- 1.11 **Section 4** discusses the suitability of our client's land for development following a review of the Council's Site Assessment Proforma.

## 2.0 BACKGROUND TO THE LOCAL PLAN REVIEW AND ITS RELATIONSHIP WITH NATIONAL POLICY AND OTHER MATERIAL CONSIDERATIONS

### Summary of Local Plan 2030 and Requirement for Immediate Review

2.1 The Bedford Local 2030 was adopted subject to the provisions of Policy 1 – ‘Reviewing the Local Plan 2030’. The Inspectors’ Report provides further clarification of the requirement for Modifications introducing the approach to this Policy and that it was considered essential for soundness.

2.2 Paragraph 1.1 of the Council’s Preferred Options Consultation Document affirms the significance of the ‘guillotine’ mechanism inserted within the review policy, which engages paragraph 11(d) of the NPPF2021 in the event that a new Plan is not submitted for Examination before January 2023. While the Borough Council is aware it cannot avoid the consequences for the statutory development plan of failing to adhere to these timescales the Preferred Options published for consultation must also address the reasons for first introducing Policy 1. Drawing from the Inspectors’ Report:

- Paragraph 17 emphasises the importance of considering longer-term requirements and thus together with other issues with the Plan a **need** for the review to be undertaken **as quickly as possible** with the three-year timeframe providing balance to allow work to be completed effectively
- Paragraphs 33-34 anticipate that the review will consider the balance between jobs and workers including any changes in the balance of net out-commuting and the implications of the Oxford-Cambridge Arc
- Paragraph 40 confirms that the Local Plan 2030’s housing requirement was determined as 970 dwellings per annum as a result of transitional arrangements for the Examination of Plans under the 2012 version of the Framework.
- Paragraph 113 confirms an expectation of two reviews before 2030 to address potential issues of non-delivery, maintain a buffer in supply and to ensure that the allocation/supply of housing is sufficient to meet the identified need, which is, itself, likely to change over time (as calculated by the government’s standard method).
- Paragraph 123 recognises that the continued existence of a five year supply of deliverable sites (within the provisions of the Local Plan 2030) is dependent on the progress with constrained capacity in the urban area and bringing forward allocations within Neighbourhood Plans quickly. The scope for early review is to allow for potential issues of non-delivery to be addressed and to consider the requirement for any additional housing site allocations in the light of evidence on housing need and realistic supply at that time.

2.3 Paragraph 18 of the Inspectors’ Report confirms that Policy 1 cannot set the parameters of the updated Local Plan. While there is a desire for alignment with the delivery of cross-boundary strategic priorities (including those related to the delivery of the Oxford-Cambridge

Arc) the requirement for review is a result of the deficiencies with the approach put forward by the Council in the Local Plan 2030.

- 2.4 The appointed Inspectors determined (in the context of the 2012 Framework) it would not be effective for the policies of the Local Plan 2030 to look beyond that date. The findings of soundness are predicated on the context of a very narrow remit of addressing the area's strategic priorities (and even then, only with the application of the three-year 'guillotine' following adoption).
- 2.5 It is not open to future Inspectors to reach the same conclusion. This emphasises the importance of the of the first paragraph of Policy 1 and the overriding objective of the aim of the review to secure levels of growth that accord with government policy. This establishes grounds for a Plan that must be fundamentally deliverable / developable over than plan period and cannot further defer relevant decisions relating to options to meet the area's strategic priorities.
- 2.6 In not fully responding to the reasons and scope of requirements for the review and subsequent update of the Local Plan the Council risks rolling forward several of the same fundamental shortcomings in the Local Plan 2030. This is not only contrary to the objectives of sustainable development but in the context of the most recent policy and guidance simply fails to provide the basis for a sound Local Plan.

### **National Policy and Guidance**

- 2.7 The most recent version of the National Planning Policy Framework was published in July 2021, following commencement of the Council's Preferred Options consultation. The changes were published in draft format in January 2021 (including those relevant to the plan-making framework) and thus available for the Council to consider.
- 2.8 These representations highlight four important components of the 2021 Framework and the changes they necessitate for the scope of the review, relative to the 2012 version of the Framework against which the current Local Plan 2030 was assessed. Other specific provisions of the Framework and NPPG are referred to in comments relating to detailed elements of the consultation proposal.
- 2.9 Firstly, Paragraph 22 of the NPPF2021 confirms that strategic policies should look ahead over a minimum 15-year period from adoption and anticipate long-term requirements. This is

a significant change from paragraph 157 of the 2012 Framework that specified that policies should be drawn up over an appropriate timeframe and only preferably a 15-year horizon.

- 2.10 Secondly, the second paragraph of NPPF2021 Paragraph 22 is a significant addition following the most recent revisions. This requires that policies should the address a vision that looks further ahead (at least 30 years) where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area. The transitional arrangements for these provisions at Annex 1 confirm their application to the preparation of all Plans except those that have already undergone consultation on the Submission version Plan. The Oxford-Cambridge Spatial Framework is also seeking to cover the period to 2050 (i.e., 30 years).
- 2.11 The Council's Preferred Options clearly anticipate reliance on these approaches to growth and the associated implications in terms of extended timescales for development. None of the Council's Preferred Options set out the proposed approach beyond a 20-year horizon. As a result, detailed policies for the scale and distribution of growth cannot be considered consistent with national policy without significantly extending their scope alongside provision for the other requirements of sustainable development.
- 2.12 Thirdly, the requirements of Policy 1 of the Local Plan 2030 accord with the circumstances outlined at Paragraph 33 of the NPPF2021 where a significant change in circumstances is identified as a result of the calculation of local housing need. Paragraph 61 of the NPPF2021 outlines that minimum annual local housing need should be calculated using the government's standard method. This is translated into the requirements against which plans must be assessed for soundness in terms of ensuring they are positively prepared and seek to meet needs in full (see NPPF2021 paragraph 35 and footnote 21) alongside the consideration of unmet needs from neighbouring areas. NPPF2021 paragraph 31 also emphasises the importance of considering relevant market signals.
- 2.13 The NPPG provides further clarification that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Circumstances where it may be appropriate to plan for a higher housing need figure than the standard method indicates include any growth strategies for the area and strategic infrastructure improvements that are planned for (ID: 2a-010-20201216).

- 2.14 The Council accepts that there are no exceptional local circumstances that justify deviating from the standard method, but the Preferred Options do not assess any alternative approach identifying a higher need than calculated by the standard method (that will typically be considered sound) (ID: ID: 2a-015-20190220). The assessment of market signals should include expected changes in the labour market, engagement with stakeholders for economic development and changes that may affect the anticipated population and local housing stock (ID: 2a-027-20190220).
- 2.15 Finally, Paragraph 35 of the NPPF2021 confirms that the criteria for the assessment of soundness have changed since the 2012 Framework. In order to provide for a justified approach, the policies for the Plan must provide for ‘**an appropriate strategy**’ rather than the ‘most appropriate’ strategy when assessed against reasonable alternatives. Paragraph 32 of the NPPF2021 provides further detail on the basis for assessing the proposed strategy in terms of seeking net gains for sustainable development and ensuring that the Plan has addressed relevant economic, social, and environmental objectives.
- 2.16 In summary, there is no longer any support in national policy for the outcomes of the Local Plan 2030 Examination in terms of pursuing constraints to the plan period and overall level of growth and deferring decisions on key components of approaches to meet strategic priorities for the area (particularly in terms of overall housing need (including affordable housing) and the delivery of social and community infrastructure (including health and education)).

### **Other Material Considerations (Notably Ox-Cam Arc Spatial Framework)**

#### *Emerging Oxford Cambridge Arc Spatial Framework*

- 2.17 The proposed Oxford-Cambridge Spatial Framework will have the status of national policy and is intended to form a material consideration for plan-making alongside the National Planning Policy Framework.
- 2.18 The government is currently seeking view on priorities for the Framework as part of consultation on the document ‘Creating a Vision for the Oxford-Cambridge Arc’ (until October 2021). The latest consultation proposals set out that it will aim to guide sustainable planning and investment decisions under four policy pillars:
- the environment;

- the economy;
- connectivity and infrastructure; and
- place-making.

2.19 The current consultation follows publication of an initial policy paper in February 2021 setting out the approach to developing the Framework. Paragraphs 2.10 and 2.11 of the policy paper set out in terms of the strategy for housing and planning in the Arc the role of the Framework will not be to make site allocations or to include detailed policies set elsewhere in national policy or better left to local plans (including for example, setting out the housing requirement). However, the policy paper emphasises the importance of meeting housing needs in full (including the delivery of affordable housing) and therefore relies on the calculation of minimum annual local housing need in accordance with the standard method as its starting point. Opportunities to increase levels of development above this minimum starting point are clearly anticipated as part of the Framework’s aspirations to support economic development and ensure a balance between the delivery of new jobs and homes (see paragraph 2.6).

2.20 Paragraph 3.8 of the policy paper sets out that the government expects:

*“ local planning authorities to continue to develop local plans before the publication of the Spatial Framework. These changes will sit alongside wider planning reforms, and as we take forward our response to the ‘Planning for the Future’ consultation, we will outline transitional arrangements and the role of the Spatial Framework within any new system.”*

2.21 The development of the Spatial Framework will be supported by two further public consultations: Towards a Spatial Framework (Spring 2022) and Draft Spatial Framework (Autumn 2022). It is the government’s intention to commence implementation of the Spatial Framework throughout 2023, meaning its policies are expected to be in place as a material consideration at the same point the Bedford Local Plan 2040 is undergoing Examination.

### **3.0 REPRESENTATIONS – DRAFT PLAN VISION, OBJECTIVES AND STRATEGY OPTIONS**

3.1 This section is to address Chapters 1 to 4 of the Published Consultation Document.

#### **Comments on Strategy Options / Proposed Approach and Supporting Evidence**

##### ***Paragraph 1.5 (proposed plan period)– Object***

3.2 Definition of the proposed plan period underpinning the Council's Preferred Options has been rendered inconsistent with national policy following publication of the 2021 version of the NPPF.

##### ***Reasoning***

3.3 The larger-scale approaches to development (including new settlements) that the Council has identified as part of its Preferred Options accord with the circumstances that national policy identifies for considering a minimum 30-year horizon, to take account of longer timescales for development.

3.4 Paragraph 1.2 of the 'Creating a Vision for the Ox-Cam Arc' consultation document also confirms that the Spatial Framework will extend to 2050 and beyond. Preparation of the Bedford Local Plan 2040 should be undertaken consistently with this aim.

3.5 The proposed plan period of 2020 to 2040, particularly when read in the context of the Council's Preferred Options resulting in a further delay to meeting development needs in full (until at least 2030) will generate a requirement for further, successive, reviews and is setting the plan up to fail.

##### ***Remedy***

3.6 Bedford Borough Council should not wait for transitional arrangements upon introduction of the Framework to have to undertake yet another review that will need to consider the shortfall in meeting needs and addressing strategic priorities to 2030. Realistically, as a result of the scale and pattern of the Preferred Options proposed, delays to timescales for development are also likely to result in delays to meeting needs in full between 2030 and 2040.

3.7 Those parts of the Council's Preferred Options relying on larger-scale development should be profiled to look further ahead to 2050.

- 3.8 This reemphasises that in terms of the soundness requirements for preparation of the Local Plan 2040 the Council's proposed approach must also fully embrace those sustainable opportunities to meet the increased requirements for growth in the immediate term and enable this through the prioritisation of suitable and deliverable sites as part of a 'hybrid' strategy. This reinforces the benefits of village-related growth in the 'east' corridor parishes.

***Paragraph 1.14 (Scope of the Plan) – Object***

- 3.9 The Council's Preferred Option consultation proposals indicate that the purpose of updates to the Local Plan following the requirements of the review policy (Policy 1) are to outline a development strategy to 2040 and meet national policy requirements for the delivery of growth. This fails to fully reflect the reasons for first introducing the requirement for immediate review and in-particular the pattern and scale of housing growth necessary to achieve sound outcomes for plan-making (particularly with regards paragraphs 20 and 74 of the NPPF2021).

***Reasoning***

- 3.10 As set out in the Spatial Framework consultation document (paragraph 5.5) the Arc demonstrates poor affordability where development has not kept pace with need. That is exactly the position in Bedford resulting from the approach adopted in the Local Plan 2030.
- 3.11 This means (at paragraph 5.7) it is an aim of the Framework to ensure that the Framework sets policies to enable ***housing needs to be met in full, including much-needed affordable housing***
- 3.12 This sits alongside strategic decisions where direction will be provided by the Framework e.g., implementation of East-West Rail, identification of Opportunity Areas and support for the delivery of previously developed land.
- 3.13 What this means in practice is that prioritizing opportunities to meet full development needs is an important component of the place-making pillar as part of a joined-up approach providing for sustainable communities.
- 3.14 The Council's proposed strategy in its Preferred Options consultation proposals would sustain a very substantial shortfall against minimum annual local housing need until at least 2030. Due to only considering a horizon to 2040 and as a result of likely timescales for the characteristics of larger-scale development (including new settlements) it is furthermore

highly likely a significant shortfall against full development needs will persist until 2040 and beyond.

- 3.15 The Council's proposed strategy offers no flexibility and choice to address the current and persistent failure to meet needs in full. Our assessment indicates that current levels of development are likely to become significantly constrained substantially before any of the longer-term solutions proposed as part of the Preferred Options achieve significant delivery. Realistic assumptions must also be made in relation to new larger-scale developments.

***Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object***

- 3.16 The Council's consultation document considers the role for development allocations to be identified in Neighbourhood Plans (as a result of the strategy in the Local Plan 2030) in the context of updates to the development strategy explored via the Preferred Options. Roxton however, declined to prepare a Neighbourhood Plan and development was allocated through the Local Plan. This is relevant to the Council determining the most appropriate approach to site selection and allocation within the Local Plan 2040.
- 3.17 Within the context of Roxton these representations identify that the consultation fundamentally fails to assess the role and ability of Neighbourhood Plans in meeting the requirements for sustainable development (including housing delivery) in the period to 2030 and beyond. Given the background to the adopted Local Plan 2030 the Local Plan Review offers a significant opportunity for Bedford Borough Council to lead on the allocation of additional sites or otherwise provide clarity of the requirements of general conformity that any future Neighbourhood Plan for Roxton must satisfy. This includes meeting the objectives for growth within the 'east' corridor parishes.

**Reasoning**

***(i) Relationship with Delivery of the Area's Strategic Priorities***

- 3.18 Paragraph 1.47 of the consultation proposals repeats the strategy outlined in Policy 4S of the adopted Local Plan. This does not confirm a realistic prospect that all 2,260 units will be delivered before 2030.
- 3.19 At paragraph 1.48 the Borough Council only provides vague indications of where further engagement might take place with Parish Councils to meet additional requirements for growth where a range of suitable sites are identified.

- 3.20 This paragraph is inconsistent with the intentions for a stepped trajectory and the NPPG for reviewing NDPs (which should encourage early review when strategic policies have changed). That is an inevitable consequence of the development plan in Bedford given its current failure to address levels of growth in accordance with the standard method. The Borough Council's own evidence indicates the strong likelihood of sites where early delivery can be prioritised, which includes our client's site land in Roxton.
- 3.21 Paragraph 28 of the Framework reaffirms the role for Neighbourhood Plans in providing for non-strategic allocations. Paragraph 29 confirms this must be within the context of Neighbourhood Plans that do not promote less development than set out in adopted strategy policies (which in this case will be replaced in the Local Plan 2040). Paragraph 66 of the NPPF2021 outlines that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. This is an important distinction from the 2012 version of the Framework. However, the Council's testing of options for the Local Plan 2040 rolls forward a 'one-size fits all' distribution of potential levels of growth in Key Service Centres and Rural Service Centres.
- 3.22 This fundamentally fails to accord with the current requirements of national policy and guidance and, importantly, has currently precluded the Council from considering 'hybrid' alternatives to the spatial strategy that would allow appropriate levels of sustainable development to be prioritised across the settlement hierarchy.

*(ii) Identification of Housing Requirements for Designated Neighbourhood Areas*

- 3.23 The Council's proposed approach is contrary to paragraphs 66 and 67 of the Framework. Paragraph 66 sets out that strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The Council's suggestion of rolling forward the contribution from the scale and distribution of growth identified in Policy 4S of the LP2030 is **not justified** and **not positively prepared**.
- 3.24 This is an important component of national policy and guidance in terms of seeking to avoid conflict between existing and emerging Neighbourhood Plans and the strategic policies of the development plan. This should form part of positive discussions between qualifying bodies and the local planning authority, recognising the ability of Neighbourhood Plans to

sustain and increase housing delivery. Any indicative requirement figure would take into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area and should minimise the risk of neighbourhood plan figures being superseded when new strategic policies are adopted (ID: 41-102-20190509).

3.25 The figures in Policy 4S of the LP2030 are a flawed basis for rolling forward potential requirements against which Neighbourhood Plans are prepared for the following reasons:

- The figures were determined arbitrarily, without reference to the OAN in place at the time or strategies for individual settlements;
- In any event the Council's OAN knowingly represented a significant shortfall against the government's policy for calculating housing need, culminating in this immediate review;
- The figures are applicable only in the context of a foreshortened plan period to 2030; and
- Figures are provided only for certain settlements, with no requirement indicated for levels of the settlement hierarchy below Rural Service Centres (despite these having been considered in earlier rounds of plan-making for the LP2030).

3.26 In the case of Roxton a requirement figure for the purposes of Neighbourhood Planning should be identified, in accordance with national policy. However, in the absence of a designated Neighbourhood Area for the parish this would alternatively provide the basis for the Borough Council to select the allocation of sites to meet this figure.

### ***Section 2 (Draft Vision) – Object***

3.27 This section addresses two main themes. It firstly sets out the shortcomings of the Vision in terms of reflecting comprehensive opportunities for sustainable development across the borough. Secondly, it addresses that while there are many positive aspects of outcomes sought under the vision these will not be addressed as part of the strategy due to the Council's selected Preferred Options.

### ***Reasoning***

3.28 The draft Vision sets out:

*“Well-planned growth supported by appropriate infrastructure and avoiding areas of high flood risk will enable the creation of strong, safe and resilient local communities in environments that facilitate healthy and independent living for all.”*

3.29 This aspect of the Vision will not be achieved in the context of the Council's Preferred Options

omitting a significant number of the Borough's KSCs and RSCs from the spatial strategy and do not seek to provide for the additional development required to secure balanced communities. It is not proposed to allocate small housing sites in the plan and concern is expressed that this will delay housing delivery in the early part of the plan period.

3.30 The Vision further states:

*“Rural communities will embrace appropriate development, in many instances through the preparation of their own neighbourhood plans.”*

3.31 This would imply a requirement for additional growth, which the preferred options exclude for a significant number of settlements. Also, for Roxton, the previous lack of willingness of the community to prepare a neighbourhood plan is also relevant to achieving the Vision.

3.32 The Vision also fails to reflect that the proposed development strategy is not looking to provide for any additional growth in rural areas as part of an uplift to meet housing needs in full before 2030. This is a significant shortcoming of the strategy and overlooks suitable and deliverable sites that could be prioritised now to meet these increased needs alongside the delivery of other substantial benefits.

***Paragraph 3.17 and Option 2d – Comment***

3.33 These representations endorse the inclusion of the 'east' corridor parishes as part of Preferred **Option 2d** but in practice indicate that this is illustrative of a need for a 'hybrid' approach to provide for an appropriate strategy in accordance with national policy and guidance (NPPF2021 paragraph 35(b)).

3.34 These representations conclude that any selected strategy option that **does not** include growth in the 'east' corridor parishes would be unsound and fail to comprise an appropriate strategy or genuine reasonable alternative for the purposes of the Sustainability Appraisal. This is due to soundness issues identified with the delivery of large-scale strategic growth comprising other components of the Council's Preferred Options.

3.35 The benefits of **Option 2d** reflect the ability to promote and maximise the benefits of what is in-effect village-related growth at the Rural Service Centre of Roxton, complementing opportunities for sustainable growth within the corridor. Growth at Roxton has been accepted as sustainable in the spatial strategy of the adopted LP2030, and the evidence base for the Local Plan 2040 indicates no in-principle constraint to capacity for further development that

could not be adequately mitigated.

3.36 The Council's draft Sustainability Appraisal findings reflect positively on the benefits of 'east' corridor parishes within the A421 corridor. The figure of 750 dwellings in the Council's Preferred **Option 2d** exceeds the Council's arbitrary figures applied for the purpose of testing Great Barford, Roxton and Willington as 'village-related' growth but would in our view represent a more realistic starting point taking account of the capacity for growth at Roxton and in-particular our client's site. There is no site-specific justification or settlement-specific justification as to why this figure should be limited to 750 dwellings and why growth at Roxton should be limited to only 35 units.

3.37 The Council's Preferred Options consultation proposals offers only limited scope to address local requirements for place-making and connectivity as part of a comprehensive strategy. The strategy concentrates on the 'east' and 'south' transport corridor parishes and it should be noted that additional development Roxton would be in general accordance with objectives of the emerging Oxford-Cambridge Arc Spatial Framework applicable across the settlement hierarchy. Opportunities for sustainable development in accordance with these requirements (and the objectives of the emerging Spatial Framework) must be embraced both in the period to 2030 (to address the immediate uplift in the need for growth) and across the entire plan period to sustain the role and function of the borough's most sustainable settlements.

Endorsement of growth at Roxton under **Option 2d** in the context of a 'hybrid' strategy recognises that there is no arbitrary distinction between 'village-related' growth and support for development in the 'east' and 'south' corridor parishes in terms of their capacity to contribute towards sustainable development. The benefits of 'village-related' development do not suddenly materialise only where Key Service Centre and Rural Service Centres are located in the A421 corridor and do not evaporate altogether outside of it. The allocation of land in Roxton represents a sustainable opportunity to provide flexibility and choice to the Council's strategy options as well as sustaining and enhancing the role of the settlement itself.

## 4.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 754)

### Introduction to Site and Proposals

- 4.1 The site was previously submitted to the Council for consideration as part of the Council's 'call for sites' exercise in August 2020. The land area being promoted is shown below.

**Figure 1: Land at Ford Lane, Roxton**



- 4.2 The site, known as Land at Ford Lane, Roxton, is situated on the eastern side of Roxton. Roxton is a village and civil parish in the Borough of Bedford.
- 4.3 The site is located on the north side of Ford Lane in Roxton. The site lies close to the core of the village and offers an opportunity for both housing and greenspace and is well linked to public transport.
- 4.4 The majority of the site is located within Flood Zone 1, with the eastern boundaries located in Flood Zone 2. The site is not within a Conservation Area or subject to any other landscape/ecology designation.

- 4.5 The site is considered suitable for residential development and would be able to accommodate a mix of typologies, both market and affordable, with appropriate landscaping and access.
- 4.6 The site lies adjacent to an established area of development, Residential development would be the most logical form of development for the site as part of the Local Plan Review.
- 4.7 In light of the extensive scope for the Review of the Local Plan 2040 we consider that an appropriate strategy will require a combination of multiple spatial options over the plan period. In the case of our client's Land at Ford Lane, Roxton, this could achieve residential development on an underused agricultural land and would provide an appropriate level of growth within a key rural settlement of Roxton.
- 4.8 The site is suitable for development and the landowner is committed to bringing it forward, such that it is available now.

### **Response to Borough Council's Site Assessment Pro-Forma (Site ID: 773)**

#### ***Site Assessment Criteria***

- 4.9 We have reviewed the Council's assessment of the site and wish to make a number of comments below.

#### **Within or adjoining the urban area or a defined settlement policy area boundary**

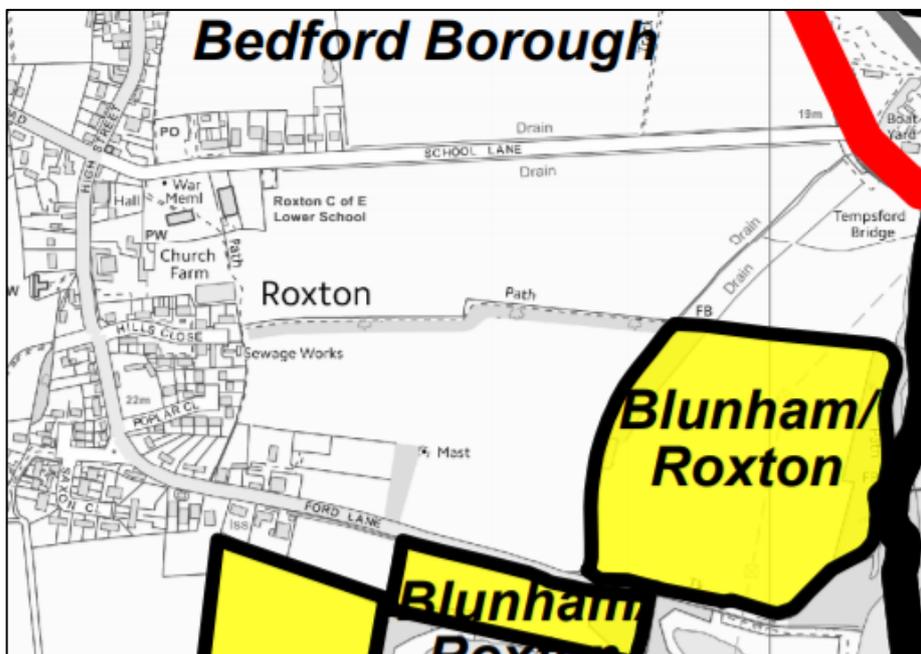
- 4.10 The site adjoins the built up area of a defined settlement. In principle it therefore falls to be considered for development as part of the Council's assessment of site options. The site is connected to the main road network off Ford Lane and is also within close proximity to the A421, which is a main growth corridor for development. Furthermore, its location also makes the site suitable for residential use.

#### **Flood Risk and Minerals**

- 4.11 While the Council's Site Assessment proforma notes the presence of areas of Flood Risk this fails to reflect that only a small portion of the far eastern boundary of the site is affected. This does not preclude the ability to identify a suitable area for development and appropriate drainage strategy together with the provision of appropriate non-built uses such as

greenspace within affected parts of the site. Those parts of the site subject to Flood Risk are also the **only** areas of the land affected by the designation of sites on the **Minerals and Waste** Policies Map indicating that this also represents no in principle constraint to development.

**Figure 2: Extract from Policies Map: Inset Map 5, Strategic Mineral Sites Black Cat and Blunham/ Roxton**



#### **Impact on designated or non-designated heritage assets or their setting**

- 4.12 The Council's site assessment proforma finds that the proposal has the potential to cause harm to heritage assets, which may range from low to high. There are no designated heritage assets within the site itself and the nearest assets are located beyond the south-west boundary of the site (Grade II Listed Polar Farmhouse).
- 4.13 Development of our client's land may result in some impact upon one aspect of the setting of relevant assets based on their relationship with the surrounding rural area. There will be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons. In the case of our client's land further assessment will be undertaken to more fully explore impacts on significance and to ensure that any impact would represent less than substantial harm in terms of Paragraph 202 of the NPPF, which is the expected outcome given the context described above.

### **Best and most versatile agricultural land**

- 4.14 Whilst all of the site comprises of best and most versatile agricultural land, according to the Natural England's Agricultural Land Classification map for the Eastern Region, the Council's strategy options all identify a necessity to release previously undeveloped sites. In this case the area of land affected would be small in scale and is distinct from the wider agricultural landscape due to existing planting and the watercourse along its boundaries. Any planning application could be supported by a detailed assessment, as required.

### **Protected Species and Ecological Value**

- 4.15 The Council's assessment notes that the site is not located within an area of importance for nature conservation but states that some protected species have been recorded on the site. This could be addressed through an ecology survey and protected species surveys, if appropriate, and the recommendations and mitigation strategy could be incorporated into any development scheme.
- 4.16 The identification of a suitable developable area for the site, including avoiding limited areas of Flood Risk within the east of the site, indicates that those areas of greatest habitat value are likely to be unaffected. These areas of the site could be subject to appropriate measures for protection and enhancement of their biodiversity value as part of the wider scheme proposals.

### **Access, Highways and Sustainable Transport**

- 4.17 The Council's assessment pro-forma notes some requirement for access improvements to secure vehicular access from the existing Ford Lane to the site entrance but does not identify any in principle constraints to widening the carriageway within land controlled by our client and no significant congestion issues are identified. The proforma otherwise reflects positively on the proximity of the site to the existing village and the accessibility of existing walking and cycling links along the northern site boundary.
- 4.18 The findings against this criteria are not considered to preclude the site from further testing as part of site options. Any planning application would be supported by detailed Transport Assessment that would consider the mitigation requirements in further detail.



BE5553 – Land at Ford Lane, Roxton

Representations to Bedford LP2040  
September 2021

## **Appendix 1 Site Plan (Land at Ford Lane, Roxton – ID: 754)**



CLIENT	DATE	11.08.2020	OS REF	515704,254280	Drawn	<b>DLP PLANNING LIMITED</b> 4 Abbey Court, Fraser Road, Priory Business Park Bedford, MK44 3WH  dynamic development solutions™
	SCALE	1:5000 @ A4	DRWG NO.	D01	PMG	
	JOB NO.	BE5553	REV.		Checked CB	
PROJECT	BBC Local Plan 2030 Review		DRWG TITLE	Ford Lane, Roxton Location Plan		†  f  e 
Offices also at: Bristol, Cardiff, East Midlands, Leeds, London, Milton Keynes, Rugby and Sheffield						



[Redacted]

**BEDFORD**  
Planning / SDD / SPRU

[Redacted]

**BRISTOL**  
Planning / SDD / SPRU

[Redacted]

**EAST MIDLANDS**  
Planning/ SDD

[Redacted]

**LEEDS**  
Planning

[Redacted]

**LONDON**  
Planning

[Redacted]

**MILTON KEYNES**  
Planning

[Redacted]

**RUGBY**  
Planning

[Redacted]

**SHEFFIELD**  
Planning/ SDD / SPRU

[Redacted]



**IEMA** Transforming the world to sustainability

